**PEAK DISTRICT NATIONAL PARK CORE STRATEGY
INSPECTOR'S MATTERS, ISSUES AND QUESTIONS**

**MAIN MATTER 1
Sections 1-8 including policies DS1, GSP1 – GSP4**
An Overview of the Soundness of the Core Strategy

ISSUE - *Whether the Core Strategy Spatial Portrait, Spatial Vision, Objectives, Development Strategy and General Spatial Policies cover a suitable range of issues, are the most appropriate, satisfactorily address cross-boundary issues, are justified, effective and consistent with the purposes of the National Park, and with national policy.*

Questions

Introduction

1.1   Does the introduction section of the Core Strategy (CS) set out sufficiently clearly its context with reference to the purposes of the National Park and the statutory duties of the Authority in the light of the Sandford Principles?

1.2   Does the CS Vision appropriately reflect the vision and 10 main outcomes of the National Park Management Plan and Circular 2010? In particular, does the CS give appropriate weight to climate change mitigation and sustainable development, and should more prominence be given to the needs of the rural economy and rural communities?

1.3   What are the main cross-boundary issues? How are they addressed by the CS?

Chapter 4: Spatial Portrait

1.4   Does the Spatial Portrait underplay the economic, cultural and social value of tourism within the National Park, and as a consequence, do the CS policies give insufficient support to the promotion of sustainable tourism development?

1.5   With particular reference to the last sentence of paragraph 4.4, does the spatial portrait correctly reflect key messages on renewable energy in PPS1 and the National Park Management Plan vision? Should more encouragement be given for community scale renewable energy generation?

1.6   Should the CS be more flexible by permitting open market housing in order to subsidise affordable housing?

1.7   Paragraph 4.22 appears to be internally inconsistent because it starts by saying that housing challenges are being addressed by a policy of concentrating most development in a range of better serviced settlements, but concludes by stating that the challenge is to maintain the current dispersed strategy that directs development to 63 settlements. Clarification is required.

1.8   Should the CS be more flexible in enabling businesses to operate from the open countryside?

1.9   Should the CS give greater recognition to the potential to restore and make better use of old mineral sites for community and recreational uses?

1.10   Should the CS give more emphasis to the need to control traffic within the National Park?

Chapter 5: Spatial and Development Strategy

1.11   With reference to the Spatial Outcomes set out in paragraph 5.3, should the landscape outcome be more explicit and include reference to the importance of biodiversity, geomorphology and cultural heritage?

1.12   Does the spatial outcome for accessibility, travel and traffic strike the most appropriate balance between achieving sustainable transport modes and enabling people to access their needs?

Spatial Objectives

1.13   What is the evidence which informs and justifies the detailed 'place' objectives set out in Figures 4, 5 and 6? Are they the most appropriate?

1.14   With reference to Figure 3, should its section on Recreation and Tourism include an overall Park objective of managing off-road recreation, as in Figure 6 bullet point 1, which refers specifically to the South West Peak area?

1.15   Are the references to minerals in Figures 3, 4 & 5 justified by national policy and guidance?

1.16   What is the evidence that informs and justifies the specific housing 'targets' referred to in Figures 5 and 6?

1.17   What is the evidence which informs and justifies the specific objectives for transport for the White Peak and Derwent Valley areas set out in Figure 5?

1.18   With reference to Figure 5, should Chatsworth House be added to the list of places named under bullet point 1 in the section headed, 'Recreation and tourism policies will…'?

Policy DS1: Development Strategy

1.19   Does policy DS1, which enables a dispersed development strategy, represent the most sustainable strategy of development for the future, particularly when taking account of downward trends in public transport provision? What other development strategies have been considered? Why were the alternatives rejected? Are such decisions supported by the Sustainability Appraisal?

1.20   What confidence is there that the policy will enable the delivery of affordable homes to meet identified local needs, taking into account that Appendix 2 informs that there is limited capacity for development in many of the named settlements?

