

DARLEY DALE TOWN COUNCIL

Formal Written Representations to Derbyshire Dales District Council Planning Committee

Planning Application 24/00665/FUL — Forest Holidays, Farley Moor, Matlock, Derbyshire

Introduction

Darley Dale Town Council (DDTC) submits the additional following formal written representations in respect of planning application 24/00665/FUL following a final review of the case and documentation released after DDTC's initial representation. DDTC is a statutory consultee in respect of this application. These representations identify specific material planning concerns which DDTC requests the Planning Committee to address before reaching its decision.

Each representation below identifies a specific concern, the relevant planning policy, and a clear request. These representations are submitted for the permanent planning record. DDTC requests that full written responses to all representations are placed on the public planning register before the committee meeting of 30 June 2026.

DDTC formally objects to the grant of planning permission for the reasons set out in these representations. DDTC urges the committee to **REFUSE** the application.

Section 1 - Highway Safety: Pedestrian Access

Representation R1 | Pedestrian Safety — Farley Lane | NPPF Paras 115, 116(a)

CONCERN:

The applicant's own Transport Assessment acknowledges that Farley Lane is unsuitable for pedestrians. The lane is narrow, unlit, has no footpaths, poor visibility, steep gradients, soft verges, and is subject to flooding and icy conditions. Despite this, the application proposes no pedestrian infrastructure improvements on Farley Lane. The committee should not approve a development expecting up to 65,000 visitors annually without being satisfied that pedestrian access is safe.

DDTC REQUESTS:

The committee should satisfy itself that the applicant has demonstrated how pedestrian safety on Farley Lane will be adequately addressed, and should not grant permission unless enforceable conditions or a Section 106 obligation secure specific, funded, and deliverable pedestrian safety improvements.

Representation R2 | Pedestrian Routes — Accessibility for All Users | NPPF Para 115

CONCERN:

There are no identified pedestrian routes between Matlock town centre and Farley Wood that are accessible to wheelchair users or pushchair users. Highways have placed a condition (5) to their assessment that suggests that the applicant provide a public footpath from Matlock to Farley Moor. The nearest alternative route via Sydnope Hill, also without a pedestrian pathway, has been warned against in writing by Tax Farm Caravan Site due to its danger. The A632 'Flying Mile' is widely described as one of Derbyshire's most dangerous roads and also has no pedestrian pathway. The application fails to identify any accessible alternative.

DDTC REQUESTS:

The committee should require the applicant to demonstrate that at least one safe, accessible pedestrian route exists between Farley Wood and Matlock town centre suitable for all users including wheelchair users and families with pushchairs. The Committee must be satisfied that if the applicant indicates it will conform with Highways condition 5, it is fully costed and design approved prior to this providing suitable pedestrian access and accepting the condition as satisfied. Without this, the development fails the test of providing safe and suitable access for all users under NPPF Para 115.

Representation R3 | Cycling Routes — Gradient and Safety | NPPF Para 115

CONCERN:

Farley Lane has gradients of 12–17% and Sydnope Hill has gradients of 20–25%. These are extreme gradients that are beyond the capability of casual or family cyclists and are deemed by locals as too dangerous to cycle. The Transport Assessment does not adequately address whether cycling is a realistic mode of travel for visitors. A development marketed at families would generate negligible cycling activity to and from the site, making visitors entirely car-dependent.

DDTC REQUESTS:

The committee should not accept claims that cycling is a realistic travel mode for this site without independent evidence demonstrating that the gradients and road conditions are genuinely suitable for the range of visitors expected. The applicant should demonstrate how sustainable travel will actually be achieved in practice.

Section 2 — Highway Safety: Public Transport

Representation R4 | Public Transport — Wholly Inadequate Provision | NPPF Paras 115, 116(b)

CONCERN:

The only bus service near Farley Moor is the Service 453 school bus operated by Slacks Coaches, which runs only on school term days. It stops approximately 0.75km from the site entrance at around 08:05 and is not timetabled to serve the needs of holiday visitors. No public pathway exists between the site entrance and the bus stop. There is no regular public bus service serving Farley Moor or the upper part of Farley Lane. A development expecting up to 65,000 visitors annually with no meaningful public transport provision is fundamentally car-dependent.

DDTC REQUESTS:

The committee should require the applicant to demonstrate how genuine public transport access will be provided. Any Travel Plan submitted should be subject to scrutiny and independent review. If no deliverable public transport solution can be demonstrated, the committee should give this significant weight against the proposal.

Representation R5 | On-Site Shuttle — Inadequate Substitute for Public Transport | NPPF Para 116(b)

CONCERN:

The application references an on-site shuttle, but this appears limited to assisting guests with luggage on check-in and check-out days. It is not available to the general public, is not a daily service, and does not serve Matlock town centre or local shops. It does not address the daily mobility needs of guests during their stay and cannot be counted as meaningful public transport provision.

DDTC REQUESTS:

The committee should clarify the exact scope, frequency, routing, and legal basis of any proposed shuttle service, and should satisfy itself that it constitutes genuine sustainable transport provision rather than a token gesture. Any commitment to a shuttle service should be secured by a legally binding condition or Section 106 obligation.

Representation R6 | Section 106 — Sustainable Transport Obligations | NPPF Para 116(b)

CONCERN:

The application makes no binding commitment to fund, extend, or improve local bus services. With 65,000 visitors per year generating substantial private car movements on unsuitable rural lanes, there is a clear planning obligation case for a financial contribution to sustainable transport improvements. The absence of any such commitment is a significant gap in the application.

DDTC REQUESTS:

The committee should require a Section 106 obligation securing a meaningful financial contribution to sustainable transport provision, including bus service improvements, before any permission is granted. The committee should not rely on voluntary commitments in a Travel Plan.

Section 3 — Highway Safety: Routing and Traffic

Representation R7 | Condition 7 — Routing Directive Creates Unresolvable Safety Conflict | NPPF Paras 115, 116(a)

CONCERN:

The Highway Authority's proposed Condition 7 requires that guests travelling to and from Matlock use a right-turn out of the site. This creates a binary choice between two demonstrably dangerous routes: (a) Synhope Hill, which Tax Farm Caravan Site has specifically warned against in writing due to its danger; or (b) the A632 'Flying Mile', which is widely described as one of Derbyshire's most dangerous roads. The condition does not resolve the highway safety problem - it merely formalises it. Satellite navigation users will be instructed to turn left for the quickest and most direct route to Matlock – will the sat nav instruction override the non-compulsory turn signposted?

DDTC REQUESTS:

The committee should require the Highway Authority to formally explain how Condition 7 resolves the highway safety concerns when both available routes have documented safety problems. The committee should not be satisfied by a condition that creates an unresolvable dilemma.

Representation R8 | Delivery and Service Vehicles — HGV Route Not Identified | NPPF Para 115

CONCERN:

Farley Lane is a narrow minor road with restricted width and passing places. The Transport Assessment does not adequately address how Heavy Goods Vehicles delivering to the construction site, and subsequently to the operational development, will safely use Farley Lane or the surrounding road network. Construction traffic alone will be substantial given the scale of the development.

DDTC REQUESTS:

The committee should require a detailed Construction Traffic Management Plan and an Operational Delivery Management Plan, both of which should be independently assessed by the

Highway Authority before any decision is made. These should include specific routing, vehicle size restrictions, and passing place improvements.

