Local Plan Review Topic Paper

Landscape, Biodiversity and Nature Recovery

April 2021

Contents

Introduction

This topic paper has been prepared to inform the review of the Peak District National Park Local Plan. Its focus is landscape, biodiversity and nature recovery.

Its purpose is to:

- assess the performance of existing policy
- examine the latest research, guidance and evidence that will impact on new policy
- highlight gaps in knowledge and generate areas of further research

Other topic papers in this series cover:

- Climate Change and Sustainable Buildings
- Economy
- Health and Well-being
- Heritage and Built Conservation
- Housing
- Minerals (pending)
- Recreation and Tourism
- Shops and Community Facilities
- Spatial Strategy
- Sustainable Transport and Infrastructure
- Utilities

Summary

Planning policies for the Peak District aim to ensure that development conserves, and if possible enhances, its 'special qualities' – including the beautiful views created by contrasting landscapes and dramatic geology, the internationally important and locally distinctive wildlife and habitats and the undeveloped places of tranquility and dark night skies.

Landscape

Our policies to conserve landscape have, in the main, been effective. The vast majority of new build development is within or on the edge of settlements. In open countryside, re-use of existing buildings is the norm. The upland 'natural zone' retains its wilder, open character.

However some development that is potentially harmful to special qualities has taken place, mostly in the open countryside. This includes new-build dwellings, agricultural barns and non-land management businesses that have all been granted planning permission 'contrary to policy' (or may be permitted development in the case of agricultural buildings.)

The 'natural zone' by definition - see inset on page 10 - retains its wilder, open character. Yet even here there are 'higher than anticipated' levels of 'exceptional circumstances' development. It is not known to what degree this contributes to conservation and enhancement.

We do not currently have enough clear evidence to judge the cumulative impact on landscape character of all development – whether according to policy or not. The current landscape review or other research will need to address this.

Biodiversity

Overall, planning policies have had a neutral to negative effect on biodiversity. Development itself is not leading to the loss of important sites and where necessary policies support land management for landscape-scale projects. Intensive agriculture is the prime driver for biodiversity loss, so the development of farm businesses leads to conservation and enhancement of special qualities far too infrequently.

The catastrophic loss of biodiversity in the UK – to which the Peak District is not immune despite some localized success – and the commitment to zero carbon present a clear challenge for the next local plan.

Nature Recovery

The new Environmental Land Management Scheme incentivizes transformational landscape-scale projects. The Committee on Climate Change is calling for 22% of land to be taken out of agricultural production. The National Planning Policy Framework and The Environment Bill both describe an enhanced role for the planning system in nature recovery, via nature recovery strategies, spatially mapped nature recovery areas and biodiversity net gain.

The Glover Report urges on national park authorities ‘a renewed mission to recover and enhance nature’ and for national parks to be the ‘backbone of nature recovery networks’.

How can planning policy in the Peak District play its part in this?

Part 1: Context

1.1 National Park Context

1.1.1 This topic is central to the first purpose of a national park as set out in the 1995 Environment Act which is to 'conserve and enhance natural beauty, wildlife and cultural heritage'.[1]

1.1.2 The Government's Vision and Circular '*English National Parks and the Broads*'[2] (2010-2030) confers 'the highest status of protection as far as landscape and natural beauty is concerned'. It sets out that by 2030 national parks will be thriving, living, working landscapes notable for their natural beauty and cultural heritage where:

- wildlife flourishes and habitats are maintained, restored and expanded and linked effectively to other ecological networks
- woodland cover has increased and all woodlands are sustainably managed
- landscapes and habitats are managed to create resilience and enable adaptation

1.1.3 The Vision and Circular recognizes landscape as fundamental to quality of place, attractiveness, distinctiveness and diversity and so should be protected and enhanced. Biodiversity should be 'protected and encouraged . . . within recognized protected areas and in the wider landscape'. The Authority has 'an important role in helping to deliver habitat restoration and expansion at a landscape scale.'

1.1.4 Paragraph 42 anticipates that national park authorities will need to think differently about their special qualities as the climate changes.

> "The Parks themselves will be threatened by climate change and the Authorities must ensure that they protect the public assets which the Parks represent. This may involve difficult decisions as the special qualities of the Parks change. For example, some tree species which are currently valued as part of the landscape may not be viable. Assumptions about the value of the traditional appearance of the countryside may have to be challenged as the needs which shape its future may be different from those which have shaped its past. The Authorities and all relevant bodies must be innovative while using the best available research to ensure that they continue to provide healthy, viable and adaptive environments."

