



Peak District National Park Authority

Local Plan

Local Plan Part 2 - Development Management Policies

Publication Draft for Consultation

SUSTAINABILITY APPRAISAL

Incorporating

STRATEGIC ENVIRONMENTAL ASSESSMENT

SUSTAINABILITY APPRAISAL REPORT



Report prepared by:



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Table i: Key Facts About The Plan To Which This Sustainability Report Relates

Relevant Authority producing the plan and the report	Peak District National Park Authority Aldern House Baslow Road Bakewell, Derbyshire DE45 1AE
Name of the Plan	Peak District National Park Local Plan Part 2 – Development Management Policies
Status of this report	A Sustainability Report (incorporating the Environmental Report) to accompany the Publication Draft Local Plan Part 2
Consultation Date	18 th November 2016
Consultation Period	10 weeks
Contact details	Mr Brian Taylor Planning Policy Service Manager Brian.Taylor@peakdistrict.gov.uk (01629) 816200
Area of Plan	Peak District National Park (see Figure 2, page 31)
Subject of the Plan	A (spatial) Development Plan Document prepared under the provisions of the Planning and Compulsory Purchase Act 2004.
Reason for the Sustainability Appraisal (incorporating the Environmental Report)	The Local Plan is a statutory plan. Environmental Assessment is required under the Environmental Assessment of Plans and Programmes Regulations 2004.

**Table ii: Components Making Up The *Environmental Report* (SEA Regulations)
SEA Directive Components Section of Sustainability Report**

1. Outline of the contents and main objectives of the plan and its relationship with other plans and programmes.	Part 1
2. Current state of the environment and likely evolution thereof without implementation of the plan.	Part 4
3. Environmental characteristics of areas likely to be significantly affected.	Part 4
4. Relevant existing environmental problems especially those of particular environmental importance.	Part 4
5. Relevant environmental protection objectives established at international, Community and national level and how they and environmental considerations have been taken into account during plan preparation.	Part 3 Part 4 Appendix 1
6. Likely significant effects on the environment	Part 6
7. Measures envisaged to prevent reduce and as fully as possible offset any significant adverse effects of implementing the plan	Part 6
8. (a) Outline reasons for selecting the alternatives dealt with	Part 6, Appendix 2,
(b) Description of how the assessment was undertaken	Part 5
(c) any difficulties encountered in compiling the required information	Part 5
9. Description of measures envisaged for monitoring	Part 7
10. A Non-Technical Summary	NTS (separate cover)

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Introduction

- i. The Peak District National Park Authority has prepared the Publication Draft Local Plan Part 2 – Development Management Policies as an important part of the statutory development plan for the National Park.
- ii. This report is the main output in the overall *process* of the Sustainability Appraisal and constitutes the full *Sustainability Report*. It is an important influence on the National Park Authority’s statutory plan-making work in preparing its Local Plan Part 2.
- iii. This report sets out at an advanced stage in the evolution of the Local Plan Part 2 how the plan’s policies are expected to perform from a sustainability perspective, and in doing so further international and national objectives for the delivery of more sustainable forms of development through the operation of the planning system. In doing so it has afforded the National Park Authority opportunities to consider if, how and when it might refine its work to improve the sustainability performance of the Local Plan Part 2 – although such amendment will not always be significant or necessary. The report can also inform other interested parties’ understanding of the Local Plan Part 2 as it is made available for public consultation.
- iv. The Report is structured as follows:
 - Part 1** sets out an outline of the plan subject to the Sustainability Appraisal;
 - Part 2** Outlines the process of Sustainability Appraisal and how and when it has influenced the Publication Draft Local Plan Part 2;
 - Part 3** Sets out the special key international, national and local policy contexts for the appraisal of the plan, and how this limits the sustainability influence of the plan generally;
 - Part 4** provides a spatial portrait of the plan area and a baseline summary of pertinent socio-economic and environmental policy, objectives and local conditions;
 - Part 5** sets out the detailed methodology for the Sustainability Appraisal of the Local Plan Part 2 and its preceding alternative options.
 - Part 6** presents the detailed findings of the Sustainability Appraisal and how the process has influenced the Local Plan Part 2 to this stage; and
 - Part 7** sets out proposals for the monitoring of the sustainability effects of the Plan.
- v. Extensive supporting material is set out in the appendices and separate Annex1 and Non-technical Summary.

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PART 1.

The Peak District National Park Local Plan Part 2 – Development Management Policies

Evolution of the Plan

- 1.1 This section sets out an outline of the plan being appraised the Local Plan Part 2, and its progress to its Publication Draft. This is a requirement of the Strategic Environmental Assessment regulations. As part of the overall process of Sustainability Appraisal, this helps set out the context of the Environmental Report.
- 1.2 The commitment to undertaking a Development Management Policies document was set out in the Local Development Scheme (third revision) (2010) submitted with the Core Strategy. This set out an intention to follow the adoption of the Core Strategy with a Part 2 document. In effect this replicated the former hierarchy of Structure Plan (1994) and Local Plan (2001) but in the form of development plan documents in the LDF, as required by the Planning and Compulsory Purchase Act 2004.
- 1.3 The Core Strategy set out a *vision, strategic spatial outcomes, spatial objectives* and *core policy principles* (with some spatial variation). These provide the framework and direction necessary to allow planning to facilitate delivery of statutory National Park purposes, to steer necessary development to the most sustainable locations, to recognise elements and areas most sensitive to change and where managed change can be accommodated whilst conserving and enhancing special qualities. They do not however provide the necessary detailed policy ‘toolkit’ which will be required to properly exercise the National Park Authority’s Development Management day-to-day functions (and in doing so deliver Core Strategy aspirations). The Core Strategy was examined in April 2011 and key to some debates was the potential effectiveness of the plan and the need to be able to monitor and review aspects of Development Management policy in order to be responsive to the economic climate at that time. Consequently, various references are made in the Core Strategy to the role of Development Management policies in delivering the objectives of the Core Strategy.
- 1.4 In October 2011 the Core Strategy was adopted and attention turned immediately to the preparation of Development Management policies.
- 1.5 On 1st February 2013 a report was taken to the full National Park Authority setting out a full conformity assessment of the Core Strategy against the NPPF with the conclusion that:
 - The Authority’s planning policies are consistent with the provisions of the NPPF;
 - That, consequently no early review of the Core Strategy be required; and
 - That the process of producing Development Management Policies be used to consider any further ways in which the Authority’s planning policies can be refined to further strengthen the consistency with national policy
- 1.6 Early plan scoping work and an Interim Sustainability Report in 2012 indicated that the embryonic Development Management Policies would in effect sit wholly within the policy framework of the adopted Core Strategy which itself had recently been

subject to statutory Sustainability Appraisal, (including Strategic Environmental Assessment)¹ and Habitats Regulations Assessment regarding the impact of policies on protected Natura 2000 sites and species. As such, the scope to generate reasonable alternative options with likely or significant implications for sustainability at this level of the development plan was highly limited.

- 1.7 In this context, from September 24th to 17th December 2012 a 12-week period of consultation took place with all consultation bodies on the *Issues and Preferred Approaches* for the Development Management Policies DPD (as then referred). That document set out reasonable policy alternative options *as far as this was possible* for the spatial issues addressed by the Local Plan Part 2, and where possible, proposed a preferred approach. The saved Local Plan policies from 2001 were heavily used as a basis for preferred approaches though not formerly established as detailed draft policy at that stage.
- 1.8 The responses to that consultation with affected stakeholders highlighted the need for further development to detailed policy, and stimulated a process of closer debate and engagement (see National Park Authority's Interim Consultation Statement), with a range of partners, with particularly focused engagement with Parish Councils. This engendered debate regarding detailed Development Management issues of greatest concern in the locality, such as:
- Using development as a means of driving conservation and enhancement of the National Park's valued characteristics;
 - The delivery of affordable houses;
 - The scope to reuse traditional buildings (heritage assets);
 - Protecting local services and employment space;
 - Responding to local parking needs;
 - Managing the impact of quarrying;
 - Business development on farms and the impact of new buildings;
 - Farming succession; and
 - Managing the impact of tourism.
- 1.9 These and other issues remained at the core of policy debate since 2012 as the plan has developed. In 2015 a report by the Planning Advisory Service (PAS) was commissioned to consider the issues that may arise in terms of meeting the various 'soundness' issues with regards to the Local Plan Part 2, as opposed to a complete Local Plan review. The final report was received in July 2015 and gave considerable reassurance to the approach taken, by comparing the experiences of other similar plans and looking at the consistency of the proposed policies (as drafted at that time) to try and predict potential issues.
- 1.10 In October 2015 a full draft of the Development Management Policies document was approved by the National Park Authority, with delegated Authority to work with a

¹ Peak District National Park Authority Core Strategy - Submission Version Sustainability Appraisal Report, Land Use Consultants, August 2010

member Steering Group to enable final changes and sign off to be reached, such as those triggered by Sustainability Appraisal findings.

- 1.11 The Local Plan Part 2 Publication Draft is being made available for comment during a 10 week period. It is published primarily in order for stakeholder and public representations to be made. The National Park Authority will review the representations and consider what, if any final changes should be made to the Plan before final submission. An independent Public Examination of the soundness of the Local Plan Part 2 is the expected final stage before adoption.

Purpose, Scope and Context of the Local Plan Part 2- Development Management Policies

- 1.12 It is a statutory requirement² for this Sustainability Report to set out a summary of the key aims and objectives of the plan being subject to the sustainability appraisal.
- 1.13 The Publication Draft of the Local Plan Part 2 represents a key stage in the National Park Authority's work to deliver a comprehensive Development Plan as set out above. The policies of the Local Plan Part 2 build directly on the strategic principles and policies set out in the Local Plan Part 1 – *Core Strategy* adopted in October 2011. The Core Strategy sets out the strategic, overarching spatial planning framework for the whole of the National Park over a 20-year horizon. It is the Core Strategy that determines guiding principles and sets out enabling policies accordingly, having taken into account National Park statutory purposes, key local issues and trends, government policy and the policies of neighbouring authorities. The Local Plan Part 2- Development Management Policies will serve to supplement the strategic grain of the Core Strategy and to introduce a level of detail within policy necessary to guide day-to-day Development Management work, applicable to the whole of the plan area.
- 1.14 The Local Plan Part 2's overall purpose is therefore *not* to set high-level strategic policy, but to present the detailed criteria for plan users and the National Park Authority to have regard to when considering proposals for development or change of use of land across the National Park. In every case the Core Strategy will provide the strategic policy context for development proposals. Hence, on adoption the Local Plan Part 2 will exercise very limited strategic influence on the location or amount of development to be delivered (over the plan period), and consequently its implications for delivery of sustainable development are proportionately limited, although at the local or site-specific scale, can be important.
- 1.15 The Publication Draft Local Plan Part 2 – Development Management Policies broadly comprises:

² Environmental Assessment of Plans and Programmes Regulations, 2004

- The **policy background to the plan**, addressing the critical relationship between the emerging plan, the Core Strategy and National Park statutory purposes and duty;
- Clarification and specific policy for the applicability and application of the ***presumption in favour of sustainable development*** set out within the National Planning Policy Framework within the plan area;
- Specific policy for **securing planning benefits** through development proposals;
- Detailed **topic-specific policies** for the consideration of planning applications covering:-
 - Conserving and Enhancing the National Park's Valued Characteristics;
 - Farming and Economy;
 - Recreation and Tourism;
 - Housing;
 - Shops, services and community facilities;
 - Bakewell;
 - Travel and Transport;
 - Utilities; and
 - Minerals and Waste.

1.16 With the exception of policies for sites or locations pre-identified within the Core Strategy (such as for the safeguarding of local building stone reserves under DMMW7), the Local Plan Part 2 **does not** independently identify or allocate particular sites for specific land uses or protection from changes of use, apart from clarifying those sites which constitute 'existing employment sites' under policy DME. ***Locally specific assessment of site-specific implications of policy are not therefore appropriate to this appraisal*** as these policies are formally established through the Core Strategy, whilst environmental policy presents an exceptionally high level of protection from harm potential arising such uses.

1.17 Policies set out in the Local Plan Part 2 do not, for the most part, include cross-references to other policies in the plan, but frequently relate to Core Strategy policies which present the strategic context and guiding principles for each of the more detailed policy in Part 2. The plan stresses that this is because all the policies are inter-dependent and the document should be read and interpreted as a whole, including the spatial strategy elements of the Core Strategy. Where a policy states that certain forms of development will be likely to be approved, this is always on the condition that such development complies with other development plan policies. This is an important consideration in the way that this Sustainability Appraisal has been undertaken. It can allow certain policies where some 'negative' sustainability outcomes are predicted, to be found to be 'sustainable' - *on balance*, because of the mitigation or compensation measures secured through the application of those other policies, or that the proposals will still be resisted if these cannot be secured.

PART 2.

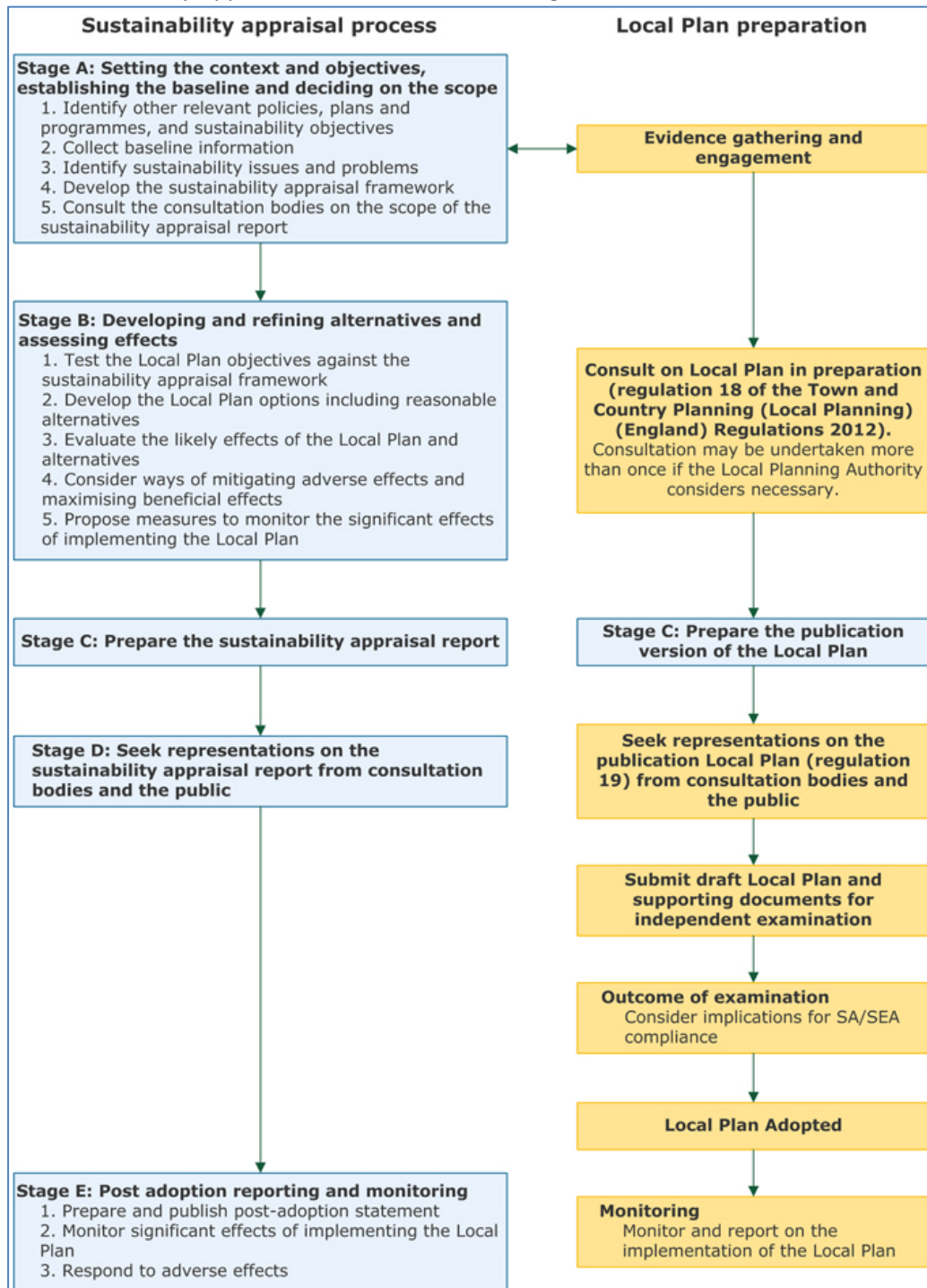
Sustainability Appraisal & Strategic Environmental Assessment

Sustainability Appraisal - A Process.

- 2.1 Following an extended period of plan-making since 2012, the Peak District National Park Authority (National Park Authority) has progressed to the *Publication Draft* stage of its Local Plan Part 2 - Development Management policies (DMP). As part of the overall process of preparing the plan, it must³ be subject to a Sustainability Appraisal.
- 2.2 The core purpose of the Sustainability Appraisal (SA) is to systematically assess the extent to which the plan contributes to achieving sustainable environmental, economic and social conditions, through implementing its emerging policies and proposals through the Development Management system. In doing so it can help plan-making authorities to identify the sustainability 'performance' of the plan, and importantly, which policy alternative options may lead to more (or less) sustainable outcomes, and to amend accordingly where it is appropriate to do so, prior to the plan's adoption. SA can also help to identify and capitalise on positive sustainability elements of the emerging plan and to secure or optimise those elements as the plan progresses through stages of drafting. The process is statutorily required and is an important part of the overall 'plan-making' process. To be most effective in influencing plan content and sustainability performance, SA is usually carried out independently to - but closely alongside, plan and policy drafting. Consultation exercises of the plan will (ordinarily) be accompanied by SA/SEA outputs.
- 2.3 It is important to recognise that SA is essentially a process which runs parallel to plan-making, and is iterative in nature, serving to help plan-makers to develop plan policies and proposals with an informed perspective on likely sustainability implications of emerging plan options and alternative approaches. **Figure 1** below illustrates the stages and flow of the parallel and inter-linked processes of plan-making and sustainability appraisal. This document represents the key output in the SA at 'Stage C'.

³ S.19 Planning and Compulsory Purchase Act, 2004

Figure 1: Sustainability Appraisal and Local Plan flow diagram.



Source: National Planning Practice Guidance

2.4 The benefits of undertaking S A of the emerging Local Plan Part 2 may however, be more limited than they would normally be for a plan with strategic spatial influence (such as the Core Strategy) and/or which identifies and then allocates land for specific development or safeguarding (which the development plan for the National Park

does not do). Nevertheless the added value afforded by the S A and SEA of the Local Plan Part 2 include:

- Helping to choose between alternative policy options that will determine the character and degree of impact of most new development;
- Explicit consideration of possible socio-economic and environmental consequences of policies and proposals;
- Considering whether additional measures are needed to prevent, reduce or offset adverse effects of the plan;
- Improving the ability of stakeholders to participate in plan making by showing how socio-economic and environmental issues have been taken into account; and
- Enabling all stakeholders to engage in the process of helping to achieve a plan more in accord with the socio-economic and environmental aims of sustainable development.

2.5 Whilst Sustainability Appraisal is required by UK planning legislation, it is closely linked with requirements of European law in relation to Strategic Environmental Assessment (SEA)⁴. This requires emerging 'plans and programmes' to be examined against likely environmental implications of their adoption. Sustainability Appraisal in England expands the scope of issues to be examined beyond those required by SEA to include social and economic implications of the plan, reflecting established thinking in respect to what constitutes more holistic 'sustainable development'. Paragraph 007 of the National Planning Practice Guidance states that "...Sustainability appraisal should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate strategic environmental assessment should not be required".

2.6 The SEA Directive and Regulations require that the *process* must include a number of specific *elements or stages*, which are also beneficial (but not statutorily prescribed) within the broader Sustainability Appraisal process. The more significant of these include:

- A *screening* process to determine whether a plan should be subject to SEA (not formally undertaken for the Local Plan Part 2 appraisal as Development Plan Documents in England will always trigger the need for SEA);
- The collation, forecasting and presentation of baseline environmental information;
- Scoping of the likely significant environmental (and socio-economic) effects of the plan;
- The opportunity for statutory Consultation Bodies to influence the assessment from an early stage;

⁴ Environmental Assessment of Plans and Programmes Regulations, 2004

- The carrying out of an Environmental (Sustainability) Assessment during the preparation of a plan and before its adoption;
- The publication of an Environmental (Sustainability) Report with the consultation or submission versions of the plan (this document);
- An early and effective opportunity for the public to comment on the Environmental (Sustainability) Report, as well as the plan, before the plan is adopted;
- Taking into account the Environmental Report and the results of consultations in plan-making;
- Provisions for considering the trans-boundary effects of the plan and consultation with those affected (SEA requirement);
- Establishing a monitoring procedure for the plan; and
- Publication of information about the adoption of the plan (final Sustainability Report/Environmental Report).

2.7 It is important to emphasise that S A and SEA are *processes* and that they are closely linked and undertaken simultaneously despite stemming from different legislative origins. Whilst certain elements of the process are identified in law, there is no prescribed *method* for the assessment process itself for carrying out S A/SEA. However regulations and guidance require the Environmental / Sustainability Report to provide the following *information*:

- An outline of the contents and main objectives of the plan (the Local Plan Part 2 – Development Management Policies) and of its relationship with other most relevant plans and programmes;
- A description of the most relevant aspects of the environmental, social and economic characteristics of the areas likely to be most affected by the Local Plan Part 2, and how they might evolve in the absence of it;
- Any existing environmental, social or economic problems relevant to the Local Plan Part 2;
- The source references for the objectives for protecting the environment established at international, European Community and national level and how those objectives have been taken into account in the preparation of the Local Plan Part 2;
- The method used in the appraisal and any limitations in information or appraisal techniques;

- An assessment of the broad (policy) options considered in developing the Local Plan Part 2 and the reasons for selecting the chosen options;
- An assessment of the policies contained within the Local Plan Part 2 against the Sustainability Appraisal Framework and thus the main predicted social, economic and environmental effects of the plan;
- A description of any measures to maximize the beneficial effects of policies or to mitigate against any adverse effects of the Local Plan Part 2;
- Details of how the significant environmental, social and economic influence of the Local plan Part 2 will be monitored in order to identify at an early stage unforeseen adverse effects so that appropriate remedial action can be carried out;
- A non-technical summary (NTS).

2.8 There are normally two principal outputs from the integrated processes, firstly an initial Scoping Report⁵ and a final Sustainability Appraisal Report (although in practice numerous interim outputs can be prepared, reflecting the multi-staged plan making process under the provisions of the Planning and Compulsory Purchase Act (2004)). The *Environmental Report* as required under the SEA Directive can be incorporated into the Sustainability Report as long as it is made clear which elements of the report constitute the Environmental Report (highlighted at page 3 of this Report).

2.9 This document presents the full iteration of the Sustainability Report and incorporates all necessary elements of the Environmental Report therein. It sets out findings of the processes of S A and SEA in relation to the advanced stage of development of the Local Plan Part 2. It will not undergo further modification apart from possible amendments to monitoring proposals which arise through the examination process, or if significant changes or additions to the plan are brought forward as a consequence of the Examination process.

2.10 The Sustainability Report sets out how the S A process has influenced the final Local Plan Part 2 Publication draft, including consideration of preferred alternatives and sets out recommendations for how the plan's 'sustainability performance' can be monitored.

Progress of the Sustainability Appraisal for the Local Plan Part 2 to the Publication Draft Stage

2.11 Across the plan-making period outlined in Part 2, a Sustainability Appraisal has been carried out as a parallel and integrated process to the drafting and refinement of emerging policy direction and detail.

2.12 Guidance and best practice determines that Sustainability Appraisal is most effective when undertaken as an iterative process, continually influencing the evolution of the plan from its earliest stages of development. This has been the case with the Local Plan Part 2. This Sustainability Report, as a formal, statutorily required stage of the appraisal follows a series of proportionate (having regard to the status and sustainability influence of the plan)⁶ and stage-specific sustainability appraisal work, as set out in Table 1 below:

Table 1: Stages in the Sustainability Appraisal of the Peak District National Park Local Plan Part 2 – Development Management Policies.

Sustainability Appraisal/SEA Document	Date	Comment / Purpose
Full Sustainability appraisal and SEA of the submission draft Core Strategy (Local Plan Part 1)	March 2011	This found the plan (subsequently adopted) to support the objectives of Sustainable Development, and in doing so the Core Strategy significantly imparts those influences to the Local Plan Part 2 as a plan working wholly within the Core Strategy's framework of policies.
Local Plan Part 2 Development Management Policies Sustainability Appraisal Scoping Report	April 2011	This set out the intended methodology for the Sustainability Appraisal of the Development Management Policies and set out a <i>Sustainability Framework</i> . The Scoping Report was made available to the Statutory Consultees for comment, receiving support subject to minor refinement.
Revision of Sustainability Framework	June 2012	Sustainability Framework refined in light of statutory consultee and stakeholder engagement during previous stage.
Interim Sustainability Statement - Appraisal of the Issues and Preferred Approaches Consultation	October 2012	The appraisal involves a systematic check of the Issues and Options Report's proposals against sustainability objectives. The nature of the emerging plan (i.e. statements of scope, intent and preferred directions for policy) required a bespoke and flexible approach to the sustainability appraisal, which focused upon alternative options and those policy areas where greater influence on 'sustainability' could be anticipated vis-à-vis relative 'constraints' of the Core Strategy. This appraisal has since influenced the plan-making authority in taking forward preferred options.

⁶ Having regard to Paragraph: Planning Practice Guidance 009 Reference ID: 11-009-20140306 and PAS guidance: <http://www.pas.gov.uk/chapter-6-the-role-of-sustainability-appraisal>

<p>Sustainability Appraisal of the Pre-Committee Recreation Hubs emerging policy issue</p>	<p>July 2014</p>	<p>Sustainability appraisal against the sustainability framework of a discrete additional policy issue not included within the previous Issues and Preferred Approaches Paper– ‘Recreation Hubs’ prior to consideration by the National Park Authority for inclusion as part of the on-going Development Management Policies plan-making.</p>
<p>Re-consultation of statutory Consultation Bodies⁷ on the scope of the Sustainability Appraisal for the Local Plan Part 2 DMP</p>	<p>March 2016</p>	<p>Formal Invitation to Statutory Consultees to review applicability of the 2012 Scoping Report and/or request information for the updating of the scope of the Sustainability Appraisal for the Local Plan Part 2. Responses received from HE/EN/EA supporting this approach and providing updated baseline information which has been incorporated into this plan and resulted in refinements to the Sustainability Framework.</p>
<p>Sustainability Appraisal Report (and Non-Technical Summary) of the Local Plan Part 2 Development Management Policies (<i>This document</i>).</p>	<p>October 2016</p>	<p>Full Sustainability Appraisal Report of the Publication Draft Local Plan Part 2 Options Report. Incorporating SEA. Indicating how the plan will contribute to the achievement of sustainable development and how the process has informed preferred policy selection and refinement.</p>

2.13 This Sustainability Report has enabled the National Park Authority to further consider the sustainability implications of the advanced draft of the plan, and as appropriate make further minor refinement prior to the submission of the Local Plan Part 2 to the Secretary of State.