Representation R9 | Traffic Modelling — Cumulative and Seasonal Peak Impacts | NPPF Para 116(a)

CONCERN:

The Transport Assessment's traffic modelling appears to use average daily traffic figures rather than seasonal or weekend peak figures. A development with 90%+ claimed occupancy, predominantly in summer and school holidays, will generate concentrated peak traffic that is not adequately reflected in average figures. The narrow road network around Farley Lane has no capacity for peak traffic surges.

DDTC REQUESTS:

The committee should require the applicant to provide traffic modelling based on peak seasonal and weekend figures rather than averages, and should require the Highway Authority to confirm that these peak figures have been tested against the road network capacity.

**** See Appendix 1 ** FORMAL HIGHWAY REPRESENTATIONS FROM DARLEY DALE TOWN COUNCIL sent directly to Highways.**

Section 4 — Hot Tub Wastewater and Chemical Drainage

Representation R10 | Hot Tub Wastewater — Volume Not Adequately Addressed | NPPF Para 180(d)(e); Environment Act 2021

CONCERN:

The application contains no adequate detail on how hot tub wastewater will be managed. Forest Holidays state on their public website that they follow guidance from the British and Irish Spa and Hot Tub Association (BISHTA). BISHTA guidance for commercial rental hot tubs recommends that water is changed between every guest occupancy for hygiene reasons. Forest Holidays operates a bromine-based sanitisation system. Based on the applicant's own occupancy claims of over 90%, and the BISHTA industry-standard practice of refilling hot tubs between stays, the development will generate approximately 7–10.5 million litres of bromine-treated water annually - approximately 25 to 30 times greater than application documents suggest. Bromine is toxic to aquatic life, harms soil microorganisms, and bioaccumulates in wildlife.

DDTC REQUESTS:

The committee should not grant permission without a detailed, independently assessed Wastewater Management Strategy specifically addressing hot tub drainage. This should include confirmed disposal routes, volumes, chemical concentrations, and the method of treatment before any discharge. Vague references to soakaways in a peat-based woodland are wholly insufficient given the ecological sensitivity of the site.

Representation R11 | Hot Tub Drainage — Risk to Peat and Wetland Habitats | NPPF Para 180(d); NPPF Para 186

CONCERN:

Farley Moor contains peat deposits and fragile wetland habitats. Soakaways discharging bromine-treated water in a peat-based environment risk direct chemical contamination of groundwater, wetlands, and watercourses including Bentley Brook. In severe weather events, soakaways can become overwhelmed and discharge untreated chemical effluent directly into the water environment. The applicant has not demonstrated that this risk has been adequately assessed.

DDTC REQUESTS:

The committee should require confirmation from the Environment Agency and Severn Trent Water that the proposed drainage arrangements for hot tub wastewater are acceptable, before any permission is granted. This confirmation should be in writing and placed on the public planning record.

Representation R12 | Biodiversity Net Gain — Hot Tub Chemistry Undermines BNG Claims
| Environment Act 2021; NPPF Para 180(d)

CONCERN:

The applicant claims to deliver the mandatory 10% Biodiversity Net Gain required under the Environment Act 2021. However, the cumulative chemical load from 75 hot tubs draining bromine-treated water into a peat-based woodland setting over 30+ years is not reflected in the BNG assessment. Any BNG metric that does not account for ongoing chemical contamination of soil and groundwater is incomplete and unreliable.

DDTC REQUESTS:

The committee should require the applicant's ecologist to confirm in writing whether hot tub chemical drainage has been factored into the BNG assessment, and if not, to resubmit a revised assessment that accounts for it. The committee should not rely on a BNG assessment that omits this material factor.

Section 5 — Peat, Ecology, and Biodiversity Net Gain

Representation R13 | Peat Integrity — Drainage Impacts Not Adequately Assessed | NPPF Para 186; Environment Act 2021

CONCERN:

Peatlands are irreplaceable habitats under NPPF Para 186. Development resulting in loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. The applicant has not demonstrated that the drainage required for 75 cabins, associated roads, and 249 parking spaces will not cause hydrological changes that permanently damage the peat deposits on Farley Moor. Raised platforms reduce surface disturbance but do not eliminate hydrological risk.

DDTC REQUESTS:

The committee should require an independent specialist peat and hydrology survey that specifically assesses the long-term hydrological impact of the development on peat deposits. The committee should not rely on the applicant's own mitigation claims without independent verification.

Representation R14 | Biodiversity Net Gain — Peat Development Makes 10% BNG Undeliverable | Environment Act 2021; NPPF Para 180(d)

CONCERN:

Achieving mandatory 10% Biodiversity Net Gain on peat-based land is exceptionally difficult because drainage requirements typically destroy the very habitat conditions that make peat ecologically valuable. The applicant's BNG assessment has not been subject to independent scrutiny in relation to the specific challenges of delivering net gain on peat. UK national policy prioritises peatland restoration over development, specifically because of its role in net zero carbon targets.

DDTC REQUESTS:

The committee should require Natural England to confirm in writing whether the submitted BNG assessment is credible in the context of a peat-based woodland setting, before any decision is made. This confirmation should be on the public planning record.

Representation R15 | Tree Felling — Over 1,300 Trees | NPPF Para 180(b); Derbyshire Dales Local Plan Policy PD6

CONCERN:

The development requires the felling of over 1,300 trees. Even with proposed replanting, replacing mature trees with saplings will take decades to restore equivalent ecological value and carbon sequestration. The felling of mature trees in a peat-based woodland setting causes irreversible short to medium-term ecological harm that cannot be adequately compensated by BNG metrics. Derbyshire Dales Local Plan Policy PD6 requires protection of woodland habitats.

DDTC REQUESTS:

The committee should require an independent assessment of the carbon and ecological value of the trees to be felled, and should require the applicant to demonstrate that BNG calculations adequately account for the ecological time-lag between felling mature trees and replacement saplings reaching equivalent maturity.

Section 6 — Flood Risk and Drainage

Representation R16 | Flood Risk — Downstream Impact on Matlock | NPPF Para 167

CONCERN:

Farley Moor sits approximately 150 metres above the River Derwent valley. Water drains southward via Bentley Brook into Matlock town centre. The Bentley Brook catchment is classified as medium to high sensitivity for increased runoff. Storm Babet (2023) demonstrated that rapid surface water flooding from Farley Moor exacerbated downstream flooding in Matlock. Introducing 249 parking spaces, internal roads, cabin footprints, and other impervious surfaces across 140 acres of currently permeable woodland will increase peak runoff volumes and speeds.

DDTC REQUESTS:

The committee should require confirmation from the Lead Local Flood Authority (Derbyshire County Council) and the Environment Agency that the proposed SuDS are sufficient to prevent any increase in peak runoff rates at the point of connection with Bentley Brook, specifically in the context of extreme rainfall events equivalent to Storm Babet. This confirmation should be in writing on the public record.

Representation R17 | SuDS — Effectiveness on Steep Peaty Ground Not Demonstrated | NPPF Para 167

CONCERN:

The applicant proposes Sustainable Drainage Systems to control surface water discharge. However, the effectiveness of SuDS on steep, peaty ground with high rainfall is not adequately demonstrated in the application documents. On gradients of 12–17% with permeable peat soils, attenuation ponds and soakaways may be overwhelmed in extreme events, defeating their purpose. The application does not demonstrate that SuDS will perform adequately in the specific topographical and geological conditions of Farley Moor.

DDTC REQUESTS:

The committee should require an independent hydrological assessment of the proposed SuDS that specifically addresses performance on steep peaty ground during extreme rainfall events. This assessment should be reviewed by the Environment Agency before any decision is made.

