

Our Ref: 14010/2026
Your Ref: **HPK/2026/0228**
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14 August 2026

FAO Bob Phillips
C/o High Peak Borough Council
Buxton Town Hall
Market Place
Buxton

Sent via email – planning@highpeak.gov.uk

Dear Bob

HPK/2026/0228 - Full Planning Permission for the repurposing of part of the existing Spring Gardens Shopping Centre, including partial demolition, and new development to create a series of development blocks to deliver residential units (Use Class C3) and commercial floorspace (to include flexibility for Use Classes E -commercial, F1 - learning and non-residential institutions, and Sui Generis - drinking establishments, cinema), new public realm and landscaping to include public squares and residential courtyards, new car parking and associated works – The Springs Shopping Centre, Buxton

OBJECTION — Firstplan on behalf of Waitrose & Partners

Firstplan act on behalf of Waitrose & Partners, who operate a store at Springs Shopping Centre, in Buxton town centre. We have previously submitted a holding objection to the above application, which was submitted via email to High Peak Borough Council on 24th July 2026. Further to the submission of this holding objection, we have now had chance to review the submitted planning application documents in detail and, following consideration of this, we wish to confirm our client's objection to this application.

Waitrose in Buxton

Waitrose has traded from its store in The Springs Shopping Centre, Buxton (formerly known as the Spring Gardens Shopping Centre) since 2006, and has therefore played a central role in meeting residents' food shopping needs for two decades. The Waitrose store sits at the rear of the shopping centre and acts as the clear 'anchor' store of the shopping centre. Furthermore, as one of the largest units in Buxton town centre as a whole, and the only main supermarket in Buxton town centre, the Waitrose store also acts an 'anchor' store to the wider town centre offer and, consequently, can be considered to play an important role in supporting the overall 'vitality and viability' of Buxton town centre.

This 'anchor' role of Waitrose is acknowledged in High Peak Borough Council's 'Retail, Leisure and Town Centre Uses Study' (2022), which also noted that footfall in the town centre was "*particularly busy walking to and from Spring Gardens from the adjacent car parks and from the car park adjacent from Waitrose into the foodstore*". The Council's study also identifies that the Waitrose store brings in approximately **£10m of spending per annum into Buxton town centre** and can be expected to generate further spending through supporting linked shopping trips to other businesses in the town centre.

Following the relocation of the town centre Aldi store and the closure of the town centre's Marks & Spencer store, the Waitrose is the only remaining larger-format foodstore serving residents and visitors to the town centre. It performs an

important role in meeting food shopping needs of both residents and visitors to the centre, both in the form of 'top up'/basket shopping but also 'main'/trolley-based shopping trips. This is reflected in the size of the foodstore which, at c.1,500 sq.m (net sales), is of a size which means it caters to both types of convenience shopping activity, and Waitrose are keen to ensure that this ability to cater to both customers wishing to undertake a full, trolley-based food shop as well as basket/top-up shopping is protected as part of any future redevelopment of the Springs Shopping Centre site.

The ability of the Waitrose store to cater for main/trolley shopping trips is assisted by the presence of a large surface car park adjacent to the Waitrose store; whilst this car park is operated by High Peak Borough Council and serves the shopping centre and wider town centre, its proximity to the Waitrose store means the car park performs a critical role in enabling customers to easily transfer large amounts of shopping to their cars.

The ability of shoppers to undertake this activity is critical to the overall function and viability of the Buxton Waitrose store. A material proportion of customers to the Buxton store arrive by car, requiring that purchases are carried by trolley between the store and the vehicle. It is therefore critical that the parking that serves these trolley-based shopping trips must therefore be convenient to the Waitrose store entrance, short-stay in character, managed so that spaces are actually available to shoppers, and connected to the Waitrose store by a step-free, trolley-capable route.

The development proposals

Waitrose have reviewed the development proposals which form the basis of the above-mentioned planning application. Whilst Waitrose welcome the potential for the regeneration of the shopping centre and adjacent land, and the introduction of a new residential community into the town centre, it is critical that the development proposals do not undermine the ability of our client's store to successfully operate, in the context of the above-described role which it plays in supporting the wider vitality and viability of Buxton town centre.

In this context, Waitrose cannot support the proposals for the location and quantum of car parking proposed at the application site under the submitted development proposals. It is understood that the current Spring Gardens car park adjacent to the eastern side of our client's store accommodates space for the parking of up to 431 vehicles; it is the only 'short stay' parking facility available to users of the town centre. Under the development proposals, the number of car parking spaces which will directly be accommodated on the site reduces to a total of 260 spaces, of which only 142 spaces will be made available as short-stay shopper/town centre visitor car parking spaces, with the remainder of spaces being for the use of residents in the new development. No maximum stay restriction or management regime is currently proposed for these spaces.

In other words, the provision of shopper/town centre visitor car parking spaces at the site will be only 33% of what is currently available. The current submitted plans and other supporting planning application material provides no indication of how this reduced number of car parking spaces will be actively managed, nor do they indicate that any of the spaces in the car park will be demised to Waitrose to enable customers to continue to easily access the store during store trading hours for trolley-based shopping trips. Whilst the town centre is served by other car parks, the capacity actually available within these alternative car parks has not been surveyed, and the walking routes from them to the store have not been assessed.

Consequently, our client is extremely concerned that this significant reduction in spaces will reduce the attractiveness of the Waitrose store as a food shopping destination in Buxton, as the reduced parking capacity on the site will make finding a parking space more challenging for customers who will need to compete for a smaller 'pool' of spaces with other users and visitor to the town centre. The reduced capacity means that there will be increased competition for the spaces from all town centre uses, not just Waitrose customers, and this will dissuade customers from visiting both the store and the wider town centre. Overall, it is considered that the parking provision which is sought presents a highly compromised position compared to that which is currently in place.

Whilst it is noted that there is an aspiration to construct further car parking provision at Palace Road, adjacent to Buxton railway station, to offset the loss of parking on the application site, Waitrose do not believe that this 'offsetting' provision will have the effect of diluting or reducing demand for the spaces at Springs. The proposed new station car park is physically detached from the primary shopping area and, due to the significant levels changes between this car park and the Waitrose store, will not be a practical alternative car parking facility for Waitrose customers. Waitrose are of the view that for users of the northern part of the town centre, i.e. the Waitrose store, Spring Gardens and wider primary shopping area, the Spring site will continue to be the 'default' car parking provision sought. Moreover, it is significant to note that no planning application has yet been submitted for this proposed additional facility at Palace Road, and therefore there is ultimately no guarantee that any such development will come forward.

Transport Evidence

Building on the points summarised above, appended to our objection letter is a detailed review of the submitted Transport Assessment (prepared by SK Transport Planning). This review takes the form of a **Transport Technical Note ('TTN')** which has been undertaken by Waitrose's transport consultants, Glanville, and identifies three fundamental areas of concern:

- the reduction from 431 to 142 public spaces has not been properly assessed;
- the assessment assumes, but does not demonstrate, that displaced demand can be accommodated; and
- the effect on accessibility and on the operation of the anchor food store has not been evaluated.