⁷ Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004

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PART 3.

Sustainability Policy Context for the Peak District National Park

- 3.1 Reflecting SEA Regulations and best practice for Sustainability Appraisal, this section sets out:
- The significance of National Park Purposes and Duty in spatial policy development.
 - High level outline of source references for the objectives for protecting the environment established at international, European Community and national level and how those objectives have been taken into account in the preparation of the Local Plan Part 2 Development Management policies.
 - An outline of the relationship of the Local Plan and Sustainability Appraisal process with other most relevant plans and programmes;
- 3.2 As part of the understanding of the local sustainability context for the plan and its appraisal, a consultation exercise to update the original 2011 Scoping Report was undertaken in early 2016. This was held primarily to review of 'baseline information' to be used as the contextual understanding for the Sustainability Appraisal. In doing so it also informed a refinement of the Sustainability Framework (see Part 5).

Review of the Relationship with other Plans, Programmes and Objectives

- 3.3 An important statutory consideration in undertaking the Sustainability Appraisal (and particularly in developing its appraisal framework of 'tests' to apply to emerging policy) is a review of other relevant *plans and programmes* in order to identify guiding social, environmental and economic objectives at the international, national, and local level that together help define a broad consensus of what sustainability aspirations are, as relevant to the Local Plan Part 2.
- 3.4 There are a number of influences at international, national and local level that should be taken into account in the development of sustainability objectives, and which can also potentially influence (spatial) policy within the plan to be appraised. These were first set out as substantive lists within appendices of the 2011 Scoping Report. An updated list, reflecting changed policy context since 2011 is set out at **Appendix 1** of this report. Key documents and their principal influences are also included with this Part of the report and again at Part 4 of this report 'Identification of Key Sustainability Issues'.
- 3.5 It should be recognised, as acknowledged within SEA Guidance⁸ that such references cannot be fully comprehensive as new plans and programmes are prepared and existing ones constantly revised and replaced. The extensive list of pertinent documents and their diverse policy objectives present a broad scope and context for

⁸ Appendix 2, ODP, Scottish Executive, Welsh Assembly Government, Department of the Environment Northern Ireland, 'A Practical Guide to the Strategic Environmental Assessment Directive', September 2006

the delivery of sustainable development, but in doing so also present practical difficulties in respect to distilling a coherent, manageable and mutually supportive set of key sustainability indicators. Nevertheless, it remains necessary to establish the wider sustainability and environmental policy context within which the Local Plan Part 2 will operate.

- 3.6 Significant changes in the policy context for this appraisal since the 2011 Scoping Report have been noted, and particularly in respect to the removal of a considerable raft of regional policy documents and the replacement of previous national Planning policy Statements and their replacement by the more strategic the National Planning Policy Framework.

Statutory National Park Purposes and Duty

3.7 The National Park Authority must ensure that across all plan-making and spatial policy development (including through the application of tools such as Sustainability Appraisal/SEA), emerging policy recognises and conforms to the statutory purposes and duty of National Parks, as set out under section the National Parks and Access to the Countryside act 1949 (as amended by the Environment Act 1995⁹). National Park *purposes* are to:

- *'Conserve and enhance natural beauty, wildlife and cultural heritage', and*
- *'Promote opportunities for the understanding and enjoyment (of the Parks) by the public'.*

In pursuing these purposes the Authority has a *duty* to:

- *'seek to foster the social and economic well-being of local communities'.*

3.8 Since the National Park Authority is statutorily bound by the purposes and duty, this document embeds these firmly within the Sustainability Appraisal /SEA process. These purposes and duty underpin and guide strategic policy in the overarching National Park Management Plan¹⁰ and the Core Strategy which themselves are highly influential on the Local Plan Part 2. This approach has been supported consistently by Government¹¹ and by Planning Inspectors presiding over development plan policy and its application.

3.9 Where there is an irreconcilable conflict between the two purposes themselves, (for example from proposals for recreational development that would result in unavoidable harm the valued characteristics of the National Park), the *'Sandford Principle'* has established to Government's satisfaction that the conservation purpose should prevail.

3.10 It is reasonable to conclude that the Purposes and Duty together present a fundamentally sustainable framework within which the National Park Authority's plan-making is founded. Prioritisation of environmental conservation and enhancement, promotion of a wider understanding and inclusive enjoyment of the

⁹ S.61 & S.62

¹⁰ Peak District National Park Management Plan 2006-2011. Peak District National Park Authority

¹¹ For example, the English National Parks UK Government Vision and Circular 2010, Defra

Park's special qualities, whilst allowing for social and economic well-being of the communities of the National Park together present a robust sustainability context for the Local Plan Part 2 - from the outset. As statutory purposes, these priorities must prevail where or when other valid sustainability objectives (not as explicitly established in law) might conflict, for example support for general economic growth or large-scale renewable energy generation.

International Law and Policy Context for the Local Plan Part 2 and the Sustainability Appraisal

3.11 As all national policy and statute is expected to be consistent with the UK's obligations under international law and policy, only a brief consideration of international policy context is appropriate for this section¹². A key international influence in carrying out Sustainability Appraisal is the requirement to satisfy the European Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment, as transposed into UK law¹³. In this respect Planning Policy Guidance¹⁴ notes that:

"Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues."

3.12 Critically, the Directive requires that the formulation of appraisal objectives must address environmental topics identified in its Annex 1(f) to ensure that all the issues detailed are considered. It lists those topics as:

- Biodiversity;
- Population;
- Human health;
- Fauna and flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage;
- Landscape; and the
- Interrelationship between these factors.

3.13 This report complies with the international obligations in respect of SEA, as specifically identified at Table ii at the head of this report. Detail of the method applied in the appraisal of the plan is expanded upon at Part 5.

¹² This conforms to former best practice set out within the PAS Sustainability Appraisal Advice Note (2010).

¹³ Environmental Assessment of Plans and Programmes Regulations, 2004.

¹⁴ NPPG Reference ID: 11-001-20140306

Summary National Policy Context for Sustainable Development

3.14 The Sustainability Appraisal of the Local Plan Part 2 is set within the context of the Government's first national sustainable development strategy 'Securing the Future'¹⁵ and the 2011 update 'Mainstreaming Sustainable Development – the Government's vision and what this means in practice'¹⁶ which seek more proactively to embed sustainable development principles across government policy and action. Securing the Future's 'refreshed' strategy set out five key principles for sustainable development across the UK as:

- *Living within environmental limits;*
- *Ensuring a strong and just society;*
- *Achieving a sustainable economy;*
- *Promoting good governance;*
- *Using sound science responsibly.*

3.15 The goal of the UK strategy and 2011 policy paper is for sustainable development to be delivered in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, a just society that promotes social inclusion, sustainable communities and personal well-being. This should be delivered in a way that protects and enhances the physical and natural environment and uses resources and energy as efficiently as possible.

3.16 Section 39 of the Planning and Compulsory Purchase Act 2004 requires that the LPAs preparing a Local Plans must do so with the objective of contributing to the achievement of sustainable development. National Planning Policy Framework (2012) at Paragraph 14 places great emphasis on the presumption in favour of sustainable development, with the caveat '*unless specific policies in this Framework indicate development should be restricted*'

3.17 Importantly for the National Park context and the Local Plan Part 2, those 'specific policies', referred to by Paragraph 14 of the NPPF include policies for National Parks. NPPF paragraphs 115 and 116 state:

'115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

116 Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

¹⁵ Securing the Future – Delivering UK Sustainable Development Strategy, DEFRA, 2005

¹⁶ Defra February 2011

- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. ’*

3.18 Since the preparation of the 2011 Scoping report, the Localism Act 2011 set the process in place for the wholesale revocation of regional plans and strategies including Regional Spatial Strategies. This has resulted in an effective vacuum of regional level policy or guidance for the sustainability context of the Local Plan Part 2.

Summary Local Policy Context for Sustainable Development in the Peak District National Park

3.19 The Local Plan Part 2 is the first Development Plan Document to be prepared following the adoption in 2011 of the National Park Authority’s Local Plan Part 1- the Core Strategy. The Core Strategy sets out strategic objectives and spatial policy principles to help achieve the statutory purposes as defined in the Environment Act 1995¹⁷ - the primary legislation underpinning National Park designation. These are noted at paragraphs 3.7-3.10.

3.20 These statutory purposes and duty underpin *all* actions and policy formulation of the National Park Authority and are critical to understanding the context for the spatial policy framework prepared as the Local Plan Part 2.

2.21 The Local Plan Part 2 compliments and adds detail to Core Strategy policies. It presents a policy suite which sets out in further detail and specificity the information and criteria planning applications are expected to include and meet, before the National Park Authority can consider positive determination of planning proposals. In doing so, detailed development management decisions will then serve to further the objectives and policies of the Core Strategy. The Core Strategy was subject to a Sustainability Appraisal itself¹⁸. Notwithstanding this very close inter-relationship, the Local Plan Part 2, it must be subject to its own Sustainability Appraisal process. It is logical therefore that there should be strong commonalities between the two appraisal processes, subject to any alterations necessary which reflect the specific role of the Local Plan Part 2, and any changing context in relation to policy and guidance differences since the Core Strategy appraisal was undertaken.

2.22 The Core Strategy itself contains a spatial strategy, alongside policies to achieve the vision and desired outcomes. In part, the vision and objectives reflect the land use aspirations of the National Park Management Plan¹⁹, the senior policy document shaping actions of all key stakeholders influencing the park’s future. The Core Strategy’s policy principles will enable the Authority to manage new and growing development pressures associated with climate change and road traffic for example, and give the clarity needed to manage traditional industries such as farming and mineral extraction.

¹⁷ National Parks and Access to the Countryside Act (1949) Section 5 as amended by Section 61 of the 1995 Environment Act

¹⁸ Land Use Consultants, Peak District National Park Authority Core Strategy - Submission Version Sustainability Appraisal Report, August 2010.

¹⁹ Peak District National Park Authority, National Park Management Plan 2012-2017

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PART 4.

Spatial Portrait of the Plan Area, Sustainability Policy Context & Baseline Conditions

4.1 Reflecting SEA Regulations and best practice for Sustainability Appraisal, this section sets out:

- A spatial portrait of the plan area;
- A description of the most relevant aspects of the environmental, social and economic characteristics of the National Park likely to be most affected by the Local Plan Part 2, and how they might evolve in the absence of the plan;
- High level outline of key policy objectives for protecting the environment established at international, European Community and national level;
- Any existing environmental, social or economic problems relevant to the Local Plan Part 2, and how they may evolve in the absence of the plan.

The Peak District National Park - Spatial Portrait Overview

4.2 The Peak District is the UK's first National Park, designated in 1951 under the National Parks and Access to the Countryside Act 1949. It is a predominantly upland area of diverse, beautiful, landscapes and settlements centrally located within England. It sits at the southern end of the Pennine chain, lying between Sheffield and Manchester and covers an area of 1438 km² (see **Figure 2**). Distinctive gritstone edges, wild heather moorlands, and more pastoral limestone dales and plateaux have been settled over thousands of years such that the natural context and human influence have characterised the much valued landscape. Attractive living and working settlements of small towns, villages and farmsteads have used local natural stone in vernacular architectural styles that often blend harmoniously within their wider landscape setting. With a rich cultural and historic heritage, distinctive, rare biodiversity and diverse opportunities for outdoor recreation, the Peak District National Park attracts over 16 million day visitors (and 2.5 million visitors who stay overnight) annually. Many visitors travel relatively short distances from the cities and conurbations surrounding the National Park, but also from across the UK and from overseas.²⁰ The National Park's central location in the UK places it at a crossroads between some of England's major population centres, giving rise to pressure for high volumes of cross-park journeys and freight movement on its strategic road and rail network, as well as energy and water transfer infrastructure.

3.3 The National Park area has a uniquely complex administrative structure as illustrated at **Figure 3**. This is reflected in the unique administration composition of the National Park Authority

3.4 The National Park is home to around 38,000 people making up around 20,000 households. 60% of the population is of working age with 25% being self-employed,

²⁰ Tourism in the Peak District – Fact Sheet 2. Peak District National Park Authority.

twice the English national average. Tourism and catering make up 24% of all jobs within the National Park and quarrying and agriculture both create a further 12 % each²¹. The landscapes of the National Park perform important functions in terms of water catchment, supply and distribution.

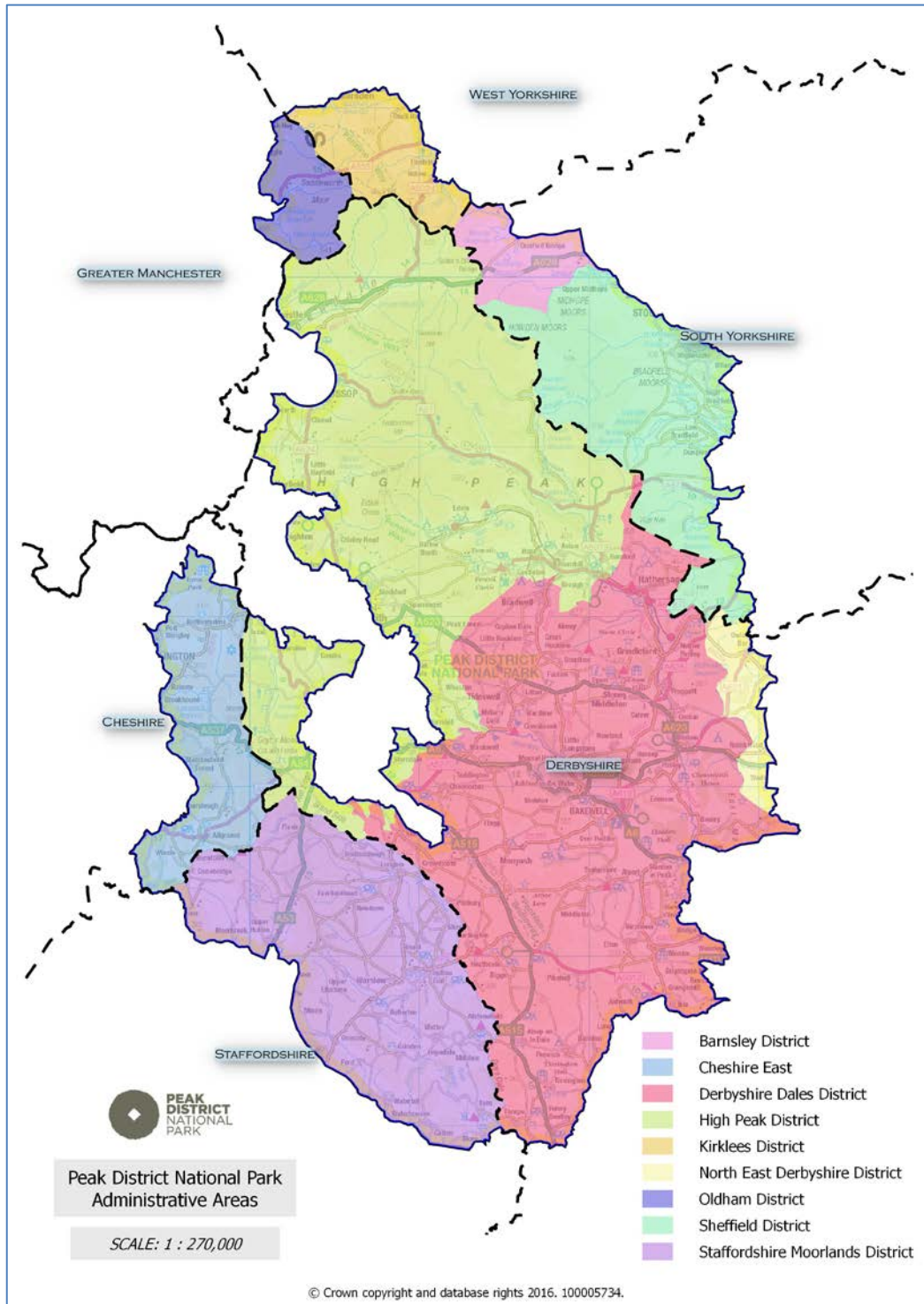
- 3.5 This special environment, the opportunities it presents for recreation and adventure, its settled character and central location in the UK serve to present many pressures on its special qualities. These pressures include demand for new development and uses of land which justify a robust but aspirational and adaptable planning policy response. This is essential if those special qualities for which the National Park was designated are to be conserved and enhanced for future generations to enjoy. The Local Plan Parts 1 and 2 (along with other DPDs) seek to provide appropriate land use and spatial policy tools, building upon the solid foundation established within the previous Local Plan and Structure Plans.
- 3.6 A challenge across the National Park is to focus development on the needs of local communities rather than the needs of those with less sustainable motives. For example, second and holiday home ownership reduces the availability of housing stock and in part exacerbates the gap between house prices and peoples' incomes.
- 3.7 Most of the National Park's population of around 38,000 live in the villages and towns White Peak and Derwent and Hope Valleys, so sustainability challenges inevitably manifest themselves more here than in the less populated Dark Peak and South West Peak. A major challenge is to assist the delivery of affordable homes because it is an urgent priority for communities and housing authorities. Development sites are scarce. This makes it harder to build housing to address community need whilst conserving and enhancing the National Park.
- 3.8 The National Park sustains high levels of employment and a relatively wealthy resident population. However structural problems still exist and there are differences across the National Park. Overall the economy is still dominated by moderately intensive pastoral farming and small to medium enterprises. A few large employers remain but the National Park has lost, or is in the process of losing some larger employers such as Dairy Crest from Hartington.
- 3.9 Quarries and quarrying operations impact heavily on the landscape particularly in the White Peak. Many villages such as Winster, Youlgrave, and Bradwell have their roots in the quarrying industry and it is also a part of the area's cultural heritage and economy. However, some quarries cause serious adverse environmental and social impacts beyond any benefits to local communities and the economy, despite the steady reduction in the number of operating quarries.

²¹ The Peak District National Park Authority – Living in. (<http://www.peakdistrict.org/index/living-in.htm>)

Figure 2: The Peak District National Park – Spatial Context.



Figure 3: Administrative Areas of the Peak District National Park.



3.10 The resident population is largely car-dependent and public transport services are limited and fragile. The level of access to essential services by walking or public transport is reasonable for most communities, but car ownership in the National Park

is of necessity above average and few people need to rely on buses or trains. However the trend is towards service loss rather than gain.

- 3.11 Across the National Park, tourism remains a vital part of the local economy, supporting not only businesses but also the services that residents value. However, whilst places like Chatsworth and Tissington depend on tourists, residents of other places such as Castleton and Hathersage suffer impacts of visitor pressure at peak times. There is a need to be sensitive to local resident needs whilst enabling the sustainable growth of tourism businesses.
- 3.12 The landscapes of the Dark Peak and Moorland Fringes are easily accessible to millions of people living in large conurbations particularly to the north, west and east of the National Park. The Dark Peak landscape lends itself to dispersal of visitors over a wide area from a few carefully managed visitor hubs such as Fairholmes in the Upper Derwent. The more gentle White Peak landscape and much of the South West Peak generally attract pursuits such as walking and cycling, but the extensive road network also lends itself to car and coach borne visitors moving between attractive villages and towns. The presence of many settlements means that the landscape, whilst still highly valued, is slightly less sensitive than the Dark Peak.

Specific Sustainability Issues in the Peak District National Park

- 3.13 Sustainability issues pertinent to the plan area are presented under a series of overarching categories which reflect key areas of relevance to the plan and its appraisal. These are based primarily on the environmental components prescribed for SEA in Annex 1(f) of the Directive, with additional socio-economic topic areas added to constitute an appropriate scope for a sustainability appraisal.
- 3.14 **Table 2** sets out the categories addressed in this section, referencing SEA Annex 1(f) requirements as applicable:

Table 2: SEA Annex 1(f) Categories for appraisal

SEA Category	SEA Annex 1(f) components
Environmental Limits	Climatic factors Soil Water Air
Natural Environment	Biodiversity Fauna and flora
Landscape	Landscape
Built and Historic Environment	Material assets Cultural heritage including architectural and archaeological heritage
Transport & Travel	<i>(not covered by SEA Directive)</i>
Housing	Population Material assets
Community Well-being	Human health Population
Economy	<i>(not covered by SEA Directive)</i>

Enjoyment & Understanding of the National Park	Human health
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- 3.15 For each general category the following information is set out:
- A summary of key **sustainability policy contexts** (distilled from core documents set out at Appendix 1);
 - A brief **description of the baseline conditions** for each component of sustainable development within the National Park;
 - **Current trends** for those issues; and
 - **Key issues** which have informed the sustainability appraisal framework criteria.

Environmental Limits

Key Policy Contexts

Kyoto Protocol 1997

- 3.16 Legally binding agreement under which industrialised countries will reduce their collective emissions of greenhouse gases by 5.2% compared to the year 1990. The goal is to lower overall emissions from six greenhouse gases - carbon dioxide, methane, nitrous oxide, sulphur hexafluoride, HFCs, and PFCs - calculated as an average over the five-year period of 2008-12. A second Kyoto commitment period has been agreed from 2013 to 2020. Fewer countries remain signatories although the UK and the EU are participating.

United Nations Framework Convention on Climate Change

- 3.17 Under the UNFCCC countries have recognised that reductions in emissions should be rapid enough to keep global temperature within 2°C above pre-industrial levels. The UK's 2050 target is broadly consistent with a global effort to achieve this.

European Union Targets

- 3.18 As a member of the European Union (EU), the UK participates in EU action to tackle climate change. These include targets on emissions, efficiency and renewable energy. The EU has committed to three targets for 2020. The first is to reduce emissions by 20% on 1990 levels. The second is to provide 20% of its total energy from renewables. The third is to increase energy efficiency by 20% from 2007 levels.

Water Framework Directive 2000/60/EC (as transposed by The Water Environment (Water Framework Directive) (England and Wales) Regulations, 2003.)

- 3.19 The aim of the Water Framework Directive is for water bodies to achieve good ecological status by 2021, or if this is unachievable, then achieve good ecological status by 2027. If the water body has been heavily modified by human impact (e.g. for navigation and flood risk management purposes), the objective is to achieve good ecological potential by 2027. The Water Framework Directive also requires that there is no deterioration in the ecological status of the water bodies. A holistic approach to water management is based upon the river basin. Environment Agency water quality monitoring and water management strategies, such as the Catchment Abstraction Management Strategies for the rivers Dove, Derwent, Aire and Calder, Mersey and

Don and Rother which partly fall across the National Park, build from the principles and objectives of the Water Framework Directive.

Climate Change Act 2008

3.20 Sets out a 2050 emissions Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels. A National Adaptation Plan requires the Government to assess the UK's risks from climate change, prepare a strategy to address them, and encourage critical organisations to do the same.

Environment Act 1995

3.21 Sets National Park purposes including to conserve and enhance natural beauty, wildlife and cultural heritage. Required development of a strategy to address areas of poor and declining air quality, to reduce any significant risk to health and to achieve the wider objectives of sustainable development in relation to air quality in the UK.

English National Parks and the Broads – UK Government Vision and Circular 2010

3.22 Confirmed government objectives for the National Parks, including a renewed focus on achieving National Park purposes. Vision seeks for National Parks to inspire visitors and local communities to live within environmental limits and to tackle climate change. The wide-range of services they provide (from clean water to sustainable food) are in good condition and valued by society.

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2011), Defra

3.23 Sets out air quality objectives and policy options to further improve air quality in the UK into the long term. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment, similar to the approach being proposed in the new European air quality directive, which is currently under negotiation.

National Planning Policy Framework

3.24 National Planning Policy Framework recognises the significant role planning can play in meeting the challenges of climate change, in terms of minimising pollution, mitigating effects and adaptation to change which is underway and environmental degradation. It sets out as one of 12 core planning principles support for the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encouraging the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy). NPPF also expects planning to be able to:

- prevent both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Peak District National Park Climate Change Adaptation Plan (May 2011)

3.25 Outlines the actions that need to be taken within the National Park to help mitigate the causes of, and adapt to the effects of climate change in the future.

Environmental Limits Baseline Conditions for the National Park:

Climate Change

- 3.26 Climate change is possibly the most pressing sustainability issue facing the National Park's valued and unique environmental characteristics, economy and community wellbeing. The UK government and wider scientific consensus anticipates that in the short and mid-term we can expect increased summer and winter temperatures; decreased summer rainfall; increased winter rainfall and more extreme weather events such as storms, droughts and floods and consequent impacts such as wild fires, landscape and habitat change and water quality issues. The National Park Authority's Adapting to Climate Change document (2011) notes that over the next 60 years average summer temperatures are likely to rise by 3.4°C over 1961-1990 averages, whilst summer rainfall is likely to fall by 22% over the same period. Increases in winter temperatures will also be significant whilst winter rainfall is likely to increase by around 13%. It is likely that temperatures will rise above the 2°C 'safe' target by the 2040's and rise over 4°C by 2100 (Climate Change Adaptation Report 2016).
- 3.27 The main contributing factor to climate change is greenhouse gas emissions. As (globally) combustion of fossil fuels continues to increase and cooling influences subside, climate change is likely to continue²² whilst the use of fossil fuels to produce energy is widely considered to be an unsustainable use of natural resources.
- 3.28 Increasing the understanding of the possible climate change impacts on the National Park is of great importance and is a key focus of the work and policy of the National Park Authority. From a positive viewpoint the natural environment of parts of the National Park can be a force for good in efforts to mitigate some causes and symptoms, and adapt to the effects of climate change. The peat moorlands and many woodlands provide a significant existing function as internationally significant carbon sinks and can do so for centuries to come if integrity is maintained. The National Park's fast flowing rivers and streams may offer some potential small-scale hydro electric sites for the generation of renewable energy.
- 3.29 Even with strengthened policy and measures to reduce the causes of climate change, it is still most likely to have a number of future impacts on the Peak District. These might include a reduction in water capture and security of supply which could impact locally upon agriculture, industry, biodiversity, recreation and hence the economy and community well-being. In addition, negative implications of climate change *locally* may be felt more widely as a consequence of the ecosystem services function of the National Park for surrounding regions. Climate change is likely to affect ecological changes that will bring about changes to valued landscapes and the health, range and type of flora and fauna. Fire hazards may increase as peat soils dry out and woodlands suffer from summer drought. It remains to be seen how a changing climate might materially affect visitor patterns, recreational activity, and impact upon the environment.