Representation R18 | Hot Tub and Chemical Drainage — Interaction with Surface Water | NPPF Para 167; NPPF Para 180(e)

CONCERN:

The application does not address the interaction between hot tub wastewater discharge and the surface water drainage system during periods of heavy rain. If soakaways handling bromine-treated water become saturated and overflow into surface water drains, chemical contamination could reach Bentley Brook and the River Derwent. This risk is not assessed in either the drainage strategy or the ecological impact assessment.

DDTC REQUESTS:

The committee should require the applicant to provide an integrated drainage assessment that addresses the interaction between foul water (including hot tub effluent) and surface water drainage, specifically in the context of extreme rainfall events and the proximity of watercourses.

Section 7 — Landscape, Heritage, and Character

Representation R19 | Landscape Character — Industrialisation of Tranquil Woodland | NPPF Para 174; NPPF Para 182; DDLP Policy PD5

CONCERN:

Farley Moor is a tranquil, valued public woodland on the edge of the Peak District National Landscape. The proposal would introduce 75 cabins, a reception building, shop, cafe, maintenance structures, ranger station, storage, recycling points, archery range, natural play area, 249 parking spaces, and a network of internal roads — equivalent to a small village within 140 acres of public forest. This would fundamentally and irreversibly alter the character, appearance, and tranquility of the woodland. The Fineshade Wood refusal (2015) was explicitly decided on these grounds for a near-identical scheme.

DDTC REQUESTS:

The committee should satisfy itself that the scale and density of the proposed development is compatible with the tranquil woodland character of Farley Moor and its setting on the edge of the Peak District National Landscape. The committee should consider the Fineshade Wood precedent, where East Northamptonshire Council unanimously refused a similar Forest Holidays scheme on exactly these grounds.

Representation R20 | Peak District Setting — Visual and Noise Impact | NPPF Para 182

CONCERN:

Although the application site is outside the Peak District National Park boundary, its proximity means that elevated cabins, lighting, vehicle movements, and visitor noise could be visible and audible from Peak District viewpoints. NPPF Para 182 requires that development in the setting of National Parks avoids and minimises adverse impacts on the designated area. The applicant has not provided a thorough assessment of visual impact from Peak District viewpoints.

DDTC REQUESTS:

The committee should require a visual impact assessment that specifically addresses views from within the Peak District National Park, and should require confirmation from the Peak District National Park Authority that the proposal is acceptable in terms of its impact on the Park's setting, scenic beauty, and tranquility.

Representation R21 | Bronze Age Archaeological Site — Time Team Discovery | NPPF Para 194

CONCERN:

Excavations including work by Time Team have confirmed the presence of a Bronze Age ceremonial site at Farley Wood, including a standing stone and associated features estimated to be approximately 3,700 years old. The applicant claims no direct impact on this heritage asset, but construction groundworks, drainage works, increased visitor pressure, and associated ground disturbance in the vicinity pose a genuine risk to the integrity of this significant and irreplaceable archaeological site.

DDTC REQUESTS:

The committee should require an updated heritage impact assessment specifically addressing the Bronze Age ceremonial site discovered by Time Team, and should require Historic England to confirm in writing that the proposal is acceptable in relation to this heritage asset before any decision is made.

Section 8 — Market Saturation and Economic Impact

Representation R22 | Market Saturation — Darwin Forest Proximity | Derbyshire Dales Local Plan — Tourism Policies

CONCERN:

Darwin Forest Country Park, located approximately one mile from the application site, offers 137 high-quality luxury lodges with hot tubs in a comparable woodland setting, together with a swimming pool, gym, restaurant, spa, and extensive facilities. It employs over 200 local people. The applicant has not provided evidence of unmet demand for this type of accommodation in the Matlock area that would justify adding a further 75 luxury woodland lodges in direct proximity to an established competitor.

DDTC REQUESTS:

The committee should require the applicant to provide evidence of unmet demand for luxury woodland cabin accommodation specifically in the Matlock catchment area, demonstrating that the proposed development would not simply displace trade from Darwin Forest and other existing providers, with associated risk to existing local employment.

Representation R23 | Economic Impact — Risk to Local Employment | Derbyshire Dales Local Plan — Economic Policies

CONCERN:

Darwin Forest employs over 200 local people and supports the Matlock catchment economy. A self-contained Forest Holidays site with on-site shop, cafe, and facilities would compete directly for the same visitor market while retaining visitor spend within the site rather than dispersing it to Matlock town centre. The inaccessibility of Matlock on foot or by bicycle means that the economic benefits to the wider local economy are likely to be significantly overstated in the application.

DDTC REQUESTS:

The committee should require an independent economic impact assessment that models the net employment and visitor spending effects, specifically accounting for trade displacement from Darwin Forest and the limited economic benefit to Matlock town centre given the site's inaccessibility without a private car.

Representation R24 | Inappropriate Commercialisation of Public Forest Land | Derbyshire Dales Local Plan; NPPF Para 174

CONCERN:

Farley Moor is managed by Forestry England for public benefit, with management plans historically emphasising informal, low-impact recreation. The proposed commercial development would restrict public access within parts of the site, introduce fenced and exclusionary elements, and prioritise private commercial profit over the public enjoyment of an open natural space that is currently freely accessible to all residents and visitors.

DDTC REQUESTS:

The committee should require Forestry England to confirm in writing the extent to which public access rights will be retained or reduced across the 140 acres affected by the development, and should satisfy itself that the commercialisation of this public forest land is consistent with Forestry England's statutory duties and the public interest.

Section 9 — Wildfire, Infrastructure, and Cumulative Impact

Representation R25 | Wildfire Risk — Peat Woodland Setting | National Fire Risk Guidance; NPPF Para 174

CONCERN:

The combination of peat deposits, woodland, and intensive visitor activity creates a significant wildfire risk, particularly during extended dry periods which are becoming more frequent. Disposable and single-use BBQs are cited in the high-profile Wareham Forest wildfire (2020) and numerous other incidents across England. Visitors confined to a small woodland site, with limited access to off-site facilities, are likely to use BBQs as a recreational activity. A wildfire on peat would be exceptionally difficult to extinguish and could cause irreversible damage far beyond the site boundary.

DDTC REQUESTS:

The committee should require a detailed Wildfire Risk Assessment and Emergency Response Plan, prepared in consultation with Derbyshire Fire and Rescue Service, before any permission is granted. This should specifically address the risks from visitor-lit fires on peat-based land and should include enforceable conditions prohibiting BBQs and open fires across the entire woodland.

Representation R26 | Infrastructure — Cumulative Ecological Impact of Associated Facilities | NPPF Para 180(d)(e); Environment Act 2021

CONCERN:

The 249-space car park, internal road network, reception building, shop, cafe, maintenance structures, ranger station, and recycling points represent a substantial infrastructure footprint beyond the cabin structures themselves. Each element contributes to habitat loss, fragmentation, impervious surface area, light pollution, noise pollution, and hydrological disruption. The cumulative ecological impact of all these elements together has not been adequately assessed as an integrated whole.

DDTC REQUESTS:

The committee should require the applicant to provide a cumulative impact assessment that considers the ecological effect of all infrastructure elements together, not merely the cabin structures in isolation. This assessment should be independently reviewed by Natural England.