These matters are fundamental concerns and Waitrose are firmly of the view that the application should not be determined until a full and comprehensive assessment of the above points has been undertaken. Furthermore, Glanville's review of the submitted Transport Assessment and other supporting evidence for the planning application identifies that a number of significant gaps and inconsistencies in the evidence, including that:

- The Transport Assessment contains no walking distance between the proposed car park and the store, no consideration of trolleys, no parking management proposals, no survey of duration of stay or trip purpose, and no occupancy survey of the car parks expected to absorb displaced demand. We have measured the routes omitted from the Transport Assessment using the applicant's own drawings: 95m from the car park core to the store entrance, 109m from the nearest accessible bay and 146m from the furthest ground-level space. Every route from the replacement decks crosses the internal vehicular route serving the Waitrose service yard and then passes through the internal mall, which is not the case for customers currently parking in the eastern car park¹.
- The submission states three different parking totals: 260 on the drawings and in the Transport Assessment, 264 in the Planning Statement and 266 in the Design and Access Statement.
- The Design and Access Statement describes the scheme as significantly increasing parking provision on the same page as its own figures show a reduction of more than a third. The Planning Statement repeats the claim and concedes the reduction two paragraphs later.
- The parking quantum appears to have been determined as a design outcome rather than derived from any assessment of demand, with larger options set aside on townscape grounds.

The TTN also identifies a number of significant concerns regarding accessible parking provision in the proposed development, noting that:

- Accessible provision falls from 24 spaces to approximately 13, removing around 17% of the town centre's entire accessible parking stock.

¹ It is right to note that, for general public parking, the measured walking distances are not greater than at present. The material change, and the basis of this objection, relates instead to the provision of accessible parking and the character and quality of the pedestrian route.

- The walk from the nearest accessible bay to the Waitrose store entrance more than doubles, from 50m today to 109m.
- Accessible parking is currently provided in three separate locations, at 50m, 83m and 131m, so a customer unable to find a space in one may use another. The proposals replace that choice with a single cluster, and the two nearest existing locations lie within the eastern car park, which is removed.
- All replacement accessible bays sit on the lowest deck, which the Flood Risk Assessment identifies as an area intended to remain open to the passage of flood water.
- The submission contains no assessment of these effects on which the public sector equality duty could be discharged.

Finally, the TTN undertakes an appraisal of the assumptions which have been made in terms of how and where the 'displaced' parking provision will be met by other existing facilities in the town centre. This finds that:

- On the applicant's own figures, 52% of Saturday parking demand must relocate to other car parks.
- The model assumes displaced trips are retained within the town centre and, by construction, cannot test whether they would be.
- Parking is modelled as an hourly flow rather than an accumulating stock. The surveyed daily peak of 301 vehicles occurs at 11:00, an hour never modelled; against 142 retained spaces this implies some 159 vehicles without a space.
- Trips are reassigned by total rather than available spaces; none of the six receiving car parks having been surveyed for occupancy, and with no allowance for tariff, maximum stay or the quality of the walking routes.
- The assessment depends upon off-site parking which the Planning Statement confirms requires a separate, future planning application.
- Residential car ownership, on the applicant's own census evidence, exceeds residential parking provision by some 44 vehicles. No demarcation is proposed to prevent that demand using the commercial deck, and no visitor parking is identified anywhere within the submission.

Based on the above concerns, all of which are explained in detail in the attached TTN, it is considered the Council should refrain from determining the application until further evidence/justification is provided from the applicants which addressed the concerns which have been identified. Section 7 of Glanville's appended note provides a full schedule of matters which are considered to require clarification to this end.

Amendments sought to the proposed development

Subject to the matters set out above and detailed in the appended TTN being fully and satisfactorily addressed, it is considered that the concerns raised in this note are capable of resolution by amendment and condition rather than by refusal of the application. Section 8 of the TTN provides a schedule of matters which can be secured by appropriate amendments and refinements to the application, and a recommendation on an appropriate securing mechanism for achieving this. These matters can be summarised as follows:

- Allocated short-stay parking for customers of the Waitrose store within the commercial deck, subject to a maximum stay and enforcement, sited adjacent to the vertical circulation serving the Waitrose store.
- Dedicated trolley bays at commercial deck level and at surface level, and a step-free, trolley-capable route between the parking decks and the Waitrose store, with lifts sized accordingly and a defined trolley containment perimeter.
- Accessible (Blue Badge) parking at a level no lower than the existing 24 spaces, located nearest the vertical circulation, with provision above the design flood level or protected by the management plan.
- Physical demarcation and enforcement preventing residential parking from occupying the commercial deck.
- A phasing mechanism linking occupation of the development to the delivery of the replacement town centre parking relied upon in the Transport Assessment as a committed development.

- A construction-phase customer parking and access strategy.
- Electric vehicle charging provision within the commercial deck.

The securing mechanism for the above matters is anticipated to be a combination of a Car Park Management Plan (or equivalent strategy), which should be secured by condition; together with other appropriate planning conditions, and revised technical planning drawings where relevant. It is emphasised that the above matters are subject to the wider points of concern in respect of the submitted technical evidence identified in the TTN (as summarised above and detailed in the TTN) being fully and satisfactorily addressed.

Summary

Having considered the submitted planning application in full, on behalf of our clients we wish to confirm our objection to the submitted proposals. Waitrose is a clear anchor store to Buxton town centre which supports the vitality and viability of the wider town centre (a point identified through HPBC's own evidence), both through acting as the only larger-format foodstore serving the town centre, and also through the support of linked shopping trips to other businesses and services in the town centre. The proposals currently submitted offer clear potential to undermine the continued successful operation of Waitrose in Buxton town centre, which, given the identified 'anchor' role which the store plays in supporting the wider town centre offer, should be given significant weight in the authority's determination of the application.

Specifically, Waitrose cannot support the current proposed parking strategy for the application site. Our letter has identified significant areas where the submitted Transport Assessment required further evidence or justification, and we are firmly of the view that the application should not be determined until these concerns been addressed in full. The application proposes to remove approximately two-thirds of the town centre's principal short-stay car park without demonstrating where displaced demand will go, whether the replacement parking can function for main food shopping trips, or how the needs of mobility-impaired shoppers will be met. Until those matters are assessed, the transport effects of the proposal remain unresolved.

Waitrose are keen to work with the applicant and HPBC to resolve the concerns identified in this letter and accompanying TTN, and Sections 7 and 8 of the TTN provide details of clarifications required and potential planning conditions/obligations which could be attached to the application to ensure the acceptability of the development to Waitrose, subject to our identified concerns being addressed.

We trust the above comments will be taken into account in your determination of the application. Waitrose reserve the right to provide further review and comment on any future application documentation which is received and request to be kept informed of this. Should you have any questions regarding the contents of this letter, please contact me.

Yours sincerely



ADAM BUNN
Technical Director

For and on behalf of Firstplan, August 2026

Enc.

