

Development Manager
Derbyshire Dales District Council
Town Hall
MATLOCK
Derbyshire
DE4 3NN

Highway Officer: Steve Dudhill
Our ref: DDDC/2025/009227/R1
Your ref: 24/00665/FUL
Date: 1 August 2025

Dear Ms Dinnen,

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Proposed creation of 75 no. timber cabins with associated reception, shop and cafe, maintenance building, natural play area, ranger station, storage pods, recycling points and ancillary roads, paths and parking. at Land At Farley Moor Farley Lane Farley Derbyshire

LOCATION: Land At Farley Moor
Farley Lane
Farley

Derbyshire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order, 2015 **has no objection subject to conditions and financial obligations.**

The highway authority submitted formal observations on this planning application on 2/9/24. Following a review of those and the applicant's submissions, the highway authority considers it necessary to recommend additional planning conditions to secure further safeguards in relation to sustainable travel, traffic routing and signage, construction traffic impacts, and deliveries and servicing.

Travel Plan (TP)

The applicant submitted an outline TP (dated June 2024). Whilst the highway authority recommended a Section 106 obligation to secure funding for TP

monitoring, no planning condition to secure the submission and approval of a TP was sought.

The outline TP was drafted prior to the issue of the current version of the National Planning Policy Framework (NPPF; December 2024), which places greater emphasis on sustainable travel. It is therefore necessary for the TP to be reviewed in the context of the current NPPF.

Whilst the outline TP includes various measures to encourage sustainable travel (e.g. staff/guest minibus, electric cycle hire facilities, staff taxi facility) it has not been finalised with the benefit of input from specialist colleagues. Further work on the TP is necessary to ensure that the final document fully satisfies the highway authority's requirements.

Rather than seeking to agree a finalised TP at this stage, the highway authority recommends that submission and approval of a TP should be secured by means of an appropriate planning condition as envisaged in para 6.2 of the outline TP.

Sustainable Travel

The outline TP envisages provision of electric vehicle (EV) charging points. Generic proposals for a cycle store, to be located close to the forest retreat and main car park, have been submitted. Secure cycle parking should be provided at the individual lodges. Details of such facilities can be secured by planning condition.

Farley Lane lacks pedestrian facilities. Section 7.2 of the applicant's transport assessment (TA) confirms that Farley Lane is not suitable for pedestrians. There are no public rights of way within Farley Wood. The applicant states that routes within the Wood will be available for use by pedestrians and confirms that footpath links are available between Farley Wood and Matlock. Such routes, if having adequate utility, would allow pedestrians travelling between the site and Matlock to avoid using Farley Lane. The highway authority considers that the applicant should submit a scheme of signage and physical improvements to the off-road pedestrian routes, to ensure that they can be used effectively and to maximise pedestrian safety. A planning condition is recommended to secure details of such a scheme.

Traffic Routing and Signage

Section 7.5 of the applicant's TA refers to the need for the proposed development to be adequately signed from the highway network. This will require new tourist signage and changes to existing tourist signage, to be implemented at the developer's expense.

Para 6.5.3 of the TA identified concerns relating to the use of Farley Lane as a vehicular route between the site and Matlock. The applicant proposes signage at the site access to encourage all vehicles leaving the site to turn right onto Farley Lane, to minimise traffic impacts on Farley Hill and at its junction with Smedley Street. An illustrative signface is shown in the TA. Such signage must be legible, to an appropriate specification, and visible during darkness.

The applicant proposes a car park to the east of the site access to accommodate existing parking that would be displaced by the proposed site access improvements. Signage to that facility is necessary to ensure that it will be used efficiently.

Details of the above signage measures can be secured by planning conditions.

Construction Traffic Management

Section 7.4 of the applicant's TA refers to construction traffic and envisages a planning condition to control construction traffic impacts. A planning condition, to secure an appropriate construction traffic management plan, is therefore recommended.

