

**Schedule of Suggested Changes to LDF Core Strategy Preferred Approaches**  
**As made at Authority Meeting 2<sup>nd</sup> October 2009**

<b><u>Preferred Approach</u></b>	<b><u>Change suggested at Authority</u></b>	<b><u>Officer view (Support change/No change proposed)</u></b>
GSP1 – Securing National Park purposes	NO SUGGESTIONS MADE	
GSP2 – Major Development within the National Park	(para 1.3) Need to reflect NP purposes in preferred approach text, to give greater emphasis to environmental considerations.  Same point in Policy box to changing the emphasis.	<b>Support change</b> – Minor amendment made but we need to be careful here not just to be reiterating guidance from PPS7 and/or MPS1 on Major Development. Policy GSP1 already sets out detail on NP purposes and the balance of factors. This policy will be utilised for example in determining minerals proposals and the short hard-hitting style it has at present is clear and succinct.
GSP3 – Sustainable development principles	(Para 1.6) Need a better definition of sustainable development in text.  Need to reflect the broader emphasis on environmental issues in sustainable development, not just conservation.	<b>No change proposed.</b> Ref already included at Para 1.37 in full document Report of the 1987 World Commission on Environment and Development ( Bruntland) and HMSO (2005) Securing the Future.  National and regional policy already sets this out more fully in full document
GSP4a – Principles for conserving and enhancing the National Park’s valued characteristics	Can we clarify the role/status of LCA and LS in the context of the LDF?	<b>Support change</b> - To be clear these documents do not automatically become SPD by virtue of their mention in the Core Strategy. The intention is to embed specific sections directly into the spatial plan

	<p>Remove “normally” in policy box, and elsewhere to improve clarity/certainty</p> <p>Can we check that the exceptions for development in GSP4a are consistent with other refs in the plan</p> <p>These exceptions need to be expressed as a category “C” in the context of settlement policy to show the opportunities for remaining settlements off the list in GSP4b.</p> <p>Is there still scope for exceptional small housing development in places off list?</p> <p>Remove “normally” from principles at bottom of GSP4a</p> <p>Clarify in those principles that the removal of buildings “when no longer needed” does not include dwellings. Is it just from agricultural? If so</p>	<p>itself.. Word changes have been made to explain in preferred approach text that LCA and LS is now a material consideration in planning decisions. There will be further scope to embed LCA and LS into reviews of SPG’s such as farm buildings and climate change..</p> <p><b>Support change</b> - word removed here but needs checking elsewhere</p> <p><b>Checks have been made</b></p> <p><b>Support change</b> - Change made by re-presenting exceptions in GSP4a across to GSP4b and checking for relevance to settlements e.g. minerals exceptions removed</p> <p>Newly defined category “C” clarifies the scope for small housing schemes by conversion or change of use but not new build</p> <p><b>Support change</b> - word removed</p> <p><b>Support change</b> - Wording changed to “<b>Where any building or structure is no longer required for the purposes for which it was</b></p>
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	clarify.	<b>approved, and it does not conserve and enhance the National Park, its removal will be required”</b> to clarify that it is the removal of those buildings or structures which do not contribute to the character and appearance of the National Park that is sought.
GSP 4b – Settlement Strategy	<p>Need to clarify the narrative in the preferred approach. What is policy trying to achieve?</p> <p>Clarify that the consultation with communities at the Preferred Approach stage is open to all settlements, not just those already on the lists.</p> <p>Include in criteria in para 1.15 first bullet point, “built character <b>and its landscape setting</b>...)</p> <p>Do delivery issues need adding into the criteria in para 1.15?</p> <p>Include in second para of policy box “..without harm to the built environment <b>and the landscape setting.</b>”</p> <p>Include a category “C” setting out opportunities for the remaining communities so that this policy can be viewed</p>	<p><b>Support change.</b> Words amended in para’s 6.59 to 6.63 of full doc and in policy GSP4b to clarify that policy relates to all settlements.</p> <p><b>No change proposed.</b> - this point is clearly made in paragraph 6.62 of full document. This matter can also be clarified in the communication material used with parishes as part of the consultation</p> <p><b>Support change</b></p> <p><b>No change proposed</b> - Will be considered in delivery plan but no changes needed.</p> <p><b>Support change</b></p> <p><b>Support change</b></p>