[1] https://www.legislation.gov.uk/ukpga/1995/25/section/61

[2] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

1.2 National Planning Policy Framework

1.2.1 The National Planning Policy Framework[3] confers a general duty on planning policies to:

- protect and enhance valued landscapes, sites of biodiversity or geological value and soils
- recognize the intrinsic character and beauty of the countryside and the wider benefits of ecosystem services
- minimise impacts on and provide net gains for biodiversity, including by establishing coherent and resilient ecological networks
- take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale

1.2.2 Specifically regarding habitats and biodiversity the Framework requires that plans should:

- identify, map and safeguard wildlife-rich habitats, the 'stepping-stones' that connect them and 'areas for habitat management, enhancement, restoration or creation'
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species
- identify and pursue opportunities for securing measurable net gains for biodiversity.

1.2.3 In addition to these general requirements, the Framework[4] requires that in national parks 'great weight' should be given to conserving and enhancing landscape, scenic beauty, wildlife and cultural heritage. The Framework reaffirms that national parks 'have the highest status of protection' with regard to landscape and scenic beauty.

Major Development

1.2.4 The Framework states that:

> 'planning permission should be refused for major development[5] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest'.

[3] https://www.gov.uk/government/publications/national-planning-policy-framework--2

[4] NPPF para 172

[5] See NPPF footnote 55 for definition of major development. (It is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purpose for which the areas has been designated.)

1.3 Local Plan Policies

1.3.1 Relevant Core Strategy Policies are L1 and L2.

L1: Landscape character and valued characteristics

A. Development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan, and other valued characteristics.

B. Other than in exceptional circumstances, proposals for development in the Natural Zone will not be permitted.

L2: Sites of biodiversity or geodiversity importance

A. Development must conserve and enhance any sites, features or species of biodiversity importance and where appropriate their setting.

B. Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any sites, features or species of biodiversity importance or their setting that have statutory designation or are of international or national importance for their biodiversity.

C. Development must conserve and enhance any sites or features of geodiversity importance and where appropriate their setting.

D. Other than in exceptional circumstances, development will not be permitted where it is likely to have an adverse impact on any sites or features of geodiversity importance or their setting that have statutory designation or are of international or national importance for their geodiversity.

1.3.2 The following Development Management Policies support Core Strategy Policies L1 and L2.

DMC1 sets out the circumstances in which a landscape assessment will be required and the content of such an assessment; the conditions for considering an application 'major development'; and the conditions where removal of a building is required.

DMC2 sets out the circumstances under which development may be permissible in the natural zone

DMC3 prescribes the siting, design and layout required where development is acceptable in principle

DMC4 describes how settlement limits should be defined

DMC11 sets out the required steps to achieve biodiversity net gain/zero net loss

DMC12 sets out the exceptional circumstances for development affecting sites, features or species of wildlife, geological or geomorphological importance

DMC13 sets out protections for trees, woodland or other landscape features put at risk by development

DMC14 deals with pollution and disturbance

DMC15 deals with contaminated and unstable land

Part 2: Performance of Policy

2.1 What are we judging policy against?

2.1.1 The performance of current planning policy can be measured against the high level spatial objectives set out in the Core Strategy, and the aims and objectives of the National Park Management Plan (in its current and previous iterations).

Core Strategy High Level Spatial Objectives

2.1.2 The Core Strategy[6] sets out 'landscape and conservation high level spatial objectives' for the Peak District as a whole and for the 3 landscape character areas: Dark Peak, White Peak and South West Peak reflecting the 3 national character areas defined by Natural England.

2.1.3 For the Peak District as a whole these are:

- Seek strict protection for the Natural Zone
- Manage development through close consideration of landscape character
- Work with partners to reduce the size and amount of road signage in open landscapes.

The Natural Zone

The Natural Zone is part of the spatial strategy and defines areas of wilder and more sensitive landscape and habitat identified under Section 3 of the Wildlife and Countryside Amendment Act 1995.

It is defined by:

- a quality of 'wilderness'
- relatively natural vegetation which is largely self-sown
- few obvious signs of human influence such as field boundaries
- 'open country' which has particular importance for certain types of recreation associated with adventure and contact with nature
- high wildlife value
- natural beauty

[6] https://www.peakdistrict.gov.uk/planning/policies-and-guides/core-strategy

2.1.4 For the **Dark Peak and Moorland Fringe** these are summarized below.

- **Protect:** remoteness, wildness, open character, tranquility, pastoral landscape, settled cultural character
- **Manage:** eastern moors, biodiversity, impacts of climate change
- **Enhance:** recreation opportunities/resources, woodlands, wildness, (bio)diversity

2.1.5 For the **White Peak and Derwent Valley** these are summarized below.

- **Protect**: distinctive and valued historic character of the settled agricultural landscapes
- **Manage:** floodplain landscapes to increase flood storage and enhance biodiversity
- **Enhance:** wild character and diversity of remoter areas, wooded character, biodiversity, wetlands

2.1.6 For the **South West Peak** these are summarized below.

- **Protect:** distinctive historic character of the landscape
- **Enhance:** recreation opportunities, woodlands, wildness and (bio)diversity of remoter areas.