Representation R27 | Light Pollution — Nocturnal Wildlife Impacts | NPPF Para 180(d)

CONCERN:

The application proposes artificial lighting across 140 acres of currently unlit woodland, including cabin lighting, road and path lighting, car park lighting, and facility building lighting. Farley Moor currently functions as a dark woodland habitat supporting nocturnal and crepuscular species including bats, owls, and other wildlife. The ecological impact assessment does not adequately address the cumulative effect of introducing artificial lighting at this scale into a currently dark habitat.

DDTC REQUESTS:

The committee should require a detailed Artificial Light Impact Assessment prepared in accordance with the Bat Conservation Trust and Institute of Lighting Professionals guidance, reviewed by Natural England, before any permission is granted.

Section 10 — Statutory Consultees and Overall Objection

Representation R28 | Severn Trent Water — Foul Water Capacity Not Confirmed | NPPF Para 180(e)

CONCERN:

The application does not contain written confirmation from Severn Trent Water that the existing sewerage infrastructure in the Matlock area has sufficient capacity to accommodate the additional foul water load generated by 75 occupied cabins with hot tubs. Farley Lane and its surrounding network are rural infrastructure not designed for the scale of development proposed.

DDTC REQUESTS:

The committee should require written confirmation from Severn Trent Water that foul water capacity is available and that no improvements to the public sewerage network will be required at public expense before any permission is granted.

Representation R29 | Natural England — Outstanding Statutory Consultee Concerns | Environment Act 2021; NPPF Para 180

CONCERN:

Darley Dale Town Council is not aware that Natural England has confirmed in writing that it is fully satisfied with the applicant's biodiversity and ecological impact assessments in the context of a peat-based woodland setting. Natural England is a statutory consultee whose views carry significant weight. Any unresolved concerns from Natural England should be resolved before the committee makes a decision.

DDTC REQUESTS:

The committee should confirm that Natural England has provided a final, unequivocal response confirming it is satisfied with the ecological and BNG submissions, and should not grant permission if any Natural England concerns remain outstanding or qualified.

Representation R30 | Overall — Formal Objection to Grant of Permission | NPPF; Derbyshire Dales Local Plan

CONCERN:

Darley Dale Town Council formally objects to planning application 24/00665/FUL. The representations above identify material planning considerations across highway safety, pedestrian accessibility, sustainable transport, hot tub wastewater, peat and wetland ecology, biodiversity net gain, flood risk, landscape character, heritage, market saturation, wildfire risk, and infrastructure impacts. Individually, each raises serious concerns. Cumulatively, they demonstrate that the application fails to satisfy the planning policy framework at national and local level.

DDTC REQUESTS:

Darley Dale Town Council respectfully urges the Planning Committee to REFUSE planning application 24/00665/FUL. The Council considers that the application is premature, that material planning concerns have not been adequately addressed, and that the public interest in retaining Farley Moor as a freely accessible public woodland outweighs the applicant's claimed economic benefits.

Section 10 — Planning policy Breaches

****See Appendix 2**.** The attached document sets out the local and national planning policies that the proposed development is considered to breach, together with brief reasons.

Summary of DDTC Position

Darley Dale Town Council formally objects to planning application 24/00665/FUL on the grounds set out in the 30 representations above, covering highway safety, sustainable transport, ecological harm, flood risk, landscape character, heritage, market saturation, wildfire risk, and cumulative infrastructure impact.

DDTC urges the Planning Committee to **REFUSE** the application. If minded to approve, the committee should satisfy itself that every material concern identified in these representations has been fully resolved before any permission is issued.

Darley Dale Town Council

Planning Committee

12 June 2026

Darley Dale Town Council The Whitworth, Station Road, Darley Dale, Derbyshire, DE4 2EQ

To: Steve Dudhill, Highways Development Management
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Derbyshire County Council, County Hall, Matlock, Derbyshire DE4 3AG

Email: jeff.hernandez@derbyshire.gov.uk / steve.dudhill@derbyshire.gov.uk

Date: 3rd June 2026

Our ref: DDTC/24-00665/FH-HWY-1

Your refs: DDDC/2024/009227 (2 September 2024) | DDDC/2025/009227/R1 (1 August 2025)

PLANNING APPLICATION 24/00665/FUL — PROPOSED 75-CABIN HOLIDAY DEVELOPMENT, FARLEY MOOR, FARLEY LANE, FARLEY, DERBYSHIRE

FORMAL HIGHWAY REPRESENTATIONS FROM DARLEY DALE TOWN COUNCIL

1. Introduction

Darley Dale Town Council (DDTC) writes as a statutory consultee in respect of planning application 24/00665/FUL, submitted by Forest Holidays in partnership with Forestry England, for the proposed creation of 75 timber holiday cabins with associated facilities at Farley Moor, Farley Lane, Farley, Derbyshire.

DDTC has carefully reviewed both Highway Authority consultation responses submitted by Derbyshire County Council:

- First response: Jeff Hernandez, 2 September 2024 (ref: DDDC/2024/009227)
- Second response: Steve Dudhill, 1 August 2025 (ref: DDDC/2025/009227/R1)

DDTC strongly objects to this application on highway safety grounds.

This letter sets out DDTC's formal representations on all highway matters and requests that the Highway Authority provides written responses to the specific questions raised. Those responses will form part of the evidence base considered by Derbyshire Dales District Council's Planning Committee at its meeting of 30 June 2026.

DDTC draws the Highway Authority's attention at the outset to two admissions in the Authority's own documents that are of fundamental importance.

ADMISSION 1 — Highway Authority second response, 1 August 2025:

"Farley Lane lacks pedestrian facilities. Section 7.2 of the applicant's Transport Assessment confirms that Farley Lane is not suitable for pedestrians."

ADMISSION 2 — Highway Authority second response, 1 August 2025:

"Para 6.5.3 of the [applicant's] Transport Assessment identified concerns relating to the use of Farley Lane as a vehicular route between the site and Matlock."

These are not objectors' claims. They are the Highway Authority's own words, based on the applicant's own Transport Assessment. The primary access road to this development has been confirmed by both the Highway Authority and the applicant to be unsuitable for pedestrians and to raise vehicular safety concerns. Yet the Highway Authority recommends no objection. DDTC submits that this position is not consistent with NPPF Paragraphs 115 and 116 of the December 2024 NPPF, which require safe and suitable access for all users and give priority to pedestrian and cycle movements.

2. Pedestrian Safety on Farley Lane and Sydnop Hill

Farley Lane is an unlit, narrow, winding minor road subject to the national speed limit. It has no pavements, no footways, poor camber, blind bends, and known flooding and icing in autumn and winter. Sydnop Hill, the only other approach road, shares these characteristics but with steeper gradients of 20–25%. The Highway Authority and the applicant have both confirmed that Farley Lane is not suitable for pedestrians.

Despite this, the Highway Authority's first response (September 2024) contained no assessment of pedestrian safety on either road. The second response (August 2025) acknowledges the pedestrian problem but proposes only a planning condition requiring unspecified improvements to off-road routes through Farley Wood.

DDTC submits this is wholly inadequate for the reasons set out below.