	as a more comprehensive sustainable communities policy.	
GSP 5 – Securing Planning Benefits	NO SUGGESTIONS MADE	
L1a - Conserving and enhancing the Natural Beauty of the National Park	NO SUGGESTIONS MADE	
L1b – Trees, woodlands, hedgerows and other landscape features	Include field barns and stone walls into this policy as key characteristics of the landscape	<b>Support change</b> - but Cultural Heritage Team manager not worried about making specific reference to these as he feels the new language of PPS15 is sufficient to enable conservation of these features
L2 – Sites of wildlife or geodiversity importance	Needs ref to climate change in Preferred approach text to show how policy relates to climate change and potential for migration of species. Noted that policy box includes ref to linkages, stepping stones and corridors.  Cross ref to CC5	<b>No change proposed</b> - because reference is in the paragraph immediately above the policy  <b>Support change</b>
L3a – Cultural heritage	Need to add in Cultural landscapes into the title and reflect in policy.  Link to L1a and L1b  Policy is old fashioned. Need to take account of draft PPS15  Include in policy box in second para, "...overall historic built environment <b>and cultural landscapes...</b> ").	<b>Support changes</b>  Changes made to reflect the emerging language in draft PPS15. This is following a meeting with Ken Smith whose advice we were asked to seek by Pauline Beswick. The broader term "cultural heritage assets" is introduced to cover all <b>significant</b> cultural characteristics. Glossary can be used to help define these terms..
L3b – Evaluating sites and features of special	NO SUGGESTIONS MADE	

significance		
L3c – Listed buildings and other buildings of historic or vernacular merit	<p>Need to clarify this includes our approach to stone barns and cross ref to GSP4.</p> <p>Also needs a statement about the impact of climate change on historic buildings by the need for adaptation</p>	<p><b>Support change</b></p> <p><b>Support change</b></p>
L3d – Sites and landscapes of historic, archaeological or cultural significance	Check need for cross ref/compatibility with desire for ref to cultural landscapes as set out in L3a.	<b>Support change</b> and cross checking done
L3e – Important parks and gardens	NO SUGGESTIONS MADE	
VE1a – Visiting and Enjoying the National Park	Amend cross ref in para 1.4 to HC8, not HC9.	<b>Support change.</b>
VE1b – Recreation, environmental education and interpretation development	NO SUGGESTIONS MADE	
CC1 – Sustainable Design and Construction	<p>Needs stronger text in the intro section about adaptation.</p> <p>Needs a ref in the delivery plan about meeting LAA national indicators</p> <p>Overall question as to whether this section is too detailed. Should some move into Dev Management Doc?</p>	<p><b>Support change -</b> Paragraphs 1.2 and 1.3 added in</p> <p><b>Noted</b></p> <p><b>Agree.</b> Detail was put in because it is a new area of policy. Now looking to clarify indicative development management principles to highlight areas that could be moved to a subsequent development management document.</p>
CC2 – Achieving low carbon development	NO SUGGESTIONS MADE	
CC3 – Renewable energy developments	Is it right to say that renewables proposals “should raise no adverse effects...”	<p><b>No change proposed</b></p> <p>Current approach is consistent with the approach to considering harm across the plan as a whole. Levels of detail will be considered in more detail for the Submission version.</p>