National Park Management Plan Special Qualities and Valued Characteristics

2.1.7 The 1995 Environment Act introduces the concept of special qualities and the National Park Management Plan defines these for the Peak District in broad terms (see below). For planning purposes it is important to understand how detailed features build up to create these broad definitions. The Core Strategy uses the term Valued Characteristics (listed on page 59) as a distinctive means of focusing on those aspects to be conserved and enhanced.

Special Qualities

1. Beautiful views created by contrasting landscapes and dramatic geology
2. Internationally important and locally distinctive wildlife and habitats
3. Undeveloped places of tranquility and dark night skies within reach of millions
4. Landscapes that tell a story of thousands of years of people, farming and industry
5. Characteristic settlements with strong communities and traditions
6. An inspiring space for escape, adventure, discovery and quiet reflection
7. Vital benefits for millions of people that flow beyond the landscape boundary

2.1.8 The links between the core strategy spatial objectives and the management plan objectives are shown in the table below.

High level objectives for landscape, conservation, biodiversity and nature recovery

Core Strategy	Current National Park Management Plan 2018-23	Previous National Park Management Plan 2012-17
In the whole Park		
Protect the Natural Zone Manage development through close consideration of landscape character Reduce the size and amount of road signage in open landscapes	Ensure management of the uplands conserves and enhances special qualities	Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued
In the Dark Peak		
Protect: remoteness, wildness, open character, tranquility, pastoral landscape, settled cultural character Manage: eastern moors, biodiversity, impacts of climate change Enhance: recreation opportunities/resources, woodlands, wildness, (bio)diversity	Maintain existing landscape scale delivery Ensure management of the uplands conserves and enhances special qualities	Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued
In the White Peak		
Protect: distinctive and valued historic character of the settled agricultural landscapes Manage: floodplain landscapes to increase flood storage and enhance biodiversity Enhance: wild character and diversity of remoter areas, wooded character, biodiversity, wetlands	Develop a wide-ranging partnership in the White Peak with a clear vision, plan and delivery actions	Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued
In the South West Peak		

Protect: distinctive historic character of the landscape Enhance: recreation opportunities, woodlands, wildness and (bio)diversity of remoter areas.	Maintain existing landscape scale delivery	Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued

2.2 Evidence: Annual Monitoring Reports

2.2.1 Between 2004 and 2013 there is no landscape-based data other than monitoring of those cases approved contrary to policy. From 2013 AMRs provide evidence in relation to:

- New development occurring outside of named settlements
- Applications granted contrary to policy
- Applications raising significant policy issues
- Number of planning permissions for development in the Natural Zone

2.2.2 It is broadly assumed that if development is managed so that levels are within the set threshold for each of these indicators, then the high level spatial objectives for landscape are being met. Taking each of these in turn:

- The target of 80-90% of new build development occurring inside named settlements is being met. However the AMRs consistently note “a very large proportion of development overall does take place outside named settlements.”
- The tolerance level of not more than 3 per year applications granted contrary to policy is being met (except 4 in 2014/15).
- The tolerance level of not more than 10 per year applications raising significant policy issues is being met but there were 10 cases in 2017/18.
- For the 2 years 2013-15 the AMR noted “a higher than expected number of planning approvals … in the Natural Zone” but that these were not for housing or business development so the impact on landscape was ‘negligible’.

2.2.3 The spatial distribution of planning permissions is also mapped in the latest AMRs (‘heatmaps’) which broadly show that development is taking place away from the natural zone.

2.2.4 However the AMRs also record[7] the following issues of concern, where some development is having a negative impact. More research is needed to understand the trend as well as the overall

[7] Local Plan Review Scoping Report (Ian Fullilove)

impact of, and implications for, planning policy. *(High level spatial objective in italics.)*

- The *remoteness, wildness, open character and tranquility of the Dark Peak* landscape is at risk from the proposed re-routing and/or upgrading of the A628 trunk road.
- Some development in the Dark Peak is concerned with creating grouse monoculture rather than *opportunities to manage and enhance … biodiversity (and) recreational opportunities.*
- There is intensified pressure to find development sites outside the NP *on the Dark Peak Yorkshire Fringe.*
- Housing schemes outside the NP are starting to impinge on landscape quality *(the settled, cultural character) of the Dark Peak Western Fringe.*
- *In countryside locations between the remoter moorlands and surrounding urban areas* development hasn't permanently changed *valued character* but car parking on surrounding roads threatens visitor experience.
- The trend towards glamping has pressured *wilder and quieter areas* where tents would previously have come and gone.
- The *open skylines, long views and semi-natural moorland expanses* have not been protected in some areas due to large agricultural buildings.
- There is no objective or subjective assessment of whether the *support for agricultural and land management businesses* has *conserved and enhanced the valued characteristics of the landscape*. Very large modern farm buildings detract from landscape quality.
- There is no evidence either way to say whether the *distinctive and valued historic character of the settled, agricultural landscapes of the White Peak have been protected nor whether the wild character and diversity of remoter areas* has been enhanced.
- There is no evidence either way (particularly with regard to the *enhancement of woodland and biodiversity*) to say whether the *settled, agricultural character of the Derwent Valley landscapes*, has been protected and managed.
- Non-land management business establishment or expansion in the open countryside is harming landscape character