1.21   The preferred options version of policy DS1 places settlements into a hierarchy. Why is this approach not reflected in the submitted policy in order to clarify and make transparent the likely scale of development that may be directed to differing sized settlements? In particular should the policy distinguish more clearly between Bakewell, which appears to be the most sustainable location, and other settlements by use of a settlement hierarchy?

1.22   Why is it not intended to allocate housing and other development sites in a subsequent DPD, since that would avoid uncertainty over site selection?

1.23   Why is intended to define the development boundaries for Bakewell but not for any of the other 62 listed settlements?

1.24   In the absence of development boundaries, how will the policy be implemented with regards to consideration of development being in or on the edge of the other 62 named settlements?

1.25   Does the policy name the settlements that most appropriately reflect the selection criteria referred to in the Settlement Matrix at Appendix 2 in all cases? For example, should Outseats be considered with Hathersage?

1.26   Does the policy inappropriately exclude those who do not live in the 63 listed settlements, by for example, discriminating against those wishing to build an affordable home on an already owned plot, whether inside or outside a settlement?

1.27   What are the special characteristics of the Natural Zone? What is the justification for the Natural Zone? Is its designation consistent with PPS7? Is the policy approach towards development in the Natural Zone consistent with national policy, including PPS4 and PPS22? How was its broad location shown on the Key Diagram determined? If carried forward from the Local Plan, has it been re-assessed for its continued appropriateness? Should it be defined in the Glossary?

1.28   Taking account of PPS4 and PPS7, is the policy a) sufficiently flexible to meet the needs of businesses both in the countryside, and in Bakewell, b) does it give sufficient scope for development of social and economic benefit to the community and c) what is the justification of the policy to limit conversion/change of use to traditional buildings only?

Key Diagram

1.29   Since cross-Park traffic is identified as being a problem to be addressed by the Core Strategy, should the main cross-Park roads be identified on the Key Diagram?

Chapter 8: General Spatial Policies

1.30   With reference to paragraphs 8.9 - 8.10, should the definition of major development be clarified here and/or in the Glossary?

1.31 Should paragraphs 8.12 – 8.14 be amended to reflect more clearly the up-to-date position and the Government's intention with regards to the IPC and National Planning Statements?

1.32 For clarity, should the Sandford Principles be quoted accurately in paragraph 8.19 – 8.20 and should they also be referred to in the Glossary?

Policy GSP1: Securing National Park purposes and sustainable development

1.33 Does policy GSP1 adequately reflect the National Park Vision and Circular 2010? In particular, do the policy and the CS generally, reflect that the National Park should provide an exemplar of sustainable development?

1.34 Associated with this, does the policy adequately stress the importance of communities living within the environmental limits of the Park?

1.35 Does policy GSP1 deal clearly and correctly with the issue of major development in the National Park?

Policy GSP2: Achieving enhancement of the National Park

1.36 With reference to paragraph 8.18, what is the justification for the statement that 'enhance' has the same legal status as 'conserve'?

1.37 Following from this, why does policy GSP2 refer to enhancement rather than conservation? Is this approach internally consistent?

Policy GSP3: Development Management principles

1.38 Are the requirements of policy GSP3 stated sufficiently clearly to enable consistent interpretation and application, for example, in relation to the use of terms like 'living conditions'?

1.39 Should the policy highlight the implications of land subsidence associated with mining operations?

Policy GSP4: Securing planning benefits

1.40 Does part A of policy GSP4 exceed the tests of Circular 05/2005?

1.41 Greater explanation is required of the Charging Schedule referred to in paragraph 8.28. Will it be included in the Development Management Policies DPD or an SPD? For transparency and to provide a 'policy hook' should the broad principles and components of the intended Charging Schedule be referred to in the CS?

1.42 For effectiveness, should policy GSP4 also refer to the use of conditions/legal agreements to ensure sustainable development, either through design and/or renewable energy technologies?