²² UK Committee on Climate Change 2015

- 3.30 Protection, management and where necessary restoration of peat moorlands will be critically important both for biodiversity and for their importance in combating the effects of climate change. 'Moors for the Future' is an internationally important partnership project to restore peat moorlands that capture large amounts of atmospheric carbon dioxide (CO₂). Damage from pollution, overgrazing, erosion and fires means that CO₂ stored in the peat is being released.

The Water Environment

- 3.31 Supply of clean, uncontaminated water is an essential prerequisite for the healthy function of our society and the ecosystem goods and services upon which it depends. The Peak District National Park fulfils an important role in water capture, storage and distribution for much of the East Midlands but also the North-West and Yorkshire and the Humber. Historically, Peak District valleys have been damned and flooded to create reservoirs where water is stored to supply the towns and cities around the National Park (such as Leicester and Nottingham). There are 55 reservoirs of over 2 hectares in the National Park. These supply around 450 million litres of water a day.
- 3.32 Climate change may put greater stress on the region's water resources particularly in the summer. Summer rainfall is predicted to decrease and this may have serious detrimental effects upon the water environment and its dependent biodiversity and ecological functionality.
- 3.33 Flood Risk is an important consideration for spatial planning, particularly within the context of uncertainty of climate change impacts. The integrity of ecological systems and soils of the South Pennine and Dark Peak moorlands in the National Park can significantly influence natural water storage capacity and run-off rates, offering opportunities for low impact flood management to downstream areas.
- 3.34 Water quality can also be dependent upon adequacy of wastewater infrastructure including sewerage collection network and sewage treatment works. Tightly limited planned growth under the Core Strategy should be achieved without placing additional burdens upon the capacity of the sewage network, which may result in adverse environmental impacts to the receiving natural watercourse catchment.
- 3.35 Threats to the water quality from flood events, such as those from severe storm events likely to be exacerbated by climate change, can stem from farming practices that result in the release of agric-chemicals or organic matter into the hydrological system, and from flooding with high sediment loads. These events can also have a serious impact on the integrity and abundance of the soil resource.
- 3.36 Notwithstanding these potential threats, 2015 Environment Agency data recognises that across the National Park river water quality is generally 'good' but a number of rivers remain 'moderate'. An exception to this is at Winscar reservoir which is recognised as having poor ecological status. As the WFD seeks to achieve 'good' ecological status by 2027 for all surface water, the generally good baseline remains open to the need for positive interventions to move moderate water course status to good.

- 3.37 The Environment Agency has explored the possibility for flood defence schemes along the River Wye through Bakewell and Ashford in the Water. Major flooding problems have occurred at Stoney Middleton due to a tailings dam burst flooding the village and closing the A623, but can be seen as an exceptional incident. A major flood event from surface water run-off also occurred in the Wildboarclough / Kettlethulme area in 1989. Flash flooding across the National Park is likely to be an increasing threat as a consequence of climate change weather events and the topography and hydrology of the National Park, particularly across the dark peak and south west peak

Air Quality

- 3.38 Over almost the entire National Park the level of air pollution is low and below national thresholds for specific policy interventions.
- 3.39 Air pollution is within allowable limits and many pollutants have reduced in the last five years. Nationally NO₂ emissions declined by 13% between 1970 and 1996, but between 1996 and 2000 NO₂ levels increased significantly at Bakewell, Baslow and Bradwell.
- 3.40 Nationally, the levels of environmental pollutants are declining, which is similar for the Park's overall monitoring sites overall. Poor air quality is identified as the third most important factor in degrading the quality of SSSIs. Acid rain has affected the National Park's moorlands for 200 years due to oxides of sulphur and nitrogen from industry, power stations and also from vehicles. These emissions particularly affect mosses and lichens and have been responsible for the decrease in sphagnum moss leading to higher erosion rates and a slowing of peat creation. Nitrogen Dioxide and PM₁₀ emissions are likely to increase in relation to traffic growth on cross-park routes. Other sources include large-scale combustion – for example the cement kiln at Hope works.

Noise and Light

- 3.41 The outline and area of the National Park is famously visible in night-time satellite imagery for its relative absence lack of light pollution. However light pollution can be locally significant, for example from larger settlements, highway infrastructure or industrial operations.
- 3.42 Noise and general disturbance is often associated with mineral extraction operations at certain sites. For example, at Backdale Quarry historic complaints relate to operations commencing in the early hours and long working days. Various forms of 'informal' motor sports are also practised in the National Park, some legitimately but frequently unlawful. The Authority's policy is to discourage this where they can compromise National Park purposes by causing harm to the landscape, create intrusive noise and nuisance and pollution to air or water.
- 3.43 Levels of tranquillity in the National Park remain high generally. However, noise and light pollution in rural areas are increasing gradually across the country and this may continue within the National Park under gradual development and visitor/transport pressures.

Key 'Environmental Limits' Issues for Sustainability Appraisal

Climate Change

- Increased temperatures from climate change will affect the economy of the National Park, particularly farming and tourism.
- Long-term changes to the climate will trigger changes to the landscape, rare habitats and species of the Peak District.
- Higher risk of moorland fires due to drier summers, with flash flooding from summer storms as well as from higher rainfall in winter.
- The generation of renewable energy supply and conservation of energy in existing building stock can present challenges for landscape and built environment conservation and enhancement.

Water and Flood Risk

- Threats to water quality from climate change and some farming practices
- Changes in rainfall patterns may cause flooding in some vulnerable areas.
- Some Peak District rivers and watercourses do not yet meet WFD objectives for ecological quality.

Air Quality

- Quality of air within the Park is largely determined by the conditions from the surrounding areas outside, and by traffic.
- Prevailing weather conditions mean that cross-boundary and trans-country pollution occurs.
- Effects from recent developments including incinerators and industrialised tyre burning require monitoring.

Noise and Light Pollution

- Noise is particularly associated with transport movements and mineral extraction operations some visitor activity and off-road motor sports.
- Light pollution associated with new development and particularly employment sites and major highways infrastructure locations.

Implications for the Sustainability Appraisal Framework

3.44 The Local Plan Part 2 can have a varying degree of influence on the above issues with the strongest direct impacts being on local environmental mitigation of effects through setting exacting parameters of control over use of land and buildings and new buildings allowed in principle by the Core Strategy, whilst impacts for issues such as waste recycling may be possible but more tenuous. The influence of the Core Strategy – for example in reducing emissions through reducing need to travel by private car, already sets a strong context for positive sustainable development outcomes. The table below shows that the sustainability criteria included in the Framework (see Part 5) will allow environmental limits issues to be taken into consideration in the development and refinement of the plan.

Sustainability Issues - Environmental Limits	
Sustainability issue	Issue related Criteria
Climate change	5d, 6a-d, 7b
Water	4b, 5c, 6d, 7b
Air quality	4a, 6a
Noise and Light Pollution	4d,
Soils	4b

Natural Environment

Key Policy Contexts

UN Convention on Biological Diversity

3.45 Stemming from the Rio Earth Summit in 1992. Three main goals to: Conserve biological diversity; the sustainable use of its components; and, fair and equitable sharing of the benefits arising from genetic resources. It recognised for the first time in international law that the conservation of biological diversity is a common concern of humankind and is an integral part of the development process. The agreement covers all ecosystems, species, and genetic resources. It links traditional conservation efforts to the economic goal of using biological resources sustainably.

Environment Act 1995

3.46 Sets National Park purpose to 'Conserve and enhance natural beauty, wildlife and cultural heritage'

The Natural Environment and Rural Communities (NERC) Act (2006)

3.47 The Act implemented key elements of the Government's Rural Strategy (published in July 2004). Introduced the duty on all public authorities to have regard to conserving biodiversity as part of your policy or decision-making. Conserving biodiversity can include restoring or enhancing a population or habitat.

Habitats Directive 1992/43/EC

3.48 Contributes to the conservation of biodiversity by requiring EU Member States to take measures to maintain or restore natural habitats and wild species at a favourable conservation status in the Community, giving effect to both site and species protection objectives.

National Planning Policy Framework (2012) DCLG

3.49 Core principles include the role planning can play in contributing to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value. The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services; and

- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

English National Parks and the Broads – UK Government Vision and Circular 2010

3.50 Confirmed government objectives for the National Parks, including a renewed focus on achieving National Park purposes. Vision promotes flourishing wildlife and habitats being maintained, restored and expanded and linked effectively to other ecological networks. Woodland cover to increase and all woodlands be sustainably managed.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (Defra 2014)

3.51 National strategy to guide conservation efforts in England including setting our ambition to halt overall loss of England's biodiversity by 2020. In the longer term, its ambition is to move progressively from a position of net biodiversity loss to net gain. The strategy seeks to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

Peak District Biodiversity Action Plan 2011-2020

3.52 Describes the species and habitats of the area and highlights the species and habitats of greatest importance or which are under the most severe threat. It identifies priorities for conservation action set targets for enhancing biodiversity and promotes outline actions which need to be taken to benefit wildlife, landscapes and people. It raises awareness and understanding of the value of biodiversity to society. The Plan aims to conserve and enhance the rich variety of wildlife habitats and species in the three Peak District National Character areas with priorities, targets and actions.

Natural Environment Baseline Conditions for the National Park

Biodiversity

3.53 Biodiversity, the range and abundance of wildlife is a critical component of the natural environment and a recognised special quality of the National Park. It is a component which presents many 'quality of life' benefits to local communities and visitors, as well as playing essential roles in the wider functioning ecosystems, providing important ecosystem goods and services on which sustainable development ultimately depends. The evidence base to the former East Midlands Regional Plan recognised that regional biodiversity levels are amongst the lowest in England and that woodland cover for the region is below the national average. However, the Peak District is an exception to the regional picture, with a broad diversity of rare and important habitats ranging from the White Peak's dale-side woodlands and flower rich-hay meadows to the wild hills of the Dark Peak with its areas of blanket bog and heather moorland.

3.54 However, biodiversity and habitat pressures remain in the National Park. Several species have become extinct within the National Park in recent decades, including the black grouse, dormouse and lady's slipper orchid. Due to loss of habitat, some once-common birds are now in rapid decline, including the skylark, song thrush and grey partridge. Wildlife can be disturbed by the level of recreational use on some of the

32,143ha of moorland that is open to the public. Moorland birds often nest and roost on the ground and are therefore especially sensitive to accidental disturbance. Orienteering, mountain biking and hang gliding are likely to cause disturbance to sensitive species.

- 3.55 Much of the National Park is positively managed for biodiversity and habitat value (for example across its National Nature Reserves (Lathkill Dale, Cressbrook Dale, Monks Dale, Hay Dale and Long Dale, Kinder Scout NNR and Dovedale NNR). The National Park can be seen to be a positive influence in the on-going fight against the prevailing decline in biodiversity value. Conservation designations within the Peak District include:
- Natura 2000 sites account for 33% of the Park covering 47,022 ha.
 - Sites of Special Scientific Interest (SSSIs) cover 35% (50,000 ha) including the Derbyshire Dales National Nature Reserve.
 - Environmentally Sensitive Areas cover 74,788ha.
- 3.56 Having achieved the 2010 target of 95% of SSSIs in Favourable or Recovering condition; the current National target has been set at achieving 50% of SSSIs in Favourable condition by 2020. Of the 51,148 ha of SSSI within the Peak District, there are currently 8,722 ha (17.1%) in Favourable condition, 41,155 ha (80.4%) in Recovering condition, and 1,307 ha (2.5%) is currently Unfavourable and not recovering.
- 3.57 In 2016 the Local Nature Partnership produced a State of Nature Report that highlights the current knowledge of the condition of key species and habitats within the Peak District. Priority BAP habitats together which clearly shows the very extensive, integral nature of the habitats within the Dark Peak and to a lesser extent in the South West Peak. Habitats of quality are much more restricted in the rest of the area with less connectivity and linkages. Some are also very small.

Extent of protected sites in the Peak District (and surrounding landscapes)

National Character Area	Habitats	Area	% of NCA
Dark Peak	Blanket bog, heather moorland, flushes and springs, upland oak woodland	40,433ha	47%
South West Peak	Blanket bog, heather moorland, flushes and springs, upland oak woodland	5,553ha	13%
White Peak	Limestone grassland, ash woodland, ponds, streams, limestone heath, lead rakes	5,014ha	9%

Geology and Geodiversity

- 3.58 There are three main geology types underlying the National Park: Limestone, in the south and central areas of the Park - the White Peak, distinctive for its dry dales and cave systems; the Dark Peak of Millstone Grit, with distinctive horseshoe of 'edges' running around parts of the park's fringes, and; Shale, a friable rock which is often found at the foot of the Millstone Grit edges and underlies the fertile northern valleys of the Park. This geological diversity helps define the distinctive and varied landscape

of the National Park. It also has led to its historical exploitation of minerals resources for thousands of years.

- 3.59 There is increasing pressure on geological features due to the increased recreational use including walking, climbing and caving as well as the significant threat to geological assets from mineral extraction. Mineral extraction can however also reveal important geodiversity features and positive planning and management actions can help safeguard these and improve general accessibility or interpretation opportunities.

Agriculture and soils

- 3.60 Around 84% of the total area of the National Park is farmed land. This is primarily upland livestock farming. Farmers and land managers are essential to looking after and securing a future for many of the special qualities of the National Park. However, future farm sustainability is dependent on business viability and resilience which often means relying on diversification and support payments. Exit of the UK from the European Union presents uncertainty as to the implications of changes in farm subsidy regimes, and hence the viability of agriculture generally, but particularly for marginal upland farming. In the Peak District the majority of farmed land is classed as Severely Disadvantaged Areas (86%) being mainly grade 4 or 5 which indicates that it is the poorest grade of agricultural land, and consequently heavily reliant on agricultural subsidies.
- 3.61 Changes to Defra classifications of agricultural enterprises have complicated the counting of farms across the area, but in 2002 there were 2,555 agricultural holdings within the National Park. 11% of these had no farmland attached. However, in 2016 The National Park Authority identifies around 3,000 agricultural units across the park. The Peak District is seeing farms increasing in size, greater volumes of small hobby farms and a slow decline in the number of medium sized traditional family farms. Records from 2009 show that in the Peak District 41.60% of holdings were less than 5ha, 62.71% were less than 20ha and 77.02% of holdings were greater in size than 50ha.²³
- 3.62 Biodiversity interests may be affected by agricultural practice, such as the historic trends of the decline in species rich hay meadow, pasture and rough grazing. The National Park Hay Meadow Project found a 50% decline in hay meadows between the mid 1980s and mid 1990s. A follow-up survey has highlighted a further 25% loss/or decline in the quality of meadows with the greatest losses occurring in intensive dairy areas such as Peak Forest.

Woodland

- 3.63 Only 8% of the National Park is woodland, of which 62% (7,193 ha) is actively managed. 56% of woodland is classed as Broadleaved, 36% conifer and 2% mixed.
- 3.64 The nature of our peak district woodlands is such that many are on steep inaccessible dale sides and isolated 'cloughs' or of such small scale to not be viable for timber production.

²³ Peak District National Park Authority 2016

- 3.65 80 % of limestone ash wood habitat (ancient woodland and other semi-natural woodland sites) within the Peak District falls within SSSIs. The majority of these also fall within the Peak District Dales Special Area of Conservation. Approximately 625 ha (28% - 30%) of upland oak woods are included within SSSIs. Several upland oak woods are included within the South Pennine Moors Special Area of Conservation. The National Park Authority manages some woodlands and is involved in encouraging others to manage their woodland. The utility (water) companies and Forest Enterprise own large areas of coniferous woodland, mostly in water catchment areas.
- 3.66 Market value of timber has increased over recent years and this together with agri-environment support payments under the latest Rural Development Programme has meant more management of accessible woodlands. This still leaves scope for targeted delivery of guidance and support to reduce the 38% of unmanaged woodlands.
- 3.67 The National Park Biodiversity Action Plan (BAP) (2001), and its 2001-2010 Review indicates trends for woodland conservation and enhancement:
- Upland Mixed Ash Woodland (priority habitat) (approx. 900ha) show a moderate increase over last 200 years (2001). Condition and restoration objectives being met.
 - Upland Oakwood / Birchwoods (priority habitat). 2050ha – 2020ha. Between 1909 and 1974 there was a loss of 8%-68% in different areas. Currently the extent is increasing although the quality is gradually declining outside SSSIs.
 - Wet Woodland (priority habitat). Estimated at approximately 200 - 250ha. A historical decline continues and restoration targets are not being met.
 - Lowland Wood-pasture and Parkland (priority habitat) is being expanded but restoration targets have not been met.

Key 'Natural Environment' Issues for Sustainability Appraisal

Biodiversity

Additional species to those identified will continue decline, or become extinct within the park, partly as a consequence of climate change.

Climate change will also contribute to changes to the landscape, habitat mix and species distribution. Those species and habitats on the edge of their range within the Park may decline, degrade or disappear (such as Ring Ouzel, Jacob's Ladder and peat bogs) and be replaced by others.

Moorland condition affecting biodiversity will continue to decline due to over-grazing, poor management, fires and air pollution. Improved grassland (where fertilisers and herbicides are used) will also detrimentally affect biodiversity.

Disturbance by increased recreational use and other human activity is a concern for some species and habitats.

The loss of micro-habitats across historic mineral site surface remains having a negative impact on specialised ecological communities.

Invasive non-native species

Geology

Extant permissions for mineral operations can present a threat to geodiversity features.

Recreational pressure may impact on exposed geological features such as gritstone edges and cave systems.

Agriculture and soils

Many National Park farms are dependent on subsidies, withdrawal from EU CAP and changes to other agri-environment schemes may have significant effects. Biodiversity interests may be affected by a decline in hay meadow, pasture and rough grazing conservation.

Policies on agricultural buildings are considered likely to have an effect on stock numbers and out-wintering of stock, and this may have adverse implications for hay meadow, pasture and rough grazing conservation.

Private ownership of land can restrict landscape and biodiversity improvements.

Climate change may affect soils resource through drought, fire (peat) and flooding leading to loss through run-off or wind erosion.

Woodlands

Ash dieback disease presents major threat to distinctive habitats and landscapes across the National Park, including NNRs and SSSIs.

Disparities in the management and condition of priority woodland types between those within and those outside SSSIs.

Climate change may affect the well-being of some species for example through storm damage and increase the risks from wild fire in summer months as well as changes in rainfall patterns.

Implications for the Sustainability Appraisal Framework

3.68 The Local Plan Part 2 can have a varying degree of influence on Natural Environment issues with the strongest direct impacts being on mitigation of effects on the local environmental through setting exacting parameters of control over use of land and new buildings allowed in principle by the Core Strategy. Influence over issues such as land management and recreational disturbance will be more tenuous. The influence of the Core Strategy – for example in limiting the scale of growth and directing development away from the most sensitive environmental areas already sets a strong context for positive sustainable development outcomes. The table below shows that the sustainability criteria included in the Framework (see Part 5) have allowed Natural Environment issues to taken into consideration in the development and refinement of the plan.

Sustainability Issues – Natural Environment	
Biodiversity	2a,
Geology	2b, 5a
Agriculture and Soils	4c,13
Woodland	1a, 2a

Landscape

Key Policy Contexts

European Landscape Convention

3.69 Recognises the importance and diversity of landscapes across the European Community and to conserve and enhance local distinctiveness and value to local communities. Supports the identification of landscape types as a spatial unit for other policy frameworks. Defines landscape as: ‘an area, as perceived by people, whose character is the result of the action and interaction of natural and/ or human factors’.

Pan-European Biological and Landscape Diversity Strategy.

3.70 To maintain and enhance Europe's biological and landscape diversity by 2015. The Strategy is a Pan-European response to support the implementation of the Convention on Biological Diversity.

Environment Act 1995

3.71 ‘Conserve and enhance natural beauty, wildlife and cultural heritage’

English National Parks and the Broads – UK Government Vision and Circular 2010

3.72 Confirmed government objectives for the National Parks, including a renewed focus on achieving National Park purposes. Vision promotes landscapes and habitats are managed to create resilience and enable adaptation.

Peak District Landscape Character Assessment (September 2009), Peak District National Park Authority

3.73 The LCA establishes a baseline audit of the current state of the landscape and develops a system for the measurement of change. It recognises eight separate Landscape Character Areas and 19 Landscape Character Types. For each unit it sets out descriptions of character and a strategy for planning and guidelines for appropriate development objectives in relation to protection, management and planning.

NPPF

3.74 NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils. Paragraph 115 notes that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'.

Landscapes Baseline Conditions for the National Park

3.75 The importance of landscape character and the need to understand, protect and enhance all landscapes, not only those of the highest quality, has become the focus of European landscape policy (European Landscape Convention). All landscapes contribute to local distinctiveness and have meaning and importance to the people who live and work in those landscapes.

3.76 The National Park extends over 143,830ha of gritstone moorland and edges, limestone upland and dales. The Landscape Character Assessment for the National Park and its surrounding area divides it into a series of eight Regional Character Areas representing broad tracts of landscape which share common characteristics. The three main character areas are Dark Peak, the White Peak and the South West Peak. These include character types such as broad open moorlands, more intimate enclosed farmlands and wooded valleys. The landscapes have been shaped by variations in geology and landform and by millennia of human settlement and land use. A variety of other landscape components, such as hay meadows, limestone heath, lead rakes and dew ponds are also important at a national level, and contribute to the landscape character.

3.77 Linear features include over 8,000km of drystone walls and banks; and 1,710km of hedgerows. Most land within the Peak Park is in private ownership. Major land owners such as the National Trust and the Water Companies can have significant influence of the landscape tracts they control.

3.78 Present trends it is possible that iconic moorland landscapes condition will continue to decline due to over-grazing, moorland fires, air pollution and increasingly from climate change.

3.79 It is recognised that the impacts of climate change may result in changes to the landscapes of the Peak District, with particular impacts affecting some landscapes more than others, such as the moors and dale grasslands. The National Park Landscape Strategy and Action Plan seeks to enhance the spatial understanding of climate change mitigation and adaptation programmes.

- 3.80 Renewable energy is important in helping to combat the effects of climate change. Some renewable energy technologies can have significant landscape impacts e.g. commercial scale hydro-power, wind power and wood fuel plants. The Strategy identifies the landscape character types which could potentially accommodate water and wood fuel schemes, either by utilising existing landscape features, such as rivers and woodland, and helping to maintain them, or by creating new features where appropriate.
- 3.81 Housing, commercial and community development is usually accommodated within the larger settlements of the National Park. However, employment development, service and utility infrastructure and new housing necessary to meet locally arising needs may strain the landscape’s capacity to accommodate change without harm.

Key ‘Landscape’ Issues for Sustainability Appraisal

Landscape
Private ownership of land can limit implementation of landscape objectives or perpetuate harmful practice at the small scale, resulting in cumulative harm or change.
Over-grazing and inappropriate moorland management can lead to loss of habitat and bring about harmful change iconic landscapes.
Possible impacts and change from renewable energy schemes or the production of biomass crops where viable.
Climate Change impacts upon ecosystems, vegetation, flood and drainage related erosion, fire risk and recreational behaviour affecting landscape character.
Development pressure, particularly from larger scale and prominent transport and communications infrastructure, and from minerals extraction and associated processes.

Implications for the Sustainability Appraisal Framework

- 3.82 The Local Plan Part 2 can have a varying degree of influence on baseline landscape character and value through setting exacting parameters of control over use of land and new buildings allowed in principle by the Core Strategy. Influence over issues such as land management such as agricultural practice and will be more tenuous. The influence of the Core Strategy – for example in limiting the scale of growth and directing development to within existing settlements should deliver positive sustainable development outcomes for the landscape of the National Park. The table below shows that the sustainability criteria included in the Framework (see Part 5) that will facilitate landscape sustainability issues to taken into consideration in the development and refinement of the plan.

Sustainability Issues – Landscape	
Landscape	1a, 1b, 2a, 2b, 3a,5a

Built and Historic Environment

Key Policy Contexts

UNESCO World Heritage Convention (1972)

3.83 Recognised cultural heritage and natural heritage are increasingly threatened with destruction not only by the traditional causes of decay, but also by changing social and economic conditions which aggravate the situation. Each State Party to this Convention recognises that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural heritage.

☒☒

Environment Act (1995)

3.84 'Conserve and enhance natural beauty, wildlife and cultural heritage'

Planning (Listed Buildings and Conservation Areas) Act (1990)

3.85 Act relating to special controls in respect of buildings and areas of special architectural or historic interest. Sets legislative context and powers for LPAs in seeking to preserve and enhance the historic built environment.

Ancient Monument and Archaeological Areas Act (1979)

3.86 Act relating to special controls in respect of specific protection for scheduled monuments.

National Planning Policy Framework (2012) DCLG

3.87 Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. This should include heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment – Historic England (2013).

3.88 Sets out guidance for the consideration of the historic environment within Sustainability Appraisal/SEA processes. Defining the historic environment broadly to cover a wide range of heritage assets, including areas, buildings, features and landscapes with statutory protection, together with those parts of the historic environment which are locally valued and recognising the irreplaceable nature of heritage assets and the wider historic environment and the implications of this finite quality. The guidance notes SEA/Sustainability Appraisal analysis of the historic environment is appropriate to the type, purpose and level of plan under consideration.