2.1 The known pedestrian routes; Farley Moor to Matlock - what actually exists

DDTC has investigated the pedestrian routes between Matlock and Farley Wood that the applicant and Highway Authority appear to rely upon in Condition 5. Three potential routes exist:

Route 1 — Farley Hill / Hurd's Hollow (road route)

- Confirmed by the applicant's own Transport Assessment (Section 7.2) as not suitable for pedestrians
- No pavement or footway of any kind
- Gradient of 12–17% — at the upper limit of what is recommended even for dedicated accessible paths
- No dropped kerbs, no refuges, no lighting
- National speed limit applies throughout
- Verdict: Wholly unsuitable for any pedestrian use

Route 2 — Woodland footpath via Hurker Wood (the off-road route)

- An unsurfaced, unlit woodland footpath on a soft needled forest floor
- Published walking guides specifically advise visitors to bring wellington boots as the path becomes muddy after rainfall
- Involves a steep ascent from Matlock — walking guides describe it as 'quite steep' with a rest bench provided halfway up
- No lighting, no surfacing, no drainage infrastructure, no accessibility provision
- Impassable for wheelchair users in virtually all conditions — wheels sink into soft or muddy ground
- Impassable for pushchairs in anything other than unusually dry conditions
- Unsuitable for young children on foot in wet weather
- Verdict: Not a usable pedestrian route for the majority of Forest Holidays guests in the majority of weather conditions

Route 3 — Via Old Hackney Lane and farm tracks

- Partial road, partial unsurfaced farm track route
- Unlit throughout and unsurfaced in sections
- Steep gradient with known blind bends — described as requiring caution even for cyclists
- Verdict: Wholly unsuitable for pedestrians, wheelchair users or pushchairs

In summary: there are no formal, surfaced, lit, or accessible pedestrian routes between Matlock town centre and Farley Wood. What exists is a combination of dangerous road walking and unsurfaced woodland footpaths suitable only for fit adults in dry weather.

Not one of these routes is accessible to wheelchair users, powered mobility scooter users, or families with pushchairs under any conditions.

2.2 The off-road route is not a usable alternative for most visitors

The footpath through Hurker Wood is an enjoyable recreational walk for fit adults in good weather. It is categorically not a usable daily pedestrian connection for holiday guests needing to reach shops, a pub, a restaurant or a bus stop. Derbyshire experiences significant rainfall throughout the year. For a large proportion of the year, the off-road route is not passable without wellington boots — an item most holiday guests will not bring, and which provides no meaningful pedestrian mobility in any case.

2.3 Condition 5 is entirely undefined

Condition 5 requires a scheme to be submitted and approved but specifies no minimum standard — no lighting level, no surface specification, no maximum gradient, and no accessibility standard. The Planning Committee has no means of assessing whether any eventual scheme will be adequate. Approving a development on the basis of an undefined future condition for a fundamental safety issue is not sound planning practice.

DDTC raises the following formal questions on pedestrian safety:

Q1

The applicant’s own Transport Assessment (Section 7.2) confirms that Farley Lane is not suitable for pedestrians. NPPF Paragraph 115 (December 2024) requires that safe and suitable access to the site can be achieved for all users, and Paragraph 116(a) requires priority to be given to pedestrian and cycle movements. Given this admission, how does the applicant demonstrate compliance with NPPF Paragraphs 115 and 116 for pedestrian users of this development?

Q2

The proposed development expects up to 65,000 visitors per year. Farley Lane is confirmed as unsuitable for pedestrians. Sydnope Hill has a gradient of 20–25% and is also unlit with no pavement. There are no public rights of way within Farley Wood. In practical terms, how do guests without a car travel safely to and from this site to reach local services, shops or public transport on any day other than arrival and departure day?

Q3

Forest Holidays market their sites to families, older people, people with mobility difficulties and families with young children. These guests cannot safely leave the site on foot given the confirmed absence of safe pedestrian access on Farley Lane. Does the applicant accept that the development is, in practice, car-dependent for all off-site movement? If so, how does this comply with NPPF Paragraphs 115 and 116 (December 2024) and the Manual for Streets requirement to prioritise people and place over vehicle movement?

Q4

Condition 5 requires the applicant to submit a scheme for signage and physical improvements to off-road pedestrian routes between the site and Matlock. DDTC has researched the known routes between Matlock and Farley Wood. The only off-road option is a woodland footpath through Hurker Wood — an unsurfaced, unlit path on a soft needled forest floor which published walking

guides describe as muddy after rainfall and requiring wellington boots. Please confirm: (a) whether this is the route referred to in Condition 5; (b) the current surface type, width, gradient and lighting provision on this route; and (c) the minimum standard of improvement — including surface specification, lighting, drainage, maximum gradient and accessibility provision — that the Highway Authority will require before approving the scheme.

Q5

The woodland footpath through Hurker Wood involves a steep ascent from Matlock that published walking guides describe as requiring a rest bench halfway up. It is unsurfaced, unlit, and muddy in wet weather. It is impassable for wheelchair users and pushchairs in virtually all conditions, and unsuitable for young children on foot in wet weather. Is this route genuinely usable by the majority of Forest Holidays guests as a practical pedestrian alternative to Farley Lane? If not, what alternative pedestrian route does the applicant propose, and what are its costs to make it safe and usable for all users, and timescales for delivery?

Q6

Condition 5 as drafted specifies no minimum standard of improvement — no lighting level, no surface specification, no maximum gradient, and no accessibility standard. Without these specifications the Planning Committee has no means of assessing whether the eventual scheme will be adequate. Will the Highway Authority commit to minimum standards in writing before the committee determines the application, so that the committee can properly assess whether the condition amounts to adequate mitigation?

3. Accessibility for Disabled Visitors and Families with Pushchairs

NPPF Paragraph 116(b) (December 2024) requires that applications for development address the needs of people with disabilities and reduced mobility in relation to all modes of transport. This is a specific legal requirement, not a discretionary consideration.

DDTC submits that none of the known pedestrian routes between Matlock and Farley Wood meets even the most basic accessibility standard:

- Route 1 (Farley Hill road): Confirmed unsuitable for pedestrians by the applicant's own Transport Assessment. No pavement, no dropped kerbs, national speed limit, 12–17% gradient. Dangerous for wheelchair users and completely impassable for powered mobility scooters.
- Route 2 (Hurker Wood footpath): Unsurfaced, unlit, muddy in wet weather, steep ascent. Impassable for wheelchairs in virtually all conditions. Impassable for pushchairs except in unusually dry weather. Unsuitable for young children on foot in wet conditions.
- Route 3 (Old Hackney Lane): Partly unsurfaced, steep, unlit with blind bends. Wholly unsuitable for wheelchair users or pushchairs.

A gradient of 12% is already at the upper limit recommended for dedicated wheelchair-accessible paths **on smooth, surfaced terrain** — not unlit roads shared with national-speed-limit traffic or unsurfaced woodland paths. The Equality Act 2010 places a duty on service providers, which Forest Holidays would be, to make reasonable adjustments to ensure disabled people are not placed at a substantial disadvantage. A development that provides no accessible pedestrian route to or from the nearest town for wheelchair users is in direct tension with this duty.

Creating a genuinely accessible pedestrian route between Matlock and Farley Wood would require a fully surfaced, properly graded, lit and drained path of significant length, built to required standards — an engineering undertaking of considerable cost and potential ecological impact through the very woodland the applicant claims to be protecting.

DDTC raises the following formal question on accessibility:

Q7 NPPF Paragraph 116(b) (December 2024) requires that applications address the needs of people with disabilities and reduced mobility in relation to all modes of transport. None of the known pedestrian routes between Matlock and Farley Wood is accessible to wheelchair users, powered mobility scooter users, or families with pushchairs. Please confirm: (a) what accessible pedestrian route to Matlock is proposed for disabled guests and families with pushchairs; (b) what engineering works are required to create one; (c) whether those works have been costed; and (d) whether the applicant has committed to funding and completing them in full prior to occupancy as a condition of permission.