MAIN MATTER 2
Whole Core Strategy
Legal Requirements/Evidence Base

ISSUE - *Whether the Core Strategy meets all of the legal requirements of the Planning and Compulsory Purchase Act 2004 and associated Regulations (as amended in 2008), and is informed by robust, up-to-date and proportionate evidence.*

Questions

2.1   What is the evidence to confirm that all the above legal requirements have been met? In particular, what is the evidence to demonstrate that the requirements for the following matters are met?

   (i)   Has the CS been prepared in accordance with the Authority's Local Development Scheme (LDS); does its listing and description in the LDS match the submission document; have the timescales set out in the LDS been met?

   (ii)   To what extent does the CS have regard to the Sustainable Community Strategies for the Districts and Counties within and adjoining the National Park? What are they and what are their main themes?

   (iii) Does the CS comply with the Statement of Community Involvement (SCI)? What is the evidence that the Authority has carried out all necessary consultation consistent with the SCI and the minimum requirements of the Regulations?

   (iv)   Has the CS been subject to a Sustainability Appraisal and has the Authority provided a final report of the findings of the Appraisal? Have all alternative strategies and policies also been subject to a Sustainability Appraisal, and is it clear from this why they have been rejected? How has the Sustainability Appraisal process influenced the formulation of the submitted spatial strategy, policies and proposals?

   (v)   How were the requirements for Appropriate Assessment under the Habitats Regulations met before publication of the CS?

   (vi)   Which Regional Spatial Strategy(s) forms part of the development plan for the National Park? Has the general conformity of the CS with the RSS(s) been confirmed by the Regional Planning Body(s)? Does the CS contain any policies or proposals that are not in general conformity with the RSS(s), and if so, what is the local justification? Several references are made in the CS to the revocation of the RSS, for example at paragraphs 2.7, 3.12, 3.27 and 11.13. All such references should be amended for correctness.

(vii) Does the CS comply with the Regulations specifically regarding the publication of prescribed documents, their availability at the Authority's principal offices and on the Authority's website, the placing of local advertisements and notification of the DPD bodies?

(viii) Are there any obvious gaps in the evidence base? Is any of the evidence that is relied upon out-of-date?

2.2 Are all of the policies of the CS consistent with national policy? If there are any departures, what is their local justification?

MAIN MATTER 3
Policies L1-L3 and RT1- RT3
Landscapes and Conservation, and Recreation and Tourism

ISSUE - *Whether the policies and proposals of the Core Strategy which seek to conserve and enhance the landscape and valued characteristics of the National Park, whilst addressing the key strategic issues for recreation, tourism, environmental education and interpretation are justified, effective and consistent with the purposes of the National Park, and with national policy.*

Questions

Chapter 9: Landscapes and conservation

3.1 Should the list of valued characteristics at paragraph 9.15 be clarified and added to by, for example, defining what are 'environmentally friendly methods of farming' and by adding reference to the historic landscape character?

Policy L1: Landscape Character and valued characteristics

3.2 What is the local justification for the rigour of policy L1 to exceed the requirements of PPS in requiring development to conserve and enhance (as opposed to conserve or enhance)?

3.3 Is the need for the Natural Zone made redundant by part A of policy L1, which refers to the Landscape Strategy? If not, how is the extra protection/restriction upon development afforded by the Natural Zone designation justified by evidence and local circumstances? Why would not a criteria based policy provide sufficient protection for this area?

3.4 What will be the impact of this designation on development associated with agriculture; would it be unreasonably restrictive?

3.5 What are the exceptional circumstances referred to in the context of permissible development within the Natural Zone?

3.6 Does the protection of the landscape and valued characteristics afforded by policy L1 unreasonably restrict flexibility to permit development for social or economic reasons?

Policy L2: Site of biodiversity or geodiversity importance

3.7 Should policy L2 be expanded to include all of the recommendations of the Habitats Regulations Assessment with particular reference to the Natura 2000 Sites?

3.8 Should policy L2 be amended to include a hierarchy of layers of sites of biodiversity importance whereby some are more important than others and are consequently afforded greater protection?