	<p>Can we clarify, here or in General Spatial policy how we support/promote more welcoming of community level renewables?</p> <p>Can we say more clearly how we are dealing with renewables in conservation areas.</p> <p>Put in specific mention of hydro potential as a more appropriate renewable energy source</p>	<p><b>Support change</b> - Have added info about SDF and EST projects in Bakewell and Edale.</p> <p><b>Support Change</b> - Policy seeks to emphasise the energy hierarchy. Within this, all renewables proposals will require sensitivity to the landscape and the built environment. Conservation Areas not specifically referenced.</p> <p>Mentioned in wider text that householder development of renewables, (including in Conservation Areas), falls under Part 40 of the Town and Country Planning ( General Permitted Development ) ( England) Order 2008</p> <p>Added mention that there are many potential opportunities In other evidence and analysis section of CC3. This will also be covered in more depth in the SPD</p>
CC4 – Flood risk reduction	NO SUGGESTIONS MADE	
CC5 – Impact of climate change on land management, biodiversity and air quality	NO SUGGESTIONS MADE	
CC6a – Management of domestic, industrial and commercial waste	Clarify in preferred approach text scope for local and very small-scale community-run waste facilities	<b>No change proposed</b> – This is already done in the indicative development management principles, along with in the text at para 9.132 (it was para 1.24 in the Authority Mtg summary). The policy and text is already

		<p>very detailed, to add any further detail will lose the emphasis of the restraint thrust of the policy which is necessary to ensure conformity with the East Midlands Regional Plan. I would be concerned that any change to this policy would seriously risk undermining enforcement activity underway and would be seen as a 'green-light' by operators of schemes we don't want to support but who would latch on to any definition of small scale. To amend this policy to try and facilitate one community scheme currently being promoted is a wholly unsound basis upon which to devise policy and it would seriously compromise the thrust of the policy and render it open to abuse. The policy already allows sufficient flexibility and provides certainty that it will only support community schemes effectively as an exception where stringent criteria are met.</p> <p>If any further detail is wanted then the Core Strategy is not the correct document the Development Management Document would be more appropriate.</p> <p><b>Example of Grindleford Energy Group recycling scheme has been added.</b></p>
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<p>CC6b – Agricultural waste generated within the National Park</p>	<p>Preferred approach text should acknowledge restriction on spreading slurry and the potential for more silos or re-use as an energy source.</p> <p>In last para in policy box is it realistic/proper that there should be “no adverse effects”, or should we accept that there is some impact if we are to promote renewable sources. This is surely more a matter of scale and degree that needs defining in dev mgt policy or SPD.</p>	<p><b>Support change</b> – The text can easily include background reference to the issues regarding slurry, and NVZ guidance although we should bear in mind that the submission document will need to ‘slim out’ much of the explanatory text anyway in due course.</p> <p><b>No change proposed</b> – the policy already recognises that there will be impacts occurring, that is why it says no adverse impacts, any neutral or positive impacts are ok, as would be any negative impacts that are then mitigated out so as not to be adverse. This is standard policy terminology and fits in with the overall objectives to conserve and enhance. It is also utilised elsewhere in the Core Strategy for example in policies GPS4a, L2, L3d, L3e, CC2, CC3, E5, T10, T11 &amp; T12. To change only this policy would lead to inconsistency across the document.</p>
<p>CC7 – Dealing with construction and demolition waste</p>	<p>NO SUGGESTIONS MADE</p>	
<p>HC1 – Reasons for new housing in the National Park</p>	<p>Need to be clearer that there is scope in second bullet point of para 1.2 that this category can give scope for returners to the NP as part of local needs housing, justified not for social housing purposes but for their role in balancing the local population.</p> <p>This would give a hook to dev</p>	<p><b>Support change</b></p> <p>Preferred Approach is easily amended by adding to the second bullet: “<i>including those who wish to return to the National Park within a reasonable period of having moved elsewhere.</i>”</p> <p>The justification then fits into</p>