2.3 Other evidence and data

Agricultural Buildings Research

2.3.1 An analysis of the size and location of new agricultural buildings granted planning permission between 2011 and 2018 has been undertaken[8]. On average 49 new agricultural buildings per year were permitted across the national park. Sixty-two per cent of these were in the White Peak, 30% were in the South-West Peak and 8% were in the Dark Peak. The average size of the buildings permitted is 334m^2 (equivalent to approx. 20m x 17m building).

2.3.2 Of the new agricultural buildings *built* during the seven year period, 24% were applications under the General Permitted Development Order (GPDOs) and 76% were full planning applications. The GPDOs averaged a size of 244m^2 and the full applications averaged a size of 363m^2.

2.3.3 The report also considers the effect of new agricultural buildings on valued landscape character (and by implication the effectiveness of existing planning policy.) Although limited to using only plans and aerial photography the report concludes that 'the majority are within farmsteads and appear appropriate'. However some development appears to be contrary to policy and cumulatively could be causing harm to the landscape, such as:

- buildings that are divorced from the farm
- substantial yard areas and access tracks even on relatively small buildings
- buildings within green fields
- buildings that are overly large
- loss of cultural heritage features.

2.3.4 More research is needed to understand landscape impact, in particular to improve mapping (where are the 'hot spots') and undertake site visits.

State of Nature Report 2019[9][10]

2.3.5 The State of Nature Report is a devastating critique.

> *"Our statistics demonstrate that the abundance and distribution of the UK's species has, on average, declined since 1970 and many metrics suggest this decline has continued in the most recent decade. There has been no let-up in the net loss of nature in the UK. Prior to 1970, the UK's wildlife had already been depleted by centuries of persecution, pollution, habitat loss and degradation."*

2.3.6 Its key findings are that most UN Convention on Biological Diversity targets won't be met, and that since 1970:

---

[8] 'Assessment of New Agricultural Buildings in the Peak District National Park erected between 2011-2018'. Internal report.

[9] https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf

[10] Defra published UK Biodiversity Indicators 2020 after this report was finalised. It restates the findings of the 'State of Nature' report and contains additional data. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/926506/UKBI-2020-A.pdf

- there has been a 13% decline in average species' abundance. Our indicator of average species' abundance of 696 terrestrial and freshwater species has fallen by 13% since 1970; the rate of decline was steeper in the last 10 years, although not statistically significantly so

- there has been a 5% decline in average species' distribution. Our indicator of average species' distribution, covering 6,654 terrestrial and freshwater species over a broad range of taxonomic groups, has fallen by 5% since 1970, and is 2% lower than in 2005.

- 41% of species have decreased in abundance. More species have shown strong or moderate decreases in abundance (41%) than increases (26%) since 1970, and likewise more species have decreased in distribution (27%) than increased (21%) since 1970

- 53% of species show strong changes. Our wildlife is undergoing rapid change; the proportion of species defined as showing strong changes in abundance, either increasing or decreasing, rose from 33% over the long term to 53% over the short term

- 15% of species are threatened. Of 8,431 species that have been assessed using regional Red List criteria, 15% have been classified as threatened with extinction from Great Britain, and 2% are already extinct.

2.3.7 The causes of this loss are:

- agricultural productivity, linked to the intensification of land management
- increase in average UK temperatures by nearly 1°C since the 1980s
- pollution, in particular excess nutrients (phosphate and compounds of nitrogen) in air and water
- changes in hydrology - the extent of wetland habitats remains greatly reduced compared to the middle of the last century
- urbanization - thousands of hectares of farmland, woodland and wetland are built on every year.
- woodland management - integrity is under threat from invasive plants, pests and diseases, lack of management, overgrazing by deer, increasing levels of recreational disturbance and nitrogen pollution
- Non-native species

State of the Park Report 2019: Biodiversity[11] *(and State of Nature in the Peak District 2016*[12]*)*

2.3.8 The State of the Park Report 2019 acknowledges 'the lack of longitudinal, PDNP-wide, comparative data regarding the extent and condition of biodiversity'. However the key finding is that ***'the data that is available indicates that the PDNP has not been immune to . . . biodiversity losses (observed at a national scale).'***

2.3.9 The executive summary for each national landscape character area notes:

The Dark Peak has internationally important moorland, mostly made up of blanket bog and upland heathland. There are also extensive cliff and scree edges, which support specialist bird species such as ring ouzel. A vast amount of restoration work has and continues to be delivered on the Dark Peak moorlands … However, there is still a long way to go to restore the full wetland functionality to much of the peat. Burning on peat, wildfire, moorland infrastructure and bird of prey populations remain key challenges to be addressed.