3.9 Should policy L2D be amended to refer to sites of regional and local biodiversity and geodiversity importance?

3.10 Should the policy also refer to the importance of ecological networks, climate change and to providing a strategic approach to biodiversity habitat enhancement and creation?

Policy L3: Cultural heritage assets of archaeological, artistic or historic significance

3.11 What is the local justification for the rigour of policy L3 to exceed the requirements of PPS5 in requiring development to conserve and enhance (as opposed to conserve or enhance)?

3.12 What is the necessity for this policy, which does not apparently add local distinctiveness to the requirements of PPS5?

Policy RT1: Recreation, environmental education and interpretation

3.13 Is part A of policy RT1 inconsistent with PPG13, because it infers that any development that cannot be accessed by public transport will be classed as unsustainable and will not be granted planning permission?

3.14 Part C of the policy is more restrictive than PPS4 and PPS7 with regards to the types of existing buildings that may be re-used. What is the evidence and local justification for limiting such development to traditional buildings of historic or vernacular merit?

Policy RT2: Hotels, bed and breakfast and self catering accommodation

3.15 The policy is more restrictive than PPS4 and PPS7 with regards to the types of existing buildings that may be re-used for new holiday accommodation. What is the evidence and local justification for limiting such development to traditional buildings of historic or vernacular merit?

3.16 What is the evidence/justification for restricting new hotel accommodation to only one location; Bakewell, because elsewhere the CS highlights the importance of supporting economic development, particularly tourism and facilities to encourage visitors, provided that there are no harmful impacts on the landscape?

Policy RT3: Caravans and Camping

3.17 Is part B of policy TR3 too restrictive in not allowing for exceptional cases where such development, especially chalets or lodges could be accommodated without adverse impact on the landscape?

MAIN MATTER 4
Policies CC1-CC5
Climate Change and Sustainable Building

ISSUE - *Whether the policies and proposals of the Core Strategy, which address the strategic role of the National Park in relation to mitigating and adapting to climate change are justified, effective and consistent with the purposes of the National Park, and with national policy.*

Questions

Chapter 11: Climate change and sustainable building

4.1   Do paragraphs 11.5 – 11.11 accurately summarise national policy concerning planning and climate change, especially with regards to the encouragement that the Government gives to appropriate renewable energy generation development? Do the CS and its policies promote renewable energy generation development in accordance with national policy or are they unreasonably cautious?

4.2   In the absence of quantifiable targets and indicators for its climate change policies, how will the achievement of the aspirations of the spatial outcomes sought in paragraphs 11.14 -11.18 be measured?

Policy CC1: Climate change mitigation and adaptation

4.3   What are the local justification for and the evidence to support the requirements of the policy, which exceed those of the current Building Regulations?

4.4   If the higher targets and threshold of part F for all new and replacement housing are justified generally, why are affordable housing developments of less than 3 units exempted, since many of the housing developments will fall within this category?

4.5   Should part C of the policy be amended to more clearly reflect PPS25?

4.6   What is the justification for the 'at least 10%' target reduction for the Buildings Emission Rate set in part G? Why are not BREEAM and CSH standards referred to rather than emission rates?

4.7   Is the 1000 square metres threshold set in part G appropriate, since most non-residential development taking place within the Park will fall below this size?

Policy CC2: Low Carbon and renewable energy development

4.8   In the preamble to policy CC2 at paragraph 11.27, is it appropriate to refer to the peat lands management as a major contribution to the region's carbon reduction targets?

4.9   Are policy CC2 and paragraph 11.29 consistent with PS22 in seeking to apply the energy hierarchy, in consideration of proposals for renewable energy development?

4.10   Is the phrase 'without harm' in part A of the policy too restrictive, since almost every development has the potential to cause some

harm to the landscape character? Should the requirement be qualified, for example by the word 'significant'?

4.11 Should the policy include reference to biomass and solar panels as appropriate sources for renewable energy generation?

4.12 Is the policy justified in permitting in principle only small scale wind turbines; there may be places where taller ones would be acceptable in landscape terms? Alternatively, is part B of the policy necessary, since such proposals would have to satisfy criterion A?

