



BY EMAIL

8 June 2020

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High Peak Borough Council
Buxton Town Hall
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Dear Ms Colley,

Re: HPK/2020/0071: Outline Permission with all matters reserved for the demolition of existing buildings and removal/demolition of other infrastructure; and development of 110 dwellings with associated infrastructure; development of a multi-purpose community and tourist facility (for use by the community and in connection with the Bugsworth Canal Basin); the provision of car parking (44 spaces) for use in connection with the community/tourism facility, and for visitors to the Bugsworth Canal Basin; the provision of formal and informal recreation space; the provision of PROWs; and the erection of a bridge linking the site with the Bugsworth Canal Basin.

1. We refer to the above application. Friends of the Peak District represents CPRE, the countryside charity in the High Peak; we are also the national park society and are a registered charity with c.1500 members and supporters. Our vision for the wider Peak District, including High Peak, is a living, working landscape that changes with the times but remains beautiful forever.
2. The Friends of the Peak District/CPRE wish to **object** to the planning application to construct 110 houses on land at Britannia Mill, Buxworth, High Peak. **In summary, we believe it should be refused as it is contrary to national policies on density (efficient use of land) and design (NPPF paras 123-127), does not meet Green Belt purposes (para.134) and fails local policies SO5, S6, DS10, EQ1, EQ2, EQ4 and EQ5. Traffic impacts are also unacceptable.**
3. Below we give our detailed comments. Please note that, due to Covid restrictions, we have been unable to visit the site and have therefore relied – to a greater extent than usual – on online resources. We reserve the option to add supplementary comments if needs be.

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Site and proposals - policy considerations

4. The whole site is within the Green Belt and the eastern end of south-eastern part lies within the Buxworth Conservation Area. The development also abuts the boundary of the Bugsworth Basin Scheduled Monument and offers, in addition to the housing, a community centre and 44-space car parking for visitors to the canal basin.
5. Under HPBC Local Plan Policies S6 (2., bullet 3) and DS 10 only the 1.5ha mill site itself is identified, as industrial legacy, for mixed use with no more than 50 houses of which 30% should be affordable. DS10 states: *'The precise capacity of the site for residential development shall be determined by further consideration of development viability and compliance with Green Belt policy.'*
6. At 4.9ha the development would be more than 3 times the area identified in Local Plan Policy DS10 and would provide more than twice the number of dwellings at an unacceptably low density of 22 dwellings/ha. The car parking provision would follow HPBC policy. There is no mention of homes fit for a zero carbon future (see below). There would be no affordable housing as the development is stated (erroneously) to be unviable, and no mixed use. The applicant claims to maintain the openness of the green belt but we suggest otherwise (see section 16 below). In any case valuable scrub and unmanaged grassland would be lost.
7. According to Policy S2 Buxworth is a *'Smaller Village'* where *only limited development to meet local rural needs may be acceptable consistent with maintaining and enhancing their distinctive character or appearance*. Local Plan Policy EQ 4 states that the openness and permanence of the Green Belt will be preserved and any development must be in accordance with national policy.

Design and sustainability

8. The Local Plan is extremely clear in its priority (within its development management policies) on the strategic role of environmental quality, sustainability and the need to address climate change (see particularly strategic objective SO5). Supporting text at para.5.16 states that climate change will be addressed by use of sustainable locations; promoting low carbon, sustainable development; maximising carbon reductions in new build by reducing the need for energy; using energy more efficiently; and generating energy from low carbon or renewable sources.
9. Furthermore Policy EQ1 gives great detail as to how, *inter alia*, new development in High Peak should contribute to a low carbon future and help meet national targets to reduce greenhouse gas emissions. In October 2019, the Council declared a Climate Emergency with the aim of becoming carbon neutral by 2030. This is a significant material consideration that adds greater weight to the need for stringent compliance with adopted sustainability and climate change policies.
10. We are surprised therefore that objective SO5 and policy EQ1 are omitted from consideration in the relevant Development Plan policies quoted in the Planning

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Statement. These core issues are nowhere considered in the application, neither in the Planning Statement or the Design and Access Statement. It is incomprehensible, even though this is an outline application, that sustainability issues (beyond ecology, green space and water management) are not addressed as ‘masterplan prompts’ in terms of the development’s contribution to future low carbon place-making. This omission must be addressed before the application can be determined or else refused.