	<p>management policy and SPD when criteria is re-considered</p>	<p>second bullet of para 1.2 in a way that links it to “counteracting ..(trends) to some degree.” Change = the addition of “<i>It will help people that have moved away from the National Park (e.g to pursue further education and early careers) to return within a reasonable period if they choose to but cannot buy into the open market.</i>”</p> <p>However, do not agree with justifying this against a need or objective to “balance” the local population, as opposed to counteract the trend. All the evidence points to the fact that we will not be able to “build our way out” of population changes such as this OR ageing. There is no justification to suppose otherwise. Trying to say that there is would conflict with the evidence base.</p> <p>Support the view that the interpretation of existing policy has incorrectly prevented people from returning.</p> <p>Provided that potential “returners” meet the 10 in 20 year qualification the justification for their return is that they should be offered the same opportunity as those that remained within the park (applying policy equitably). The policy was written in order to allow people a reasonable time to choose to return after moving away for education or other reasons but soon enough to argue that</p>
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		<p>they had not fully settled down outside the NPK. Yes, this will to some degree counteract the population changes that are otherwise occurring BUT it is not justified by that in view of the scale of change involved. Not convinced we should refer to “imbalances” since they are occurring everywhere to almost the same degree – mostly because of ageing irrespective of movement choices – which re-enforce trends at their margins.</p> <p>This should be seen as a continuation of policy as opposed to the manner in which it has become interpreted over the years. More detail on how we will reconsider scope for returners will be covered in the Development Management Document</p>
<p>HC2 – The scale of new housing in the National Park</p>	<p>Last sentence in para 1.3 is very difficult to understand. Can we make it simpler?</p>	<p><b>Support change</b></p> <p>Delete <i>“in a manner that is neither a target nor a limit”</i> from that sentence</p> <p>Change last para of HC2 to read <b><i>“The Core Strategy will contain estimates of the number of homes to be provided, but they will not be treated as minimum targets in the way that some spatial strategies do, or indeed as upper limits.”</i></b></p> <p>An explanation is already given just below in the text of the full version. (para 30 of the section).</p>

<p>HC3 – Achieving affordable housing for local</p>	<p>Is there a sentence missing before the last sentence in para 1.4?</p>	<p><b>No change proposed</b> - nothing missing. However, “at the same time” is not really correct. It was because the last sentence deals with non-spatial planning matter – it is an add-on extra. Has been re-phrased to “<b><i>In addition.....</i></b>”</p>
<p>HC4a – Size, type and tenure of newly provided housing for different groups in the community</p>	<p>NO SUGGESTIONS MADE</p>	
<p>HC4b – Housing for key workers, including those employed in agriculture, forestry</p>	<p>This policy needs to address the issue of farmer succession.</p>	<p><b>No change proposed.</b></p> <p>Farm (or farmer succession) was intentionally not covered in the preferred approach. The text available in the full document to be published already covers the point by reference to national policy, other evidence and development management policy</p> <p>National policy states that retirement needs cannot justify a new building. Government urges a strict approach to prevent what it openly calls “abuse” of the planning system.</p> <p>Text to be published on other evidence says: “New agricultural and forestry housing has been provided at a rate of about 7 per yr between 1991/92 and 1998/99, declining to 3 per yr since then (a total of 85 – see table 3). We are aware of some instances where farming families seek</p>

	<p>Para 1.10 uses the term “land management” whereas “rural enterprises” is used in economy section and in the policy. Need for consistency of language.</p>	<p>additional accommodation to cater for family needs as one generation gets ready to retire and the next may wish to take over the enterprise. National policy ought to be applied inside a National Park at least as carefully as in other rural areas, and it is clear that to justify a completely separate new home, the national tests designed to prevent abuse of the planning system should be implemented. After all, there is no certainty that a farm business will remain in the same family ownership in perpetuity. Nevertheless, it should be possible in many cases to use an annexe to the main farmhouse or for needs to be met through change of use to agricultural buildings under the policies on locally needed affordable housing (see HC3 and HC5). If necessary, these interrelationships will be considered in more detail in subsequent development management policies and/or practice.</p> <hr/> <p><b>No change proposed</b> as para is about decisions on land management in the context of conservation and landscape change, whereas HC4b is about key workers and validly refers to rural enterprise – which can be wider than land management, but include it.</p>
<p>HC5 – Increasing the proportion of affordable</p>	<p>Cross ref to HC4a in cases of 3 or more where RSL’s will be</p>	<p><b>Support Change</b></p>