- Transport Technical Note, Glanville Consultants

Copy to

- Simon Gregory, John Lewis Partnership

TRANSPORT TECHNICAL NOTE

Waitrose Buxton

The Springs Shopping Centre and Spring Gardens

1.0 Introduction and Scope

- 1.1 Glanville Consultants has been instructed by John Lewis plc on behalf of Waitrose & Partners, supported by Firstplan Ltd as planning consultants, to review the transport evidence supporting planning application HPK/2026/0228: the repurposing and part redevelopment of The Springs Shopping Centre and Spring Gardens, Buxton. Waitrose is the anchor tenant of the shopping centre and is retained within the proposals. This note has been prepared to accompany representations made by Firstplan Ltd on behalf of Waitrose in respect of the application.
- 1.2 At the outset it should be recorded that, whilst Waitrose does not object in principle to the aspiration to regenerate and enhance the existing shopping centre and surrounding land, its concerns as anchor tenant relate to the parking and access arrangements serving the store. The application and its supporting documents have not considered the operational requirements of the anchor Waitrose store in any detail, and the technical evidence on parking does not support the conclusions drawn from it.
- 1.3 The principal concern can be stated shortly. The existing car park provides 431 spaces and is the only car park in the Council's town centre stock which provides short-stay parking, as Section 3 sets out; under the proposals the parking available to the public reduces to 142 spaces. No proposal to introduce short-stay parking elsewhere in the town centre is identified anywhere in the submission, with the consequence that the whole of the town centre's short-stay demand would be funnelled into a facility of one third the present capacity, in which no allocation or priority is proposed for customers of the anchor Waitrose store. The submitted assessment does not demonstrate that the displaced demand can be accommodated without adverse consequences for the operation of the anchor store, for mobility-impaired shoppers, or for visitors to the town centre. Three matters follow, and the remainder of this note supports them: the reduction from 431 to 142 public spaces has not been properly assessed; the assessment assumes, but does not demonstrate, that displaced demand can be accommodated; and the effect on accessibility and on the operation of the anchor food store has not been evaluated.
- 1.4 We have reviewed the Transport Assessment prepared by SK Transport Planning Ltd (reference 260505/SK22504/TA01 (-02), Revision 02, "Updated Scheme", dated 5 May 2026) together with its appendices, including the Interim Travel Plan and the Stage 1 Road Safety Audit; the Design and Access Statement (stephenson hamilton risley STUDIO, dated 23 February 2026); the Planning Statement (AshtonHale Limited, dated May 2026); the Flood Risk Assessment (Booth King Partnership Ltd, reference 15289-BKP-ZZ-XX-RP-C-0001, Revision P04, dated 26 February 2026); the submitted general arrangement and survey drawings; and the material available on the Council's public planning register.
- 1.5 No site visit has been undertaken. Observations concerning the proposed layout are drawn from the submitted documents and drawings; distances have not been measured on site. The general arrangement drawings al(04)0100 (Revision P08), al(04)0101 and the topographical survey al(02)0002 have been obtained from the public register and measured at their stated 1:1000 scale, verified against the printed scale bar. The walking route between the proposed car park and the retained Waitrose store is derived on that basis at Section 4 and Appendix A.

- 1.6 Section 5 of the Transport Assessment is misnumbered in the submitted document; its paragraphs run 1.10 to 1.37. References in this note to paragraphs in that range are to Section 5 as submitted.



2.0 The Store and its Operational Requirements

- 2.1 A main food shopping trip has a distinctive profile. A material proportion of customers arrive by car; purchases are carried by trolley between the store and the vehicle; the parking stay is short but the load is heavy; and the return leg to the car is made with a full trolley. The parking that serves such a trip must therefore be convenient to the Waitrose store entrance, short-stay in character, managed so that spaces are actually available to shoppers, and connected to the Waitrose store by a step-free, trolley-capable route.
- 2.2 A proportion of customers have mobility impairments. For these customers, walking distance, gradient and dependence on lifts bind hardest, and the quantum and location of accessible parking is determinative of whether the Waitrose store can be used at all.
- 2.3 The Transport Assessment itself recognises, at paragraph 6.19, that the existing car park is used by people visiting commercial uses within the red line, people visiting other commercial uses nearby, and general visitors to the town centre. The anchor store thereby supports linked trips to the wider centre. The consequences of the parking proposals accordingly extend beyond any single operator: they bear on the vitality of the town centre that the application, which is titled Revitalising Buxton, is intended to serve. The applicant's own Interim Travel Plan, at paragraph 2.6, quotes national Planning Practice Guidance to the effect that travel plans, transport assessments and statements can be important tools to improve the quality of town centre parking and, where necessary to improve the vitality of town centres, the quantity too.
- 2.4 The applicant's own material reinforces the point. The consultation summary in the Design and Access Statement records public feedback at the first consultation event including "questions regarding parking provision" (page 74). The same document describes the Spring Gardens "high street" area as "facing some vacancy challenges in the past 5-10 years" (page 18), while the masterplan's objectives include establishing a high-quality pedestrian route between the station and Spring Gardens and attracting footfall along Spring Gardens (page 21). The vitality consequences of the parking proposals fall on a centre the applicant itself describes in these terms.

3.0 The Existing Parking Position

- 3.1 The Spring Gardens and Wye Street car park provides 431 spaces, including 24 disabled spaces (TA Table 2.1). It is the largest car park in the town centre, holding 41% of the 1,052 public spaces and 43% of the 999 spaces operated by High Peak Borough Council; the next largest, Pavilion Gardens, provides 254 spaces.
- 3.2 Its role is not merely one of scale. TA paragraph 2.20 records that of the Council's stock, 431 spaces are short-stay and 568 long-stay, and that the short-stay spaces are located at the Spring Gardens and Wye Street car park. The site therefore constitutes the entirety of the Council's short-stay parking offer. It is the only town centre car park with a four-hour maximum stay, and it holds 24 of the Council's 64 disabled spaces. This equates to 38% of the accessible parking stock.
- 3.3 Surveyed demand (Friday 6 and Saturday 7 June 2025) reached a maximum of 301 vehicles at 11:00 on the weekday (70% occupancy) and 298 at 11:30 on the Saturday (69%) (TA Table 3.3). The Saturday profile at Figure 3.3 of the Transport Assessment remains at or near its peak from mid-morning until mid-afternoon. TA paragraph 3.5 records that June is the peak neutral month and that July and August carry higher visitor numbers; the surveyed values therefore understate peak seasonal conditions.
- 3.4 Residents holding a permit may park free of charge at the site between 08:00 and 12:00 and between 15:00 and 18:00 Monday to Saturday, and all day Sunday (TA paragraph 2.21). Those free periods overlap the observed demand peak.
- 3.5 The Planning Statement's summary of the planning history (paragraph 2.17) records that a Section 52 Agreement dated 30 March 1984, made in connection with the permission for the shopping centre, requires the car park to be open to all members of the public at all times, to be managed and kept in a suitable condition, and not to be altered without the approval of the Council; and that it secured the maintenance of at least 150 car parking spaces throughout the original construction period until the new car park was completed.