4.13 What is the evidence to justify the blanket ban on wind turbines in Natural Zone referred to in paragraph 11.32?

Policy CC3: Waste Management – domestic, industrial and commercial waste

4.14 Should the CS include supporting text to clarify its approach to recycling and small scale processing within the Park, and the linkages to sustainability and tackling climate change, sufficient to guide Development Management Policies DPD production and the assessment of planning applications?

4.15 Should policy CC3 or policy CC2 acknowledge the contribution that anaerobic digestion plants at a community, as well as farm scale, can make to renewable energy production?

Policy CC4: Waste Management – on farm anaerobic digestion of agricultural manure and slurry

4.16 Is policy CC4 unreasonably restrictive and inflexible towards anaerobic digestion plants to be established at a farm scale, particularly with regards to the extent to which such plants can receive a waste stream in order to make them viable to operate and the flexibility on types and source of waste permitted by the policy?

4.17 Should the policy clarify that it also applies to community based anaerobic digestion plants?

Policy CC5: Flood risk and water conservation

4.18 In order to not repeat national planning policy contained in PPS25, should policy CC5 be made locally specific to the National Park? Alternatively, why is it necessary; should it be removed?

MAIN MATTER 5

Policies HC1-HC6

Homes, Shops and Community Facilities

ISSUE - *Whether the policies and proposals of the Core Strategy, which seek to address the social needs of communities in the National Park are justified, effective and consistent with its purposes, and with national policy.*

Questions

Chapter 12: Homes, shops and community services

General

5.1   With reference to the housing policies, what are the key pieces of evidence that underpin them? How complete is the coverage of published Parish Plans? What other plans will be relied upon to identify local need?

5.2   What national policy is relied upon to justify the severe restriction of new open market housing development?

5.3   From what evidence are the figures given in paragraph 12.17 derived?

5.4   How do they link with/complement the housing policies, particularly for the provision of affordable housing, of adjoining Councils?

5.5   With reference to policy HC1, does this carry forward the existing policy contained in the adopted Local Plan? What are the differences? How well has the current policy been operating?

5.6   What alternative forms of policy HC1 have been considered? Why were these rejected?

5.7   A summary of the overall need for affordable housing within the National Park, which includes provision for backlog and newly arising need, broken down on a Parish basis is required.

5.8   To what extent will identified capacity and site availability in the named settlements have the potential to meet the identified local need, both numerically and geographically? In other words, will the development strategy set out in policy DS1 have the potential to meet local affordable housing needs within the National Park, where it is needed, in the amount that it is needed and when it is needed?

5.9   For compliance with paragraph 30 of PPS3, the CS should also specify clear targets for delivery of affordable housing to meet the identified needs. Additional supporting text should be suggested to meet this requirement.

5.10   To what extent is delivery of affordable housing in the National Park reliant upon public subsidy? What are the proportions of affordable housing that have historically been provided privately and through Registered Social landlords?

5.11 Read together, would policies DS1 and HC1 prevent those who live outside the 63 listed settlements or a neighbouring settlement from building an affordable home on an already owned plot, whether inside or outside a settlement? If so, is this the intention of these policies? If not how would this apparent restriction be circumvented?

Policy HC1: New housing

5.12 The meaning of the first sentence of policy HC1 is unclear as no allocations are to be made for affordable housing rural exception sites either?

5.13 With reference to part A of the policy, what evidence will be used to assess local need? Whose responsibility will it be to provide such evidence?

5.14 Is the embargo of the policy on open market housing consistent with national policy? If not, what is the local justification for this approach?

5.15 Following recent government announcements on spending cuts, it is possible that public funds for affordable housing will be reduced or made unavailable during the plan period. Since policy HC1 permits only very limited open market housing, little private subsidy will be available. Does the policy include sufficient flexibility/contingency to allow for alternative options for delivery of affordable housing? Is it sufficiently proactive?