The White Peak is known for its ravine ash woodlands, characteristic diverse grasslands and dew ponds, which provide biodiversity havens and are recognised by international designation in many of the dales. However, the White Peak lacks joined-up habitats that are large enough support sustainable populations and provide the full range of public goods.

The South West Peak has an enclosed farmed landscape with a pastoral character created by semi-improved grassland, hay meadows and rushy pastures with springs and flushes, as well as a mosaic landscape of productive farmland, small woodlands and moorland.

2.4 Performance of Existing Policy: Conclusion

Landscape

2.4.1 Performance of policy against the high level objectives of the core strategy and management plans is shown in detail for each landscape character area in appendix 1. The key findings are listed below and unless stated otherwise relate to the Park as a whole.

2.4.2 The Natural Zone (NZ) has been protected from harmful development in accordance with policy L1. Significant levels of development do occur inside the NZ in accordance with the 'exceptional circumstances' set out in DMC2. It is not known to what extent development permitted contributes to conservation and/or enhancement in accordance with policy.

2.4.3 Development has taken place in accordance with the spatial strategy so that most new build development is: (i) within named settlements; and (ii) within the tolerance thresholds for cases that are contrary to policy. This indicates that most development is managed through consideration of landscape

[11] https://report-publishing/stateofthepark/docs/SQ/Wildlife-Habitats/

[12] *State of Nature in the Peak District: What we know about the key habitats and species of the Peak District (2016);* Penny Anderson on behalf of the Local Nature Partnership

character. However there are also negative effects on landscape character emerging due to:

- development justified on the grounds of supporting agricultural and land management businesses, including large agricultural buildings and infrastructure for grouse shooting
- establishment or expansion of non-land management businesses in the open countryside
- development just outside the boundary of the NP
- glamping' sites
- A628 Woodhead Road improvement

2.4.4 Subject to the threats noted above, planning policy has been successful in that it has conserved (but not enhanced) the special qualities[13] of 'beautiful views' and 'undeveloped places'.

2.4.5 It can be assumed that the 'distinctive historic/settled/cultural character' of land outside the Natural Zone has been protected *somewhat* due to adherence to the spatial strategy, but there is no other evidence.

2.4.6 There is sufficient evidence from the AMRs to conclude that planning policies have largely protected the natural zone and landscape character across the whole Park. However there is also evidence of harmful development. There is insufficient evidence to judge the cumulative impact on landscape character of all development – whether according to policy or not. Further evidence in this regard could be provided by the landscape strategy review.

Biodiversity

2.4.7 Planning policy has had a neutral to negative effect on all of the high level outcomes relating to biodiversity, landscape scale projects and enhancement/restoration of ecosystems. Development itself is not leading to the loss of important sites and where necessary policies support land management for landscape scale projects. Intensive agriculture is the prime driver for biodiversity loss, so the development of farm businesses leads to the conservation and enhancement of special qualities far too infrequently.

2.4.8 The National Planning Policy Framework and The Environment Bill both describe an enhanced role for the planning system in nature recovery, via nature recovery strategies, spatially mapped nature recovery areas and biodiversity net gain.

[13] Special Qualities relevant to this topic paper are: • beautiful views created by contrasting landscapes and dramatic geology •internationally important and locally distinctive wildlife and habitats •undeveloped places of tranquility and dark night skies within reach of millions

Part 3: Issues and Evidence Driving New Policy

The National Planning Policy Framework (NPPF)

3.1 The Core Strategy pre-dates the NPPF and although it was judged to be in conformity it is worth highlighting Section 15 'Conserving and enhancing the natural environment'. This indicates that local plans should establish coherent ecological networks and provide net gains for biodiversity. (Net Gain will be mandatory in the Environment Act and local plans will be expected to work alongside spatial Nature Recovery Strategies.) The Core Strategy does not define coherent ecological networks.

The 25 year Environment Plan

3.2 The 25 year Environment Plan[14] outlines broad ambitions 'to help the natural world regain and retain good health'. Most relevant for local plan review are:

- 'Environmental' net gain, nature recovery networks and conservation covenants (see Environment Bill for more detail)
- A new environmental land management system
- A focus on woodland
  - increase tree planting by creating new forests, and incentivising extra planting on private and the least productive agricultural land, where appropriate
  - drive extensive woodland planting while enhancing distinctive landscapes
  - incentivising more landowners and farmers to plant trees on their land, including for agroforestry and bio-energy production purposes.
- Reducing risks from flooding (and coastal erosion) by expanding the use of natural flood management systems including tree planting, river bank restoration, building small-scale woody dams, reconnecting rivers with their flood plains and storing water temporarily on open land
- Improving soil health and restoring and protecting peatlands

The Glover Report

3.3 The Glover Report[15] neatly summarises this report's conclusion:

> *"There is much debate, and not enough data to say for certain, whether the state of nature in national landscapes is better, or no*

[14] https://www.gov.uk/government/publications/25-year-environment-plan

[15] https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review

better, or even worse than it is elsewhere. While it is good news that we have retained places of great natural beauty, sometimes alive with wild species . . . what can be agreed is that what we currently have is not good enough."