Landscape, green belt and local amenity

11. In accordance with the landscape remit of our organization, and despite our inability to make a site visit, our observations concentrate on the visual and amenity impacts of the proposed development within the Green Belt, close to the boundary of the Peak District National Park and alongside the Peak Forest canal. In principle, housing development of the north western, brownfield part of the site is acceptable (as per Policy DS 10, see below) but the present and future open space values of the north eastern and south-eastern parts of the site are worthy of protection and should not be developed for housing.
12. The site of the planning application clearly falls in to two distinct parts in terms of its present uses and character. The north-western end of the site consists of the former Britannia Mill and Britannia House buildings at Buxworth, whilst the south eastern area of the site is grassland and wooded land with potential for open space uses. It is development on the north eastern and south eastern area of the site which in our opinion should not be permitted. Although the developer seeks to justify that the degree of landscape change is negligible within the wider landscape character areas (see LVIA, section 6.6), we disagree and suggest Policy EQ 2 is not met as the development is detrimental to the character of the local landscape and also the setting of a settlement.
13. The High Peak Local Development Plan adopted in 2016 has clearly stated policies for the proposed development site under Policy DS 10 which seeks to protect the open south eastern part of the proposed development site. It states about the south eastern part of the site:

The adjacent greenfield area contains woodland which provides a landscape framework and contributes to the character of the adjacent settlement of Buxworth. The woodland surrounding and within the site should be protected from development to provide a landscape framework, and to ensure that visual coalescence between the settlements of Buxworth, Whaley Bridge and Furness Vale does not occur.
14. We completely support this statement, as permitting development of the south eastern part of the site would be contrary to broad green belt policies and also contrary to Policy DS 10 of the Local Plan. It would impact adversely on the historic settlement of Buxworth and the Conservation Area and on the setting of the nearby historic canal and canal basin, which is of national importance (scheduled monument).
15. Buxworth is a small attractive settlement with a population today of under 300. The proposed development of 110 houses would double the size of Buxworth as a

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settlement and be out of proportion to the existing village. Others, notably the Parish Council, have raised concerns about lack of infrastructure and we support this concern.

16. Buxworth is located at the end of the historic Peak Forest Canal - an asset of great long-term importance for leisure, tourism and biodiversity. When the canal was first built in 1789, the Bugsworth basin became the biggest inland port in the country, being able to moor over 100 boats at any one time. Today the canal basin is an important amenity with potential for further use for recreation and tourism. It is a popular place for walking and cycling and much used by local residents and visitors. Permitting housing development on the south eastern portion of the proposed development site would, in our view, impact adversely on the setting of the scheduled canal basin and the canal tow path.
17. The open and wooded land at the south-eastern end of the site has potential for future open space uses in connection with leisure and recreation. It could be a valuable green space linking to the canal and canal basin and, if developed for housing, this potential would be lost. The LVIA analysis states (para. 6.9) a high/adverse change to the local landscape will occur, underlining the extent of loss. It also states (para. 6.6) that the change allows for enhancements that: 'Ensure connection with existing vernacular character of the settlement of Buxworth'. It is clear to us that if the development of the wider site occurs to the degree that it links visually to the built character of the settlement, then it must follow that the openness of the Green Belt will be compromised, contrary to Policy EQ 4 and national policy.
18. The deciduous woodland that has developed on the most south-easterly part of the site, close to Buxworth village, is of particular landscape importance, providing a buffer and landscape containment to the village. These woodlands should be protected in any future development of the site for open space uses and should under no circumstances be sacrificed for housing development. The LVIA again suggests a set of landscape/green infrastructure/biodiversity mitigation measures (paras 6.8 and 6.9) but we fail to see these reflected explicitly in the full proposals, contrary to Policy EQ 5. Furthermore, we see no evidence of a positive contribution to overall biodiversity. Such a contribution needs to be set out formally and explicitly (with accompanying metrics) in terms of biodiversity net gain.