Peak Through Time – Cultural Heritage Strategy for the Peak District National Park

3.89 Seeks to identify what are the most likely future trends and what actions are required to maintain the character and distinctiveness of the Peak District National Park for current and future generations to experience, understand and enjoy

Baseline Conditions for Built and Historic Environment for the National Park

- 3.90 The landscape of the Peak District is a cultural landscape. The cultural heritage of the National Park is explicitly recognised as one of its special qualities within the 1949 Act, as amended by the Environment Act 1995. What is seen today reflects the cultural heritage of those whose actions have shaped the landscape over the 10,000 years since the end of the last Ice Age. Cultural heritage is a key component of what generates local distinctiveness across the Peak District. It provides the sense of place that attracts visitors and residents to the area, attracting inward investment and contributing to the local economy through tourism, leisure, the arts and creative industries and other activities. The attraction lies in the aesthetic as well as the physical, in the emotional responses, triggered in the young and old alike by memory, association and the awareness of history, of the passage of time.
- 3.91 The built and historic environment of the Peak District ranges from the grandest of country houses and Victorian rail and water infrastructure through to labourers' cottages, field barns, stone crosses. Ridge and furrow, stone age hill forts to cup and ring carving in the ground. Many factors have shaped the built heritage of the Peak District, including climate, local materials and historic periods of growth. Agriculture, with its resource of farmhouses and agricultural buildings has been influential on the built environment alongside its landscape contribution. Past industrial activity such as lead mining, quarrying and textiles has also left a strong landscape and built environment legacy, sometimes with important biodiversity interest.
- 3.92 The settlements of the Peak District are diverse in character, including loose, linear villages made up of farmsteads, to 19th century planned villages of terraces for mill workers. Their character and distinctiveness is often enhanced by the complementary and visually attractive setting of built features with their landscape context, such as stone slate roofs, paving, drystone walls and planned shelter belt planting that provide the context for the buildings themselves.
- 3.93 Within the National Park there are 457 Scheduled Monuments including the iconic Arbor Low stone circle and Mam Tor hill fort. There are 109 Conservation Areas, and a total of 2,897 listed buildings: Grade I = 49; Grade II* = 105; Grade II = 2,745. Some listed buildings remain 'at risk' (around 7% of the Listed Building stock), and without adequate funding this proportion will continue to rise as more fall into disrepair than are rescued. Around 59% of the National Park remains un-surveyed for its archaeological content, and the condition of known archaeological features in the National Park are not monitored.
- 3.94 The National Park includes Registered Historic Parks and Gardens including nationally recognised Chatsworth House and Haddon Hall.
- 3.95 The National Park Cultural Heritage Strategy recognises the integral role people play in defining the cultural heritage of the area. Cultural traditions such as Well Dressing are an important part of local tradition and contribute to community identity and well-being.

Key Built and Historic Environment Issues for the Sustainability Appraisal.

Built and Historic Environment
Loss of historic features and assets due to lack of understanding and survey deficiencies
Loss of archaeological assets through inappropriate management, development pressure and agricultural practice
Continuing loss of lead rake workings and associated features due to removal through agricultural practice ²⁴
Achieving a balance between enabling settlements to develop to meet local needs, and maintaining their distinctive local character and rich historic importance.
Climate change impacts on the fabric and resilience of the built heritage of the National Park, and enabling historic buildings to improve energy efficiency.
Ensuring historic buildings have an economic use to secure upkeep and maintenance.

Implications for the Sustainability Appraisal Framework

3.96 The Local Plan Part 2 can have a high degree of influence on future baseline historic environment and cultural heritage capital and value through setting exacting parameters of control over use of land and new buildings allowed in principle by the Core Strategy. The influence of the Core Strategy – for example in limiting the scale of growth and directing development to within existing settlements should deliver positive sustainable development outcomes for the cultural heritage of the National Park, whilst the detail of the Local Plan Part 2 should facilitate the proper levels of detail and sensitivity are be afforded to the historic environment in considering applications for development. The table below shows that the sustainability criteria included in the Framework (see Part 5) which will facilitate cultural heritage issues to taken into consideration in the development and refinement of the plan.

Sustainability Issues – The Built and Historic Environment	
Historic Environment	1b, 1c, 3a, 7a,
Built Environment	1b, 1c, 7b

Transport & Travel

Key Relevant Policy Objectives

Environment Act 1995

3.97 ‘Conserve and enhance natural beauty, wildlife and cultural heritage’

National Planning Policy Framework

3.98 Sustainable transport is prompted by NPPF as one of its core planning principles, and recognises that strategic planning has an important role in minimising the need to

²⁴ Peak District National Park Authority Lead Rakes Project, *Barnatt and Penny (2004)*.

travel. NPPF recognises that planning permission should be refused for major developments (such as major transport infrastructure) in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Derbyshire Local Transport Plan 2011-2026

3.99 The Peak District is covered by 6 Local Transport Plans / Strategies: Derbyshire, Staffordshire, Cheshire East, Greater Manchester, South Yorkshire and West Yorkshire. All have objectives relating to: -

- Supporting local economic growth;
- Safety and security;
- Quality of life, inclusion and health; and
- Reducing emissions.

3.100 All of the above can bring benefits to the National Park, it's residents and visitors, and potentially contribute to (key) Sustainable Transport ambitions, i.e. when: -

'The National Park is known as a place you can easily and inexpensively travel to, within and from, without a car. Choice of travel options makes using public transport, walking and cycling more attractive and part of the National Park experience, and there is less reliance on the private car. Innovative travel solutions become part of the attraction of the National Park'.

'Transport infrastructure is at a minimum, sympathetically designed and there are no redundant structures. Therefore, the National Park is known as a place where transport infrastructure respects the environment and protects the valued characteristics, while promoting safety.'

Baseline Conditions for Travel & Transport

3.101 The Peak District lies within a network of surrounding urban areas, roads and motorways, including the M62 to the north, the M1 to the east, the A50 to the south and the A34 and M6 in the west. The southern Trans-Pennine rail line (the Hope Valley line) crosses the Park between Sheffield and Manchester. This relationship with the national transport network and urban areas means that the Park's boundary is within a one hour drive of 16 million people, resulting in severe pressure on the Park's transport systems and rural roads.

3.102 The environmental impacts of traffic are a significant threat to the special qualities of the National Park. The high level of transport related emissions contributes to the causes of climate change and results in air pollution which is harmful to human health and ecosystems. Higher traffic levels also threaten the tranquillity of the National Park. Traffic congestion can cause particular problems at popular sites such as Bakewell, Castleton, Dovedale and Chatsworth. Many villages lack off-street parking causing problems to residents and visitors alike. On street parking can have serious detrimental impacts upon the visual character of settlements and the landscape, for example within Winster Conservation Area.

3.103 To address such problems traffic management initiatives have been introduced in some locations including the Upper Derwent Valley and the Goyt Valley. Park and Ride schemes are another options and have also proved successful during major

events, such as Bakewell Show. In addition, the National Park Authority has entered into a number of transport partnerships such as Peak Connections, the Derbyshire and High Peak Accessibility Partnership, and the Community Rail Partnership which help to increase the use of public transport amongst both visitors and residents.

3.104 There are a number of traffic-free cycle and walking routes (e.g. the Monsal, Tissington and High Peak trails) which are well used by local people and visitors, as are related cycle hire centres located around the National Park. Increased connectivity of these routes and the opening of the previously closed tunnels along the Monsal trail have significantly enhanced their popularity and value over recent years. In addition national cycle routes traverse the Peak District, including the Pennine Bridleway (National Route 68). Over the past decade there has been a marked increase in both recreational road cycling and mountain biking across the National Park. Whilst this has contributed positively in many aspects of sustainable development, it has also increased tensions between different types of road and Public Rights of Way users.

3.105 The number of cars owned by residents continues to be higher than the national average and is increasing. In 2001, 86% of households had access to a car or van compared with 73% in England as a whole. The number of vehicles per household rose to 1.5 in the Park compared with 1.1 nationally

3.106 Nevertheless, 85% of visitors to the National Park arrive by car and most people would regard this as their favoured option.

3.107 The number of trains stopping within the National Park (at least once) has increased, but scheduled buses have shown a slight decrease and are likely to continue to decline in current economic circumstances.

Key Travel & Transport Issues for the Sustainability Appraisal.

Transport & Travel
Enhancing more options for environmentally sustainable modes of transport such as cycleways and multi-user footpaths
Ensuring new development is located close to existing services in order to minimise the need to use the private car
Retention of public transport services for both residents and visitors
Control of traffic signage and other transport infrastructure within villages and the landscape to avoid urbanisation and loss of local distinctiveness
The need for traffic management schemes and parking provision to reduce traffic congestion and visual intrusion within settlements and sensitive landscapes
Continued reduction in motorised transport's contribution to climate change and damaging the environment and human health

Implications for the Sustainability Appraisal Framework

3.108 The Local Transport Plan is the key document for transport planning in the Peak District but the Development Plan Documents retain a critical role in ensuring a sustainable relationship between the location of new development in relation to transport infrastructure, in allocating land for transport projects, minimising the

environmental impacts of transport schemes and in ensuring that any new development facilitates access by a number of different transport methods. The Sustainability Appraisal Framework contains a number of criteria to ensure that these issues are considered in the Development Plan Document.

Sustainability Issues - Transport & Travel	
Sustainability issue	
Transport	6c, 7a, 11c 12a, 14a, 14b

Housing

Key Relevant Policy Objectives

Environment Act 1995

3.109 *Duty*: 'Seek to foster the social and economic well-being of local communities'.

National Planning Policy Framework (DCLG) (2012)

3.110 NPPF recognises that sustainable development includes supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS) require local planning authorities (LPAs) to carry out assessments of the future accommodation needs of Gypsies and Travellers.

Peak District Annual Housing Report (2007) and Annual Monitoring Reports Peak District National Park Authority

3.111 The Annual Housing Report 2007 and Annual Monitoring Reports update information on housing development, land availability and contributions towards local housing needs in the Peak District National Park (PDNP) from 1991/92 to 2015/16. The information helps the Peak District National Park Authority (PDNPA) develop housing policy for the area.

Derby, Derbyshire, Peak District National Park Authority and East Staffordshire Gypsy and Traveller Accommodation Assessment (2014)²⁵

3.113 The main objective of this study is to assess the need for additional authorised Gypsy and Traveller site provision within the National Park to 2034. It identifies a need for 9

²⁵ RRR Consultancy Ltd

additional pitches across High Peak, Derbyshire Dales and the National Park combined, but acknowledges these should not be provided within the National Park.

National Park Baseline Conditions for Housing

3.114 Housing pressure within the National Park is acute because of its attractive location and relative accessibility to surrounding urban centres. National Park designation prioritises conservation and enhancement over the demand for open market housing because of inherent incompatibility between market demand for housing and meeting National Park landscape capacity to accommodate this whilst meeting the statutory purposes and duty. Consequently, strategic land use policy has for the past 20 years resisted most types of market housing.

3.115 Strategic housing policies (former structure Plans and the current Core Strategy) instead focus on addressing the local need for affordable housing, whilst providing for limited open market housing where this investment can help secure the conservation and enhancement of the National Park (utilising former industrial sites and traditional buildings).

3.116 The Local Development Plan Annual Monitoring Report for 2015/16 shows 700 completions nearing the mid-point of the Core Strategy from its base date of 2006. This suggests that planning policies are working to allow a steady flow of development across various forms of residential provision, but other factors have an impact on delivery and completion of permitted schemes, such as the quality, quantity and capacity of sites in National Park villages, and by the amount of public subsidy available to support social housing.

3.117 The gap between wages and house prices is often greater within the National Park than elsewhere in the region and many local people find affordability a serious barrier to securing suitable housing locally. This contributes to many local young people moving to other areas. In addition, the stock of available smaller homes at lower cost is diminished partly because of use as holiday or second homes or extensions.

3.118 Housing quality within the National Park is generally good, although pockets of lower quality housing exist but is often masked by its dispersed distribution.

3.119 28% of households in the Peak District comprise people over 65 and this has not changed since 2001. The average household size in the Peak District is 2.3 persons with an average of 3 bedrooms per house. A large number of houses in the Peak District are occupied by a single resident aged 65+. As population increases, under occupation of houses could impact on housing availability for other age groups²⁶.

3.120 The number of households owned outright has been increasing since 1991 in the Peak District. Approximately 75% of houses in the National Park were owned by the occupier, with 46% owned outright and 27% owned with a mortgage. This is higher than other National Parks, and the regional and national average.

²⁶ 2011 census data

3.121 The latest Housing Needs Survey (2007) indicates that 26.1% of households in the rural areas were found to be living in problem housing. The Peak National Park Authority areas within High Peak Borough and Derbyshire Dales District have the highest number and proportion of households in problem rural housing.

3.123 The numbers of agricultural worker dwellings permitted and completed show the continued value of related policy to farm businesses. No farm worker’s dwellings have been lost to other uses such as open market dwellings.

Key Housing Issues for Sustainability Appraisal.

Housing
High house prices – amongst other influences, resulting in local young people moving to other areas, a trend also affected by the gap between local income and house prices ²⁷ .
Ensuring the delivery of Affordable Housing in accordance with the Core Strategy and to meet current and residual local housing need.
Maximising the use of existing housing and building stock to meet the need for affordable housing for local people.
Adapt to aging population profile and need for appropriate housing types.

Implications for the Sustainability Appraisal Framework

3.124 The Local Plan Part 2 could have considerable impact on the delivery, occupancy criteria, specific siting, quality, energy efficiency, design, and affordability of dwellings within the Peak District. The Core Strategy however sets the clear parameters for the principles for housing delivery, and the Local Plan Part 2 will not alter these principles. In any circumstance the delivery of new housing units will be limited in comparison to the existing housing stock. The ways that the document can influence the quality of *existing* housing stock are considerably more limited but should be explored as part of the preparation of the plan.

Sustainability Issues	
Housing	1b, 7b, 11a, 11b

Community ‘Well-Being’

Key Relevant Policy Objectives

Environment Act 1995

3.125 ‘seek to foster the social and economic well-being of local communities’.

**A Guide To Community-Centred Approaches For Health And Wellbeing
Full Report - Public Health England 2015**

²⁷ Peak Sub Region Strategic Housing Land Availability Assessment -Final Report to Derbyshire Dales District Council, High Peak Borough Council and the Peak District National Park Authority - 2009

3.126 Government strategy recognising that communities, both place-based and where people share a common identity or affinity, have a vital contribution to make to health and wellbeing. Community life, social connections and having a voice in local decisions are all factors that underpin good health.

The NHS Five Year Forward View –

3.127 First priority within the NHS Forward View is that the future health of millions of children, the sustainability of the NHS, and the economic prosperity of Britain all now depend on a radical upgrade in prevention and public health within the community.

Defra 8-Point Plan for National Parks

3.128 Promotes innovative schemes for National Parks to serve national health objectives through sustainable outdoor activity.

National Planning Policy Framework

3.129 NPPF sets out the promotion of healthy communities as a core planning principle. To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (amongst others): Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

3.130 Paragraph 28 of NPPF supports the promotion and the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

National Park Baseline Conditions for Well-Being

3.131 Well being can include a wide range of socio-cultural issues such as health, community safety, population trends, access issues, deprivation and quality of life. As an overall indicator of well being, constituent authorities all rank relatively highly in relation to indicators of multiple deprivation²⁸, with areas within the National Park reasonably likely to perform better than across each full constituent area.

Population

3.132 The population within the Peak District at around 38,000 has remained stable from 2001 to 2011, which is well below the national increase of 7.1 per cent but is consistent with the position in the other National Parks. There is an ageing profile to the National Park population. Problems arise from this in relation to the ability to maintain community succession, supporting services, events, culture etc. In addition where services are no longer provided locally, vulnerable people may struggle as they have less mobility travel to access them, although health services could move to peripatetic models of delivery. Workforce can shrink where people retire early.

²⁸ Office for National Statistics Home General Health in England and Wales 2011 and comparison with 2001 (2016)

Housing availability can log-jam because little movement occurs at the upper end of the market.

Public Health

- 3.133 Latest statistics for community health²⁹ shows that over the East Midlands there has been a reduction in the proportion of the population in 'good health' between 2001 and 2011 but by less than 1%. Data shows that access to health services is low across rural areas of the East Midlands, including in and around the Peak District.³⁰
- 3.134 Life expectancy within the region is almost exactly in line with the national average; however the Derbyshire Dales local authority area has one of the lowest life expectancies for men within the region at 72.3 – 73.7 years. Cancer is the main cause of death amongst both males and females in the East Midlands.³¹ None of the National Park' constituent authorities are ranked within the best or worst areas for good health profiles.
- 3.135 Just under one third of the population of 38,000 have a limiting long-term illness (similar to the national figure). The Peak District is slightly better than the average in England, falling in the top 40% of authorities with the healthiest and least disabled populations.
- 3.136 Regional data shows that the prevalence of obesity in both men and women in the East Midlands has been higher than the national average and is continuing to rise. Improving nutrition and rates of exercise participation amongst young people will be key to tackling this issue³². To address this problem the Government wants National Park Authorities to play a part in improving the nation's health. The 'Walking the Way to Health' agenda proves this and Primary Care Trusts are encouraging people to do more to stay healthy or become healthy.
- 3.137 Average rates of smoking in the East Midlands are in line with the national average. However, within the region, levels of smoking are lower within the Derbyshire Dales and High Peak areas than most other local authorities. Smoking prevalence across the region is continuing
- 3.138 Levels of naturally occurring radon are relatively high within the Peak District. Half the Park's parishes need full radon precautions, and a further fifth need secondary radon precautions to be incorporated into the design of new dwellings.
- 3.139 There is a common commitment to healthy communities across the Community Strategies of constituent authorities that share the National Park area.

²⁹ Office for National Statistics Home General Health in England and Wales 2011 and comparison with 2001 (2016)

³⁰ East Midlands Health Profile: Access to Services. Available online at:
<http://www.empho.org.uk/Download/Public/8355/1/38.pdf>

³¹ East Midlands Health Profile: General Health and Health Inequalities. Available online at:
<http://www.empho.org.uk/Download/Public/8350/1/24-31.pdf>

³² Improving Health in the East Midlands, Keeping Health in Mind, Report of the Regional Director of Public Health in the East Midlands (2006) EMRA

3.140 Rural isolation, market conditions and small populations may result in the loss of vital services that keep village communities alive. Young people in particular find it difficult living in isolated villages where there are fewer services and cultural activities available.

3.141 Decline and ageing of the National Park's population will also affect the demographic make-up of communities in certain areas.

Ethnicity³³

3.142 97% of the population of the Peak District is White British compared with 85% in the region and 80% nationally. The growth of minority ethnic groups in England and Wales is not reflected in the Peak District or any of the National Parks.

Standard of Living

3.143 In general the National Park is an affluent area with good standards of living. None of the National Park's communities are in the top 30% most deprived areas of England and only one constituent area (Sheffield) has a monitoring area overlapping the Peak District with deprivation falling into this category. In this case most of the concern population reside outside the National Park part of the area. This has remained the same since 2004.

3.144 According to national monitoring areas statistics, 98% of the most deprived areas are urban, but there is evidence of pockets of deprivation in rural areas, and this has been identified across the National Park. Such issues may relate to low incomes associated with seasonal tourism and (marginal) agricultural sectors.

Crime

3.145 Crime statistics show that the National Park had a significantly lower total recorded crime rate, compared to Derbyshire as a whole. Staffordshire has the lowest level of all recorded crimes, is the most rural and least densely populated part of the National Park.

Access to Services

3.146 There has been a decline in community services over the last ten years, particularly of shops, post offices, healthcare facilities and public houses.

3.147 Many Peak District villages do retain a range of well-used, thriving local services and amenities. However, a combination of online services along with changing behaviours such as combined trips for work and shopping and the longer-term trend increase in the use of private transport may all contribute to a steady loss of facilities such as pubs, post offices and village shops, with several larger centres on the fringes of the National Park (e.g. Buxton, Glossop, Leek and Chesterfield) offering a greater range of goods and services in close proximity. Annual monitoring does however also highlight localised gains in farm and village shops. Access to services varies according to size of village, geographical location and proximity to larger settlements. The average distance from a residential property to a primary school is around 1km in the Peak District. The average distance to a post office is similarly around 1.5km, whilst

³³ A separate Equalities Impact Assessment has been prepared to accompany the Local Plan Part 2 Publication

distance to bank or building society is around 6km on average, supermarket 7km, and job centre closer to 15km (2010). Excluding pubs, primary schools and post offices remain the most common rural service in the Peak District.

3.148 Data indicates that parts of the South West Peak face the worst conditions in terms of access to services. 51 parishes in the National Park have seen a loss of services since 1994, and this trend has been accelerating.

3.149 The trend in the reduction in post offices impacts upon communities, particularly those with poor transport provision. Some communities such as Bamford, Winster, Youlgrave and Litton have saved their post offices by integrating them into the village shop, thus improving the long-term viability of both community services. In Winster, the shop is also owned by the community.

3.150 Established Core Strategy policy for the change of use of community facilities requires strong tests to prove that such a use is no longer required, but nevertheless periodic reviews of services in settlements is warranted to monitor losses over time.

Key Well-being Issues for Sustainability Appraisal.

Well-Being
<p>Health</p> <p>Difficulties in accessing health services in rural areas.</p> <p>Recognising the potential of the National Park's special environment's to encourage healthy and fulfilling lifestyles.</p> <p>Ageing population and increasing levels of obesity, particularly amongst young people.</p>
<p>Crime</p> <p>Maintaining relatively low levels of crime and perception of crime across the Peak District.</p>
<p>Access to services</p> <p>Maintain or improve current levels of community services and, where possible, reverse past losses, particularly in least well served settlements.</p> <p>Accessing community services in more sustainable ways, whether as local, static service or via mobile service providers, or by sustainable transport options accessing services elsewhere.</p>

Implications for the Sustainability Appraisal Framework

3.151 The Local Plan Part 2 is only one of the many factors that can affect improvements to the well-being of the communities of the National Park, but it can help facilitate provision and access to the range of facilities and services that can improve education and health services and opportunities for employment and recreation. Within the constraints of the Core Strategy the Local Plan Part 2 can also serve to help improve 'quality of life' in its widest sense by: protecting local distinctiveness and historic and cultural assets; promoting the provision of town and village centres as foci of service provision and social interaction; and, in the promotion of sustainable access to good quality, safe and bio-diverse open spaces, linear routes and to the wider countryside (addressed in other sections of the Sustainability Appraisal). As almost all the criteria can or will have some impact on some aspect of the above issues, only key specific criteria are listed in the summary table below:

Sustainability Issues – Well-Being	
Sustainability issue	Issue related Criteria
Health	4a, 4d, 5d, 9b, 11a
Crime	11b
Access to Services	12a, 12b

National Park Economy

Key Relevant Policy Objectives

Environment Act 1995

3.152 'Seek to foster the social and economic well-being of local communities'.

European Agricultural Fund for Rural Development

3.153 EU funding will contribute to delivering the Government's top priority of economic growth through: Building knowledge and skills in rural areas; Funding new, and developing non-agricultural, micro, small and medium sized rural business; Funding small scale renewable and broadband investments in rural areas; and Supporting tourism activities in rural areas.

The Midlands Engine Initiative

3.154 Looks to make the East and West Midlands an engine for growth for the UK economy. It is being backed by business, local authorities, 11 Local Enterprise Partnerships (including the D2N2 LEP which covers the great majority of the National Park. Provides a strategy for economic growth through a multi-faceted financial, training, promotion and research programme.

The Peak District & Derbyshire Growth Strategy For The Visitor Economy 2015 – 2020 (2013)

3.155 A plan for growth responds directly to the strategic aims and objectives highlighted in the D2N2 Economic Strategy. This Growth Plan sets out the strategic direction for the visitor economy from 2014 through to 2020 and is the strategic framework for the whole of Derbyshire. This strategy has been developed through consultation with stakeholders in particular with the input from the Visit Peak District and Derbyshire Management Team. A strong visitor economy can play a key role in improving the quality of life, strengthening the distinctiveness and ranking of Derbyshire as a place to live, invest and visit. The sector provides significant opportunities to help address issues such as youth unemployment and worklessness through a wide breadth of job roles and up-skilling prospects; this is particularly important to areas in the north of the County.

National Planning Policy Framework

3.156 Support for a strong rural economy is one of the Government's 12 core principles for planning. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. Policies are encouraged to: support the sustainable growth and expansion of all types of business and enterprise in rural areas; promote the

development and diversification of agricultural and other land-based rural businesses; and support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.

National Park Baseline Conditions for Economy

- 3.157 Economic activity rates in the Peak District are higher than the national average. Unemployment is lower than the national average, but the trend is upwards in line with national trends. There are around 2,800 businesses within the National Park employing some 14,000 people (2007 data). Businesses tend to have fewer employees than regionally or nationally. Wages in sectors that offer seasonal or relatively unskilled work tend to be lower than regional or national average and there is a constant issue in raising skills and wage levels across the working age population.
- 3.158 The rural economy is interdependent with the urban employment centres nearby. About half of the working population travels to jobs outside the National Park. Non-residents fill about 4 out of 10 jobs in the National Park. The commuting distance for most people is below average because of the close proximity of large employment centres such as Manchester and Sheffield.
- 3.159 The majority of National Park businesses are within the service sector but most people are employed in manufacturing, electricity, gas and water supply. Agriculture accounts for 19% of businesses. Hotels and restaurants account for 19% of businesses but only 10% of jobs.
- 3.160 The National Park's economy has historically been reliant on primary industries such as agriculture and quarrying though these have suffered a steady decline and particularly over the past 30 years as agriculture and minerals industries have become highly mechanised. In 2001, mining and quarrying accounted for only 304 jobs, but over 3,000 people were working in agriculture.
- 3.161 Tourism and visitor services are a very important element of the local economy and provide a third of all employment within the Park. However, jobs in these sectors are often low paid, low skilled and seasonal by nature. Nevertheless there are generally lower levels of unemployment within the Park than nationally, with the main occupations for residents being within professional, managerial and administrative jobs (38%). More specifically local employment structure breaks down as follows:
- 25% of residents are self-employed;
 - 24% are employed in tourism and catering;
 - 19% are employed in manufacturing;
 - 12% of jobs are in agriculture, forestry and fishing; and
 - 12% of jobs are in quarrying
- 3.162 The Peak District National Park supports important sustainable economic activity through facilitating marketing and management of grant aid for sustainable tourism, food, craft, and innovative enterprise which also have strong relationships with the landscapes they are set within. It also assists farmers with grants and helps businesses which offer social, economic or environmental benefits and which do not serve to harm the National Park's natural beauty, wildlife or cultural heritage.

3.163 There is an identified shortage of modern office accommodation and limited appropriate development sites, which combined with limited access to services, and restricted road and rail connections, can result in perceived limited some business sector development opportunity.

Key Economy Issues for Sustainability Appraisal

Economy
Over- reliance on seasonal, poorly paid tourism-based employment
Shortage of modern office accommodation
Loss of jobs in traditional industries such as agriculture and quarrying leading to a need to foster enterprise and diversify economic base.
Employment training opportunities limited locally.

Implications for the Sustainability Appraisal Framework.

3.164 The Local Plan Part 2 can affect economic activity in two ways. The first through ensuring that there is an identified supply of employment land and premises that meet the requirements of existing businesses and also emerging businesses, but always within the capacity of the environment to do so. The second is to facilitate employment and training opportunities, and ensure that these are accessible and sustainably located. The sustainability criteria for the Local Plan Part 2 test whether the objectives of the Core Strategy will be implemented in such a way as to secure positive economic benefits whilst maintaining sustainable well-being of the social and environmental qualities of the National Park. The criteria aimed at ensuring improvements to wider environmental quality and well being issues can/will also assist the economy of the National Park's economy, but are not listed below.