4. Cyclist Safety

Neither Highway Authority response contains any assessment of cyclist safety on Farley Lane or Sydnoppe Hill. The outline Travel Plan mentions electric cycle hire as a sustainable travel measure. However, Farley Lane has gradients of 12–17% and Sydnoppe Hill 20–25%, both unlit and without cycle lanes or any separate cycling infrastructure. DDTC submits that safe cycling on these routes is not a realistic option for the majority of leisure visitors, including families, and that providing cycle storage at the site without safe cycling routes serves no meaningful sustainable transport purpose.

Q8 Neither Highway Authority response assesses cyclist safety on Farley Lane or Sydnoppe Hill. Please confirm: (a) whether a cycle safety assessment of these routes has been carried out; and (b) what specific physical highway improvements are proposed to make cycling a safe and realistic option for guests on roads with gradients of 12–25%, no lighting, no cycle lanes, and a national speed limit.

Q9 Condition 4 proposes secure cycle storage and equipment facilities at the site. What is the practical value of cycle facilities at a site from which no safe cycling route to any service, shop or public transport stop exists? Please explain how Condition 4 contributes to safe sustainable travel in the context of these road conditions.

5. Horse Rider Safety

Farley Lane and the surrounding roads are regularly used by horse riders. Neither Highway Authority response contains any assessment of the impact of significantly increased vehicle movements on horse rider safety. Horse riders are lawful users of these roads and are among the most vulnerable road users in any traffic environment.

Q10 Neither Highway Authority response assesses the impact of this development on horse rider safety on Farley Lane or Sydnoppe Hill. Please confirm: (a) whether such an assessment has been carried out; and (b) what mitigation is proposed for horse riders who currently use these roads and will face a significant increase in vehicle movements if this development is approved.

6. The Five-Year Collision Data — A Flawed Baseline

The September 2024 Highway Authority response places significant weight on five years of personal injury collision data, concluding there are no existing or historical highway safety issues on the adjacent network that would be exacerbated by the proposed development. DDTC respectfully but firmly challenges this conclusion.

Farley Lane and Sydnop Hill currently carry very low pedestrian, cyclist and horse rider traffic. Local residents and users of Farley Moor already consider these roads unsafe for non-motorised use and largely avoid them. The near-absence of recorded pedestrian injury accidents on Farley Lane is therefore not evidence of safety — it is evidence that almost nobody currently walks or cycles along it.

The proposed development would introduce up to 65,000 visitors per year to a site that cannot currently be reached safely on foot or by bicycle. The collision data baseline — drawn from a period of very low non-motorised use — is not a reliable predictor of post-development safety. This argument has been accepted by Planning Inspectors in comparable appeal decisions, including the Beamish Area Holiday Lodges appeal (APP/X1355/W/23/3323086, Inspector Wraight, 13 October 2023), where poor sustainable transport links and highway safety on minor rural roads were decisive factors in dismissing a similar scheme.

Q11

The five-year collision data reflects a period when Farley Lane and Sydnop Hill carried very low pedestrian and cyclist traffic, as local residents already consider these roads unsafe for non-motorised use. Has the Highway Authority carried out any modelling of predicted pedestrian, cyclist and horse rider movements on these roads post-development, accounting for up to 65,000 visitors per year? If so, please provide the results. If not, please explain why not, and on what basis the collision data alone is considered an adequate assessment of post-development safety for non-motorised users.

7. Proposed Vehicle Routing — Condition 7 Creates an Unacceptable No-Win Situation

The August 2025 Highway Authority response proposes Condition 7, directing all vehicles leaving the site to turn right onto Farley Lane heading north, specifically to avoid the dangerous Farley Hill descent and the Smedley Street junction. DDTC draws the Highway Authority's attention to the fact that this condition does not resolve the vehicle safety problem — it relocates it, leaving visitors with no safe primary route to Matlock or other local services.

Vehicles turning right from the site have two realistic onward options:

7.1 Option A — Via Sydnop Hill (B5057)

Turning right from Farley Lane and continuing north brings vehicles to Sydnop Hill, a descent of 20–25% gradient into Two Dales that is narrow and winding. This route is so well recognised locally as dangerous that at least one nearby business — Tax Farm Caravan Site, operating in the same immediate area — explicitly warns its own customers in writing: "DO NOT GO DOWN SYDNOPE HILL. It is not advised to approach via Two Dales and Sydnop Hill." The Highway Authority is effectively proposing to direct 65,000 annual visitors onto a route that local operators already flag in writing as dangerous.

7.2 Option B — Via Jagers Lane and the A632 Chesterfield Road

The alternative northward route proceeds via Jagers Lane to the A632 Chesterfield Road — a significantly longer detour. The A632 between Matlock and Chesterfield is locally known as the "Flying Mile" and has been publicly described as one of the most dangerous stretches of road in Derbyshire, with calls from elected

representatives for average speed cameras to reduce speeds and prevent serious accidents. Routing 65,000 annual visitors via this road does not constitute a safe alternative.

7.3 Option C — Ignoring the signage

In practice, many visitors using satellite navigation will ignore the right-turn signage and turn left towards Matlock via Farley Hill regardless — which is precisely the dangerous route the Highway Authority seeks to prevent. Signage alone cannot enforce routing compliance, particularly for visitors unfamiliar with the area and relying on navigation devices that may direct them downhill towards Matlock.

The result is a no-win situation that the two Highway Authority responses do not acknowledge:

- Turn left → Farley Hill at 12–17% gradient and dangerous Smedley Street junction — so dangerous the Highway Authority seeks to prevent it via Condition 7
- Turn right, via Sydnoppe Hill → 20–25% gradient, locally warned against in writing by nearby businesses
- Turn right, via A632 → lengthy detour including a road described as one of the most dangerous in Derbyshire
- Ignore signage → visitors use Farley Hill anyway, defeating the purpose of the condition entirely

DDTC submits that there is no safe primary vehicle route to or from this site and that Condition 7 does not create one. It simply redirects traffic between dangerous alternatives.

Q12 Condition 7 directs all vehicles leaving the site to turn right onto Farley Lane to avoid Farley Hill and the Smedley Street junction. Vehicles turning right have two onward options: (a) via Sydnoppe Hill — a 20–25% gradient descent that a local business in the immediate area explicitly warns its customers not to use; or (b) via Jaggars Lane and the A632 — a road publicly described as one of the most dangerous in Derbyshire. Please confirm which onward route the Highway Authority considers acceptable for 65,000 annual visitors, what safety assessment has been carried out on that route, and what physical highway improvements are proposed to make it safe for this volume of traffic.

Q13 The Highway Authority's own second response (paragraph 6.5.3 of the Transport Assessment) identifies concerns about the use of Farley Lane as a vehicular route between the site and Matlock. Given that Farley Hill is considered too dangerous to use, Sydnoppe Hill is locally recognised as dangerous, and the A632 is one of the most dangerous roads in Derbyshire: is there a safe primary vehicle route to and from this site? If so, please identify it and confirm what safety assessment supports that conclusion.

Q14 Condition 7 relies on signage to enforce the right-turn requirement. Many visitors will use satellite navigation devices that may direct them via the shortest route — downhill on Farley Hill towards Matlock — regardless of site signage. What enforcement mechanism beyond signage does the applicant propose to ensure compliance with Condition 7, and what evidence is there that signage alone is effective in comparable rural tourism settings?

8. The Travel Plan — Undefined and Incomplete

The August 2025 Highway Authority response confirms that the outline Travel Plan submitted by the applicant (dated June 2024) was drafted before the December 2024 NPPF, is incomplete, has not been reviewed by specialist colleagues, and requires further work before it satisfies the Highway Authority's requirements. The Planning Committee is therefore being asked to determine an application whose sustainable travel arrangements are undefined.