<p>housing on enhancement schemes including changes of use to existing buildings.</p>	<p>required.</p>	<p>This Preferred Approach deals with enhancement schemes rather than the social provider / more affordable homes that are dealt with in HC4a. Therefore cross ref in the Approach itself is not appropriate.</p> <p>However, the text that follows policy and describes the national and regional context includes the following in which cross ref is appropriate and has been added (blue highlight): “The Regional Plan encourages provision of affordable homes as a form of planning gain when open market residential development is permitted. For the Peak, Dales and Park Housing Market Area, the number of affordable homes to be provided equates to 61% of the total housing provision. Within the National Park, the driving context for housing is “complying with the statutory purposes of the Peak District National Park;..(and)..meeting affordable housing needs in a way that promotes a more sustainable pattern of development.” The Regional Plan does not impose any form of housing target on the National Park, but any housing development that does occur is to be counted as a contribution to the targets for the Housing Market Area<sup>1</sup>. Given this wider context it is logical that in the National</p>
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<sup>1</sup> Government Office for the East Midlands. (2009). East Midlands Regional Plan (Regional Spatial Strategy). TSO. Paras 3.1.9 to 3.1.12, Policies 13a & 14.

	<p>There is very limited scope for the approach set out in 3<sup>rd</sup> paragraph.</p> <p>Question over the reality/viability of the requirement of a financial contribution for larger enhancement schemes. Can we either clarify how this will happen or demonstrate viability of approach?</p>	<p>Park the two key drivers of housing policy should now be combined to seek as many affordable homes as possible whenever residential opportunities arise. This will help to raise the proportion of affordable homes provided across the Housing Market Area as a whole, <b><i>adding to those provided under Preferred Approach HC4a.</i></b></p> <hr/> <p>There is limited scope but it does occur from time to time (Bradwell – Hartington are examples)</p> <hr/> <p><b>Some changes made</b>  The accompanying text on “other evidence and analysis” already covers this point. Together with modification since the workshop (new text is in italics here) it reads as follows: “It has proved very difficult to make an accurate estimate of the number of homes likely to be provided by enhancement projects, whether new-build or change of use. The Strategic Housing Land Availability Assessment (SHLAA)<sup>2</sup> has provided an indicative estimate of new build opportunities, but has not been able to survey all potential candidates for changing the use of existing buildings, and take into account their owners’ intentions. Despite these</p>
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<sup>2</sup> ecosgen in conjunction with Arup. (2009). Peak Sub Region Strategic Housing Land Availability Assessment. Date Accessed: 17/06/09. <http://www.peakdistrict.gov.uk/index/looking-after/plansandpolicies/ppbackground.htm>