Deliveries and Servicing

Having regard to conditions along Farley Lane to the south of the site, at the Farley Hill junction with Smedley Street, and elsewhere on the local highway network the highway authority considers that a management plan is necessary to minimise traffic impacts arising from, and control the sizes of, goods vehicles which deliver to, and service, the site. A planning condition, to secure an appropriate delivery and servicing management plan, is therefore recommended.

Additional Recommended Planning Conditions

The highway authority would have no objection to this planning application subject to the following recommended planning conditions, which are additional to the conditions recommended in the highway authority's 2/9/24 observations (and numbered in sequence accordingly):

3. No part of the development hereby permitted shall be occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall set out proposals (including targets, a timetable and enforcement mechanism) to promote travel by sustainable modes which are acceptable to the Local Planning Authority and shall include arrangements for the monitoring of progress of the proposals. The Travel Plan shall be implemented in accordance with the timetable set out in that plan unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interest of promoting sustainable travel.

4. No part of the development hereby permitted shall be brought into use until provision has been made within the application site for secure, covered cycle parking, secure cycle equipment storage, and electric vehicle charging facilities in accordance with details to be first submitted to and approved in writing by the Local Planning Authority. The approved facilities shall not thereafter be used for any other purpose and shall be maintained for the life of the development.

REASON: In the interest of furthering travel by sustainable modes.

5. No part of the development shall be commenced until a scheme for signage of, and physical improvements to, pedestrian routes between the application site and Matlock has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to first occupation of the development hereby permitted and shall be maintained for the life of the development.

REASON: In the interest of promoting sustainable travel and pedestrian safety.

6. No part of the development hereby permitted shall be commenced until a scheme for the provision of new and amended tourist signage to the site has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to first occupation of the development hereby permitted and shall be maintained for the life of the development.

REASON: In the interest of highway safety.

7. No part of the development hereby permitted shall be commenced until a scheme for the provision of signage to direct all vehicles leaving the site to turn right from the site access onto Farley Lane has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to first occupation of the development hereby permitted and shall be maintained for the life of the development.

REASON: In the interest of highway safety.

8. No part of the development hereby permitted shall be commenced until a scheme for the provision of signage to the proposed public car park on the site has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to first occupation of the development hereby permitted and shall be maintained for the life of the development.

REASON: In the interest of highway safety.

9. No development shall take place until a Construction Traffic Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Construction Traffic Management Plan shall be adhered to throughout the construction period and shall include, not exclusively, provision for:

- a). Routing of vehicles of site operatives, construction traffic, deliveries, and visitors.
- b). Timings of vehicular arrivals and departures.
- c). Advanced warning and route signage.
- d). Parking of vehicles of site operatives and visitors.
- e). Loading and unloading of plant and materials.
- f). Wheel washing and/or road sweeping facilities.

REASON: In the interest of highway safety.

10. No part of the development shall be brought into use until a delivery and servicing management plan (the Plan) has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include a timetable for implementation and an enforcement mechanism. The Plan shall be implemented in accordance with the timetable set out in the plan unless otherwise agreed in writing

by the Local Planning Authority. The approved Plan shall operate for the life of the development.

REASON: To minimise and control goods vehicle impacts in the interest of highway safety.

Informatives

Works in the highway arising from the above recommended planning conditions would be undertaken at the developer's expense and would be subject to a Section 278 Agreement. The informatives recommended in the highway authority's 2/9/24 observations address that requirement. No further informatives are recommended.

SD; DCC TDM; 1/8/25.

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

To: Steve Dudhill, Highways Development Management
Jeff Hernandez, Highways Development Control
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 Sydnop 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 Sydnop Hill — a 20–25% gradient descent that a local business in the immediate area explicitly warns its customers not to use; or (b) via Jagers 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, Sydnop 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 Sydnop 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, Sydnop 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

Darley Dale Town Council

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DDTC Planning Committee members.

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.