4.0 What the Submitted Evidence Addresses — and What it Does Not

- 4.1 The proposals replace the existing 431-space surface car park with a decked car park of 260 spaces, of which 120 are allocated to residents and 140 to commercial and town centre use, together with two surface spaces (TA paragraphs 1.26, 1.29 and 1.36). The retained public short-stay provision is therefore 142 spaces, one third of the existing quantum.
- 4.2 The submission documents are not consistent as to that quantum, or its allocation. The submitted car park drawings annotate 134 spaces at ground level and 126 at the upper level equating to 260 in total, consistent with the Transport Assessment; the Design and Access Statement states 266 spaces (pages 5, 32 and 78); and the Planning Statement states 264 (paragraphs 5.57 and 6.19). Further, the Transport Assessment's allocation "by car park deck level" of 120 residential and 140 commercial spaces (paragraph 1.29) cannot be reconciled with drawn levels of 134 and 126 spaces: no assignment of whole levels produces either figure, and the basis of allocation is therefore undefined even on the applicant's own drawings.
- 4.3 The submission's own description of the change is also inconsistent. The Design and Access Statement asserts (page 78) that "the incorporation of a multi-level car park significantly increases parking provision", on the same page as it records the existing car park at 431 spaces and the proposed arrangement at 266; its only other characterisation is that the car park "consolidates parking provision while removing the visual dominance of vehicles from the streetscape" (page 34). The Planning Statement repeats the assertion of an increase (paragraph 6.20) and, two paragraphs later, concedes the opposite: "the quantum of public car parking on the site will reduce as a result of this, which will displace some parking activity to other town centre car parks" (paragraph 6.22, repeated at paragraph 7.11). On the applicant's own figures the proposal reduces on-site parking by more than a third; the assertion of an increase is incorrect, and the submission is internally contradictory on the point. Nor is any offsetting facility elsewhere relied upon in justification of the figures, as paragraph 4.11 explains.
- 4.4 We take no issue with a number of elements of the Transport Assessment. The scope of the assessment was agreed with Derbyshire County Council; the junction capacity assessment shows the proposed access operating well within capacity; and the trip generation approach for the residential element was presented to the highway authority at scoping. Nothing in this note should be read as re-opening those matters.
- 4.5 The difficulty lies in what the transport evidence does not address. The omissions set out below are not merely technical. Each bears directly on whether the anchor Waitrose store, the principal attractor drawing shoppers into this part of the town centre and the trip generator on which the linked trips described at paragraph 2.3 depend, can continue to be reached and used by its customers in the manner it is today. The walking route, the trolley provision, the management of the replacement spaces and the accessible parking are the components of a main food shopping trip. The following matters, each central to whether the replacement parking can perform the function of the parking it replaces, are absent from that evidence:

Matter	Treatment in the submitted evidence
Walking route between the proposed car park and the retained Waitrose store, including distance, level change and vertical circulation	Not assessed. No walk distance appears anywhere in the Transport Assessment or its appendices. The Design and Access Statement asserts (page 78) that the lowest car park level “aligns with the entrance to The Springs Shopping Centre, providing convenient access for visitors”, but states no distance and identifies no route; the route is measured at paragraph 4.8 and Appendix A of this note
Trolley provision — bays, containment and a trolley-capable route between the Waitrose store and the parking decks	Not addressed in the transport evidence. The word “trolley” does not appear in the Transport Assessment or its appendices, although the Design and Access Statement refers to “dedicated trolley bays” (page 78) and the general arrangement drawings show four trolley stores within the car park and a combined trolley and mobility-scooter store within Block 10; none of this infrastructure, its capacity, or the route it implies is assessed anywhere
Management of the replacement car park — allocation, maximum stay, tariff, enforcement	Not addressed. Allocation is described by deck level only (TA paragraph 1.29); no management strategy, maximum stay, charging or enforcement regime is proposed; the Planning Statement's draft Section 106 heads of terms contain no parking head, and its submission schedule identifies no parking management plan among the application documents
Duration of stay in the existing car park	Not surveyed. The counts record arrivals and departures only; dwell time is not established
Trip purpose of existing car park users	Not surveyed. No interview or beneficiary survey was undertaken. This is critical to establishing what proportion of existing car park use is accounted for by customers of the anchor Waitrose store, which the submission nowhere quantifies
Capacity available in the receiving car parks	Not surveyed. None of the six car parks to which trips are reassigned was surveyed for occupancy
Walking routes from the receiving car parks	Not assessed, although the Transport Assessment applies a walk-distance methodology to bus stops at its Table 4.1
Seasonal demand at the August peak	Not assessed. TA paragraph 3.5 records that July and August have higher visitor numbers than the surveyed month of June
Accessible (Blue Badge) parking — quantum and location within the new car park	The transport evidence states only 5% of 260 (approximately 13, TA paragraph 1.26) with the split between decks unstated; the drawings identify approximately twelve accessible bays, all at ground level, none on the upper level
Parking for visitors to the residential accommodation	Not addressed. No visitor provision is identified in any submission document; the stated allocations (120 residential, 140 commercial, two surface) account for the whole of the proposed quantum
Electric vehicle charging within the new car park	None proposed anywhere in the submission
Construction-phase customer parking and access	Not addressed; the applicant's consultation material states delivery in two phases, and the Planning Statement records a four-year construction period

Matter	Treatment in the submitted evidence
Availability of the car park during flood events	Not addressed in the transport evidence. The Flood Risk Assessment classifies the car park ground floors as "allowed to flood" and designs them as an "open route for flood water" (Table 3.4), employing the undercroft as floodwater conveyance within the flood compensation strategy (paragraph 4.3); the Design and Access Statement records that "during a flood, the car park is also expected to be affected" (page 25).
Confirmation of future town centre parking provision, required by Derbyshire County Council at scoping (TA paragraph 1.9)	Answered only by reference to a further car park at Palace Road, for which no planning application reference, consent or space count is identified

- 4.6 Taken together, these are the matters which determine whether a customer can park, reach the Waitrose store, shop, and return to the vehicle with a full trolley. The Transport Assessment addresses none of them, and the vitality of the centre which the application seeks to revitalise depends in part on the answer.
- 4.7 The contrast within the Transport Assessment itself is instructive. At Table 4.1 it measures walking distances and times from the site to each nearby public transport node, at an average walking speed of 80 metres per minute derived from Manual for Streets (TA paragraph 4.10), identifying crossing points en route. That is precisely the exercise required for the route between the proposed car park and the retained Waitrose store, and for the routes from each receiving car park. It is applied to neither.
- 4.8 We have accordingly measured the routes ourselves, from the submitted general arrangement drawings at their stated scales; the measurements are presented on drawings 8260548/3101 and 8260548/3102 at Appendix A. Measured to the main Waitrose store entrance in each case, the designed pedestrian route from the car park's southern stair-and-lift core, via a crossing of the internal vehicular route, the entrance lobby within Block 10 and the length of the internal mall, measures 95 metres; from the nearest accessible bay 109 metres; and from the furthest ground-level space 146 metres. Spaces on the upper level depend in addition on the single stair-and-lift core. The corresponding existing routes measure 135 metres from the nearest ordinary public space, 181 metres from the approximate centre of the car park and 188 metres from the furthest public space. It should be recorded plainly that, for ordinary public parking, the proposed arrangement is therefore not more distant than the existing one and in those respects is shorter; the applicant's own demolition plan (Design and Access Statement, page 38) also identifies several existing points of access into the shopping centre directly from the car park frontage, in place of the single stair-and-lift core proposed. The material changes lie elsewhere, in accessible provision (Section 5) and in the character of the route. Whether any of the upper-level spaces would be available to customers of the store is unclear: allocation is stated by deck level, which the drawn level counts cannot deliver. If the upper level is in practice residential, all parking for customers of the Waitrose store would sit on the ground level, which is also the level the Flood Risk Assessment designs as a route for flood water and on which all of the accessible bays are placed. At the Transport Assessment's own 80 metres-per-minute convention these are straightforward calculations; the Transport Assessment performs none of them.