		<p>uncertainties, it is becoming clear that the number of larger enhancement schemes (both new build and change of use) is both limited and finite. On the other hand, the strong demand for housing in the National Park helps to ensure the viability of those schemes that come forward.</p> <p>The SHLAA has provided a viability assessment 'tool' to help to authorities develop a more consistent approach when considering development economics on a case by case basis. This can be applied to proposals for single homes as well as schemes that involve changing the use of large individual buildings or newly built groups. Those larger proposals may require additional more sophisticated analysis than that offered by the viability assessment tool. The initial value of land can be factored into the model and should help prevent unrealistic expectations, particularly when allied to a firm principle of maximising the number of affordable homes to be provided. <b><i>In our experience, the range of factors involved varies widely from scheme to scheme and it would be impractical to set a plan-wide proportion of affordable homes for this kind of project. Individual evaluation in the market circumstances that apply when a scheme comes</i></b></p>
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		<p><b>forward is more realistic.</b></p> <p>To assess whether the policy presumption in favour of affordable housing is reasonable (particularly in respect of smaller schemes) and can be maintained on all enhancement sites, the results of viability assessments will be kept under review. If the evidence warrants it, we will consider introducing a size threshold below which we accept that projects require open market values in order to ensure continued useful conservation and enhancement of the built heritage. <b>Sometimes, larger enhancement schemes might include a larger amount of housing than the number of affordable homes required in that part of the National Park. In such a case we will ask for a contribution towards the costs of providing affordable homes elsewhere. These details will be addressed in development management documents following adoption of the Core Strategy.</b></p> <p>In addition Preferred Approach HC5A has been modified to leave out direct reference to schemes of more than 10 homes. The relevant paragraph now reads: <b>“Where an enhancement scheme might provide more</b></p>
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		<i>affordable housing than is needed in that particular part of the National Park, we will (subject to viability considerations) ask for a financial contribution to help meet affordable housing needs elsewhere.”</i>
HC6 – Identifying housing sites	Seems to be an inconsistency between the position set out here and the position in GSP4a which suggests there are no sites in some places. How can we discuss sites in one area and dismiss them in others?	<p><b>No change proposed</b></p> <p>HC6 is concerned with formal identification of sites in an adopted plan (which is not preferred – because of the risks that are identified) as oppose to the process of assessing capacity. The capacity assessment (in the evidence base as the SHLAA or Strategic Housing Land Availability Assessment) does of course involve identifying <i>possible / potential</i> sites, but this is not the same in law as allocating them on a map in an adopted plan.</p> <p>GS4a is saying that in some places the evidence base has not yet provided any indication of potential sites. That is why more work is needed in those places. This further work will let the Authority make a carefully researched and overt decision as to whether more new houses can be built in such places without harm to the place and its landscape setting.</p>
HC7 – Where to buy existing	A broader approach to “better	<b>Some change supported</b>

<p>housing stock for use as affordable housing</p>	<p>use of the existing housing stock” would be better to reflect wider repair/regeneration programmes as well as buy back.</p>	<p>The second sentence of the paragraph preceding HC7 can be amended to say “It properly recognises the pivotal role of the housing providers and housing authorities in any increased purchase <i>and renewal</i> of existing residential stock.</p> <p>HC7 itself has been amended to include “..when buying and <i>(if necessary) renewing</i> existing homes ....”</p> <p><i>Reference to opportunities for the renewal of older properties as part of buy back were in earlier versions and have now been reintroduced by adding the following to the end of paragraph 116 of the section: “Every home bought in this way will also be able to be brought up to modern standards where necessary (e.g. for energy and accessibility).”</i></p> <p>However, improvement and renewal (or indeed ongoing maintenance) programmes for existing properties that are not being brought into the affordable sector do not affect land-use requirements and seem inappropriate to a spatial strategy.</p>
	<p>Also a question of the appropriateness of this form of policy, as not a development control matter.</p>	<p><b>No change proposed</b> Spatial strategies need not be confined entirely to matters that can be implemented through development control. The criteria for choice about inclusion of another area of</p>

		<p>policy is the degree to which it affects decisions about the use of land (the spatial element). This preferred approach has a clear relationship to that because for every affordable house purchased from within the existing housing stock, one less new site is needed.</p>
	<p>Wider consistency issue across the whole plan and the application of non development control style policies.</p>	<p>The change to LDF's gave scope for a wider interpretation of the term "spatial" as being the impact on land-use of other plans, programmes, powers etc. This therefore gives scope for reference to matters beyond traditional development control matters where pertinent to the spatial plan and its objectives. This principle will be used to determine policy consistency across the whole plan.</p>
HC8 – Community Services and Facilities	NO SUGGESTIONS MADE	
HC9 - Shopping	Check compatibility with E1 with ref to ancillary uses and businesses in the countryside.	<b>See E1 below.</b> The issue of how much imported produce can be sold (or any) needs to be resolved for the Submission version
E1 – Businesses in the countryside	<p>Need to cross ref to low carbon development policy and wider environmental management.</p> <p>Check compatibility with HC9, re the statement that "ancillary retail will not be permitted".</p> <p>Also look at consistency of statement, "business use in</p>	<p><b>No change proposed</b> – caution over what else should be said over &amp; above existing words on sustainability and management.</p> <p><b>Support Change</b> – Compatibility issue dealt with through cross ref.</p> <p><b>Support change</b> to embellish concept of</p>