5.16 Should the policy be amended to allow, in principle, conversion of holiday homes to affordable homes?

5.17 What is the justification for part C V of the policy? Does it satisfy the tests of Circular 05/2005?

Policy HC2: Housing for key workers in agriculture, forestry or other rural enterprises

5.18 Why is policy HC2 necessary? How does it add to national policy?

Policy HC3: Buying existing homes to add to the affordable housing stock

5.19 Buying existing homes to add to the affordable housing stock is likely to be only a very short term solution. In any case, would it be counter productive, since any removal of smaller, less expensive market priced housing from the open market could reduce people's opportunities to get onto the open market housing ladder?

Policy HC4: Sites for gypsies, travellers or travelling show people

5.20 Does the Derbyshire Gypsy and Traveller Accommodation Assessment 2008 cover the whole of the National Park? If not what other Assessments have been undertaken or are proposed?

5.21 Policy HC4 is ambiguous, lacks clarity and effectively prevents appropriate site provision. Should it be amended along the following or similar lines?…

Proposals for Gypsies, Travellers and Travelling Showpeople may be permitted where there is a proven need and where the proposed site does not have any adverse impact on visual or residential amenity, and will provide a satisfactory environment for the occupants.

5.22   Should an additional/alternative policy be included in the Cs which sets out criteria against which any planning applications will be assessed?

Policy HC5: Provision and retention of community services and facilities

5.23   Paragraph 12.41 directs new or improved community facilities to the larger settlements listed in policy DS1, but in the absence of a hierarchy how can these be transparently identified?

5.24   Part C of policy HC5 refers to 'reasonable attempts'. How is 'reasonable' defined in this context?

Policy HC6: Shops, professional services and related activities

5.25   Clarification of the justification for and the effectiveness of this policy is required, because it does not apparently address the local circumstances of the National Park, the findings of the retail evidence relating to Bakewell, nor does it appear to be consistent with PPS4.

5.26   Paragraph 12.44 informs that the central shopping area of Bakewell will be retained. Is this justified by a recent re-assessment of the centre and up-to-date retail studies, which identify additional retail capacity within Bakewell?

5.27   The retail hierarchy of policy HC6, which refers to towns, villages and the countryside does not reflect the development strategy of policy DS1, which refers to settlements and the countryside. Consistency between these policies is required.

5.28   The precise wording of part B of the policy does not reflect PPS4. In any case, should part B of the policy be a stand-alone section, since there may possibly be proposals for such development beyond the named settlements?

MAIN MATTER 6
Policies E1 and E2

Supporting Economic Development

ISSUE - *Whether the policies and proposals of the Core Strategy aimed at achieving a diverse and prosperous local economy, are justified, effective and consistent with the purposes of the National Park, and with national policy.*

Questions

Chapter 13: Supporting economic development

6.1   Is the approach of the CS towards employment development sufficiently positive and flexible?

Policy E1: Business development in towns and villages

6.2   What is the evidence that supports the safeguarding of all existing business land and premises, as intended by policy E1D? If all of these sites have not been recently re-assessed or the evidence does not support the retention of all of them, this part of the policy should be amended accordingly.

6.3   What is the justification for part D of the policy, which limits alternative use of redundant employment sites to affordable housing or community uses?

Policy E2: Businesses in the countryside

6.4   Is the policy sufficiently flexible to take account of a possible future decline in the farming economy during the plan period?

6.5   Part A is not clearly worded. The first part states that businesses must be located in existing buildings…, but the second part enables alternative provision. Internal consistency in this paragraph is required.

6.6   Is the policy consistent with PPS4, which does not impose such stringent restrictions on new business development in the countryside as those contained at parts B, C and in the last paragraph of policy E2? What is the evidence and local justification to support the approach of policy E2?