Sustainability Issues – Economy	
Sustainability issue	Issue related Criteria
Strong local economy	12b, 13a, 13b, 13c

Enjoyment and Understanding of the National Park – Tourism, Recreation and Education

Key Relevant Policy Objectives

Environment Act 1995

3.165 'Promote opportunities for the understanding and enjoyment (of the Parks) by the public.'

3.166 **The European Charter for Sustainable Tourism**, (as adopted by the English National Parks Authorities Association)

Seeks to support development, management or tourist activity which ensures the long-term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and

well-being of individuals living, working or staying in protected areas.’ (Europarc 2000).

Defra 8-Point Plan for National Parks

3.167 Promotes National Parks as world-class destinations to visitors from overseas and the UK, and seeks to better realise the immense potential for outdoor recreation in National Parks. Includes objectives to: Promote innovative schemes for National Parks to serve national health aspirations; and realise the immense potential for outdoor recreation in National Parks.

East Midlands Tourism Strategy 2003-2010

3.168 This is better described as a visitor strategy. The main markets are people living in the East Midlands region or near it, including local people. Although there is an emphasis in favour of attracting more people who will stay overnight, and that implies a further distance of visitor origin, the Strategy is realistic in its understanding that tourists from overseas or far distant places are unlikely to be the mainstay of tourism in the region.

National Park Management Plan (2012- 2017)

3.169 The shared vision for the Peak District National Park is to be a welcoming and inspiring place. Shared ambitions over the next 20 years include:

- *An inspiring Peak District where all are welcome to discover, enjoy, understand and value the special qualities of the National Park; a place where people can develop a sense of adventure and belonging, and play a part in its sustainable future.*
- *The Peak District National Park will strengthen its role as a welcoming place and premier destination, synonymous with escape, adventure, enjoyment and sustainability. [NPMP 2012-17]*

The Peak District & Derbyshire Growth Strategy For The Visitor Economy 2015 – 2020 (2013)

3.170 A plan for growth responds directly to the strategic aims and objectives highlighted in the D2N2 Economic Strategy. This Growth Plan sets out the strategic direction for the visitor economy from 2014 through to 2020 and is the strategic framework for the whole of Derbyshire. This strategy has been developed through consultation with stakeholders in particular with the input from the Visit Peak District and Derbyshire Management Team. A strong visitor economy can play a key role in improving the quality of life, strengthening the distinctiveness and ranking of Derbyshire as a place to live, invest and visit.

National Park Baseline Conditions

Tourism and Recreation

3.170 The National Park is the most accessible upland and ‘wild’ area in England with 16.1 million people within 40 miles or approximately one hour’s driving time of the National Park boundary. It offers a wealth of recreation opportunities from passive enjoyment of the landscape, biodiversity, cultural heritage and built environment to energetic and adrenaline-focused sports such as rock climbing and mountain biking.

Most visitors enjoy walking within the National Park. It also is important as the first upland area that people visit when heading north from the south.

- 3.171 In 1996 the National Park Authority commissioned 'Assessment of Visitor Numbers Report' (based on the APVS 1994 and other available data) estimated in excess of 22 million tourist days each year for any type of visitor for any length of time. 85% of tourists arrive by car, and many continue to use their cars to tour around the National Park. Day visitors are the main type of visitor (77%) spending on average £3.30 per day, and those staying spend an average of £25.72 per day. The health of the local economy is significantly dependent upon the enjoyment of the park's special qualities by visitors.
- 3.172 Most visitors come from Derbyshire (14%), South Yorkshire (13%), Cheshire (12%) and the other counties that are partly within the National Park. Over 60% of all recreational visits to the National Park are made during the months of May to September. In a typical summer week, over 500,000 visits are made, while a typical low season week may have over 250,000 visits. Sundays are the busiest day.
- 3.173 'Gateways' to the National Park (outside the Park itself) include Ashbourne, Buxton, Glossop, Matlock, Wirksworth and Derwent Valley Mills World Heritage Site and can act as important public transport hubs, or accommodate visitor focused development less suited to within the itself Park.
- 3.174 The National Park Management Plan seeks to afford a more balanced mix between active and low intensity recreation opportunities for visitors and local residents. The Park is recognised as presenting excellent and relatively accessible opportunity for active sports such as climbing, cycling, mountain biking, and canoeing in suitable locations. It also seeks to remove barriers to facilitate the enjoyment of the park by minority groups, particularly from adjacent urban areas and those with mobility limitations.
- 3.175 The farm-based holiday accommodation increased by 45% between 1991 and 2000, and has become an important element of local rural regeneration. The increasing provision of holiday accommodation, particularly self-catering accommodation through conversion of traditional buildings can be seen to have helped farm businesses to remain viable during the challenging periods of BSE, Foot and Mouth, and changes in grant regimes.

Rights of Way and Open Access

- 3.176 In total 52,432 ha of the National Park (37%) is open to public access. The park has for many years enjoyed relatively good access to moorland areas. The Countryside and Rights of Way Act (2000) established a new right to access open country and in 2004 significant additional areas of the Peak District were made available for public access.
- 3.177 Public Rights of Way within the National Park include:
- 2,136km of public footpaths
 - 293km of Public Bridleways; and
 - 30km of other PROW.

- 3.178 Access for people with mobility and other disabilities have been improved. Extensive routes suitable for wheelchair users have been developed and adapted fishing platforms have been provided at Ladybower reservoir.
- 3.179 A number of multi-user trails within the National Park pass along old railway lines and are very well used. This recreational asset may be vulnerable if the railways are ever reinstated.
- 3.180 The Park Recreation Forum alongside other stakeholder groups such as the Local Access Stanga and Hope Valley Forums afford stakeholders opportunity to influence recreation interests and management and to share views, addressing access issues such as the use of trail bikes and off-road vehicles.

Understanding the National Park - Education and Engagement

- 3.181 Urban areas within which under-represented and disadvantaged community groups are located surround the National Park. Local authorities and voluntary groups such as Sheffield Black and Ethnic Environmental Network play a full role in the MOSAIC project. The National Park Authority Learning and Discovery Team provides a range of learning opportunities for people of all ages and encourages them to better understand and engage within the care and management of the Peak District National Park.
- 3.182 Government policy approaches seeks to encourage greater engagement with disabled, black and minority ethnic people and those living in areas of multiple deprivation, as well encouraging children to participate in outdoor activities in areas such as the National Park.

Key Enjoyment and Understanding Issues for Sustainability Appraisal.

Tourism and Recreation

Inequity in opportunity to access the Park, particularly from surrounding areas by under-represented communities.

Difficulties in achieving more sustainable modes of transport by people enjoying the National Park.

Recognising 'win-win' solutions in terms of environmentally sustainable access and enjoyment and local economic well-being.

Some recreational activities threaten environmental condition, particularly the 'wild' and more tranquil areas of the National Park which are most valued for quiet enjoyment.

Some of the most popular sites attract large numbers of visitors resulting in local environmental and local quality-of-life problems for residents, such as overcrowded car parks, blocked roads, and overstretched local facilities.

Rights Of Way and Open Access

Visitor pressure particularly on the moors and prominent hills causing erosion, ecological harm and disturbance.

Motorised off-road conflicts with other rights of way users

Education

Behavioural change still necessary to address environmental harm caused by visitors.

Wider dissemination of environmental and sustainability issues within the National Park and understanding sustainable management solutions may influence positive behavioural change.

Further education of the health and well-being opportunities possible from sustainable access and enjoyment of the National Park

Implications for the Sustainability Appraisal Framework.

3.183 Core Strategy policies determine the strategic principles for recreation and education related development and uses (as controlled within the planning system) across the whole park area. However, The Local Plan Part 2 can affect these issues in terms of control over the detail and delivery of appropriate development permitting and directing visitor education, interpretation, demand and management and facilities.

Sustainability Issues – Tourism and Recreation	
Sustainability issue	Issue related Criteria
Tourism and Recreation	9a, 9b, 4d
Rights of Way	1a, 2a, 2b, 4d
Education	8a, 12b, 13b

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PART 5.

Method For The Sustainability Appraisal Of The Local Plan Part 2 – Development Management Policies.

- 5.1 This section sets out the scope and level of detail used for the Sustainability Appraisal that the report must include to meet SEA Regulations. It sets out how the Sustainability Appraisal Framework - the main tests by which the appraisal of the plan is undertaken, have been developed to this stage.
- 5.2 This element of the Report is particularly important part of the Local Plan Part 2's appraisal because of the **specific nature of the plan being appraised and the relative limitations on it in terms of its likely and significant sustainability influences**. This directly stems from two matters: Firstly, that the Local Plan Part 2 is significantly constrained in its scope and influence (and hence sustainability outcomes of implementation) by the Core Strategy policy framework it operates within; and secondly, because the plan (as with the Core Strategy) is primarily influenced by statutory purposes and duty for the National Park Authority. Nevertheless, the process and Report must highlight what these constraints are as well as the method, extent and breadth of the appraisal undertaken.

The Sustainability Framework

- 5.3 A final Sustainability Framework, set out in **Table 3**, contains 14 sustainability objectives, which are supported by 36 more detailed criteria. Criteria have been used as 'prompts' rather than rigidly specific tests, during appraisal of the emerging plan and its alternative options at preceding stages.
- 5.4 To ensure consistency with the Core Strategy's Sustainability Appraisal of 2011, the underpinning *sustainability objectives* developed for this appraisal have been built upon that earlier framework, with amendments made to reflect the specific purposes and grain of application of the Local Plan Part 2 and to allow for the passage of time. The more specific *sustainability criteria* help provide a tighter focus and specificity to the broader sustainability objectives, reflecting local conditions and sustainability aspirations across the National Park, and hence better relate to the likely influence of the Local Plan Part 2.
- 5.5 The sustainability objectives have evolved from their original basis on the principles contained in the UK's sustainability strategy 'Securing the Future' (2005) and to specifically reflect the National Park context which, because of its statutory status, is a critical influence on what constitutes sustainability priorities locally. Those categories are:
- *Living Within Environmental Limits and Protecting National Park Special Qualities*
 - *Ensuring a Strong, Healthy and Just Community*
 - *Achieving a Sustainable Economy*
- Securing the Future* also contains two further principles:
- *Promoting good governance; and*
 - *Using sound science responsibly.*

- 5.6 The latter two principles are not set out as objectives within the Sustainability Framework, but are inherently embedded both within the processes used to develop the Local Plan Part 2 e.g. the statutory requirements for publicity and non-statutory additional stages for public engagement during plan-making (and its Sustainability Appraisal), and within the development of the objectives themselves, for example, as the scientific or statistical evidence linking pollution to human health issues. In respect to the latter – ‘using sound science responsibly’, it must be understood that the Sustainability Appraisal is a strategic-level test and not a forensic scientific process *per se*. Professional judgment and on-going consultation with the statutory environmental agencies does however afford further weight to the findings appraisal.
- 5.7 The Sustainability Framework (**Table 3** set out below) covers all matters required by the SEA Regulations, with social/community and local economy elements added to cover sustainability issues in their broader context. In relation to the expected level of influence that the Local Plan Part 2 may exert on sustainable development outcomes, the framework may be seen to be more comprehensive than guidance suggests³⁴. However the detail and scope of the framework reflects two important considerations: Firstly, the plan area context brings with it additional considerations under National Park ‘purposes and duty’ which the Sustainability Appraisal should acknowledge and embrace, in addition to sustainability and SEA criteria relevant to most circumstances, and; Secondly, at the time of the development of the Sustainability Appraisal method, some uncertainty as to the actual scope, format and detail of the final Local Plan Part 2 resulted in some sustainability objectives and criteria being generated which in retrospect, after the appraisal process has been undertaken, can be seen to be less pertinent to the fully drafted plan scope and format. However, the process has taken a precautionary approach and applied the full sustainability framework assessment to all policies of the emerging plan.
- 5.8 Key to the preparation of a Sustainability Framework that is fit-for-purpose has been the twin-staged input of the statutory Consultation Bodies and other key stakeholders in 2012 and again in 2016. Scoping opinions received from Natural England, Historic England and the Environment Agency have added legitimacy and confidence to the method taken as well as helped refine sustainability criteria, identify baseline conditions, policy and local sustainability issues.

³⁴ <http://www.pas.gov.uk/chapter-6-the-role-of-sustainability-appraisal>

Table 3: Sustainability Framework for the Peak District National Park Local Plan Part 2

Objective	Criteria
Living Within Environmental Limits and Protecting National Park Special Qualities	
1. To protect, maintain and enhance the landscape and built environment of the National Park.	
1a To conserve and enhance diversity character and condition of landscapes, including woodland, grassland and any historic importance.	Will it protect areas of highest landscape sensitivity from harmful incremental change?
	Will it protect key or characteristic landscape features?
	Will it support delivery LCA aspirations and facilitate landscape enhancement?
1b To protect, enhance and manage the character and appearance of the built environment, maintaining and strengthening local distinctiveness and sense of place and relationship to its landscape setting.	Will it deliver high quality of design and construction?
	Will it deliver change which conserves and enhances an attractive and locally distinctive built environment and ensure its good landscape fit, including important vistas into and out of the settlement?
1c To secure architectural, artistic and historic open spaces within settlements.	Will it retain or deliver new and/or respect existing valuable open space and its amenity value, within and on the edge of settlements?
2. To protect, enhance and improve biodiversity, flora and fauna and geological interests	
2a To conserve and enhance designated nature conservation sites and vulnerable habitats and species as well as the wider biodiversity importance of the National Park.	Will it protect sites and habitats of nature conservation value, including SSSIs and other national and local designations? (<i>note N2K sites covered by law</i>)
	Will it protect BAP priority species and Habitats and Species of Principal Importance in England?
	Will it protect nature conservation interests outside designated areas, including wildlife corridors, and maintain or improve permeability of the landscapes to species responding to climate change?
	Will it generate opportunities for enhancement of habitats and biodiversity?
2b To protect geodiversity assets.	Will it conserve and where possible enhance geological interests, including RIGS, through conservation or managed accessible feature exposure?
3. To preserve, protect and enhance the National Park's historic and cultural environment	

3a To preserve and enhance sites, features, areas and the settings of archaeological, historical and cultural heritage importance.	Will it preserve and protect scheduled and non-scheduled archaeological sites and other historic assets, and facilitate site survey?
	Will it preserve and enhance the setting of features and sites of heritage importance?
	Will it protect and enhance the integrity and character of conservation areas?
	Will it preserve and enhance buildings and groups of buildings, which contribute to the wider historical and architectural character of the National Park, including Listed Buildings 'at risk'?
	Will it resist loss or harmful change to Registered Parks and Gardens and other designed landscapes?
	Will it help respect and support the Park's cultural heritage? (e.g. history, traditions, customs and literary associations and the spaces and places these rely upon or relate to).
	Will it recognise and respond to the special qualities and sensitivities of designated and non-designated buildings and heritage assets?
4. To protect and improve air, water and soil quality and minimise noise and light pollution	
4a Reduce air pollution and its effects.	Will air quality be protected or improved?
4b To maintain and improve water quality and, natural hydrological system and security of supply.	Will it allow water to be used efficiently and managed with care?
	Will water quality in the natural environment be protected and improved and natural drainage processes allowed to function?
4c To maintain and improve soil quality.	Will it protect the soil resource from loss, particularly peat and unimproved soils?
	Will it support remediation of contaminated land?
	Will BMVL (grades 1, 2, 3a) be protected from loss where alternative sites of lower quality soil sites are feasible?
4d To protect and increase a sense of remoteness and tranquillity.	Will it serve to control noise and light pollution from roads, industry and other development so as to protect tranquillity and dark skies?
5. To minimise the consumption of natural resources	
5a To safeguard mineral reserves for future generations and promote the	Will it prevent the sterilisation of known or suspected mineral resources by development?

reuse of secondary materials.	Will it ensure efficient/prudent use of mineral and other resources, such as recycling aggregates?
5b To reduce waste generation and disposal and increase recycling.	Will it result in a reduction in the amount of waste requiring treatment and disposal, and encourage recycling or 'Energy from Waste' in line with the waste hierarchy?
5c To reduce water consumption.	Will it help encourage a reduction in water consumption through maximising water efficiency and encouraging recycling/re-use of 'grey water'?
5d To increase opportunities for walking and cycling	Will it support reduction in vehicular traffic and related emissions by promoting alternative sustainable modes of transport?
6. To develop a managed response to climate change	
6a To conserve and enhance the carbon absorption function and capacity within the National Park.	Will it conserve and protect the functionality and increase capacity of carbon sinks, such as peat soils, unimproved grassland and woodland?
6b To promote the use of renewable energy, exploring innovative techniques.	Will it promote or facilitate the use of alternative renewable energy where it is within the capacity of the National Park's special qualities to accommodate it?
6c To achieve efficient energy use.	Will it help improve energy efficiency in the built environment?
6d To ensure development is not at risk from flooding and will not increase the threat from flooding elsewhere.	Will it reduce the vulnerability to fluvial flooding and flash flooding within settlements both within and outside the National Park through reduced run-off rates and increase water absorption / management?
6e To ensure all new development is resilient to climate change.	Will development facilitate natural urban cooling in larger settlements through planting schemes and avoidance of reflective materials?
7. To achieve and promote sustainable land use and built development	
7a To maximise the use of previously developed land and buildings.	Will it allow for the conversion of existing buildings where overall effect is a more sustainable development?
7b To promote sustainable construction solutions in the design of development which also meet landscape and built environment conservation priorities.	Will local materials be sourced which will not pressure the wider landscape and natural environment of the National Park?
	Will it seek to support sustainable design and construction techniques embracing energy efficiency measures, micro-generation, water and waste conservation whilst respecting conservation priorities?

	Will it encourage sensitive design of road infrastructure? (e.g. reduced signage road markings, use of local materials and alternative traffic calming methods).
Ensuring a Strong, Healthy and Just Community	
8. Increase understanding of the special qualities of the National Park by all, including the specific target groups of: young people; people from disadvantaged areas; people with disabilities; and, those from ethnic minority backgrounds.	
8a Facilitate learning opportunities, information availability and interpretation resources.	Will it facilitate and encourage provision of accessible resources and opportunities which can improve understanding of the special qualities, pressures and management of the National Park to all?
9. To promote access for all	
9a Increase enjoyment of the National Park by under-represented groups from surrounding urban areas.	Will it help remove real or perceived barriers to target group understanding and enjoyment of the Park and facilitate enhanced accessibility to these groups?
9b Manage the range of recreational activities which depend upon the special qualities of the National Park so that all types of users can enjoy its recreational offer.	Will it allow for improved access to and provision of high quality and a wider scope of formal and informal recreational opportunities?
	Will it facilitate the meeting of educational, sports and recreational needs of the local community, children and disadvantaged groups?
10. Promote good governance	
10a To improve opportunities for participation in local action and decision-making.	Will it empower all sections of the community to participate in decision-making and increase understand of how those decisions are reached?
	Does the plan set a process for engagement with communities, including specific approaches to reach particular groups/sectors?
10b Raise partners' awareness and understanding of National Park purposes and standing.	Will it encourage positive partnership involvement and joint working with other stakeholders and sectors?
10c To ensure compliance with Race, Disability and Gender Equality Duties.	Does the policy avoid potential for inequality of effect, or serve to positively address existing identified inequalities through its implementation comes?
11. To help meet local need for housing	

11a To meet identified local affordable / social housing need both in terms of quantity and type.	Will it deliver housing that meets the needs of the young, elderly, local people and those on limited incomes, and allow for the changing needs of residents within affordable housing?
11b To ensure housing in the National Park is appropriate in terms of quality, safety and security.	Will it provide good quality, safe, and secure housing, resilient to climate change and avoid areas at risk from flooding?
12. Secure better access to a range of sustainable local centres, services and amenities	
12a To improve access to and retention of schools, shops, post offices, pubs and medical facilities in order to meet local need.	Does it allow for delivery of new and improved healthcare, schools and other community services?
	Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?
12b To increase opportunities for skills development and access to post-school education and training.	Will it facilitate improved access to vocational training, education and skills for all, including young people?
	Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider National Park purposes?
Achieving a Sustainable Economy	
13. Promote a healthy and resilient Park-wide economy	
13a To encourage a viable and diversified farming and forestry industry which is influential in positively shaping the valued landscape of the National Park	Will it support the changing needs of sustainable agriculture and forestry, including diversification within the capacity of the National Park's special qualities to accommodate it?
13b To increase and improve the quality of jobs related to National Park purposes including tourism	Will it facilitate sustainable tourism opportunity?
	Will it help improve the creation of good quality of jobs in the tourism sector, and reduce seasonal dependence?
	Will it offer alternative opportunities for employment, to offset declining traditional employment activity and reduce pressure for commuting?
13c To encourage business	Will it provide the spaces and infrastructure

growth	to support self-employment opportunities and business start-up?
	Will it support existing business viability and local employment growth?
14. To reduce the need for, and impacts of road traffic.	
14a To improve the provision of public transport	Will it promote sustainable forms of transport (public transport including bus and rail, cycle and pedestrian routes) and ensure that the necessary associated infrastructure is made available?
	Will it increase access to special qualities of the National Park by sustainable transport modes?
14b To reduce the impact of transport infrastructure on the National Park's special environmental qualities and quality of life?	Will it reduce the net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking?

Level and Detail of the Appraisal.

- 5.9 A core element of the Sustainability Appraisal process for the Local Plan Part 2 is the testing the main elements of the plan, that in turn, steer decision-making through the Development Management functions of the National Park Authority. The testing has been made against the Sustainability Appraisal Framework (above) utilising a 'matrix' approach to aid transparency and consistency in testing. This allows for assessment of policies in such a way as to present systematic and transparent analysis and to meet the requirements of the SEA Directive. In addition, a Policy Gap Analysis of the emerging plan has been undertaken to identify whether there are policy vacuums for identified sustainability issues within the emerging policy suite.
- 5.10 The scope of the Local Plan Part 2 itself is such that it does not set out a vision or strategic objectives that are commonly found within spatial plans with a more strategic function. Furthermore, the plan makes no site-specific allocations, and does not therefore require appraisal consequent site-specific (sustainability) implications. Hence this sustainability appraisal is confined to the testing of the detailed policies set out within the plan as previously summarised in Part 1 of this Report.

Range of Likely Significant Environmental (and Sustainability) Effects

- 5.11 In undertaking the sustainability appraisal, The Environmental Assessment of Plans and Programmes Regulations (2004) require that the final *Environmental Report* set out the anticipated likely significant effects on the environment of the implementation of the plan being assessed. Those effects must be considered across a range of categories. The types of effects to be taken into account are those that may be:
- Secondary;
 - Cumulative;
 - Synergistic;
 - Short, medium or long term;

- Permanent or temporary; and
- Positive or negative,

- but *only* where these are likely *and* significant. The completed appraisal matrices use both symbols and summary narratives to set out the expected implications for sustainability for each policy. The categories of likely and significant effects noted above at Table 2 are embedded within the summary narratives for each policy interaction, and brought to prominence where particular categories of effect are likely.

- 5.12 This appraisal therefore focuses only upon the *significant effects likely* to be generated by the Local Plan Part 2. Locally important sustainability issues were identified at the two stages of scoping (as outlined above) in order to inform how the Sustainability Appraisal Framework should be constructed so as to take specific account of any likely outcomes of the implementation of the emerging plan on these specific matters. **Table 4** details which criteria within the Sustainability Appraisal Framework ensure that the Local Plan Part 2 takes account of the issues as set out in Annex 1 of the SEA Directive, and as pertinent to local character and issues.

Table 4: Sustainability Criteria Compliance with the Scope of SEA Directive Annex 1

Range of likely environmental effects	
SEA Annex 1, Environmental Issues (with additional socio-economic categories necessary to constitute <i>sustainability appraisal</i> .)	Relevant Sustainability Appraisal Framework Objectives
a) biodiversity	1a, 2a
b) population	11a, 11b, 12a
c) human health	4a, 4d 5d, 9b, 11a, 11b, 12a
d) fauna	2a
e) flora	2a
f) soil	4c
g) water	4b, 5c, 6d
h) air	4a
i) climatic factors	6a, 6b, 6c, 6d, 6e
j) material assets	3a, 5a, 6d, 7a, 7b, 11a, 11b,
k) cultural heritage including architectural and archaeological heritage	3a
l) landscape	1a, 1b, 1c, 3a
m) Economy	12b, 13a, 13b, 13c.
n) Enjoyment and Understanding of the National Park	8a, 9a, 9b.
o) the inter-relationship between issues	All

Sustainability Appraisal of 'Alternative Options'.

- 5.13 The consideration of the sustainability credentials of reasonable alternative options for emerging policy is a requirement of the SEA Regulations. This can help LPAs identify the most sustainable policy approach to pursue as the early iterations of the plan are refined to preferred approach.

- 5.14 The National Park Authority has prepared the Local Plan Part 2 Publication Draft following an extended period of policy development (set out in the Authority's Consultation Statement) entailing significant and on-going stakeholder engagement. It is the first full iteration of the plan, building upon the issues and alternative options considered within the 2012 consultation document *Development Management Policies - Development Plan Document: Issues and Preferred Approaches*. That document set out an extensive narrative that examined the scope for reasonable alternative approaches that were open to the National Park Authority for Development Management policy in the context of the Core Strategy, statutory National Park purposes and the NPPF.
- 5.15 The Issues and Preferred Approaches document presented *directions* for policy and identified - where reasonable - scope for alternative policy options which existed at that stage. The document set out *preferred approaches* and their *alternatives*, but not as fully drafted policy.
- 5.16 These alternative approaches were subject to Sustainability Appraisal³⁵ (as chronicled within **Table 1** of this Report), following the first Scoping Report and its development of the Sustainability Framework. It was made available for public consultation alongside the policy document itself, with positive and constructive responses received from a range of stakeholders including each of the statutory Consultation Bodies in relation to both the proportionate methodology it set out, and the scope of sustainability and baseline issues.
- 5.17 The structure and narrative format of the 2012 consultation document and its relationship with the Core Strategy suggested that a proportionate and bespoke approach to sustainability appraisal was justified at that non-statutory stage of the overall process, in line with best practice³⁶. This entailed a filtered approach to appraisal, whereby emerging policy 'directions' that focused (at that point) on issues limited to:
- Development Management Procedure(s) (such as application validation);
 - Policies with a highly limited scope of sustainability influence;
 - Policy for detailed design criteria;
 - Policy where there was effectively no material expansion on Core Strategy policy; and
 - Policy which directly relates only to fulfilling National Park purposes (and hence where there were no reasonable policy alternatives)
- were subject to a 'light-touch' professional sustainability assessment, with a sustainability summary attributed to those policy areas and not to a matrix-based process.
- 5.18 Where the *Development Management Policies - Development Plan Document: Issues and Preferred Approaches* set out alternative options to policy development which

³⁵ http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0008/280799/DMP-Interim-Sustainability-Statement.pdf

³⁶ PAS Sustainability Appraisal Guidance

did not fall within the above categories, a comprehensive appraisal process was undertaken utilising the sustainability framework and matrix approach, and hence setting an evolutionary starting point for the Sustainability Appraisal of the current Publication Draft process. In all cases of policy option narratives, consideration of sustainability influence was made having regard to the scope of environmental considerations required by the SEA Directive, i.e., short, medium and long term, secondary (indirect), cumulative and synergistic effects. This allowed for transparent and comprehensive examination of the sustainability implications of the preferred approaches and their alternatives as far as reasonably feasible where these had been generated.