	<p>isolated buildings in the countryside will not be permitted”, compare to GSP4a.</p>	<p>“isolated” to mean open countryside unrelated to other buildings, no relationship to highway etc. Cross ref already exists between GSP4a and E1 to explain issue with isolated buildings. GSP4a can allow development on farmsteads or in hamlets within the scope of the ‘countryside’; isolated buildings as referred to in E1 are a particular and different case.</p>
<p>E2 – Employment in towns and villages</p>	<p>In para 1.8, last sentence add “traditional buildings in <b>or on the edge of</b> villages for workspace..”</p> <p>Add this terminology to the policy box also.</p> <p>Drop the term “designated” in relation to settlements in policy box.</p> <p>Overall policy box needs better language. Statements are rather fragmented.</p> <p>Also re the ref to business growth, this should apply the same criteria as that used in first instance, i.e. that that appears at the bottom of the policy box.</p>	<p><b>Support change</b> - in para 1.8 and policy box.</p> <p><b>Support change.</b></p> <p><b>Support change.</b></p> <p><b>Support change.</b></p> <p><b>Support change.</b> Clarified in text.</p>
<p>E3 – Identifying and safeguarding employment sites</p>	<p>NO SUGGESTIONS MADE</p>	
<p>E4 – Hotels, bed and breakfast and self catering holiday accommodation</p>	<p>Cross ref to GSP4a in para 1.13</p> <p>Add ref to availability of public transport in criteria</p>	<p><b>Support change.</b></p> <p><b>No change proposed</b> – we are unlikely to recommend refusal simply because no public transport service</p>

		existed?
E5 – Caravans and camping	Wider point not for inclusion in policy re exemption licences. We may want to liaise with ENPAA re changing the law.	<b>No change proposed</b> - Exemptions are by definition outside the scope of policy. Not something we can deal with in this plan
Min1 - Minerals	NO SUGGESTIONS MADE	
Min 2 - Aggregates	NO SUGGESTIONS MADE	
Min 3 – Cement-making materials	<p>Paragraph 1.4 needs shortening and made simpler to read.</p> <p>While the approach overall is supported the text in para’s 1.4 to 1.6 should be generalised and not refer to a specific company.</p> <p>The huge amount of CO2 which is released by Hope Cement Works should be mentioned.</p> <p>Is there a superfluous “12” after Minerals Strategic Action Plan in para 1.4.</p>	<p><b>No change proposed</b> – This para has been the subject of quite a lot of tweaking already to try and balance competing issues.</p> <p><b>Needs changing</b></p> <p><b>Support Change</b> - the text can easily include background reference to CO2 from Hope Cement Works, although we should bear in mind that the submission document will need to ‘slim out’ much of the explanatory text anyway in due course.</p> <p><b>Support Change</b> – Yes the ‘12’ is supposed to be a subscript reference.</p>
Min 4 – Industrial Limestone	NO SUGGESTIONS MADE	
Min 5 – Fluorspar	NO SUGGESTIONS MADE	
Min 6 – Small-scale Building and roofing stone	Check if full doc refers to ROMPS.	<b>No change proposed</b> – The issue of ROMPS is an overall minerals issue not a building stone specific issue so this would be the wrong policy against which to include the issue. However the issue of