- 4.9 The measurements also disclose a change in the character of the route which distance alone does not capture. Under the existing arrangement a customer parking in the eastern car park reaches the store without passing through the internal mall; routes 4, 6 and 7 on drawing 8260548/3102 are of that character, whereas routes 1, 2 and 3 pass internally. The proposals remove the eastern car park, which contains, in the section to the south of the store, the nearest accessible parking to the store entrance, and every route from the replacement decks measured on drawing 8260548/3101 crosses the internal vehicular route, passes through the Block 10 lobby and then runs the length of the internal mall. That vehicular route, on the applicant's own drawing al(04)0100, continues eastwards to serve the Waitrose service yard. Under the existing arrangement no such conflict arises: the topographical survey al(02)0002 shows servicing segregated from customer movement, via Pontefract Way to the rear of the store, marked one-way, "keep clear" and "strictly no parking". The proposals therefore introduce a crossing of a service vehicle route into the only pedestrian route between the car park and the Waitrose store, on which the return leg is made with a loaded trolley; neither the frequency nor the types of vehicle using that route, nor the interaction between them and pedestrians, is assessed anywhere in the submission. For a main food shopping trip the distinction is material: the return leg is made with a loaded trolley, and the trolley route, its containment and the suitability of the internal mall for that purpose are matters the submission does not address, the word "trolley" appearing nowhere in the Transport Assessment or its appendices. The Design and Access Statement's own convenience claim is instructive in this respect: it states that the lowest car park level aligns with the entrance to The Springs Shopping Centre (page 78), which is the entrance to the centre and not to the store, the latter lying beyond it along the mall. Because no beneficiary or trip purpose survey was undertaken, the submission cannot say how many customers presently use the eastern car park for that reason, and the Transport Assessment does not address the point at all.
- 4.10 Nor is the quantum itself derived from any assessment of demand. The Design and Access Statement records (page 78) that car park options of 269, 408 and 436 spaces were considered during design development and set aside on design and townscape grounds, the largest being dismissed as compromising the delivery of a gateway building; the same page acknowledges that "parking provision is essential to support the town's commercial and residential activity" and that "Buxton would benefit from additional car spaces". The retained quantum was arrived at as a design outcome; nothing in the submission derives it from, or tests it against, an assessment of parking demand.
- 4.11 Nor does the submission justify the reduction by reference to any multi-storey or replacement facility elsewhere. The only multi-storey car park considered was a design option of 436 spaces to the east of the site, which the Design and Access Statement records was "dismissed outright" by High Peak Borough Council because it would compromise the delivery of a gateway building (page 78). No other facility is identified: the off-site provision relied upon is unnamed and, on the Planning Statement's own account, requires a separate planning application. The Planning Statement also recites the development plan requirement for the provision of additional parking of approximately 30 spaces to serve Buxton Station to the north of Station Road; no such provision forms part of these proposals.

5.0 Accessibility

- 5.1 The accessibility of the anchor Waitrose store is a matter of particular significance. It is a food store within an area which the applicant's own Design and Access Statement describes as serving "Buxton and its hinterland" (page 18), on a site which the same document describes as served by public transport "serving both the town and surrounding areas" (page 76); the Transport Assessment itself records that the car park serves visitors to the wider town centre (paragraph 6.19). For customers with impaired mobility, the ability to park close to the entrance is determinative of whether the store can be used at all.
- 5.2 The existing car park provides 24 disabled spaces equating to 38% of the Council's accessible parking stock of 64 spaces. The proposed car park provides accessible spaces at 5% of 260, approximately 13. The general arrangement drawings identify approximately twelve accessible bays, all at ground level and clustered at the southern stair-and-lift core, an appropriate location, and one the transport evidence nowhere describes or secures. The proposals remove roughly 17% of the town centre's entire accessible parking stock, and place the whole of the replacement accessible provision on the lowest level of the car park. This is the level the Flood Risk Assessment classifies as "allowed to flood" and designs as an "open route for flood water" (Table 3.4).
- 5.3 Customers with impaired mobility are precisely those for whom walking distance, gradient and dependence on lifts bind hardest, and for whom reassignment to a more distant car park is least available as an answer. On the measured routes at Appendix A, the walk from the nearest accessible bay to the main store entrance lengthens from 50 metres today to 109 metres, more than double, and includes a crossing of the internal vehicular route which serves the Waitrose service yard, and the length of the internal mall. The existing arrangement further offers accessible parking in three separate locations, at 50, 83 and 131 metres from the entrance, so that a customer unable to find a space in one may use another; the proposals replace that choice with a single cluster at 109 metres. The two nearest of those locations, at 50 and 83 metres, both lie within the eastern car park, which the proposals remove; the accessible parking closest to the Waitrose store today is therefore the provision most directly displaced. The local planning authority is subject to the public sector equality duty under the Equality Act 2010 in determining the application; the submitted evidence contains no assessment of the effect of the reduction in accessible provision, its location within the new car park, or the step-free route to the Waitrose store, on which that duty could be discharged.
- 5.4 The wider site compounds the point. The Design and Access Statement records that the masterplan "negotiates a 9-meter level difference across the site" (page 76), that its spatial spine, the principal pedestrian connection between Station Road and the town centre, is "a new north-south boulevard, cascading stair, and central civic square" (page 34), and that step-free movement between the public levels depends on the stair-and-lift core at the observation tower (pages 76 and 79). The submitted drawings are themselves organised around two ground datums, at Station Road and at the Springs (pages 23 and 79); the topographical survey confirms a fall of some six to eight metres between Station Road and the store threshold. For customers with impaired mobility, and for any customer moving a loaded trolley, the location of accessible spaces relative to the lift cores is therefore determinative and, but for the drawings, unstated.

6.0 The Reassignment Assessment

- 6.1 The Transport Assessment deals with the reduction in parking in two steps. First, at paragraph 6.22 and Table 6.9, the surveyed traffic flows are adjusted pro rata on the relationship between the 142 retained spaces and the maximum surveyed demand in each modelled peak period, producing retained proportions of 77% (weekday AM), 85% (weekday PM) and 48% (Saturday). Secondly, at paragraphs 6.26 to 6.28, the reassigned trips are distributed among six other car parks by a gravity model whose deterrence function comprises the number of spaces in, and the walking distance to the centre of the site from, each alternative car park.
- 6.2 It should be noted first what this method concedes: on the applicant's own figures, 52% of Saturday parking demand must relocate to other car parks. We do not quarrel with that proportion. The difficulty is that, having conceded it, the assessment does nothing with it: no check is made of the capacity available in the receiving car parks, no assessment is made of the routes from them, and no test is applied to whether the resulting parking offer meets the operational requirements of the anchor Waitrose store or the needs of shoppers with impaired mobility.

Retention is assumed, not assessed

- 6.3 The model contains no mechanism by which a displaced trip could fail to be retained within the town centre. The gravity model allocates 100% of reassigned trips among the six alternative car parks; there is no absolute deterrence term and no possibility of trip suppression within the method. In short, the assessment assumes that displaced users remain within the town centre; it does not, and by construction cannot, test whether they would in fact do so.

Parking capacity is treated as a flow, not a stock

- 6.4 The pro rata calculation at paragraph 6.22 compares the 142 retained spaces with demand in the modelled peak hours only (08:30–09:30 and 16:30–17:30 on the weekday). A car park does not operate hour by hour: a vehicle that arrives at 10:00 and stays two hours occupies its space at 11:00 and at noon. Once the accumulated stock of parked vehicles exceeds capacity, the constraint binds continuously until demand falls. The surveyed daily maximum of 301 vehicles occurs at 11:00. This is an hour that is never modelled.
- 6.5 Set against the 142 retained spaces, the surveyed accumulation implies 159 vehicles without a space at the weekday peak and 156 at the Saturday peak. The surveyed profile at Figure 3.3 sits above 142 vehicles from mid-morning until late afternoon on both days, broadly the whole of the shopping day.