- 5.19 The full summary findings of the Interim Sustainability Statement are set out in **Appendix 2**. This non-statutory sustainability appraisal exercise did not conclude that either major or minor refinement of emerging policy was necessary as did it not identify significant likely outcomes which would harm the achievement of more sustainable development through its implementation. Nevertheless, the detailed assessment of each pertinent area of policy provided a narrative guide that has been used by the National Park Authority in developing the plan to its present iteration.

Limitations and Difficulties Encountered within the Sustainability Appraisal of the Local Plan Part 2

- 5.20 It is necessary under the SEA Regulations to identify limitations in understanding or difficulties encountered in undertaking the sustainability appraisal.
- 5.21 It is important to understand that while there may (and should) be close parallels between the Local Plan Part 2's policies and the appraisal's sustainability objectives (as set out within the Sustainability Framework) there may also be circumstances in which those are not fully compatible with one another. The findings of a Sustainability Appraisal process are not therefore binding, nor are there likely to be 'perfect' options or solutions in respect to all sustainability issues identified. The particular socio-economic and environmental circumstances of any plan area may, and should, reasonably determine priorities for spatial plans. In doing so it is possible that some elements of sustainability might properly be prioritised over others in certain circumstances, provided that any negative effects of doing so are minimised through mitigation and compensation measures secured through the wider policy suite. For example, the Core Strategy seeks to ensure that renewable energy generation is only permitted where the National Park's statutory purposes would not be compromised, even though this may limit low carbon energy generation, and inherently sustainable aspiration. For the Local Plan Part 2, policy DMC7 seeks to ensure that Listed Buildings are appropriately maintained which may include the use of locally sourced stone or slate. The extraction of these materials may have localised harmful impacts, such as to habitats or the landscape.
- 5.22 Such policy approaches remain valid responses to the planning challenges across the National Park, but can also present challenges as to how they can be integrated with other important environmental aspirations (which are fully recognised by the Local Plan Part 2). The value of Sustainability Appraisal is being able to anticipate such difficulties and developing policy responses that improve overall sustainability.

- 5.23 Because of the very broad scope of elements and aspirations which together form the framework of 'sustainable development', (as locally expressed through the Sustainability Framework) appraisal may often identify, quite properly, a mix of both positive and negative implications stemming from the application of any single policy. The appraisal method adopted examines all policies against ranges of community, environmental and economic sustainability objectives. Hence it would be expected that outcomes that present strong environmental benefits could potentially be considered restrictive in terms of economic or community development. One of the benefits of the Sustainability Appraisal process is that these internal conflicts or incompatibilities can be anticipated and draft policies refined or amended so as to minimise those conflicts and holistic 'win-win' alternatives then developed.
- 5.24 The duration of impacts on sustainability from policy implementation is considered in the appraisal of the Local Plan Part 2's policies. However, as a planning document with a likely period of application over many years (the Core Strategy period theoretically can extend for 20 years) this appraisal has taken a position of primarily interpreting long-term outcomes, and not focusing in specific detail the differentiation between temporary and medium-term impacts of policy unless these are likely and significant. This approach reflects the purpose of the Local Plan Part 2 as seeking to facilitate and deliver the long-term socio-economic and environmental benefits determined by the Core Strategy, and the sustainability implications should be considered accordingly. Some elements of new development will have temporary or medium term impacts upon environmental and quality-of-life issues during construction periods (such as noise and disturbance) or in the time it takes for landscaping to mature to mitigate against visual impacts, or for new habitats to become established. These are inherent in most elements of new development, so this appraisal does not major upon these given their degree of significance.
- 5.25 Cumulative or synergistic effects are required to be anticipated by Regulation 16 and Schedule 2 of the 2004 SEA Regulations. Cumulative effects in this context are effects that are increased in magnitude by successive additions or losses. Synergistic effects in this context are those where the combined effects are greater than the sum of the individual separate effects. Both positive and negative cumulative and synergistic effects should be considered under SEA process. For example, provision of new linear habitats which then act as ecological pathways can provide synergistic benefits through bridging gaps in the permeability of landscapes to species migration and colonisation, whereas loss of critical links can cause more significant harm than the loss of the asset alone.
- 5.26 At the non-specific/proposal/allocations park-wide level (as addressed by the Local Plan Part 2) these types of impacts are very difficult to anticipate with certainty, even when utilising a structured and consistent appraisal methodology. Such impacts can emerge through a complex interaction of multiple policies alongside all the other non-planning influences that affect the economic and behavioural profile of the plan area, which themselves are dynamic over the plan period. Secondary, cumulative and synergistic impacts are more likely to be anticipated in the consideration of site-specific projects where Environmental Impact Assessment may be triggered. The absence of allocations (perhaps with development briefs) within the Local Plan Part 2

mean that any such assessments based on non site-specific policy could be tenuous. Nevertheless, such potential impacts have been given consideration allowing for the acknowledged complexity of doing so, and where anticipated, are set out within the appraisal summaries of each policy outline.

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PART 6.

Findings of the Sustainability Appraisal of the Local Plan Part 2 - Development Management Policies, Publication Draft 2016.

- 6.1 This section sets out the core findings of the Sustainability Appraisal of the Local Plan Part 2 – Development Management Policies following application of the appraisal methodology to the Publication Draft stage of the plan’s development. In doing so it examines the sustainability credentials of the whole plan. Three main elements of the findings are presented.
- Findings of the interim sustainability appraisal of earlier policy alternative options;
 - A Policy Gap Analysis which looks generally across the plan to see whether policy scope is broad enough to address the locally specific sustainability aspirations established in earlier stages of the process;
 - Appraisal findings of each policy within the plan in respect to its sustainability performance and to identify appropriate responses within the plan itself.

Assessment of Alternative Policy Approaches

- 6.2 A key purpose of Sustainability Appraisal is to steer plan-making authorities to the most sustainable policy options as it considers the objectives and direction of the plan. The preceding section of this report sets out the methodology used for the appraisal of emerging policy and their reasonable alternative options as presented within the *Development Management Policies - Development Plan Document: Issues and Preferred Approaches* (October 2012).
- 6.3 As emphasised within this report, the Core Strategy and statutory purposes for National Parks, when taken together, severely constrain significantly differing policy alternatives for the Local Plan Part 2. Nevertheless, in early phases of policy drafting (and consultation) on those proposals, alternative approaches were set out and appraised for sustainability implications. **Appendix 2** sets out a summary findings table for the consideration of sustainability implications of the 2012 policy alternatives, as prepared by the National Park Authority in the period following adoption of the Core Strategy.
- 6.4 The key findings of that exercise indicate that the policy approach, as far as was developed at that stage of the Local Plan Part 2, **did not set out any significant sustainability concerns**, whereby alternative policy approaches would, on balance provide a better outcome. Within the evolving raft of policies, steered by the established Core Strategy policies, sufficient safeguards and mitigation measures were embedded within the preferred options to secure sustainable outcomes of policy implementation. **No significant proposals for change were therefore identified.** The preferred options of the document therefore set out the framework on which the Publication Plan has developed.

Policy Gap Analysis - Coverage of Sustainability Issues by the Local Plan Part 2

6.5 Good practice in Sustainability Appraisal encourages the appraisal process to consider whether the emerging policy suite within the plan presents a framework sufficient to address the full scope of sustainability issues identified within the scoping stage of the process. Whilst the overarching objectives of the parent plan – the Core Strategy has previously been found to strongly support the furtherance of sustainable development, it does not necessarily follow that all policies within this plan cover the full scope of sustainability matters identified through scoping. A *policy gap analysis* has been undertaken to examine whether each of the sustainability criteria within the Sustainability Framework is positively addressed (directly or indirectly) by policies within the emerging plan. All completed policy appraisal matrices³⁷ (set out in full at **Annex 1** – separate document) have been analysed in order to identify whether any of the 36 sustainability criteria have not been positively influenced by individual spatial policies of the plan. Any sustainability criterion where no positive, or no likely positive outcome was found would suggest the Local Plan Part 2 *may* be insufficiently scoped to deliver the range of effects needed to comprehensively facilitate sustainable development across the National Park.

6.6 **Table 5** sets out where positive or likely positive outcomes are identified by each policy against each of the sustainability criteria. This identifies that the scope of the Local Plan Part 2 policies is comprehensive with minor exceptions addressed in the following paragraphs.

Table 5: Policy Gap Analysis.

Objective	Criteria	Spatial Polices where positive relationship with the Objective is identified	Summary level of Policy Coverage
Living Within Environmental Limits and Protecting National Park Special Qualities			
1. To protect, maintain and enhance the landscape and built environment of the National Park.			
1a To conserve and enhance diversity character and condition of landscapes, including woodland, grassland and any historic importance.	Will it protect areas of highest landscape sensitivity from harmful incremental change?	DM1, DMC1, DMC2, DMC3, DMC4, DMC5, DMC6, DMC7, DMC8, DMC9, DMC10, DMC11, DMC12, DMC13, DMC14, DME1, DME2, DME3, DME4, DME5, DME6, DME7, DME8, DMR1, DMR2, DMR4, DMH1, DMH4, DMH5, DMH6, DMH7, DMH8, DMH9, DMH10,	Strong
	Will it protect key or characteristic landscape features?		
	Will it support delivery LCA aspirations and facilitate landscape enhancement?		

³⁷ The exceptions to the matrix-based systematic appraisal of each draft policy :- DMB1 ‘Bakewell’ which presents no criteria apart from re-confirming the existing settlement boundary.; and DMH11 which relates to purely planning mechanisms (S.106 agreements) with no likely of significant spatial implications.

		DMS3, DMT1, DMT2, DMT3, DMT4, DMT5, DMT6, DMT7, DMT8, DMU1, DMU2, DMU4, DMU5, DMMW1, DMMW2, DMMW3, DMMW4, DMMW5, DMMW6, DMMW8	
1b To protect, enhance and manage the character and appearance of the built environment, maintaining and strengthening local distinctiveness and sense of place and relationship to its landscape setting.	Will it deliver high quality of design and construction?	DM1, DMC1, DMC3, DMC4, DMC5, DMC6, DMC7, DMC8, DMC10, DMC13, DMC15,	Strong
	Will it deliver change which conserves and enhances an attractive and locally distinctive built environment and ensure its good landscape fit, including important vistas into and out of the settlement?	DME1, DME2, DME3, DME4, DME5, DME6, DME7, DME8 DMR1, DMR2, DMR4, DMH1, DMH4, DMH5, DMH6, DMH7, DMH8, DMH9, DMH10, DMS3, DMS4, DMS5, DMT1, DMT2, DMT3, DMT4, DMT5, DMT6, DMT7, DMT8, DMU1, DMU2, DMU4, DMMW1, DMMW2, DMMW3, DMMW4, DMMW5, DMMW6, DMMW7, DMMW8,	
1c To secure architectural, artistic and historic open spaces within settlements.	Will it retain or deliver new and/or respect existing valuable open space and its amenity value, within and on the edge of settlements?	DM1, DMC1, DMC3, DMC4, DMC5, DMC6, DMC7, DMC8, DMC9, DMC10, DMC13, DMC14, DME1, DME2, DME3, DME4, DME5, DME6, DME7, DME8 DMR1, DMR2, DMR4, DMH1, DMH5, DMH6, DMH7, DMH8, DMH9, DMH10, DMS4, DMS5, DMT1, DMT2, DMT3, DMT4, DMT5, DMT6, DMT7, DMT8, DMU1, DMU2, DMU4, DMU5, DMMW1, DMMW2, DMMW3, DMMW4, DMMW5, DMMW6, DMMW7, DMMW8	Strong

2. To protect, enhance and improve biodiversity, flora and fauna and geological interests			
2a To conserve and enhance designated nature conservation sites and vulnerable habitats and species as well as the wider biodiversity importance of the National Park.	Will it protect sites and habitats of nature conservation value, including SSSIs and other national and local designations? <i>(note N2K sites covered by law)</i>	DM1, DMC1, DMC2 DMC3, DMC4, DMC9, DMC11, DMC12, DMC13, DMC14, DME1, DME3, DME4, DME7, DME8 DMR1, DMR2, DMR4, DMH1, DMH6, DMH9, DMT2, DMT4, DMT8, DMU1, DMU2, DMU4, DMU5, DMMW1, DMMW3, DMMW4, DMMW5, DMMW6, DMMW8,	Strong
	Will it protect BAP priority species and Habitats and Species of Principal Importance in England?		
	Will it protect nature conservation interests outside designated areas, including wildlife corridors, and maintain or improve permeability of the landscapes to species responding to climate change?		
	Will it generate opportunities for enhancement of habitats and biodiversity?		
2b To protect geodiversity assets.	Will it conserve and where possible enhance geological interests, including RIGS, through conservation or managed accessible feature exposure?	DM1, DMC1, DMC2 DMC3, DMC4, DMC11 DMC12, DMC14, DMC15, DME1, DME3, DME4, DME7, DME8 DMR1, DMR2, DMR4, DMH1, DMH6, DMT2, DMT3, DMT4, DMT8, DMU2, DMU4, DMU5, DMMW1, DMMW3, DMMW4, DMMW5, DMMW6, DMMW8,	Strong
3. To preserve, protect and enhance the National Park's historic and cultural environment			
3a To preserve and enhance sites, features, areas and the settings of archaeological, historical and cultural heritage importance.	Will it preserve and protect scheduled and non-scheduled archaeological sites and other historic assets, and facilitate site survey?	DM1, DMC1, DMC2 DMC3, DMC4, DMC5, DMC6, DMC7, DMC8, DMC9, DMC10, DMC13, DMC15, DME1, DME2, DME3, DME4, DME5, DME6, DME7, DME8 DMR1, DMR2, DMR4, DMH1, DMH5, DMH6, DMH7, DMH8, DMH9, DMH10, DMS4, DMS5, DMT1, DMT2, DMT3, DMT5, DMT6, DMT7, DMT8, DMU1, DMU2, DMU4, DMU5, DMMW1, DMMW3, DMMW4, DMMW6, DMMW7,	Strong
	Will it preserve and enhance the setting of features and sites of heritage importance?		
	Will it protect and enhance the integrity and character of conservation areas?		
	Will it preserve and enhance buildings and groups of buildings, which contribute to the wider historical and architectural character of the National Park, including Listed Buildings 'at risk'?		
	Will it resist loss or harmful change to Registered Parks and Gardens and other designed landscapes?		

	<p>Will it help respect and support the Park's cultural heritage? (e.g. history, traditions, customs and literary associations and the spaces and places these rely upon or relate to).</p> <p>Will it recognise and respond to the special qualities and sensitivities of designated and non-designated buildings and heritage assets?</p>		
4. To protect and improve air, water and soil quality and minimise noise and light pollution			
4a Reduce air pollution and its effects.	Will air quality be protected or improved?	DM1, DMC2, DMC11, DMC12, DMC13, DMC14, DMC15, DME6, DMH1, DMS3, DMT3, DMT4, DMT5, DMT6, DMU2, DMU3, DMMW2, DMMW3, DMMW4, DMMW5, DMMW8,	Strong
4b To maintain and improve water quality and, natural hydrological system and security of supply.	Will it allow water to be used efficiently and managed with care?	DM1, DMC1, DMC2, DMC11, DMC12, DMC13, DMC14, DMC15, DMMW8,	Strong
	Will water quality in the natural environment be protected and improved and natural drainage processes allowed to function?	DM1, DMC1, DMC2, DMC3, DMC11, DMC12, DMC13, DMC15, DMU1, DMU2, DMMW2, DMMW2, DMMW3, DMMW4, DMMW5, DMMW8,	
4c To maintain and improve soil quality.	Will it protect the soil resource from loss, particularly peat and unimproved soils?	DM1, DMC1, DMC2, DMC11, DMC12, DMC13, DMC14, DMC15, DMMW2, DMMW3, DMMW4, DMMW5, DMMW8,	Strong
	Will it support remediation of contaminated land?		
	Will BMVL (grades 1, 2, 3a) be protected from loss where alternative sites of lower quality soil sites are feasible?		
4d To protect and increase a sense of remoteness and tranquillity.	Will it serve to control noise and light pollution from roads, industry and other development so as to protect tranquillity and dark skies?	DM1, DMC1, DMC2, DMC9, DMC11, DMC13, DMC14, DMC15, DME1, DME2, DME3, DME5, DME6, DME8, DMR1, DMR2, DMR4, DMH1, DMH6, DMT1, DMT2, DMT3, DMT4, DMT5, DMT6, DMU1, DMU2, DMU4, DMU5, DMMW1, DMMW2, DMMW3, DMMW4, DMMW5, DMMW6,	Strong

5. To minimise the consumption of natural resources			
5a To safeguard mineral reserves for future generations and promote the reuse of secondary materials.	Will it prevent the sterilisation of known or suspected mineral resources by development?	DM1, DMC2 DMMW7,	Adequate
	Will it ensure efficient/prudent use of mineral and other resources, such as recycling aggregates?		
5b To reduce waste generation and disposal and increase recycling.	Will it result in a reduction in the amount of waste requiring treatment and disposal, and encourage recycling or 'Energy from Waste' in line with the waste hierarchy?	DM1, DMC3, DMMW4,	Adequate
5c To reduce water consumption.	Will it help encourage a reduction in water consumption through maximising water efficiency and encouraging recycling/re-use of 'grey water'?	DM1, DMU1, DMU2, DMMW1,	Good
5d To increase opportunities for walking and cycling	Will it support reduction in vehicular traffic and related emissions by promoting alternative sustainable modes of transport?	DM1, DMT4, DMMW2, DMMW5, DMMW6, DMMW8,	Strong
6. To develop a managed response to climate change			
6a To conserve and enhance the carbon absorption function and capacity within the National Park.	Will it conserve and protect the functionality and increase capacity of carbon sinks, such as peat soils, unimproved grassland and woodland?	DM1, DMC1, DMC2 DMC12, DMMW5	Adequate
6b To promote the use of renewable energy, exploring innovative techniques.	Will it promote or facilitate the use of alternative renewable energy where it is within the capacity of the National Park's special qualities to accommodate it?	DM1, DMU2,	Limited Policy cover
6c To achieve efficient energy use.	Will it help improve energy efficiency in the built environment?	DM1,	Limited Policy Cover
6d To ensure development is not at risk from flooding and will not increase the threat from flooding elsewhere.	Will it reduce the vulnerability to fluvial flooding and flash flooding within settlements both within and outside the National Park through reduced run-off rates and increase water absorption / management?	DM1, DMC1, DMC2, DMC3, DMU2, DMU5,	Adequate

<p>6e To ensure all new development is resilient to climate change.</p>	<p>Will development facilitate natural urban cooling in larger settlements through planting schemes and avoidance of reflective materials?</p>	<p>DM1,</p>	<p>Limited Policy Cover</p>
<p>7. To achieve and promote sustainable land use and built development</p>			
<p>7a To maximise the use of previously developed land and buildings.</p>	<p>Will it allow for the conversion of existing buildings where overall effect is a more sustainable development?</p>	<p>DM1, DMC4, DMC5, DMC7, DMC8, DMC10, DME1, DME2, DME3, DME4, DME5, DME6, DMH1, DMH4, DMH5, DMH6, DMH7, DMU4,</p>	<p>Strong</p>
<p>7b To promote sustainable construction solutions in the design of development which also meet landscape and built environment conservation priorities.</p>	<p>Will local materials be sourced which will not pressure the wider landscape and natural environment of the National Park?</p> <p>Will it seek to support sustainable design and construction techniques embracing energy efficiency measures, micro-generation, water and waste conservation whilst respecting conservation priorities?</p> <p>Will it encourage sensitive design of road infrastructure? (e.g. reduced signage road markings, use of local materials and alternative traffic calming methods).</p>	<p>DM1, DMC3, DME7,</p>	<p>Adequate</p>
<p>Ensuring a Strong, Healthy and Just Community</p>			
<p>8. Increase understanding of the special qualities of the National Park by all, including the specific target groups of: young people; people from disadvantaged areas; people with disabilities; and, those from ethnic minority backgrounds.</p>			
<p>8a Facilitate learning opportunities, information availability and interpretation resources.</p>	<p>Will it facilitate and encourage provision of accessible resources and opportunities which can improve understanding of the special qualities, pressures and management of the National Park to all?</p>	<p>DME2, DME5,</p>	<p>Limited policy cover</p>
<p>9. To promote access for all</p>			
<p>9a Increase enjoyment of the National Park by under-represented</p>	<p>Will it help remove real or perceived barriers to target group understanding and enjoyment of the Park and facilitate enhanced accessibility</p>	<p>DM1, DME2, DMR1, DMR2, DMR3, DMR4, DMT3, DMT4,</p>	<p>Strong</p>

groups from surrounding urban areas.	to these groups?		
9b Manage the range of recreational activities which depend upon the special qualities of the National Park so that all types of users can enjoy its recreational offer.	Will it allow for improved access to and provision of high quality and a wider scope of formal and informal recreational opportunities?	DM1, DME2, DMR1, DMR2, DMR3, DMR4, DMS6, DMS7 DMT4, DMT6, DMMW3, DMMW4, DMMW5, DMMW6, DMMW8,	Strong
	Will it facilitate the meeting of educational, sports and recreational needs of the local community, children and disadvantaged groups?		
10. Promote good governance			
10a To improve opportunities for participation in local action and decision-making.	Will it empower all sections of the community to participate in decision-making and increase understanding of how those decisions are reached?	DMH6,	Limited policy cover
	Does the plan set a process for engagement with communities, including specific approaches to reach particular groups/sectors?		
10b Raise partners' awareness and understanding of National Park purposes and standing.	Will it encourage positive partnership involvement and joint working with other stakeholders and sectors?		NO POLICY COVER
10c To ensure compliance with Race, Disability and Gender Equality Duties.	Does the policy avoid potential for inequality of effect, or serve to positively address existing identified inequalities through its implementation comes?	DMH1, DMH2, DMH3 DMS1,	Adequate
11. To help meet local need for housing			
11a To meet identified local affordable / social housing need both in terms of quantity and type.	Will it deliver housing that meets the needs of the young, elderly, local people and those on limited incomes, and allow for the changing needs of residents within affordable housing?	DM1, DME3, DME4, DMR3, DMH1, DMH2, DMH3, DMH6, DMH10, DMS1, DMS7	Strong
11b To ensure housing in the National Park is appropriate in terms of quality, safety and security	Will it provide good quality, safe, and secure housing, resilient to climate change and avoid areas at risk from flooding?	DM1, DMC15, DMH1, DMU3, DMMW2, DMMW7,	Strong

12. Secure better access to a range of sustainable local centres, services and amenities			
12a To improve access to and retention of schools, shops, post offices, pubs and medical facilities in order to meet local need.	Does it allow for delivery of new and improved healthcare, schools and other community services?	DM1, DMC4 DME3, DME4, DMH1, DMH2, DMH3, DMH5, DMH6, DMS1, DMS2, DMS3, DMS6,	Strong
	Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?		
12b To increase opportunities for skills development and access to post-school education and training.	Will it facilitate improved access to vocational training, education and skills for all, including young people?	DM1, DME2, DME3, DME5, DME7, DME6, DMS1, DMS2, DMS3,	Strong
	Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider National Park purposes?		
Achieving a Sustainable Economy			
13. Promote a healthy and resilient Park-wide economy			
13a To encourage a viable and diversified farming and forestry industry which is influential in positively shaping the valued landscape of the National Park	Will it support the changing needs of sustainable agriculture and forestry, including diversification within the capacity of the National Park's special qualities to accommodate it?	DM1, DME1, DME2, DMR1, DMR2, DMR3, DMR4, DMH4, DMS3,	Strong
13b To increase and improve the quality of jobs related to National Park purposes including tourism	Will it facilitate sustainable tourism opportunity?	DM1, DMC2, DMC5, DMC6, DMC7, DMC9, DMC8, DMC10, DMC11, DMC12, DMC13, DMC14, DME2, DME3, DME5, DME6, DME7, DMR1, DMR2, DMR3, DMR4, DMS1, DMS2 DMT3,	Strong
	Will it help improve the creation of good quality of jobs in the tourism sector, and reduce seasonal dependence?		
	Will it offer alternative opportunities for employment, to offset declining traditional employment activity and reduce pressure for commuting?		
13c To encourage business growth	Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up?	DM1, DMC5, DMC6, DMC7, DMC DMC10, 8, DMC9, DMC11, DMC12, DMC13, DMC14, DME1, DME2, DME3, DME4, DME5, DME6, DME7, DME8 DMR3, DMR4, DMS1, DMS2, DMS3	Strong
	Will it support existing business viability and local employment growth?		

14. To reduce the need for, and impacts of road traffic.			
14a To improve the provision of public transport	Will it promote sustainable forms of transport (public transport including bus and rail, cycle and pedestrian routes) and ensure that the necessary associated infrastructure is made available?	DM1, DMC4, DME3, DME7, DMH1, DMH2, DMH3, DMH6, DMT3, DMT5, DMT6,	Strong
	Will it increase access to special qualities of the National Park by sustainable transport modes?		
14b To reduce the impact of transport infrastructure on the National Park's special environmental qualities and quality of life?	Will it reduce the net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking?	DM1, DMT1, DMT2, DMT3, DMT4, DMT5, DMT6,	Adequate

- 6.7 The Policy Gap Analysis suggests that overall, a very high degree of policy applicability can be found within the Local Plan Part 2 for a great majority of the sustainability objectives. This indicates that the scope of the plan itself positively addresses a broad spectrum of sustainability aspirations. In a large majority of cases, the policy framework of the Local Plan Part 2 offers support for sustainability objectives across a significant range of individual policies. For example, sustainability objectives for conserving remoteness and tranquillity (4d) are covered to varying extents by policy for Development Management Practice, Conservation, Farming and Economy, Recreation and Tourism, Housing, Travel and Transport, Utilities and Minerals and Waste. This suggests that the plan's policy framework as a whole – in respect to most spheres of sustainability influence, works in a positive and integrated way, presenting a supportive tool for the delivery of more sustainable development through its operation and implementation. This is a likely reflection of the three main influences on policy within the plan, i.e. the Core Strategy context, national planning policy supporting sustainable development through the planning system, and the influence of National Park statutory purposes.
- 6.8 The analysis does however indicate that for a narrow group of sustainability objectives the draft plan does not offer a significant integrated policy framework. Issues where sustainability aspirations are addressed by the plan, but in a less integrated way than for most other policy areas, are in relation to *climate change adaptation, promotion of renewable energy generation and energy efficiency in new buildings*. In addition, the draft plan can be seen to be less responsive in respect to sustainability aspirations relating to *learning and interpretation* and for *local governance* matters such as *positive engagement by local people in the planning process*.