	<p>Add “<b>and international</b> markets more than local ones.” In 2<sup>nd</sup> to last sentence of para 1.11.</p> <p>The language in the last sentence is overly negative. Mention ROMPS.</p>	<p>ROMPS is not really an issue for the LDF, as the process is prescribed in statute and it is not a ‘fresh’ planning determination. ROMPS are determined under part 10 of Schedule 13 of the Environment Act, this requires consultation to be undertaken in accordance with s65 of the Planning Act 1990, but there is no obligation to determine the application in accordance with the provisions of the Development Plan, therefore the old s54a and now s38(6) of the Planning Act 2004 do not apply and as such it is not an issue which should be covered within the LDF.</p> <p><b>No change proposed</b> – There is no documented evidence that building stone goes to international markets.</p> <p><b>Support Change</b> - by deleting word unfortunate but note that the policy is designed to be negative against large proposals and positive towards small scale proposals to meet the needs of the National Park. To be any more positive would start to raise potential conformity concerns against the gradual reduction thrust of EMRP. The full text, particularly the evidence base explains the rationale much more fully and the policy has been written to accord with the National Park Management Plan wording on</p>
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	Possibly refer to S106 agreements as a method of controlling the end use of stone extracted from the National Park	this issue.  <b>No change proposed</b> – The last sentence of the policy already refers to the use of legal agreements to secure the policy objectives, there is no need to add anything further.
MIN 7 - Safeguarding	NO SUGGESTIONS MADE	
MIN 8 - Restoration	NO SUGGESTIONS MADE	
T1a – Reducing the need to travel, especially by car, in the National Park, and encouraging the use of more sustainable modes of transport	NO SUGGESTIONS MADE	
T1b – Travel Plans	Question whether this sort of policy should be in? See issue of buy-back also in HC7	<b>No change proposed</b> National Policy is to include the need for Travel Plans as part of planning applications, therefore a valid policy. This is one area of transport where we have direct control.
T2 – Transport infrastructure will be designed to take account of the valued characteristics of the National Park	Remove “usually a reduction” in para 1.6 as it is obvious.	<b>No change proposed</b> Whilst recent activity by Highway Authorities has been to reduce speed limits, there may be occasion, (where for reasons of safety, or visual impact of signage), when a raising of a speed limit could be a preferred approach.
T3 – Managing the demand for new roads in the National Park	Check the language is up to date re the situation with Tintwistle by-pass.  Check for consistency of language between the last	<b>Change made</b> Sentence has been slightly amended to reflect the current situation regarding the Highway Agency proposed bypass. No change to policy stance or policy box.  <b>No change proposed</b> The two sentences referred to

	paragraph in policy box and words re current policy in para 1.7. Check they don't conflict.	are consistent. Paragraph 1.7 may have been misinterpreted, as this outlines current policy as well as the preferred approach. There is no easy way of re-wording this, so suggest it remains as currently worded.
T4 – Providing sustainable access to essential services, and park and ride to visitor areas.	<p>Check the first para in policy box is written the right way round.</p> <p>Clarify that the position re park and ride should be at sites, “<b>outside the</b> National Park boundary”</p>	<p><b>Suggest Change</b> No significant change, but suggest changing the first sentence, so it says balances the need for access to services whilst protecting the National Park. This sentence is currently written the other way round. So no policy change, just a change of order in the first sentence</p> <p><b>No change proposed</b> The text makes it clear that the preference is for P&amp;R outside the boundary. It is outside the boundary so people change their mode of travel before they enter the National Park. However there may be a circumstance where we would be willing to accept a P&amp;R inside provided it brought net benefit.</p>
T5 – Managing the demand for rail, and using former railway routes for non-motorised users	NO SUGGESTIONS MADE	
T6 – The availability and provision of safe walking, cycling, horse riding routes and waterways	NO SUGGESTIONS MADE	
T7 – Directing traffic onto the most appropriate routes	Is it in our gift to identify a road hierarchy?	<b>No change proposed</b> In practice we already have the road hierarchy. But due to cross boundary issues we



		believe we have a role to play still, particularly if the role of a road within the National Park is to be changed.
T8 – Ensuring that the adverse impact of motor vehicles on environmentally sensitive areas of the National Park is minimised.	NO SUGGESTIONS MADE	
T9 – Managing the demand for car and coach parks against their impact	NO SUGGESTIONS MADE	
T10 – Managing the demand for freight transport and the provision of lorry parking	NO SUGGESTIONS MADE	
T11 – Managing the demand for air travel against its impact on the valued characteristics of the National Park	NO SUGGESTIONS MADE	
T12 – Utilities infrastructure	Need for the same landscape considerations for masts/towers etc as we would apply to wind turbines	<b>No change proposed</b> as this policy includes criteria to consider the impact of other utilities infrastructure such as masts and towers.