3.4 The proposals to tackle this are:

- National landscapes with renewed mission to recover and enhance nature
- The state of nature and natural capital regularly and robustly assessed, informing the priorities for action
- Strengthened Management Plans set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration).
- National landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries

Land use policies for a net-zero UK (Committee on Climate Change: Jan 2020)

3.5 The report[16] sets out the Committee's advice on policies needed to deliver the land sector's contribution to the UK's new 'net-zero' emissions target. Significantly for the Park these require a high uptake of low carbon farming practices and releasing 22% of land out of traditional agricultural production for long-term carbon sequestration.

3.6 The actions identified include:

- Low-carbon farming practices
- Afforestation, agro-forestry (planting trees on agricultural land, while maintaining their primary use) and improved woodland management
- Restoring at least 50% of upland peat and 25% of lowland peat including a ban on rotational burning including for grouse shooting. (This practice was traditionally undertaken on mineral soils but over-time it has encroached onto peat soils. Burning heather promotes young shoots, which grouse feed on, but it is highly damaging to the peat, and to the range of environmental benefits that well-functioning peat can deliver (e.g. water quality, biodiversity and carbon sequestration). A voluntary cessation of this activity by landowners has not produced the desired outcome so the practice should be banned across the UK with immediate effect. The adoption of more sustainable practices to manage the vegetation (e.g. heather cutting) would still allow grouse shooting to continue on peat soils, while the burning of heather could continue on mineral soils
- Bioenergy crops.

[16] https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/

The Environment Bill

3.7 Developers must deliver 10 per cent net biodiversity gain through their schemes. Natural England has advised that in the Peak District:

> "The residential development that is allowed within the Park is generally small scale and so net gain is likely to be achievable within the application site. However quarry restoration can offer significant biodiversity net gains through restoration plans. Surrounding local authorities may look to source areas within the Park as locations for habitat creation. Furthermore the Environment Bill is also proposing Statutory Biodiversity Credits Scheme - under proposed mandatory biodiversity net gain, when a developer cannot achieve the biodiversity net gain required on their development site following application of the mitigation hierarchy, and where the relevant LPA cannot find another site within their authority area for the off-site net gain, they will have the option to purchase biodiversity units from an offsite habitat market. If units cannot be sourced from local habitat markets, developers will be able to purchase their required units (as credits) which will be invested in habitat creation. Currently the biodiversity credits scheme is at the beginning of a pilot trial so it is early to say how this concept would work in practice. It is possible that some areas of the National Park could be identified as being possible sites to benefit from this proposed scheme and this should be strategically planned to deliver habitat creation sites within the Nature Recovery Network (NRN)."

3.8 Councils must produce "local nature recovery strategies" and administer the system. Natural England has advised:

> "Local Nature Recovery Strategies (LNRSs), to be established by the Environment Bill, will be a mandatory system of locally developed, spatial strategies for nature that identify opportunities and priorities for enhancing the natural environment in each area in England. Five locations for pilots of LNRS have recently been selected (Cumbria, Northumberland, Greater Manchester, Buckinghamshire, and Cornwall) – these will test the process and run until March 2021. More detailed guidance will be provided by Defra following these pilot cases.
>
> LNRS's will be the legal tool from the Environment Bill which will establish the Nature Recovery Network (which is policy). They will follow a specific legal process which will set out what is required of a LNRS and the products that it will need to include i.e. statement of biodiversity priorities; an agreed map; engagement with stakeholders. They will be prepared on a County basis and led by a "responsible body" and will provide full coverage of England and so the boundaries must be aligned to allow for this. The responsible body will need to be agreed by the Secretary of State and are ultimately responsible for the document. However the process is intended to be collaborative

and will involve input from stakeholders. Generally the responsible bodies would be local authorities - the arrangement for National Parks is currently unclear as they encompass many local authorities though the Environment Bill does say that NP authorities can be "responsible bodies". This question should be clarified through the pilot cases.

As well as identifying the opportunities and priorities for enhancing biodiversity LNRS will support wider objectives such as mitigating or adapting to climate change in an area."

The Agriculture Bill

3.9 The Agriculture Bill proposes a new Environmental Land Management Scheme (ELMS) to replace the current system of farm payments. The Bill is in the final stages of the parliamentary process and trials of the system are currently running, including in the White Peak. ELMS is a single scheme with three tiers.