- 6.9 In only one instance did the plan not present any overt policy coverage to a particular sustainability objective. This is in relation to raising the awareness of statutory purposes to stakeholders and other National Park Authority partners (Objective 10b).
- 6.10 The Policy Gap Analysis' indication of potential shortcomings in respect to sustainability coverage of the plan can however be seen not to be significant in relation to the sustainability appraisal and SEA process. In all instances (as set out from the outset in this report), the scope and policy context of the Local Plan Part 2 must be seen in relation to its role within the development plan for the National Park. The Core Strategy sets out a comprehensive and positive policy context for issues relating to climate change, its causes and adaptation to predicted changes in weather patterns, and to renewable energy generation. In doing so the Core Strategy policy suite is relatively detailed, for example at policies CC1, CC2 and CC4. In drafting the Local Plan Part 2 the National Park Authority has considered further expansion of policy specifically in relation to climate change matters to be unnecessary, particularly in the context of more generic key conservation provisions the plan sets out. Furthermore the National Park Authority has prepared and adopted Supplementary Planning Guidance 'Climate Change and Sustainable Building' (2013) in relation to Climate Change matters. This sets out a proactive and positive approach to how planning operations within the National Park can contribute to more sustainable outcomes. Therefore, it can be seen that in terms of the development plan, there is no significant or likely sustainability deficit in this important policy area.
- 6.11 In addition, the Policy Gap Analysis' suggestion that the plan is not responsive to sustainability aspirations for good governance and engagement with local communities (criteria 10a, 10b) can be seen to reflect the purpose of the plan as now fully evolved, and the precautionary approach to the development of the sustainability framework and method as detailed in the previous chapter, rather than a shortcoming of the plan. The Local Plan Part 2 is principally a spatial plan which has a specific function of presenting detailed policy for application through Development Management process(es). As such it is not primarily a promotional or engagement-focused tool that might be expected to influence sustainability actions in relation to good governance and community engagement. However, it is clear that the process by which the Local Plan Part 2 has evolved - entailing extensive stages public and targeted engagement (as documented in Part 1 of this Report) can be seen to strongly support the aspiration, whilst Development Management processes generally have public engagement embedded by statute in many of its aspects of operation. These issues are further addressed within the Equalities Impact Assessment and Local Plan Scheme.
- 6.12 Consequently, as an overview analysis, no fundamental policy gaps are identified which might otherwise further objectives for more sustainable development across the National Park in spatial policy terms.
- 6.13 ***No additional policy coverage is suggested to be necessary to ensure that the policy scope reflects the established sustainability objectives for the National Park in respect of spatial policy function.***

Appraisal of Local Plan Part 2 Policies for Sustainability Effects

- 6.14 The Local Plan Part 2 does not set out a vision or overarching objectives that might be found in other commonly appraised spatial plans, nor does it present or prioritise specific site allocations. This reflects the close and subservient relationship with the Core Strategy, which includes such overview components and determines no land allocations. Therefore these are not repeated or enlarged upon within the Local Plan Part 2. The key element of this Sustainability Appraisal is therefore limited to the findings of the systematic assessment of the Publication Draft *policies* against the Sustainability Framework.
- 6.15 **Annex 1** (separate document) to this Sustainability Report sets out the detailed assessment matrices in full.
- 6.16 With the exception of policy DMB1 and DMH11, all policies have been subject to this transparent and systematic process of testing against the Sustainability Framework. Examination of the matrices shows that across the total of 68 policies appraised in this way (entailing a total number of 2,448 separate systematic judgments), only 30 negative, or potentially negative individual interactions against any particular criterion were identified. In addition, only 20 interactions have been identified where it was reasonably unclear as to the likely sustainability effect of the policy against any particular criteria – which taken together only represented approximately 2% of all policy test outcomes. Nevertheless, those policies where negative and significantly uncertain sustainability outcomes were flagged by the matrix appraisals, *all* present strong sustainability outcomes when considered against the full range of sustainability criteria.
- 6.17 **Table 6** sets out a summary of the findings of the sustainability appraisal assessment matrices (presented in full in Annex 1).
- 6.18 Within Table 6 the principal element of the findings are set out in the *Summary Sustainability Findings* column which provides the overview statement for the policy as a whole. This presents the critical component of the overall appraisal process, setting out a summary view of the likely significant outcomes of applying the policy in terms of sustainability outcomes.
- 6.19 ***The sustainability appraisal has found that a very substantial majority of policy effects in relation to meeting sustainability framework objectives and criteria are likely to be positive (i.e. likely to further sustainability objectives) or neutral (i.e. no-direct sphere of influence). A very small minority of policy interactions (with sustainability criteria) have presented a potential negative outcome, or one where the outcome is reasonably unpredictable.***
- 6.20 Table 6 therefore, also highlights those specific elements of the assessment where a limited number of policies have triggered a negative or uncertain sustainability outcome with one or more of the assessment criteria. These are presented in the third column of the table - '*Criteria where negative sustainability effects or a significant degree of uncertainty are anticipated*'. The National Park Authority's responses to those findings are set out in the final column, setting out whether and/or how, policy has been amended prior to Publication.

Table 6: Summary Sustainability Findings of Local Plan Part 2 Policies and Proposed Response by National Park Authority to Predicted Negative Sustainability Effects

Policy	Summary Sustainability Findings Noting any <i>significant</i> implications in relation to <ul style="list-style-type: none"> • Secondary; • Cumulative; • Synergistic; • Short, medium or long term; or • Permanent or temporary effects 	Criteria where negative sustainability effects or a significant degree of uncertainty are anticipated	National Park Authority Proposed Actions arising from the Sustainability Appraisal/SEA process and outcomes at Submission Draft stage.
Development Management Principles			
DM1	This overarching policy sets out the strict legislative and national planning policy context for all spatial policy within the National Park and how the National Park Authority will manage proposals for development in this context. It clarifies a positive approach will be taken where these twin drivers of sustainable development which provide the higher frameworks of the plan can be met. It highlights the function of the plan as a whole is to further these joint and supportive aspirations. In this context it is clear that the policy will at least set a positive functional context for sustainable development within the suite of policies that follow, albeit at a strategic and non-specific level.	None	No change to policy.
DM2	This policy focuses on the intended reliance upon specific Development Management mechanisms for the delivery of policy objectives. Consequently it could be seen to have a positive influence in delivering sustainable development - where the specific policy to which it applies has been appraised as sustainable in its intent and effect. However in terms of direct and specific significant effects, this policy can be seen to have no significant impacts on sustainability.	None	No change to policy.
Conserving and Enhancing the National Park’s Valued Characteristics			

DMC1	<p>This policy sets out the National Park Authority's expectation for the transparent consideration of landscape effects from development proposals and to ensure that proposals are locally responsive to landscape character. This presents a strongly sustainable framework in the context of the National Park Authority's statutory purposes, but in limited situations may restrict opportunities for renewable energy, high-end energy efficiency in new buildings and sustainable use of existing redundant buildings.</p>	<p>6b, Conflict between landscape conservation and facilitating renewable energy generation</p> <p>7a, Conflict between landscape conservation and use of previously developed land</p> <p>7b Conflict between landscape conservation and use of innovative sustainable design and construction</p>	<p>Post Core Strategy work to produce SPD and landscape sensitivity criteria mean that there is now no potential conflict between landscape conservation and facilitating renewable energy conservation across the development plan.</p> <p>No change to policy</p> <p>In response to the latest Sustainability Appraisal, at a scale of landscape, other policies such as those for the Natural Zone (DMC2), policy safeguarding nature conservation interests (DMC11) and policies safeguarding sites of features or species of wildlife geological or geomorphological importance (DMC12) plus policy for countryside (anywhere outside of settlements listed in DS1) as (DMH6 A(i) all ensure that re-development of previously developed land can only take place where landscape and its valued component parts can be conserved.</p> <p>No change to policy</p> <p>The use of innovative sustainable design and construction, beyond the scope encouraged by the NPPF paragraph 55 bullet point 4, has not been presented as an option or a policy since the core strategy does not permit new build housing in the countryside other than as a replacement or where the conservation merits of introducing housing to previously developed land represent an enhancement to the landscape. In practice application of the Core Strategy, Local Plan and NPPF has enabled innovative sustainable design in such cases and it is not considered that the policy DMC1 makes this possibility less or more likely.</p> <p>No change to policy</p>
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DMC2	<p>6b, Significant landscape impacts commonly arise from mature renewable energy technologies. This sustainability test focuses on accommodating RE development within the capacity of the National Parks' special qualities to do so - and is therefore positive in effect, although overall this may serve to reduce the harnessing of theoretical renewable energy resources in the National Park.</p> <p>6c 'High performance' energy efficiency in new development may not reflect the distinctive building vernacular which helps define the Park's landscape and special qualities, and prioritisation of conservation purposes may limit – but not remove, the ability to deliver high performance energy efficiency in new buildings.</p>	<p>The Natural Zone is a distinctive area of countryside which is designated on the back of Statutory Section 3 Maps so the higher level of protection is evidenced and justified. However large tracts of landscape are not Natural Zone, and in these there is scope within DMC1 and other policies such as DMC3 as well as the Core Strategy CC policies and the SPD and landscape sensitivity guidance to facilitate renewable energy generation.</p> <p>No change to policy</p>
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DMC3	<p>This policy primarily sets out the scope of considerations that the LPA will expect planning applications to address, whilst setting out an indication of the aspirations for those policy elements, prioritising measures which help deliver statutory purposes through the development management system. Policy is on balance <i>strongly sustainable</i> in respect of furthering statutory purposes, but presents possible shortcomings in respect to embedded renewable energy and energy efficiency measures within new development.</p>	<p>5b Policy does not address integrated recycling and waste management facilities within new development, although other policy elements address this.</p> <p>6b Policy does not overtly address embedded renewable energy opportunities in new development</p> <p>6c Policy does not overtly address embedded energy efficiency opportunities in new development</p> <p>6e Policy does not overtly address climate change resilience in new development</p>	<p>Reference to recycling and waste management facilities has not been removed through subsequent iterations of the plan, therefore its inclusion as concern through the current Sustainability Appraisal is thought to be minor in light of other policies and SPD for sustainable building. No change to policy</p> <p>Reference to embedded renewable energy opportunities has not been removed through subsequent iterations therefore its inclusion as concern through the current Sustainability Appraisal is thought to be minor in light of other policies and SPD for sustainable building. No change to policy</p> <p>Reference to embedded energy efficiency has not been removed through subsequent iterations therefore its inclusion as concern through the current Sustainability Appraisal is thought to be minor in light of other policies and SPD for sustainable building. No change to policy</p> <p>Reference to climate change resilience has not been removed through subsequent iterations therefore its inclusion as concern through the current Sustainability Appraisal is thought to be minor in light of other policies and SPD for sustainable building. No change to policy</p>
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DMC4	<p>Policy has strong settlement character and landscape sustainability effects. Indirect effects are possible for agriculture and ecosystems services through protection of settlement fringe soils and habitats, and community service provision through strengthened community viability.</p>	<p>6d Dependent upon case specific circumstances. Settlements with areas at risk from flooding may be less able to accommodate necessary growth within SDLs free from flood risk.</p> <p>11a Strict application of policy may limit opportunity for housing site identification, although other policy addresses such issues</p>	<p>This was not raised as an issue at the ISS and the fact that boundaries do not exist other than for Bakewell means that policy application always gives scope for communities and the National Park Authority to agree careful evolution of settlement form. No alternatives were suggested in the ISS</p> <p>This was not raised as an issue at the ISS and the fact that boundaries does not exist other than for Bakewell means that strict application always gives scope for communities and the National Park Authority to agree careful evolution of settlement form in light of flood risk . No change to policy</p>
DMC5	<p>This is a primarily <i>process</i> orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the historic environment. It also presents opportunity for direct and indirect economic benefits but could present a potential constraint on new social development within tightly constrained settlements in particular. However, other plan policies seek to address conflicts arising between core strategy objectives.</p>	<p>7b Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource.</p> <p>11a Policy presents potential constraints on development within settlements characterised by historic built heritage resource.</p>	<p>Policy establishes the requirements to understand the historic built heritage as a prerequisite to conserving it. The policy also establishes criteria which restricts development but is justified in the context of National Park purposes and special qualities. No change to policy.</p>
DMC6	<p>This is a primarily process-orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the historic environment. It also presents opportunity for direct and indirect economic benefits but could present a potential constraint on new social development within vicinity of the SM. However, other plan policies seek to address conflicts arising between core strategy objectives.</p>	<p>11a Policy presents potential constraints on development within settlements in vicinity of Scheduled Monuments.</p>	<p>The policy mirrors the national legislation and is therefore a sustainable approach No change to policy</p>

DMC7	<p>This is a primarily process-orientated policy but also enlarges on Core Strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the historic environment. It also presents opportunity for direct and indirect economic benefits but could present a potential constraint on new social development within tightly constrained settlements in particular. However, other plan policies seek to address conflicts arising between core strategy objectives.</p>	<p>7b Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource</p> <p>11a Policy presents potential constraints on some development within settlements within setting of Listed Buildings.</p>	<p>No issues raised in ISS and no alternatives suggested so, notwithstanding the Sustainability Appraisal comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy. No change to policy</p> <p>No issues raised in ISS and no alternatives suggested so, notwithstanding the Sustainability Appraisal comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy No change to policy</p>
DMC8	<p>This is a primarily process-orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the historic environment. It also presents opportunity for direct and indirect economic benefits but could present a potential constraint on new social development within tightly constrained settlements in particular. However, other plan policies seek to address conflicts arising between core strategy objectives.</p>	<p>7b Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource.</p> <p>11a Policy presents potential constraints on some development within settlements with potential for negative impacts on Conservation Areas.</p>	<p>No issues raised in ISS and no alternatives suggested so, notwithstanding the Sustainability Appraisal comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy No change to policy</p>
DMC9	<p>This is a primarily process-orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the historic environment. It also presents opportunity for direct and indirect economic benefits.</p>	None	No change to policy

DMC10	<p>This policy enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the historic environment. It also presents opportunity for direct and indirect economic benefits but could present a potential constraint on new social development within tightly constrained settlements in particular. It raises potential issues of sustainable design and construction and the balance to be struck with primary conservation purposes of the National Park. However, other plan policies seek to address conflicts arising between core strategy objectives.</p>	<p>7b Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource.</p>	<p>The ISS suggested that greater clarification of what heritage and non designated heritage assets are to avoid any confusion thrown up by the core strategy. The preferred approach was followed through taking into account the ISS findings and recommendations, and supporting text to this policy clarifies this as the basis for considering proposals for conversion of the built heritage resource. No change to policy.</p>
DMC11	<p>Primarily a process-orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the natural environment and its dynamic habitats and ecosystem functions. It also presents opportunity for direct and indirect economic benefits in addition to its core objectives.</p>	None	No change to policy.
DMC12	<p>This is a primarily a policy seeking to add clarity to the hierarchy of the levels of protection afforded to the cascade of designations across the Park, clarifying core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the natural environment and its dynamic habitats and ecosystem functions. It also presents opportunity for direct and indirect economic benefits in addition to its core objectives.</p>	None	No change to policy.
DMC13	<p>Primarily a process-orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the natural environment and its dynamic habitats and ecosystem functions. It also presents opportunity for direct and indirect economic benefits in addition to its core objectives.</p>	None	No change to policy.
DMC14	<p>Primarily process-orientated policy but also enlarges on core strategy spatial policy. Policy performs strongly in respect to furthering sustainable statutory purposes across the natural environment and its dynamic habitats and ecosystem functions, particularly in respect to tranquillity and air and water quality. It also presents opportunity for direct and indirect economic benefits in addition to its core objectives.</p>	None	No change to policy.

DMC15	This is a primarily process-orientated policy but also enlarges on core strategy spatial policy. Policy has limited scope for influence on sustainability beyond its limited focus.	None	No change to policy.
Farming and Economy			
DME1	The policy sets a positive context for the economic and functional viability of agriculture, which is a primary influence of the landscape of the National Park and its economy. Policy sets out some explicit criterion regarding landscape, visual and tranquillity considerations, but is silent on other elements of the Park's special qualities.	None	No change to policy.
DME2	The policy sets a positive context for the economic and functional viability of agriculture through appropriate farm diversification, in turn supporting agriculture as a primary influence of the landscape of the National Park. Policy sets out explicit criteria regarding landscape, visual and tranquillity considerations, but is silent on other elements of the Park's special qualities. The policy performs strongly in relation to economic and conservation orientated sustainability objectives.	None	No change to policy.
DME3	The policy seeks to focus new or expanding economic development on existing sites within or on the edge of the Park's larger settlements. This presents multiple sustainability benefits in terms of safeguarding more sensitive sites from visual or other environmental harm and also underpins the viability and vitality of settlements and their local economies. Policy also allows for mixed-use developments which can help deliver community beneficial development whilst prioritising the employment uses of the sites.	None	No change to policy.

DME4	<p>The policy seeks allow a pragmatic and flexible approach to the use of developed employment sites for alternative uses where it can be seen existing use is unviable or no longer needed. Redevelopment of brownfield sites is inherently sustainable, but overall sustainability effects, particularly in respect to employment and economic viability remain uncertain and would be determined by the specific reuse of the site proposed. Positive community effects through re-use of sites as well as associated enhancement of the built environment would be likely to occur as a consequence of the policy.</p>	None	No change to policy.
DME5	<p>The policy sets a positive context for the economic and functional reuse of buildings for low-impact/nuisance employment uses, in turn supporting the economic base of the National Park. Policy sets out explicit criteria seeking to control such development outside settlements so as to protect the special qualities of the National Park with consequent strong sustainability outcomes.</p>	None	No change to policy.
DME6	<p>The policy sets a positive context for the for low-impact/nuisance employment uses within dwellings, in turn supporting the economic base of the National Park. Policy sets out explicit criteria seeking to control such development so as to protect residential amenity and the special qualities of the National Park with consequent strong sustainability outcomes.</p>	None	No change to policy.
DME7	<p>The policy seeks to allow appropriately controlled expanding economic development of existing sites and hence supporting economic sustainability across the National Park. It presents multiple sustainability benefits in terms of safeguarding more sensitive sites from visual or other environmental harm and also underpins the viability and vitality of settlements and their local economies as well as free standing but established business. Policy includes environmental and community safeguards from potential harmful implications of the proposals, and thus furthers environmental and community sustainability.</p>	None	No change to policy.

DME8	The policy seeks to allow appropriately controlled expanding economic development of existing sites and hence supporting economic sustainability across the National Park. It presents multiple sustainability benefits in terms of safeguarding more sensitive sites from visual or other environmental harm and also underpins the viability and vitality of settlements and their local economies as well as free standing but established business. Policy includes environmental and community safeguards from potential harmful implications of the proposals, and thus furthers environmental and community sustainability.	None	No change to policy.
Recreation and Tourism			
DMR1	The policy sets a positive context for the economic expansion and extended provision of affordable tourism accommodation within the specific capacity of the area's special qualities. Policy sets out explicit criterion regarding landscape and special qualities considerations. The policy should facilitate sustainable tourism in the National Park.	None	No change to policy.
DMR2	The policy sets a positive context for the economic expansion and extended provision of affordable tourism accommodation within the specific capacity of the area's special qualities. Policy sets out explicit criterion regarding landscape and special qualities considerations. The policy should facilitate sustainable tourism in the National Park.	None	No change to policy.
DMR3	The policy is primarily focused on procedure and control mechanisms in relation to holiday occupancy, for clarity and avoidance of doubt for plan users. Overall sustainability implications are therefore quite limited. It sets a positive context for the flexibility in (affordable) tourism accommodation within the specific capacity of the area's special qualities.	None	No change to policy.

DMR4	<p>The policy sets a positive context for the economic expansion and extended provision of recreational facilities within the specific capacity of the area's special qualities. Policy sets out explicit criterion regarding landscape and special qualities considerations. The policy should facilitate sustainable recreation in the National Park.</p>	None	No change to policy.
Housing			
DMH1	<p>Policy seeks to clarify the scale and location for new affordable housing provision within the National Park. The policy sets out detailed and specific limits of the size of housing units for affordable housing which is intended to support long-term affordability whilst providing decent quality housing, and as such offers good environmental and social sustainability outcomes. However, the significant quantitative specificity of the policy goes beyond (proportionate) capability of Sustainability Appraisal/SEA process to assess whether minor variance of those thresholds would present any likely or significant environmental or sustainability effects. Nevertheless, the environmental and community benefits the policy would help deliver would present positive sustainability outcomes.</p>	None	No change to policy.

DMH2	<p>Policy seeks to control the first occupancy of new affordable housing in the National Park so as to ensure the limited capacity of its landscape/environment capacity is managed to meet those with clear need and clear local connection. In doing so community vitality benefits can be expected. However, the significant criteria specificity of the policy goes beyond (proportionate) capability of Sustainability Appraisal/SEA process to assess whether minor variance of those thresholds would present any likely or significant environmental or sustainability effects. However, the policy is based on extensive experience of the LPA in managing an affordable housing policy. A lower threshold for need and local connection would be likely to increase pressure on the limited number of suitable exceptions sites, whilst a higher threshold would be likely to unreasonably limit eligibility for new affordable housing and hence have negative social impacts in relation to community vitality and coherence.</p>	None	No change to policy.
DMH3	<p>Policy seeks to control the secondary and subsequent occupancy of approved affordable housing in the National Park so as to ensure the limited capacity of its landscape/environment capacity is managed in the long term to meet those with clear need and clear local connection. In doing so community vitality benefits can be expected. However, the significant criteria specificity of the policy goes beyond (proportionate) capability of Sustainability Appraisal/SEA process to assess whether minor variance of those thresholds would present any likely or significant environmental or sustainability effects. However, the policy is based on extensive experience of the LPA in managing an affordable housing policy. A lower threshold for need and local connection would be likely to increase pressure on the limited number of suitable exceptions sites, whilst a higher threshold would be likely to unreasonably limit eligibility for new affordable housing and hence have negative social impacts in relation to community vitality and coherence.</p>	None	No change to policy.
DMH4	<p>Policy seeks to allow for the provision of new housing to support essential rural workers reside at their place of work for functional reasons. Criteria are strictly set out as a sequence of priorities before new buildings are permitted. The consequence of the policy is that landscape impacts of new development will be kept to a minimum whilst the social and environmental benefits of essential rural workers are recognised and retained, hence presenting a strongly sustainable approach.</p>	None	No change to policy.

DMH5	<p>Policy seeks to allow for the provision of new ancillary housing where this can be accommodated within the capacity of the National Park's special qualities. Strict control over proposals' impacts on townscape and residential amenity a generally sustainable outcome in environmental and community terms. However, it could be seen that the net relative increase in property value after such development has been delivered could be that affordability and shortage smaller housing stock / supply is exacerbated, resulting in negative community outcomes.</p>	<p>11a Policy facilitates semi-independent additional living accommodation for young, elderly or those with special needs. However, where ancillary accommodation is provided within the curtilage of an otherwise 'smaller' dwelling, the long-term implications of its increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties.</p>	<p>The Authority contends that all market housing is already prohibitively expensive. Ancillary use may create the relationship of dwelling units that offers some families the opportunity to remain in the area. Without this scope, it may encourage use of smaller properties for holiday homes and lets which renders housing stock unavailable to local people. No change to policy.</p>
DMH6	<p>Policy seeks to take a pragmatic approach to furthering the National Park's statutory purposes where this can be achieved through new housing development in specific circumstances. The policy is primarily a conservation focused policy but would be likely to deliver community benefits also, particularly through assisting in delivery of affordable housing. The policy represents a strongly sustainable approach.</p>	<p>None</p>	<p>No change to policy.</p>

DMH7	<p>Policy seeks to take a pragmatic approach to furthering the National Park’s statutory purposes where this can be achieved through new housing development in specific circumstances. The policy is primarily a conservation focused policy but would be likely to deliver community benefits also, particularly through assisting in delivery of affordable housing. The policy represents a strongly sustainable approach.</p>	<p>11a Where extended and or ancillary accommodation is provided within the curtilage of an otherwise ‘smaller’ dwelling, the long-term implications of its increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties.</p>	<p>The Authority contends that all market housing is already prohibitively expensive. Without the scope for extensions, it may encourage use of smaller properties for holiday homes and lets which renders housing stock unavailable to local people. No change to policy.</p>
DMH8	<p>Policy seeks to allow for the provision of ancillary (non-residential) buildings to existing dwellings where this can be accommodated within the capacity of the National Park’s special qualities. Strict control over proposals’ impacts on townscape and residential amenity a generally sustainable outcome in environmental and community terms. However, it could be seen that the net relative increase in property value after such development has been delivered could be that affordability and shortage smaller housing stock / supply is exacerbated, resulting in negative community outcomes.</p>	<p>11a Where additional built structures are provided within the curtilage of an otherwise ‘smaller’ dwelling, the long-term implications of its increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties.</p>	<p>This was not assessed at the ISS because no options were proposed. The policy was introduced to clarify the circumstances in which new storage buildings would be permitted. It works with DMH5, which gives scope for ancillary dwelling use through new buildings, negating the need to try and force this use following overinvestment in storage buildings.</p> <p>The Authority contends that all market housing is already prohibitively expensive. Without the scope for storage space, it may encourage use of smaller properties for holiday homes and lets which renders housing stock unavailable to local people. No change to policy.</p>

DMH9	<p>Policy seeks to allow for the provision replacement dwellings where clear benefits to National Park purposes would accrue in relation to the National Park’s special qualities. Strict control over proposals’ impacts on townscape and residential amenity a generally sustainable outcome in environmental and community terms. However, it could be seen that the net relative increase in property value after such development has been delivered could be that affordability and shortage smaller housing stock / supply is exacerbated, resulting in negative community outcomes.</p>	<p>11a Where replacement dwellings are provided under this policy erosion of smaller housing stock may arise. Long-term implications of a site’s increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties. Policy does allow for recognition of house size/type preferences of Neighbourhood plans for any net increase in housing delivered under the policy.</p>	<p>The erosion of smaller stock in the name of conservation and enhancement and improved quality of building and their sustainability is seen as more than offsetting any change to affordability in the housing market, which is already such that most houses proposed for replacement are out in the countryside, have large curtilages and are already very expensive. Changes to the policy since the ISS do however set the bar higher on design standards where larger replacement dwellings are proposed which may prevent some smaller houses being replaced by larger ones. The policy also enables replacement of one with more than one in DS1 settlements, which may increase the stock of smaller houses in the most sustainable locations. No change to policy.</p>
DMH10	<p>Policy seeks to allow for the sub-division of existing dwellings where clear safeguards to the National Park’s special qualities can be secured. Strict control over proposals’ impacts on townscape and residential amenity a generally sustainable outcome in environmental and community terms. Positive sustainability outcomes are likely.</p>	<p>None</p>	<p>No change to policy.</p>
DMH11	<p>This policy is focused purely on planning mechanisms (legal agreements) to implement and make robust the policy objectives set out in preceding housing policies, and as assessed for their sustainability credentials in this document. No sustainability assessment against the Sustainability Framework is made as this would not afford any meaningful outcomes.</p>	<p>None</p>	<p>No change to policy.</p>

Shops Services and Community Facilities			
DMS1	<p>The policy sets a positive context for the economic (retail and related services) expansion and extended provision within main settlements.</p> <p>Policy sets out explicit criterion accessibility although this may benefit from strengthening and clarity. The policy should facilitate sustainable retail in the National Park.</p>	None	No change to policy.
DMS2	<p>The policy sets a positive context for the retention of economic (retail and related services) businesses across the National Park. It presents stringent tests before loss of community valued services can be lost to other uses. Whilst in the longer term viability is likely to be a primary determinant of service provision, the policy would encourage sustainable development outcomes.</p>	None	No change to policy.
DMS3	<p>The policy sets a positive context for the protection of more sustainable settlement based economic (retail and related services) enterprise.</p> <p>Policy sets where development outside main settlements may be appropriate but always as ancillary to main site use, and thus limiting additional private vehicle trip generation and landscape pressures.</p>	<p>13b</p> <p>Whilst seeking to protect sustainable retail/service enterprise within settlements, the policy may serve to restrict other retail enterprise proposals which would otherwise provide employment opportunity</p>	<p>The ISS recommended a simpler policy than Local Plan LS3 and reliance on Core Strategy HC5. DMS3 is simpler than LS3 and in combination with Core Strategy HC5 gives a moderated approach to retail provision outside named settlements. It does restrict retail in the interests of sustaining local facilities in DS1 settlements and protecting the countryside, rather than to restrict job opportunities, although it is accepted this may be a consequence at a low level.</p> <p>No change to policy.</p>
DMS4	<p>The policy sets a positive but narrow context for the design and external appearance of shop fronts. Positive sustainability (conservation) outcomes would be likely, with no likely or significant dis-benefits.</p>	None	No change to policy.
DMS5	<p>The policy sets a positive but narrow context for the design and external appearance of advertisements. Positive sustainability (conservation) outcomes would be likely, with no likely or significant dis-benefits</p>	None	No change to policy.