MAIN MATTER 7
Policies MIN1-MIN4
Minerals

ISSUE - *Whether the policies and proposals of the Core Strategy for minerals extraction, restoration and safeguarding, are justified, effective and consistent the purposes of the National Park, and with national policy.*

Questions

Chapter 14: Minerals

7.1 Does the strategy of the CS which aims to gradually reduce aggregate and mineral extraction from the National Park strike the most appropriate balance between natural environment and heritage interests, or does it weigh too heavily in favour of environmental protection?

7.2 What are the implications for employment provision to gradually reduce aggregate and mineral extraction from the National Park?

7.3 The second bullet point of paragraph 14.16 appears to be contradictory. Clarification is required.

7.4 The regionally agreed apportionment figures extend only until 2020, some 6 years short of the CS plan period. Does the CS make adequate provision for aggregates and minerals extraction if the figures were rolled forward until 2026? These requirements and anticipated provision should be added to the CS.

7.5 Paragraphs 14.21 and 14.22 infer that the Authority does not entirely agree with the apportionment recommendations of the East Midlands Regional Aggregates Working Party (RAWP). What is the evidence to support that inference?

7.6 Does this mean that it may work to an alternative, lesser apportionment, especially towards the end of the plan period? If so, what, and what is the evidence to support such alternative figures?

7.7 Reference to abolition of the RSS in paragraph 14.22 and elsewhere in chapter 14 is now incorrect and should be amended.

7.8 Is the text at paragraphs 14.28 - 14.31 factually correct, and necessary to be contained in the CS?

7.9 Are the Authority's intentions towards future cement manufacture, as set out in paragraph 14.27 and elsewhere in the CS, justified by evidence and consideration of possible mitigation measures to reduce carbon dioxide emissions? Are they the most appropriate having regard also to employment considerations? Are they feasible having regard to the operator's intentions? Are they consistent with national policy and sufficiently flexible to take account of long term circumstances and possible future national requirements for cement?

7.10   Are the Authority's intentions towards building and roofing stone extraction, as set out in paragraphs 14.11, 14.12, 14.32 and elsewhere in the CS, justified by the evidence, the most appropriate and sufficiently flexible, and consistent with national policy?

Policy MIN1: Minerals Development

7.11   Does the intention of policy MIN1 to progressively reduce the proportion and amount of aggregates and minerals extraction accord with national guidance contained in MPS1? If not what is the evidence and local justification to support this approach?

7.12   For clarity, should policy MIN1 define the volume of the provision of aggregates extraction that the Park will make during the CS period, including the rolling forward of the agreed sub - Regional apportionment, to the end of the plan period in 2026?

Policy MIN2: Fluorspar proposals

7.13   No questions.

Policy MIN3: Local small scale building and roofing stone

7.14   Given that the supporting text to policy MIN3 highlights the importance of sandstone roofing slates and locally sourced building stone for the restoration of historic buildings, not only within the National Park, what is the evidence and policy justification to restrict its extraction to only meet demonstrable needs within the Park?

7.15   Is this approach consistent with national guidance on heritage protection?

7.16   Is the policy too restrictive and inflexible, and as a consequence, could it frustrate the successful repair of important historic buildings and structures outside the National Park boundary?

Policy MIN4: Mineral safeguarding

7.17   Is the approach of policy MIN4, which seeks to safeguard some mineral reserves of economic importance but not all, consistent with national policy and is it based on sound evidence?

7.18   Is the argument to not safeguard some mineral reserves on the grounds that conservation policies prevent the risk of sterilisation occurring sufficient reason to not comply with national safeguarding policy?

MAIN MATTER 8
Policies T1-T7
Accessibility, Travel and Traffic

ISSUE - *Whether the policies and proposals of the Core Strategy will achieve a sustainable approach to transportation that is justified, effective and consistent with the purposes of the National Park, and with national policy.*

Questions

Chapter 15: Accessibility, travel and traffic

8.1   The Sustainable Transport Action Plan has a publication date of December 2010 and thus was not in the public domain at the time when the CS was consulted upon. In the interests of transparency, is this approach reasonable? Is the document now available for public viewing? Also, chronologically, how have the CS transport policies been developed to complement this transport strategy, as stated in paragraph 15.1 of the CS?