- Tier 1: This would encourage farmers to adopt environmentally sustainable farming and forestry practices and they would be paid for taking action rather than delivering outcomes.
- Tier 2: This would encourage farmers, foresters and other land managers with specialist knowledge to deliver locally targeted environmental outcomes. Payments could be received for services such as tree planting, flood mitigation and habitat creation, restoration or management.
- Tier 3: This would pay farmers and land managers who undertake transformational landscape-scale projects, such as restoring peatland.

The Planning White Paper

3.10 The move to a 'zonal system with permission in principle' has huge implications for national parks. As currently presented it is difficult not to conclude that the purposes of a national park as set out in the 1995 Environment Act would be undermined by the proposed planning reforms.

Climate Change Vulnerability Assessment

3.11 The Climate Change Vulnerability Assessment[17] assesses how vulnerable the special qualities of the PDNP are to future climate change. It is comprehensive and up to date, looking in detail at 156 individual features that make up the 'special qualities' (see paragraph 2.1.7). With regard to the overall vulnerability of the special quality 'internationally important and locally distinctive wildlife and habitats the report concludes:

17 https://democracy.peakdistrict.gov.uk/documents/s39721/PDNP%20Climate%20Change%20Vulnerability%20Assessment.pdf

“This special quality ***is the most vulnerable special quality to climate change***. This is because 23% of the 31 features assessed have been rated as ‘very high’ on our scale and almost 70% were rated as ‘high’. The rest have been rated as ‘moderate’, and no features were given a ‘low’ rating. Changes to rainfall patterns, with wetter winters and drier summers as well as extremes of drought or flooding, are some of the key factors likely to affect habitats and species in the PDNP.

Additionally, poor current condition has contributed to many features being rated as ‘very high’ or ‘high’ in terms of overall vulnerability to climate change. Current condition is usually due to non-climate factors. In the case of habitats, poor current condition is often because only small fragments remain – as in the case of meadows and wet woodlands. Interconnection between habitats is also often poor, making them less resilient to change. Past and current human actions such as agricultural improvement of grassland, the switch from hay to silage, and the drainage of wet areas have also contributed to this high vulnerability.

Quality of the remaining patches of habitat is also important. For instance, the extremely degraded condition of blanket bog in the PDNP makes it vulnerable despite there being large continuous areas present. The PDNP is home to a range of species adapted to cooler upland or northerly conditions. Many are on the southern edge of their range in the UK and are unlikely to cope with projected climatic changes, including merlin, twite and the bilberry bumblebee. Modelling shows some may be lost from the PDNP entirely. In addition, human responses to climate change, particularly through changes to agricultural practices, could have profound effects on some species.”

Part 4: Requirement for Further Evidence and Questions Arising

4.1 Further Evidence

4.1.1 There is sufficient evidence from the AMRs to conclude that planning policies have largely protected the natural zone and landscape character across the whole Park. However there is also evidence of harmful development. There is insufficient evidence to judge the cumulative impact on landscape character of all development – whether according to policy or not. Further evidence in this regard could be provided by the landscape strategy review. If it is not provided by the review (either because of a delay in the review or the methodology) then further research will be needed to assess the impact of development on the landscape.

4.1.2 The local plan must meet the requirement of the NPPF to "identify, map and safeguard wildlife-rich habitats, the 'stepping-stones' that connect them and 'areas for habitat management, enhancement, restoration or creation'. The local plan needs to function as one of a suite of key National Park policy documents (including the management plan and the landscape plan) that capture and focus the funding and delivery mechanisms for nature recovery, land-based solutions for net zero and ecosystem services, such as ELMS, biodiversity net gain, conservation covenants, community action and other semi-market led carbon/biodiversity trading mechanisms that become available. Evidence can be drawn from:

- in house and partner-owned data on biodiversity and biodiversity opportunity mapping
- commissioned research on biodiversity and biodiversity opportunity mapping where there are gaps in the spatial data
- landscape review
- woodland strategy
- nature recovery strategy and network

4.2 Questions arising from performance of existing policy and new issues and evidence

4.2.1 Evidence overwhelmingly points to a crucial role for national parks in landscape-scale nature recovery and land-based solutions for net zero.

Q1: Should the local plan focus more on outcomes related to biodiversity and net zero as well as landscape character?

Q2: Should the spatially mapped nature recovery network that results from the nature recovery strategy (or strategies if not undertaken by the NPA) be incorporated into the local plan in accordance with para 174 of the NPPF.

Q3: Should planning policies specify what types of development are allowed in accordance with the spatial plan for nature recovery (as well as other policies), and link this to the requirement for net gain?

4.2.2 The link between DS1 C which lists ‘agriculture, forestry and other rural enterprises’ as development that is acceptable in principle in the countryside, and L1 that requires this development to ‘conserve and enhance valued landscape character’ could be re-examined.