The turnover the retained spaces would have to achieve

- 6.6 Summing the inbound car movements recorded at each surveyed car park access point in Appendix A of the Transport Assessment, the surveyed weekday records 2,073 car arrivals and the Saturday 2,294; including taxis and light goods vehicles the totals are 2,228 and 2,410. Across the existing 431 spaces this represents approximately five turnovers per space per day. For 142 spaces to serve the same arrivals, each space would need to turn over approximately 15 times on a weekday and 16 times on a Saturday, roughly one arrival per space every 45 minutes across a 12-hour day at continuous full occupancy. Nothing in the submitted evidence establishes the duration of stay, and therefore the turnover, that the existing car park actually achieves: the counts record arrivals and departures at the cordon, not dwell. The central quantitative claim, that 142 spaces can serve the retained demand, is accordingly unquantified in the assessment's own terms.

The receiving network is untested

- 6.7 The gravity model allocates reassigned trips by the total number of spaces in each receiving car park, not the number available: none of the six was surveyed for occupancy on the survey days. The deterrence function includes no term for tariff or maximum stay, although the site is the only four-hour car park in the town and is charged on a premium tariff band; nor any term for the character of the walking route from each receiving car park, although the Transport Assessment applies exactly that analysis to bus stops. The applicant's own Design and Access Statement characterises the principal walking corridors qualitatively: Station Road is "largely car-dominated, with limited pedestrian amenity", with signalised crossings that "do not create a welcoming arrival for pedestrians"; the A515 corridor has "narrow pavements"; and High Street and Eagle Parade are "somewhat disconnected from other active routes due to their elevated position" (pages 14 to 15). For demand reassigned to parking north of Station Road, the Statement records that a new crossing of that road is a "long-term aspiration... not included in the current Masterplan" (page 24). Routes the applicant itself describes in these terms are assigned displaced parking trips by a model containing no term for route quality, gradient or level change. Trip purposes are likewise undifferentiated, such as a main food shopping trip, a comparison shopping trip, a commuter and a tourist are treated as a single trip type, although the Statement's own character analysis distinguishes areas that "primarily serve residents" from "key attractions for visitors" (page 18), and no interview or beneficiary survey supports the single-type treatment.

The dependence on Palace Road

- 6.8 One of the six receiving destinations is a new car park proposed by the Council off Palace Road, treated in the Transport Assessment as a committed proposal (paragraph 6.20). No planning application reference, consent, space count or delivery mechanism for that facility is identified in the submission. Derbyshire County Council's scoping response required "confirmation of future town centre parking provision" (TA paragraph 1.9); a facility with no identified consenting route does not provide that confirmation. No sensitivity test excluding Palace Road is presented. The applicant's own documents characterise the provision three ways: the Transport Assessment relies upon it as a committed development; the Design and Access Statement records it as off-site options High Peak Borough Council "is exploring", identifying no site, capacity or planning reference (pages 32 and 78); and the Planning Statement states that it "will form part of a separate planning application" (paragraph 5.58). A facility whose consenting route lies in a future application is not committed development, and the applicant's principal planning document confirms as much.

Residential parking and the integrity of the commercial deck

- 6.9 The Transport Assessment's own census evidence (Table 2.2) records car ownership at apartments in the local area of 0.50 cars per household. Applied to 327 apartments this implies a demand of approximately 164 vehicles, against 120 residential spaces. This equates to a shortfall of some 44 vehicles on the applicant's own figures. Paragraph 1.34 answers this by reference to the 36% of flat dwellers who drive to work; but commuting mode share and car ownership measure different things. A resident who owns a car and walks to work still keeps the car in a space, including at 11:00 on a Saturday. Allocation between residents and commercial users is proposed "by car park deck level" only (paragraph 1.29), an allocation the drawn level counts of 134 and 126 spaces cannot in any event deliver, with no demarcation, barrier, enforcement or management plan. On the applicant's own ownership evidence, unaccommodated residential demand of this order could occupy up to 31% of the 140-space commercial deck. Nor is any provision identified for visitors to the residential accommodation: the visitor demand generated by 332 dwellings, likely to be concentrated in evenings and at weekends, coinciding with the Saturday conditions in which the assessment already concedes that more than half of existing demand must relocate, falls by default on the commercial deck or on a receiving network the assessment never tests for spare capacity, and which the reassignment model, redistributing only existing displaced demand, nowhere counts.

Points noted for completeness

- 6.10 Two further matters are noted briefly. The Saturday residential trip rates at Table 6.4 are produced by applying a whole-day National Travel Survey factor of 0.90 to a single weekday hour, assuming that a weekday mid-morning profile represents a Saturday; that is an unevidenced approximation, though not one on which our conclusions depend. Similarly, the derivation at TA paragraph 2.27 of the 36% figure assumes that the relationship between car ownership and commuting mode share holds constant across accommodation types, which is asserted rather than evidenced.

7.0 Matters Requiring Clarification

- 7.1 The following information should be sought from the applicant. These requests are proportionate to an application of this scale, and in substance they ask only that the Transport Assessment complete exercises of kinds it has itself deployed elsewhere:
- a. a beneficiary interview survey of existing car park users, establishing trip purpose, destinations visited, party composition, mobility needs and available alternatives;
 - b. a duration-of-stay survey (matched-plate or ANPR), with dwell time disaggregated by trip purpose;
 - c. constrained accumulation modelling, applying the 142-space cap to the observed demand profile and deriving unaccommodated demand by time of day;
 - d. occupancy surveys of all six receiving car parks, undertaken on the same days and over the same hours as the site survey;
 - e. a walking route audit from each receiving car park, and from the proposed car park, to the Waitrose store and the town centre. This should be measured by distance, gradient, crossing provision and delay, footway width, lighting and trolley suitability, also applying the 80 metres per minute convention the Transport Assessment itself adopts at Table 4.1;
 - f. a sensitivity test of the reassignment assessment excluding the Palace Road car park, together with confirmation of that facility's planning status, capacity and delivery mechanism;
 - g. seasonal factoring of the surveyed demand to the August peak which TA paragraph 3.5 concedes is higher than the surveyed month;
 - h. the reassignment model rebuilt with a deterrence function that includes walking distance to the actual destination, tariff, maximum stay and available (rather than total) capacity, and which permits non-retention;
 - i. a statement of how the resulting parking offer meets the operational requirements of the anchor Waitrose store; and
 - j. the availability of the car park during flood events. The Flood Risk Assessment establishes that flooding of the car park is a matter of design, not chance: the car park ground floors are classified as "allowed to flood" and designed as an "open route for flood water" (Table 3.4), and the undercroft forms part of the scheme's flood compensation, conveying floodwater through the site (paragraph 4.3). The same Assessment shows this is not a remote prospect. Surface water depths of up to 300 millimetres are mapped across the area north of the main shopping centre building in a medium event, one with an annual probability of between 1% and 3.3% (paragraph 3.8), and the site has flooded before, in 1984 and 2000, including the car park itself (paragraph 3.2). The local catchments respond so quickly that there is "limited lead time for flood warning dissemination" (paragraph 2.7). That constraint bears directly on the audible warning system on which the Design and Access Statement relies (page 25): a warning with little lead time cannot secure the removal of vehicles whose drivers are elsewhere.
- 7.2 None of the transport consequences of this design is addressed anywhere in the submission. The applicant should therefore state:

- a. the flood event at which each parking level first becomes unavailable, including climate change allowances;
 - b. how long the car park would be closed, and how long reinstatement would take, following such an event;
 - c. the operational protocol for warning, evacuation, closure and reinstatement, and who is responsible for operating it;
 - d. where displaced vehicles are assumed to go, noting that none of the receiving car parks has been surveyed for spare capacity; and
 - e. the effect on accessible parking, all of which the drawings place on the flood-conveyance level.
- 7.3 Finally, the Flood Risk Assessment itself requires two documents the submission does not contain: a long-term management and maintenance plan for the floodwater-conveyance function (paragraph 4.3), and a Flood Emergency Plan for any part of the development below the estimated flood level (paragraph 4.4). Both should be secured through the Car Parking Management Plan sought at Section 8.
- 7.4 The basis on which parking demand from visitors to the 332 dwellings has been assessed, the provision made for it, and its treatment within the reassignment assessment. No visitor parking provision is identified in any submission document: the stated allocations, 120 residential, 140 commercial and two surface spaces, account for the whole of the proposed quantum. The reassignment assessment redistributes existing displaced demand among the receiving car parks; it nowhere adds the new demand the development itself generates.
- 7.5 The servicing arrangements for the Waitrose store in the proposed layout, including the frequency and types of vehicle using the internal vehicular route which the pedestrian route between the car park and the store crosses, and the measures proposed to manage the interaction between service vehicles and customers, including customers with impaired mobility and those moving trolleys. No such conflict arises under the existing arrangement, in which servicing is segregated from customer movement.
- 7.6 The following points of drafting clarification are also sought:
- a. the number of town house parking spaces, four at TA paragraph 1.29, against five at paragraph 1.20 of the Interim Travel Plan and five townhouses each with an integral garage in the Design and Access Statement (pages 32 and 54);
 - b. reconciliation of the total parking quantum, 260 on the submitted drawings and in the Transport Assessment, 266 in the Design and Access Statement and 264 in the Planning Statement, and of the basis of allocation, which “by deck level” cannot produce the stated 120/140 split from drawn levels of 134 and 126;
 - c. confirmation of which submission documents describe the Revision 02 “Updated Scheme”, the Design and Access Statement predating it and the general arrangement drawings post-dating it;
 - d. provision of the drawing set identified in the Planning Statement submission schedule as “Existing and Proposed Site Sections and Finished Floor Levels”;
 - e. provision of the “Parking Demand Report — Revitalising Buxton Parking Study, February 2025”

disclosed at reference 27 of the Flood Risk Assessment, with confirmation of whether it is the parking study on which the Transport Assessment relies;

- f. reconciliation of the flood zone designation of the site, stated as including Zone 3b in the Planning Statement (paragraph 7.38) and the Flood Risk Assessment (Section 3), but as excluding Zone 3b in the same Assessment's summary of the Strategic Flood Risk Assessment (paragraph 3.1);
- g. confirmation of the status of the street between the car park's eastern core and the store's north-facing lobby door, which the drawings suggest may offer a shorter route of approximately 65 metres but which serves the Waitrose service yard; and
- h. confirmation of whether the access layout assessed in the Stage 1 Road Safety Audit of September 2025, whose brief excluded levels and gradients, remains that of the Revision 02 "Updated Scheme" of May 2026.



8.0 Recommended Amendments and Securing Mechanisms

- 8.1 The information sought at Section 7 falls to be provided and considered before the application is determined; the amendments below do not substitute for that information, and it is not suggested that a condition can cure a deficiency in the evidence base. Subject to those matters being addressed, the concerns raised in this note are capable of resolution by amendment and condition rather than by refusal, and that is the outcome Waitrose seeks. The following schedule sets out the amendments sought and the mechanisms by which each could be secured:

Amendment / requirement	Basis	Securing mechanism
Allocated short-stay parking for customers of the Waitrose store within the commercial deck, subject to a maximum stay and enforcement, sited adjacent to the vertical circulation serving the Waitrose store	No parking management strategy of any kind is proposed; the Planning Statement's draft Section 106 heads contain no parking head; the Flood Risk Assessment itself requires a long-term management and maintenance plan for the undercroft's floodwater-conveyance function (paragraph 4.3) and a Flood Emergency Plan for any part of the development below flood level (paragraph 4.4), neither of which appears in the submission	Car Parking Management Plan secured by condition, to include flood-event closure, evacuation and reinstatement procedures
Dedicated trolley bays at commercial deck level and at surface level, and a step-free, trolley-capable route between the parking decks and the Waitrose store, with lifts sized accordingly and a defined trolley containment perimeter	The Transport Assessment is silent on trolleys; the Design and Access Statement refers to "dedicated trolley bays" (page 78) and the drawings show trolley stores, without number, capacity or an assessed route; the Stage 1 Road Safety Audit records a significant level change at the site access; and the proposals introduce a crossing of the service access to the Waitrose service yard into the pedestrian route between the car park and the store	Condition and amended general arrangement drawings
Accessible (Blue Badge) parking at a level no lower than the existing 24 spaces, located nearest the vertical circulation, with provision above the design flood level or protected by the management plan	Provision otherwise falls to approximately 13 spaces; the drawings place all accessible bays on the lowest, flood-affected level	Condition and amended drawings

Amendment / requirement	Basis	Securing mechanism
Physical demarcation and enforcement preventing residential parking from occupying the commercial deck	Census car ownership at Table 2.2 of the Transport Assessment implies residential demand of approximately 164 vehicles against 120 residential spaces; the stated deck-level allocation cannot be delivered by the drawn level counts; no provision is identified for residential visitors, whose demand would otherwise fall on the commercial deck	Car Parking Management Plan secured by condition
A phasing mechanism linking occupation of the development to the delivery of the replacement town centre parking relied upon in the Transport Assessment as a committed development	The reassignment depends on a facility the Planning Statement confirms requires a separate, future planning application; the Planning Statement itself envisages that “any phasing will be conditioned” (paragraph 6.10)	Condition or planning obligation
A construction-phase customer parking and access strategy	Not addressed; the Planning Statement records a four-year construction period, and its own planning history records that the Section 52 Agreement of 30 March 1984 secured at least 150 spaces throughout the original construction — the mechanism under which the existing centre was itself built	Condition
Electric vehicle charging provision within the commercial deck	None is proposed in a 260-space car park; the town centre presently offers two charging spaces in total	Condition

9.0 Servicing and Construction Phase

- 9.1 The store's existing servicing and delivery arrangements should be protected through the construction period and in the completed scheme, and the introduction of residential accommodation adjoining the service area should not give rise to future restriction of delivery hours. The Design and Access Statement confirms the three existing service yards "will remain fully operational" (page 77) while locating the car park's smoke-extraction air intake in the slab above the Waitrose service yard (pages 22 and 78); this designed interface should be confirmed with the operator, as should the introduction of a service vehicle crossing into the pedestrian route between the car park and the store described at paragraph 4.9; these matters should be kept under review as the application progresses.