DDTC submits that a finalised, publicly available, NPPF-compliant Travel Plan is a material consideration that the Planning Committee cannot properly assess without seeing. Leaving this to a post-permission condition — in circumstances where the primary access road is already confirmed as unsuitable for pedestrians, no accessible route for disabled visitors exists, and no safe cycling route has been assessed — is not an adequate safeguard.

Q15

The outline Travel Plan was drafted before the December 2024 NPPF, is confirmed as incomplete by the Highway Authority, and has not been reviewed by specialist colleagues. The Planning Committee is being asked to determine an application whose sustainable travel arrangements are still undefined. Should the application be deferred until a finalised, NPPF-compliant Travel Plan has been submitted, made available for public comment, and approved by the Highway Authority — rather than leaving this fundamental matter to a post-permission condition?

Q16

The outline Travel Plan mentions electric cycle hire as a sustainable travel measure. Given that the approach roads have gradients of 12–25%, no lighting, no cycle lanes, and the Highway Authority has not assessed whether cycling on these roads is safe: on what basis is electric cycle hire included as a meaningful sustainable travel measure? Please confirm what safety assessment underpins this proposal.

9. Overall NPPF Compliance

Taking the two Highway Authority responses together, DDTC submits the following material facts are now established on the evidence:

1. The applicant's own Transport Assessment confirms Farley Lane is not suitable for pedestrians.
2. The Highway Authority accepts this finding.
3. No assessment of cyclist or horse rider safety has been carried out on Farley Lane or Sydnope Hill.
4. The Travel Plan is incomplete and undefined.
5. The only pedestrian mitigation proposed is a condition of unspecified standard for improvements to an unsurfaced, unlit woodland path that is muddy in wet weather and requires wellington boots.
6. Not one of the known pedestrian routes between Matlock and Farley Wood is accessible to wheelchair users, powered mobility scooter users, or families with pushchairs.
7. There is no safe primary vehicle route from the site to Matlock — Farley Hill, Sydnope Hill and the A632 all carry significant safety concerns identified in the Highway Authority's own responses or on the public record.
8. Signage alone cannot enforce vehicle routing compliance.

NPPF Paragraph 115 requires that safe and suitable access to the site can be achieved for all users. NPPF Paragraph 116(a) requires priority to be given to pedestrian and cycle movements. NPPF Paragraph 116(b) requires the needs of people with disabilities and reduced mobility to be addressed. NPPF Paragraph 120 requires refusal where there would be an unacceptable impact on highway safety or severe residual cumulative impacts on the road network. DDTC submits that none of these tests is met.

Q17

Taking all the above matters together — the confirmed unsuitability of Farley Lane for pedestrians, the complete absence of any accessible pedestrian route for disabled visitors or pushchair users, the absence of any assessment of cyclist and horse rider safety, the undefined Travel Plan, the inadequate and undefined off-road pedestrian condition, and the absence of a safe primary vehicle route to the site — please confirm specifically how the development complies with NPPF Paragraphs 115, 116(a), 116(b) and 120 (December 2024).

10. Conclusion and Request for Written Response

Darley Dale Town Council strongly objects to planning application 24/00665/FUL on highway safety grounds. The Highway Authority's two consultation responses, read together with the applicant's own Transport Assessment, reveal a development that cannot provide safe access for pedestrians, has no accessible route whatsoever for disabled visitors or families with pushchairs, has not been assessed for cyclist or horse rider safety, has undefined sustainable travel arrangements, and has no safe primary vehicle route to local services.

DDTC formally requests that the Highway Authority provides written responses to each of the seventeen questions raised in this letter. Those responses should be submitted to Derbyshire Dales District Council's planning department and made available on the public planning register before the application is determined by the Planning Committee on 30 June 2026.

DDTC further requests that the Planning Committee is advised that, in DDTC's submission, the application cannot comply with NPPF Paragraphs 115, 116 and 120 (December 2024) without:

- A full non-motorised user safety assessment covering pedestrians, cyclists and horse riders on Farley Lane, Sydnop Hill and all onward vehicle routes;
- A fully costed, deliverable accessible pedestrian route between the site and Matlock that is usable by wheelchair users, pushchair users and people with mobility difficulties in all weather conditions;
- A finalised, NPPF-compliant Travel Plan, reviewed by specialist colleagues and available for public scrutiny before determination;
- A Condition 5 pedestrian route scheme with defined minimum standards of surface, lighting, gradient and accessibility;
- A full vehicle route safety assessment demonstrating that at least one safe primary route to Matlock and local services exists for the development's visitors and staff.

In the absence of these matters being satisfactorily resolved, DDTC urges the Planning Committee to refuse application 24/00665/FUL on the grounds that safe and suitable access for all users — as required by NPPF Paragraphs 115 and 116 (December 2024) — has not been demonstrated.

Darley Dale Town Council would welcome the opportunity to discuss these representations further and is available to attend any site visit or meeting arranged by the Highway Authority or the Planning Committee.

Yours sincerely,

Cllr David Chapman Planning Committee Member

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RELEVANT POLICY REFERENCES

NPPF Paragraph 115 (December 2024): Requires that sustainable transport modes are prioritised and that safe and suitable access to the site can be achieved for all users.

NPPF Paragraph 116(a) (December 2024): Requires applications to give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, and to create places that are safe, secure and attractive, minimising the scope for conflicts between pedestrians, cyclists and vehicles.

NPPF Paragraph 116(b) (December 2024): Requires that applications address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

NPPF Paragraph 120 (December 2024): Development should only be prevented or refused on transport grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network following mitigation would be severe, taking into account all reasonable future scenarios.

Equality Act 2010: Places a duty on service providers to make reasonable adjustments to ensure disabled people are not placed at a substantial disadvantage.

Manual for Streets (DfT, 2007): Highway authorities are expected to shift the focus of street design from prioritising traffic movement to prioritising people and place.

Beamish Area Holiday Lodges Appeal (APP/X1355/W/23/3323086, Inspector Wraight, 13 October 2023): Appeal dismissed on grounds including poor sustainable transport links and highway safety on minor rural roads — a directly comparable precedent.

Applicant's Transport Assessment, Section 7.2: Confirms Farley Lane is not suitable for pedestrians.

Applicant's Transport Assessment, Section 6.5.3: Identifies concerns about Farley Lane as a vehicular route between the site and Matlock.

Planning Policy Breaches: Application 24/00665/FUL

Forest Holidays — Proposed 75-Cabin Development, Farley Moor, Matlock, Derbyshire

The following table sets out the local and national planning policies that the proposed development is considered to breach, together with brief reasons. References are to the Derbyshire Dales Local Plan (2017), the National Planning Policy Framework (December 2024), and the Environment Act 2021. This table is intended to support written objections and verbal representations to the Planning Committee.