Transport

19. As noted earlier, the site is allocated by Local Plan policy DS 10 but is recognised as 'relatively isolated' by the Local Plan. It appears to us to be unsustainable for housing and scores poorly on the checklist for new housing developments created by Transport for New Homes.
20. The proposed residential development is expected to generate 50 two-way vehicle trips during the morning peak hour, with 44 during the afternoon peak hour and 478 across a day. Current daily traffic flows along New Road, which is the main route to reach the A6, are not provided but on a country lane such an increase would be

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substantial and unacceptable. The developer claims that most local people using the community centre would use sustainable modes of transport but having a car park immediately adjacent would encourage car use.

21. It also appears that leisure trips to use the 44-space car parking for tourists accompanying the development has been excluded from the transport assessment. Without visitor numbers we do not know if this provision of car parking is necessary. We note and support the comments by local residents and the Parish Council that the community facilities offered, including the car park, do not outweigh the harm posed by the current over-developed proposal.
22. Fifty per cent of journeys from the estate are stated to be made by sustainable modes, but this is an exaggeration as it includes car passengers. Only 22% of person trips would be made by foot, cycle or public transport, and car-dependency is likely to be high. The train stations at Whaley Bridge, Chinley and Furness Vale are located within 2km of the site and could be accessed by bus using the stop adjacent to the site on New Road, but they are well beyond the acceptable walking distance of 400m for bus and 800m for rail. Furthermore, residents at the western end of the development would have to walk 500m to reach the bus stop. The developer does not address these deficiencies through travel planning.
23. The walking and cycling facilities for access to daily needs in Buxworth are inadequate. The B6062 onto which the development would access is a single carriageway country lane and has a narrow pavement on the north (opposite side of the road to the site) side which extends only from the western end of the development to the church in Buxworth, where the bus stop is on the opposite side of the road. East of the church there is no pavement and cars are parked along the road, creating a strong disincentive to walk or cycle to the primary school or pub. The mean recorded vehicle speeds of 36mph would further intimidate both walkers and cyclists. Brookside as an alternative route to reach the school is also a narrow road with only a short narrow section of footway on the east side in front of the terrace of cottages. Services in Whaley Bridge (1.5km) and Furness Vale (2km) could be reached by foot and cycle using the canal towpath and the Goyt way, which of course provide an excellent leisure route.
24. The proposed access to the site onto the B6062 would be outside the 30mph speed limit for Buxworth.

Other comments/issues

25. We have been made aware of the comments made to High Peak Council by the Buxworth Residents Group, a member organisation of the CPRE, and we support their detailed observations and wish to add our support to them, in particular their cogent analysis of the erroneous viability study provided by the developer.
26. The Whaley Bridge Neighbourhood Plan may have something to say about the development site but it is still in development.

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Conclusion

27. Insufficient detail has been given regarding the masterplan approach to sustainability and low carbon place-making, particularly in respect of house design, construction and layouts. The low density, car-dominated outline designs are unacceptable.

28. If the development is to proceed, it should be constrained to the industrial legacy area and rigorously adhere to Policy DS10. Access should not use the green field to the east. At the outline planning stage the standard for low carbon homes should be set. The speed limit along the B6062 should be reduced to 30 mph along its entire length between Chinley and Furness Vale, with 20mph at school opening and closing times to allow children to walk and cycle safely. Robust travel planning should be a condition of the development.

29. We therefore wish to object to the present planning application to construct 110 houses on the entire site and recommend that this application should be refused.

We trust these comments are of assistance; please contact us if you need any clarification or further information. Please notify us of your decision in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Tickle', written over a horizontal line.

Andy Tickle
Head of Campaigns

(homeworking tel. 07810 647104)

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