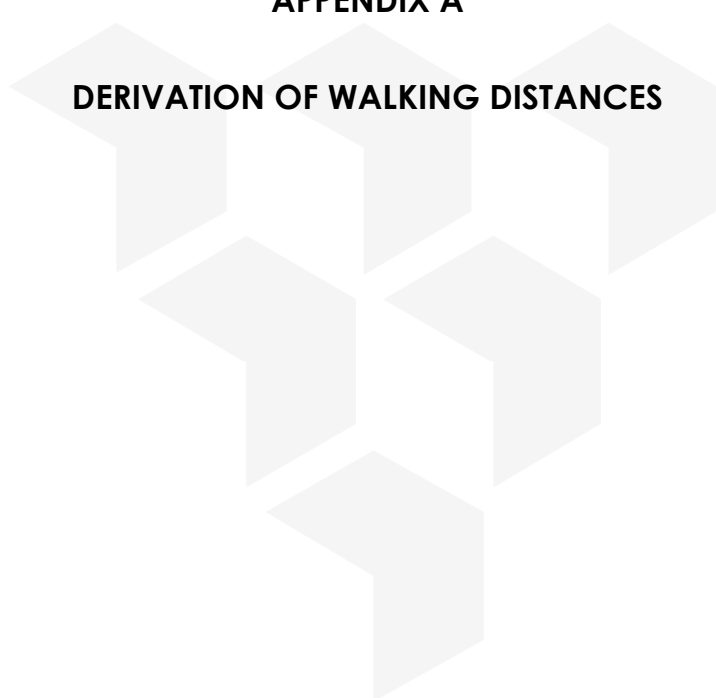


10 Conclusions

- 10.1 Waitrose does not object in principle to the aspiration to regenerate and enhance this part of Buxton town centre, and seeks amendment of the proposals rather than their refusal. The site's car park is the only car park in the Council's town centre stock providing short-stay parking, and holds 38% of its accessible parking stock; no short-stay provision is proposed elsewhere in the town centre, so the whole of that demand would be funnelled into a facility of one third the present capacity in which no allocation or priority is proposed for customers of the store. The application would reduce that provision to a third of its present quantum without assessing the walking route to the Waitrose store it anchors — measured in this note, from the applicant's own drawings, at 95 metres from the car park core and 146 metres from the furthest ground-level space, and, most significantly, at 109 metres from the nearest accessible bay against 50 metres today — the management of the replacement spaces, the capacity of the car parks expected to absorb displaced demand, or the position of shoppers with impaired mobility.
- 10.2 The reassignment assessment on which the application relies assumes, and is structurally incapable of testing, the retention of displaced trips within the town centre; it models parking as an hourly flow rather than an accumulating stock; and it depends upon a further car park which the applicant's own Planning Statement confirms requires a separate, future planning application. On the applicant's own evidence, more than half of Saturday parking demand must relocate, and residential car ownership exceeds residential parking provision by some 44 vehicles with nothing proposed to keep that demand off the commercial deck. The submission's design documentation, meanwhile, describes a reduction of more than a third in on-site parking as a significant increase — an assertion its own Planning Statement contradicts within the same chapter — and states three different totals across three documents. The assessment accordingly does not demonstrate that customers undertaking main food shopping trips can continue to access the Waitrose store in a manner comparable to existing conditions.
- 10.3 In summary, the application proposes to remove approximately two-thirds of the town centre's principal short-stay car park without demonstrating where displaced demand will go, whether the replacement parking can function for main food shopping trips, or how the needs of mobility-impaired shoppers will be met. Until those matters are assessed, the transport effects of the proposal remain unresolved. The requests at Section 7 and the amendments and conditions at Section 8 would resolve them while allowing the scheme to proceed, and we would welcome the opportunity to discuss these matters with the applicant and the authorities.

APPENDIX A

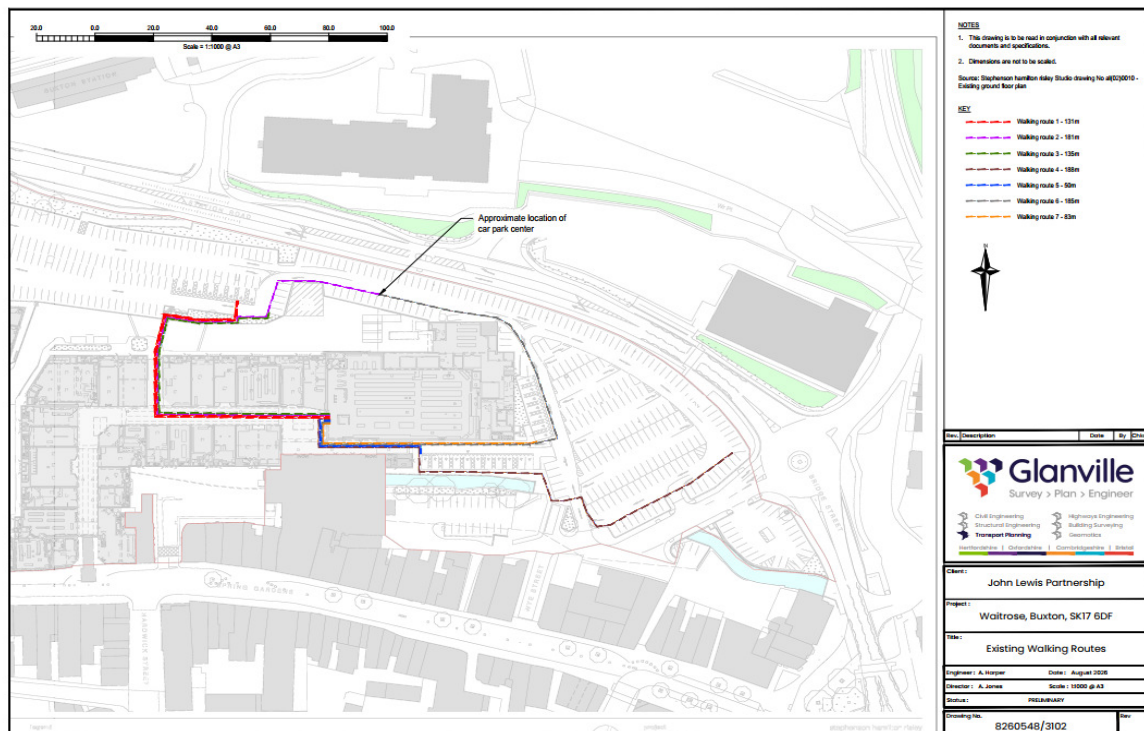
DERIVATION OF WALKING DISTANCES



- A.1 Source and scale. Walking distances have been measured by Glanville Consultants and are presented on drawings 8260548/3101 (Proposed Walking Routes, 1:250 at A3) and 8260548/3102 (Existing Walking Routes, 1:1000 at A3), appended. The proposed routes are measured from the applicant's drawing al(04)0100 "Proposed Level 00", Revision P08 dated 4 June 2026, and the existing routes from al(02)0010 "Existing Ground Floor Plan", both by stephenson hamilton risley STUDIO and obtained from the Council's public planning register.
- A.2 Method. Each route has been measured as a walked polyline following the aisles, footways, crossings and internal circulation available, without straight-line shortcuts through parked rows or building fabric. All routes, existing and proposed, are measured to the main Waitrose store entrance.
- A.3 Results. Proposed (drawing 8260548/3101): from the stair-and-lift core, 95 metres; from the nearest accessible bay, 109 metres; from the furthest ground-level space, 146 metres. Spaces on the upper level depend in addition on the stair-and-lift core. Existing (drawing 8260548/3102): from the nearest accessible bays, located within the eastern car park in the section to the south of the store, 50 metres; from the accessible bays adjacent to the eastern building edge within the same car park, 83 metres; from the accessible bays to the north-west of the store, 131 metres; from the nearest ordinary public space, 135 metres; from the approximate centre of the car park, 181 metres via the internal mall and 195 metres via the eastern car park; and from the furthest public space, 188 metres.
- A.4 The measured routes are shown on drawings 8260548/3101 and 8260548/3102, appended.



Drawing 8260548/3101 — Proposed Walking Routes (based on al(04)0100 Rev P08)



Drawing 8260548/3102 — Existing Walking Routes (based on al(02)0010)