8.2   With reference to the anticipated outcomes of the transportation policies set out in paragraph 15.14, what is the evidence to support and justify the specific proposals listed? Are they appropriate and complementary to other CS spatial outcomes? How realistic is their delivery? Should they be located within the relevant transport policies, rather than in supporting text?

8.3   What is the justification for the abandonment of the line of a Bakewell relief road?

8.4   Should reference to the potential to use transport networks and hubs to inform and educate visitors and residents about the National Park be added to the preamble to the transport policies?

8.5   Does the Highways Authority support the hierarchy of roads set out at paragraph 15.20 and in policy T2? If not, how realistic is it?

8.6   Is the footnote 151, referred to in paragraph 15.18, correct?

8.7   Should the transport chapter of the CS emphasise more the problem in the National Park of dangerous roads with high accident rates, together with a commitment to seek to work with partners to reduce these dangers?

Policy T1: Reducing the general need to travel and encouraging sustainable transport

8.8   Whilst the intentions of policy T1 may be justified, how in practical terms will its aspirations be delivered?

Policy T2: Reducing and directing traffic

8.9   Whilst it may be appropriate for the CS to support the aim of reducing the need to travel and encouraging the use of more sustainable modes of transport, the practicalities of achieving this will require partnership working with other agencies such as

Derbyshire County Council. What evidence is there of such joint working?

8.10   Furthermore, there appears to be no definitive sources of funding identified to support the delivery of these transport aims within the accompanying Delivery Plan. If the resources are not available can the aspirations of the policy be effectively delivered?

8.11   With reference to parts A and B of policy T2, they give mixed messages regarding the management of cross-Park traffic. Furthermore, it is not clear how an increase in such traffic could bring clear long term net environmental benefits to the National Park. Clarification, supported by evidence is required.

8.12   With reference to part C of the policy, as the Authority is not the Highways Authority, how can it refuse permission for a new road scheme?

Policy T3: Design of Transport infrastructure

8.13   The wording of policy T3 is aspirational. How and by whom will it be delivered, and how will it be monitored?

Policy T4: Managing the demand for freight transport

8.14   No questions.

Policy T5: Managing the demand for rail, and re-use of former railway routes

8.15   Should a further criterion be added to policy T5 which states that all proposals should be subject to the test for major development?

Policy T6: Routes for walking, cycling and horse riding, and waterways

8.16   What is the evidence that the partnership arrangements necessary for the successful implementation of this policy are in place and are working well?

8.17   What is the evidence that the cross-boundary proposals of this policy are supported by the relevant adjoining Council's?

Policy T7: Minimising the adverse impact of motor vehicles and managing the demand for car and coach parks

8.18   With reference to car parking standards, does paragraph 15.39 accord with recent amendments to PPG13?

8.19   Where will parking standards be defined? Will they be subject to prior public consultation?

MAIN MATTER 9
Whole Core Strategy
Delivery, Monitoring, Implementation and Flexibility

ISSUE - *Whether the delivery and monitoring strategy for the Core Strategy effectively demonstrates; what, where, when and by whom its policies and proposals will be delivered and that its contingencies for promoting their delivery are flexible, appropriate and effective.*

Questions

9.1   Although the CS is essentially an enabling tool it is nevertheless necessary, in order to demonstrate soundness, for it to clarify how, by whom, with what funding and when, its vision, objectives and policies will be achieved. This necessary implementation detail should be added in respect of each of the CS policies.

9.2   Similarly, the CS should contain sufficient detail in order to measure, monitor and manage the achievement of the CS policies in delivering its vision and objectives. Measurable targets and indicators should be provided for each of the CS policies.

MAIN MATTER 10
Whole Core Strategy
Miscellaneous Matters

ISSUE - *Any other miscellaneous and procedural matters.*

Questions

10.1   Any other outstanding matters concerning the soundness of the Core Strategy.

10.2   Any outstanding procedural matters concerning the Examination.

10.3   Anticipated date of Inspector's Report.