Policy Reference	Policy Summary	Why the Application is in Breach
DERBYSHIRE DALES LOCAL PLAN (2017)		
Policy PD3 – Biodiversity and the Natural Environment	Requires development to protect and enhance biodiversity, avoid harm to habitats and species, and deliver measurable net gains. Development causing unacceptable harm to ecological networks must be refused.	The proposal involves felling over 1,300 trees, draining fragile peatland and wetland habitats, and introducing impervious surfaces across approximately 140 acres of biodiverse woodland. The volume and chemical content of hot tub drainage — potentially 7–10.5 million litres of bromine-treated water annually — poses a serious risk to soil ecology, groundwater and wetland species, undermining any credible claim of biodiversity net gain.
Policy PD5 – Landscape Character	Requires development to respect and enhance the intrinsic character of the local landscape. Development that causes significant harm to landscape character, tranquillity or visual amenity will be refused.	Introducing 75 cabins, central facilities, a 249-space car park, internal roads, lighting and visitor activity across a tranquil public woodland would fundamentally industrialise the site's character. The scale and density — the highest of any Forest Holidays location — is wholly incompatible with the quiet, natural moorland setting on the edge of the Peak District.
Policy PD6 – Trees, Hedgerows and Woodlands	Requires that development protects trees and woodland of amenity, ecological and landscape value. Development requiring the felling of significant trees or damaging root protection areas will be refused unless exceptional circumstances are demonstrated.	The application proposes felling over 1,300 trees to accommodate cabins, roads and infrastructure. There are no wholly exceptional circumstances to justify this loss in what is a commercial holiday development. Proposed replanting with saplings cannot replace the ecological value of mature trees for decades.
Policy S1 – Sustainable Development	Requires development to achieve sustainable development across economic, social and environmental objectives. Development that conflicts with environmental objectives or causes irreversible harm to natural assets is not considered sustainable.	Draining peat deposits — an irreplaceable carbon store and habitat — to accommodate a commercial development conflicts directly with the environmental dimension of sustainable development. The risk of permanently damaging wetland and peat habitats, and of increasing downstream flood risk in Matlock, cannot be reconciled with sustainable development principles.
Policy EC7 – Tourism Development	Supports tourism development that is of an appropriate scale and type, does not cause unacceptable harm to the environment, and demonstrates a genuine need that cannot be met by existing provision.	Darwin Forest Country Park, approximately one mile away, already provides 137 comparable luxury lodges with hot tubs and superior facilities. No demonstrated need for additional large-scale provision has been established. The proximity creates a clear risk of market saturation, potential harm to an established local employer of over 200 people, and the over-development of a sensitive natural site without justification.
NATIONAL PLANNING POLICY FRAMEWORK (NPPF, December 2024)		
Paragraph 110 – Sustainable Transport: Safe Access	Requires that applications for development ensure safe and suitable access to the site for all users, including pedestrians, cyclists and those with limited mobility.	Farley Lane is a narrow, unlit, winding minor road with no footpaths, poor camber, a steep gradient and known flooding and icing. With up to 65,000 visitors per year, no meaningful public transport, and hills of 12–25% gradient making cycling dangerous, the development cannot provide safe access for all users. The private on-site shuttle is limited to check-in and check-out days only and does not address day-to-day mobility needs.
Paragraph 116 – Sustainable	States that development should only be refused on highway grounds where there is an unacceptable impact on	The cumulative impact of hundreds of additional daily vehicle movements on Farley Lane and Sydnope Hill — both narrow, unlit, unpaved rural roads — represents a

Policy Reference	Policy Summary	Why the Application is in Breach
Transport: Highway Safety	highway safety or severe residual cumulative impacts on the road network that cannot be mitigated.	severe and unacceptable safety risk to existing pedestrians, horse riders, cyclists and residents. Appeal decisions in comparable cases (including Hazelfield Cottage, Darlington, and the Beamish appeal) have dismissed similar schemes on these grounds.
Paragraph 167 – Flood Risk	Requires that development does not increase flood risk elsewhere and that a robust Flood Risk Assessment is submitted for sites where drainage or surface water impacts are a concern.	Farley Moor sits on a steep catchment draining directly into Bentley Brook and the River Derwent in Matlock town centre, a known flood-risk area. Severn Trent Water has already formally rated the Matlock sewer network as Amber for development impact with multiple recorded overflow incidents downstream. The introduction of large impervious surfaces and up to 10.5 million litres of annual hot tub discharge has not been adequately assessed at the drain frequency consistent with the applicant's own 90% occupancy claims.
Paragraph 174 – Natural Environment: Valued Landscapes	Requires planning decisions to protect and enhance valued landscapes, recognise the intrinsic character and beauty of the countryside, and protect the benefits of trees and woodland.	Farley Moor is a valued, tranquil public woodland on the edge of the Peak District National Landscape. The proposed development — with its scale, density, lighting, noise and visitor volumes — would cause irreversible harm to the intrinsic character and beauty of this setting, contrary to both the spirit and the requirements of this paragraph.
Paragraph 180 – Biodiversity: Net Gain and Minimising Harm	Requires that planning decisions minimise impacts on biodiversity and provide measurable net gains. Developments must apply the mitigation hierarchy (avoid, mitigate, compensate) and deliver verifiable improvements to ecological networks.	Construction on peat-based land with drainage of wetland habitats makes genuine Biodiversity Net Gain impossible to achieve. Hot tub drainage at the true operational frequency — approximately 94 drain cycles per tub per year at 90% occupancy — produces a chronic chemical load on the peat and wetland ecosystem that the application's own assessments have not adequately addressed, undermining any claim of a measurable 10% net gain.
Paragraph 182 – Setting of National Landscapes	Requires that development in or near National Parks and National Landscapes avoids and minimises adverse impacts on the designated area, and that great weight is given to conserving landscape and scenic beauty.	Although the site lies outside the Peak District boundary, its elevated position means that lighting, structures and visitor activity would be visible from Peak District viewpoints, harming the scenic setting of the National Landscape. Increased visitor pressure from up to 65,000 annual visitors risks spilling over into the Peak District, exacerbating congestion and disturbance.
Paragraph 186 – Irreplaceable Habitats	States that development resulting in the loss or deterioration of irreplaceable habitats — including ancient woodland and peat — should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.	The peat deposits and wetland habitats on Farley Moor are irreplaceable. This is a commercial holiday development — not a project of national importance — and no wholly exceptional reasons have been advanced. True avoidance (no development) is the only means of preserving peat integrity. Raised platform cabins do not eliminate hydrological risks from access infrastructure and drainage.
Paragraph 190 – Well-Designed Places	Requires that development contributes to conserving and enhancing valued landscapes and that proposals respond sensitively to local character, including the tranquil character of countryside settings.	The proposal would introduce intensive commercial infrastructure — at the highest lodge density of any Forest Holidays site — into a currently quiet public woodland. This fails to respond sensitively to the tranquil woodland character of the site, mirroring the grounds on which an almost identical Forest Holidays proposal at Fineshade Wood, Northamptonshire, was unanimously refused in 2015.
ENVIRONMENT ACT 2021		
Section 98 & Schedule 14 – Mandatory Biodiversity Net Gain (BNG)	Requires all major developments to deliver a minimum 10% measurable net gain in biodiversity, secured for at least 30 years. Net gain must be calculated using the statutory DEFRA biodiversity metric and verified by a competent authority.	The application's BNG assessment is based on drainage frequencies and chemical discharge volumes that are materially inconsistent with Forest Holidays' own operational model of draining and refilling hot tubs between every guest stay. Peatland drainage — required for construction of roads, parking and infrastructure — inherently prevents the delivery of a genuine 10% net gain on this type of sensitive substrate. Until the BNG metric is recalculated on accurate operational assumptions, the

Policy Reference	Policy Summary	Why the Application is in Breach
		statutory requirement cannot be considered to have been met.

Note: This table is based on information available at the date of preparation. Policy references are to the NPPF (December 2024, as amended February 2025). Objectors should supplement these grounds with site-specific survey evidence where available.