> Q4: Are policies DS1C and L1 of the Core Strategy and DMC11 of the Development Management Polices sufficient to prevent development that harms landscape character and deliver biodiversity net gain?

4.2.3 DMC2 (i) permits within the natural zone ‘development that is essential for the management of the natural zone’.

> Q5: Should policy specify ‘management for the purposes of landscape scale nature recovery’ to prevent management associated with maintenance of a heather monoculture and grouse shooting?

Appendix 1: Performance of policy

HIGH LEVEL AIMS			Has planning policy been effective in meeting high level aims?
Core Strategy	**Current National Park Management Plan**	**Previous National Park Management Plan**	
In the whole Park			
Protect the Natural Zone			(1) The Natural Zone (NZ) has been protected from harmful development in accordance with L1. Significant levels of development do occur inside the NZ in accordance with the 'exceptional circumstances' set out in DMC2. It is not known to what extent development permitted contributes to conservation and/or enhancement.
Manage development through close consideration of landscape character			(2) Development has taken place (i) in accordance with the spatial strategy so that most new build development is within named settlements and (ii) within the tolerance thresholds for cases that are contrary to policy. This indicates that most development is managed through consideration of landscape character. However there are also negative effects on landscape character emerging due to: • development justified on the grounds of supporting agricultural and land management businesses, including large agricultural buildings and infrastructure for grouse shooting • establishment or expansion of non-land management businesses in the open countryside • development just outside the boundary of the NP • 'glamping' sites • (A628)

			(3) The overall impact of these negative effects will be assessed via the landscape review.
Reduce the size and amount of road signage in open landscapes			(4) Not monitored. However, Highways Authorities are on the whole providing compliance through consultation under the 'duty to cooperate' and promotion of the Transport Design Guide SPD.
	Ensure management of the uplands conserves and enhances special qualities		(5) The special qualities relevant to this topic paper are: • beautiful views created by contrasting landscapes and dramatic geology • internationally important and locally distinctive wildlife and habitats • undeveloped places of tranquility and dark night skies within reach of millions Planning policy has been successful in that it has conserved (but not enhanced) the special qualities of 'beautiful views' and 'undeveloped places'. The landscape review will determine to what extent the pressures noted at (2) have harmed special qualities. Planning policy is neutral with regard to wildlife and habitats.
		Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty	(6) As (5)
		The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its	(7) Planning policy is neutral with regard to wildlife and habitats.

		diverse geology is retained and valued	
In the Dark Peak			
Protect: remoteness, wildness, open character, tranquility, pastoral landscape, settled cultural character			(8) The remoteness, wildness and open character has largely been protected by the Natural Zone and the restriction of new build development to existing settlements. The extent to which the pressures noted at (2) have harmed these qualities will be assessed in the landscape review.
Manage: eastern moors, biodiversity, impacts of climate change			(9) Planning policy has not been a barrier to the management of land for biodiversity or the impact of climate change.
Enhance: recreation opportunities/resources, woodlands, wildness, (bio)diversity			(10) Planning policy is neutral with regard to the enhancement of woodlands and biodiversity.
	Maintain existing landscape scale delivery		(11) Planning policy has not been a barrier to landscape scale delivery
	Ensure management of the uplands conserves and enhances special qualities		(12) See point (5)
		Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty	(13) See points (1) and (2)
		The richness of the natural environment will be conserved, restored and	(14) Planning policy is neutral with regard to wildlife and ecosystems.

		enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued	
In the White Peak			
Protect: distinctive and valued historic character of the settled agricultural landscapes			(15) This has not been assessed.
Manage: floodplain landscapes to increase flood storage and enhance biodiversity			(16) This has not been assessed.
Enhance: wild character and diversity of remoter areas, wooded character, biodiversity, wetlands			(17) Planning policy is neutral with regard to the enhancement of wild character, woodlands, wetlands and biodiversity.
	Develop a wide-ranging partnership in the White Peak with a clear vision, plan and delivery actions		(18) White Peak Partnership currently in development (with ELMS trial) so existing planning policy is neutral.
		Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty	(19) See points (1) and (2)

		The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued	(20) See point (18). Planning policy is neutral with regard to wildlife and ecological systems.
In the South West Peak			
Protect: distinctive historic character of the landscape			(21) This has not been assessed
Enhance: recreation opportunities, woodlands, wildness and (bio)diversity of remoter areas.			(22) Planning policy is neutral with regard to the enhancement of woodlands, wildness and biodiversity.
	Maintain existing landscape scale delivery		(23) Planning policy has not been a barrier to landscape scale delivery
		Diverse national park landscapes will respond to challenges whilst retaining their special qualities and natural beauty	(24) See points (1) and (2).
		The richness of the natural environment will be conserved, restored and enhanced so wildlife can thrive, ecological systems remain healthy and its diverse geology is retained and valued	(25) Planning policy is neutral with regard to restoration and enhancement of wildlife and ecological systems.