DMS6	<p>The policy seeks to ensure that sites identified or approved for important community focused facilities/uses are not lost to other possibly more (economically) viable uses. Effectively the policy recognises the difficulty of delivery of such uses in light of other economically viable uses. This presents a positive social sustainability outcome in terms of community well-being, but could in principle restrict employment use and associated economic well-being. Where developable sites are in short supply, affordable housing use may also be compromised or be in competition with other community uses. However, these negative outcomes are likely to be infrequent.</p>	<p>11a Potential for conflict over the delivery of affordable housing sites across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.</p>	<p>The ISS saw the policy intent as sustainable, community sites are to be shown on the proposals maps, and facilities will be protected. This may remove some scope for affordable housing, but additional housing with reduced or absent community facilities is unsustainable. The policy nevertheless gives space to replace with affordable housing where sites no longer required so the change in use is driven by the demand for community space and not any demand for housing. No change to policy.</p>
		<p>13b Potential for conflict over the delivery of employment generating uses across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.</p>	<p>The ISS saw the policy intent as sustainable, community sites are to be shown on the proposals maps, and facilities will be protected. This may remove some scope for additional employment uses but at a strategic level there is no need for significant additional employment space. Additional employment space with reduced or absent community facilities is unsustainable. No change to policy.</p>
		<p>13c Potential for conflict over the delivery of employment generating uses across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations</p>	<p>The ISS saw the policy intent as sustainable, community sites are to be shown on the proposals maps, and facilities will be protected. This may remove some scope for additional employment uses but at a strategic level there is no need for significant additional employment space. Additional employment space with reduced or absent community facilities is unsustainable. No change to policy.</p>

DMS7	<p>The policy seeks to ensure that existing community recreation facilities are not lost to other possibly more (economically) viable uses. This presents a positive social sustainability outcome in terms of community well-being, but could in principle restrict employment use and associated economic well-being. Where developable sites are found to be no longer required, affordable housing use will be prioritised further strengthening sustainable community outcomes.</p>	<p>13b & 13c Potential for conflict over the delivery of employment generating uses across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.</p>	<p>The ISS saw the policy intent as sustainable. The policy gives space to replace with affordable housing where sites no longer required so the change in use is driven by the demand for community space and not any demand for housing. No change to policy</p>
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Bakewell

DMB1	<p>The policy essentially provides a community-agreed mechanism for the consideration of planning judgments as to when a proposal or site is 'in or on the edge of' the settlement of Bakewell. It does not set further planning principles or issues than this. Consideration of alternative development boundary lines would be likely to lead to highly complex or convoluted considerations of relative sustainability whilst the policy to which it relates within DS1 has already clearly established sustainability benefits.</p>	None	No change to policy.
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Travel and Transport

DMT1	<p>The policy presents a very high level of restraint over new major transport infrastructure, whilst acknowledging the exceptional circumstances in which this might be permitted. In doing so the default consequence for sustainability will be a long-term environmental benefit, including air quality locally, but resultant trip generation outside the National Park may present negative energy efficiency and air quality harm. Furthermore, restriction on new road and rail infrastructure may be seen to constrain some economic performance and employment generating investment consequent to logistical and access problems. The overall sustainability consequences of the policy can be seen to be locally beneficial in relation to environmental sustainability, but less beneficial in relation to global and economic sustainability aspirations. Whilst tensions across sustainability objectives may therefore be anticipated, the approach is clearly compliant with National Park statutory purposes, themselves positive contributors to achievement of wider sustainable development.</p>	<p>4a</p> <p>Policy is likely to have local air quality benefits through strategic discouragement of cross-park trips. However, at a broader sustainability level, should restriction on cross park journeys lead to longer trips overall, vehicular emissions are likely to be greater overall. In addition should the policy curtail strategic improvements to the road network at the cost of local congestion points, localised air quality may suffer from on-going vehicle emissions. Other influences on trip generation and air quality from emissions are likely to be significant over the long term, such as vehicle technology.</p> <p>13b, 13c</p> <p>A possible short to medium-term implication of policy is to discourage economic growth because of perceived logistical / road network connectivity and flow.</p>	<p>In combination with Core Strategy T2, and with the acknowledgement of the circumstances in which exceptional development may be permitted to address a compelling national need (i.e. there is no reasonable alternative) and notwithstanding the Sustainability Appraisal comment the policy is considered to be justified. No change to policy.</p> <p>The policy does allow for exceptions where there is a demonstrable long term net economic benefit within the National Park which would allow inward investment in some circumstances. However the policy deliberately sets the bar very high on this which recognises the inherent economic value of a high quality landscape to the local and larger than local city region economies. No change to policy.</p> <p>These types of business would not be sustainably located to coincide with cross-park routes and would make no impact on the strategically preferred locations for employment space. No change to policy.</p>
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DMT2	The policy relates to the design and local sensitivity of new transport and access infrastructure. It performs strongly in relation to environmental sustainability, with no significant negative implications for economic or community well-being.	None	No change to policy.
DMT3	The policy recognises that opportunity for possible rail related transport infrastructure exists, at least for example, across former rail track beds. However, the policy would ensure that such development would only be permitted where significant net gains in environmental and experiential quality would arise across the National Park as a whole. Whilst this presents wider environmental and heritage sustainability benefits, it implicitly acknowledges that localised harm to the special qualities of the National Park, including opportunities for understanding and enjoyment may arise. In the case of high tier biodiversity sites, the law may preclude the 'mitigation approach' that the policy adopts. However, the overall sustainability credentials of the policy, consequent to its broad cascade of safeguarding criteria, are positive.	2a Policy focuses on 'net benefits' to the National Park's valued environmental characteristics. This implies that some localised harm to those qualities may be expected as a consequence of the proposals. In relation to designated ecological sites and protected species the thresholds for allowing such harm by development may be high, for example N2K sites where these are in the vicinity of existing track beds, may override the policy's embedded approach of mitigation where harm arises if the provisions of the relevant Directives are not met.	In combination with core strategy T2, and with the acknowledgement of the circumstances in which exceptional development may be permitted to address a compelling national need (i.e. there is no reasonable alternative) the aim of net environmental benefit applies to the wider National Park. It is considered to be justified, although it is not intended that this aim should be used to attempt to override any thresholds applied to N2K or other protected sites. The National Park Authority considers that mitigation whilst potentially beneficial in wider landscape terms may not of itself justify localised impacts on designated ecological sites or protected species. No change to policy.
DMT4	The policy performs strongly in relation to wider environmental and social inclusiveness and community health sustainability objectives. Minor economic benefits may accrue as a consequence of wider use of the PRow network and its on-going expansion and improvement, although these may be of lower significance.	None	No change to policy

DMT5	<p>The policy performs strongly in relation to environmental sustainability, but potentially presents a dis-benefit to economic / employment activity where car-based accessibility is an important factor. However, the policy does offer some limited flexibility whilst recognising the effects of proposals on visual amenity of the locality.</p>	<p>13c Restraint on new business parking and adoption of the Parking Standards set out at Appendix 17 may result in some perceived constraint on business efficiency, and hence viability, potentially discouraging investment, retention or expansion of economic/employment activity.</p>	<p>The Policy refers to the Parking Standards document which provides clear guidance as to the maximum levels of parking for developments, which also have a min. & max. for some types of development. National Park Authority considers that this is preferable to adding the standards to the Policy. No change to policy.</p>
DMT6	<p>The policy performs strongly in relation to a pragmatic and flexible approach to managing the two statutory purposes with emphasis afforded to environmental sustainability. Due to general approach of constraint in visitor parking provision potential dis-benefit to economic / employment activity where car-based accessibility is an important factor may arise. However, the policy does offer some limited flexibility whilst recognising the effects of proposals on visual amenity of the locality and achieving clear settlement character benefits.</p>	<p>5d Provision of visitor parking by definition facilitates car-borne trip generation. Whilst this may not have a negative impact on walking opportunities per se, it would not serve to encourage non-motorised trip generation.</p> <p>13c Restraint on new visitor may result in some perceived constraint on accessibility for markets/consumers, and hence viability, potentially discouraging investment, retention or expansion of economic/employment activity.</p>	<p>The policy is restrictive rather than permissive and qualifies that links to park n ride and footpath networks should be considered to encourage sustainable use from within sites inside the Park. This is pragmatic and sustainable. No change to policy.</p> <p>The <i>recreation hubs</i> work will establish where visitor facilities and sites are best developed as new or expanded facilities, and this will include consideration of the commercial viability of facilities. No change to policy.</p>

DMT7	The policy performs strongly in relation to environmental sustainability, and has limited implications for other sustainability objectives.	None	No change to policy.
DMT8	The policy performs strongly in relation to environmental sustainability, but may be seen to present some restriction on some (minority) recreation activities but which is nevertheless partly dependent upon the valued characteristics of the National Park, specifically relief and low settlement density. However, in most cases such uses will not be dependent upon changes of use or operational development being permitted, and where it does, Sandford Principles should be properly applied because of the limited but potentially significant threat to biodiversity value.	9b Policy seeks to control development or establishment of non-powered flight sites/facilities where valued characteristics of the area are threatened. Ordinarily facilities will not be required for paragliding and hang gliding, but these are dependent to a degree on the special qualities of the park to operate. Restriction of such development and use may limit this objective but be consistent with Sandford Principle.	The National Park Authority considers the policy is sufficiently controlling provided it specifies that landing and take-off sites and facilities will not normally be permitted. It is a policy that pre-emptly foreseeable pressure for such sites and is sustainable in the context of special qualities. Policy changed to refer to take-off as well as landing sites.
Utilities			
DMU1	This policy primarily seeks to ensure that new development is not dependent upon utility infrastructure provision which would be harmful the special qualities of the National Park. In doing so it facilitates other acceptable development whilst prioritising the first statutory purpose. Positive sustainability outcomes are likely.	None	No change to policy.
DMU2	This policy primarily seeks to ensure that new utility development must be related to local community benefit which would not be harmful the special qualities of the National Park. In doing so it facilitates other acceptable development whilst prioritising the first statutory purpose. Positive sustainability outcomes are likely.	None	No change of policy

DMU3	This policy narrowly focuses on avoiding risk to human health and property through avoiding locating development away from potentially hazardous installations. As such it affords positive community focused sustainability credentials with no significant dis-benefits.	None	No change of policy
DMU4	This policy primarily seeks to ensure that new utility development must be justified and not be harmful the special qualities of the National Park. In doing so it facilitates communication development whilst prioritising the first statutory purpose. Positive sustainability outcomes are likely.	None	No change of policy
DMU5	This policy primarily seeks to ensure that new utility development should be removed following decommissioning so as to ensure continued protection of the special qualities of the National Park. In doing so it facilitates communication development being delivered in the short to medium terms to meet identified needs, but may be seen to remove opportunity for on-going sustainable reuse of buildings following decommissioning.	7a Policy effectively removes opportunity for sustainable building re-use.	Telecommunications infrastructure is not generally in the form of buildings and sustainable re-use of the structures to achieve other plan objectives would not be a reasonable alternative in most cases. Where buildings or other structures are left redundant and an appropriate re-use in line with other plan objectives can be achieved, the Authority would be able make an exception, but prefers this approach rather than blanket encouragement of re-use of structures and buildings that will, in many cases have only been accepted in the landscape to meet an overriding national need as opposed to being positive additions to the landscapes valued character. No change of policy.
Minerals and Waste			
DMMW1	This policy primarily seeks to ensure that appropriate and sufficient information is presented with planning applications in order that the National Park Authority can gain full understanding of the justification minerals or waste developments in context of Core strategy. Policy is essentially therefore process/administrative, but with indirect significant positive environmental sustainability benefits.	None	No change to policy.

DMMW2	<p>This policy primarily seeks to ensure that the direct effects of proposed minerals or waste development are acceptable to a broad range of local amenity consideration. In doing so the policy can be expected to deliver positive environmental and community sustainability outcomes, with no <i>significant</i> constraint on economic opportunity in the National Park context.</p>	<p>2a Whilst focused upon amenity considerations, the scope of those factors considered by the policy is broad, yet does not include impacts upon the ecology of an area.</p> <p>2b Whilst focused upon amenity considerations, the scope of those factors considered by the policy is broad, yet does not include impacts upon the geodiversity of an area. However other plan policies cover these issues sufficiently.</p> <p>3a Whilst focused upon amenity considerations, the scope of those factors considered by the policy is broad, yet does not include impacts upon the historic and archaeological assets of an area. However other plan policies cover these issues sufficiently.</p>	<p>The Authority considers that the policy, used in combination with other Development Management Policies covering biodiversity and wildlife, is sufficient to afford protection to the ecology of an area when considered against the tests outlined. The paragraph preceding DMMW2 and DMMW3 (covering impact of working on amenity and the environment respectively) explains that these policies will be used in combination with policies for the ecology of the area which are set down earlier in the DMP document.</p> <p>No change of policy</p>
DMMW3	<p>This policy primarily seeks to ensure that the direct effects of proposed minerals or waste development are acceptable to a broad range of environmental characteristics of the area and the ability of the public to enjoy those qualities. In doing so the policy can be expected to deliver positive environmental and community sustainability outcomes, with no significant constraint on economic opportunity in the National Park context.</p>	None	No change of policy

DMMW4	This policy primarily seeks to ensure that where the principle of waste facility development is acceptable under Core Strategy policy, that sites are prioritised to the most sustainable and accessible locations and in doing so to have regard to the special qualities of those sites and to protect those accordingly. As such the policy is likely to present positive sustainability effects, including community benefits (accessibility).	None	No change of policy
DMMW5	This policy primarily seeks to ensure that where the principle of waste facility development is acceptable under Core Strategy policy, that sites can be fully restored over the long term in respect to multiple environmental components which make up special qualities across the National Park. As such the policy is likely to present positive sustainability effects, including community benefits (accessibility).	None	No change of policy
DMMW6	This policy primarily seeks to ensure that where the principle of waste facility development is acceptable under Core Strategy policy, that combinations of new and existing sites do not have a detrimental cumulative or synergistic effect on the special qualities across the National Park. As such the policy is likely to present positive sustainability effects, including community benefits (accessibility).	None	No change of policy
DMMW7	This policy primarily seeks to ensure that carefully controlled small-scale minerals operations can be permitted where a direct enhancement of the National Park's built heritage resource would be facilitated through use of the most appropriate building/repair materials. This presents a significant range of threats to conservation and some amenity aspirations. However, in combination with other plan policies which ensure protection of the Park's special qualities the benefit to the built environment, the policy can be seen to deliver a pragmatic and sustainable approach.	<p>1a, 2a, 2b, 4a, 4b, 4c, 4d, 5d, 9b.</p> <p>The development plan generally regards new minerals development as harmful to the National Park's special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise.</p>	<p>The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable.</p> <p>No change of policy</p>

DMMW8	This policy primarily seeks to ensure that where existing buildings and uses ancillary to the 'host' minerals operation cease, the secondary use will also cease and site and structures restored to agreed after-use standards. This is likely to have positive sustainability implications for the environmental conservation of the National Park but suggests sustainable uses of existing buildings and plant.	7a Sites pertinent to this policy are by definition previously used and will often include existing structures or buildings. Policy would generally preclude secondary uses or uses not closely associated with the 'host' minerals operation.	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. No change of policy
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- 6.21 Notwithstanding the findings in respect to individual sustainability criteria, it is significant to note the extent of policies, which, on balance, have been identified for consideration for some degree of further amendment.
- 6.22 The findings in this respect are limited in range (30 interactions), reflecting the very positive sustainability credentials the plan as a whole is anticipated to deliver. The iterative process between the Sustainability Appraisal and plan-making process has allowed (potentially) negative sustainability interactions (even for single criteria) to be considered by the National Park Authority prior to finalising the Publication draft plan. In this context ***the National Park Authority has determined only one modification to policy or supporting text*** as set out in **Table 7**.
- 6.23 Comparison between Table 6 and Table 7 content indicates that it does not follow that every individual 'negative' sustainability interaction has justified policy amendment. This reflects the integrated nature of the plan's policy framework, but also its relationship with the Core Strategy. In most instances where potential negative sustainability interactions are identified, *the policy as a whole* can be seen to deliver strong sustainability implications, which, if amended, may be diminished, or the policy intent itself undermined. Where negative but focused outcomes are anticipated and no policy refinement has been made, ***it is expected in all cases that the plan when read as a whole, would serve to mitigate, compensate or otherwise prevent that harmful impact arising.*** The National Park Authority has relied on the implementation of the plan's raft of policies operating as a whole being highly sustainable, in determining only very limited changes to the Publication draft Local Plan Part 2.

Table 7: Policy Amendments Arising from the Sustainability Appraisal Process

Policy	Changes made following Sustainability Appraisal
DMT 8	Minor amendment to policy to clarify that the policy applies to landing sites as well as take-off sites for aircraft.

6.24 ***The National Park Authority has been able to refine the emerging plan in the light of the iterative Sustainability Appraisal findings, and in doing so secure the added value that those changes make to the Local Plan Part 2's overall effect on sustainability.*** In practice these policy alterations may only add limited added value to the Local Plan Part 2, but nevertheless further ***demonstrate positive, significant and widely-scoped sustainability effects.***

6.25 The principal benefits can be seen to be in relation to providing confidence to plan users and authors as to the plan's furtherance of statutory and national policy sustainability objectives, rather than addressing any fundamental flaws in sustainability terms. The process of sustainability appraisal has allowed for confidence to be developed that significant shortcomings are *not* embedded in the plan as drafted, as well as securing those enhancements to its sustainability influence.

Trans-boundary Effects

6.26 Article 7 of the EC Directive and Regulation 14 of the *Environmental Assessment of Plans and Projects Regulations* (UK) 2004, require the plan-making authority to consider whether the Local Plan Part 2 would be likely to result in any significant trans-boundary environmental effects and, if so, to follow specific procedures in order that those who may be affected would be consulted by the Secretary of State. In this context 'trans-boundary' refers to other member States of the European Union and *not* adjacent local authority or other administrative areas.

6.27 It can be reasonably concluded that because of the level of influence of the plan in terms of its geographical application and absence of strategic growth influences, the distance of the National Park from other Member States and the absence of any likely pathways between Member States, that there would be no significant trans-boundary environmental effects from the Local Plan Part 2 that would require consultation with other Member States.

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PART 7.

Proposals for Monitoring the Sustainability Outcomes of the Local Plan Part 2.

- 7.1 The SEA Directive and the 2004 Regulations require this Environmental (Sustainability) Report to include a description of the measures envisaged for monitoring any significant environmental effects of the Plan in order, amongst other things, to identify at an early stage unforeseen adverse effects, and to be able to carry out appropriate remedial action. To avoid duplication, existing monitoring arrangements may be utilised.
- 7.2 Monitoring is an essential part of the development planning process. The purposes of monitoring can be seen to include:
- Assessing the performance of the Development Plan's policies: For example, have the policies been adhered to, are the objectives of the policies being met and is the scope of the plan's policies still relevant and adequate?
 - To keep track of change: Including change in the environment and of human responses to changes in the environment.
 - To provide better information about the environment and the implementation of the Development Plan Document, to reduce any uncertainty and to increase the accuracy and objectivity of professional judgements in future plan appraisals.
- 7.3 Best practice suggests that a monitoring strategy should:
- Consider only potentially *significant* sustainability and environmental effects of the plan;
 - Only be on effects directly attributable to the plan;
 - Concentrate on policies which were assessed as potentially having a negative impact or where the impact was uncertain;
 - Focus on a small number of issues and do these well rather than spread resources too thinly.
- 7.4 For the plan area more generally:
- Applications granted against advice from statutory environmental consultees;
 - Landscape character condition an change;
 - Proportion of new development delivered on previously developed land;
 - Extent of land and property at risk from flooding;
 - Frequency and length of visitor journeys by car;
 - User trends for public transport services;
 - Renewable energy generation capacity;
 - Extent and condition of designated wildlife habitats;
 - Achievement of Local Biodiversity Action Plan priorities;
 - Number of affordable housing units delivered; and
 - Levels of community service provision.

- 7.5 In monitoring the *sustainability* performance of the Local Plan Part 2, the National Park Authority should seek to achieve efficiency and integration by utilising key monitoring indicators identified by the Local Plan itself which relate most directly to key Sustainability Framework strategic objectives.
- 7.6 This sustainability appraisal of the Local Plan Part 2 has indicated that some policies may trigger very limited but nevertheless potentially negative sustainability implications - within a clear context of overall net benefits. In this respect the following policies are identified for specific monitoring focus in line with best practice:

Table 8: Provisional Monitoring Proposals by Policy.

Objective	Criteria	Provisional Indicator	Monitoring Target
Living Within Environmental Limits and Protecting National Park Special Qualities			
1. To protect, maintain and enhance the landscape and built environment of the National Park.			
1a To conserve and enhance diversity character and condition of landscapes, including woodland, grassland and any historic importance.	Will it protect areas of highest landscape sensitivity from harmful incremental change?	Applications permitted contrary to Landscape Strategy objectives	None
	Will it protect key or characteristic landscape features?		
	Will it support delivery LCA aspirations and facilitate landscape enhancement?		
1b To protect, enhance and manage the character and appearance of the built environment, maintaining and strengthening local distinctiveness and sense of place and relationship to its landscape setting.	Will it deliver high quality of design and construction?	Applications permitted contrary to Conservation Area objectives	None
	Will it deliver change which conserves and enhances an attractive and locally distinctive built environment and ensure its good landscape fit, including important vistas into and out of the settlement?	Applications permitted contrary to Nation Park Authority Design Guide objectives/principles	None
1c To secure architectural, artistic and historic open spaces within settlements.	Will it retain or deliver new and/or respect existing valuable open space and its amenity value, within and on the edge of settlements?		
2. To protect, enhance and improve biodiversity, flora and fauna and geological interests			
2a To conserve and enhance designated nature conservation sites and vulnerable habitats and species as well as the wider biodiversity importance of the National Park.	Will it protect sites and habitats of nature conservation value, including SSSIs and other national and local designations? <i>(note N2K sites covered by law)</i>	% of SSSIs in Favourable or Unfavourable Recovering condition.	Net increase/improvement
	Will it protect BAP priority species and Habitats and Species of Principal Importance in England?	% of Local Sites under positive conservation management .	
	Will it protect nature conservation interests outside	BAP reviews extent/condition of	

	designated areas, including wildlife corridors, and maintain or improve permeability of the landscapes to species responding to climate change? Will it generate opportunities for enhancement of habitats and biodiversity?	designated sites and abundance of protected species % of land area managed under national agri-environment scheme Planning applications approved which secure habitat /wildlife corridor enhancement	
2b To protect geodiversity assets.	Will it conserve and where possible enhance geological interests, including RIGS, through conservation or managed accessible feature exposure?	Number, extent/condition of designated Geodiversity sites	Net increase / Improvement
3. To preserve, protect and enhance the National Park's historic and cultural environment			
3a To preserve and enhance sites, features, areas and the settings of archaeological, historical and cultural heritage importance.	Will it preserve and protect scheduled and non-scheduled archaeological sites and other historic assets, and facilitate site survey?	Percentage of heritage assets 'at risk'	Net improvement
	Will it preserve and enhance the setting of features and sites of heritage importance?	Conservation Areas 'at Risk'	No reduction in special and historic character
	Will it protect and enhance the integrity and character of conservation areas?	Historic buildings 'delisted'	None
	Will it preserve and enhance buildings and groups of buildings, which contribute to the wider historical and architectural character of the National Park, including Listed Buildings 'at risk'?		
	Will it resist loss or harmful change to Registered Parks and Gardens and other designed landscapes?		
	Will it help respect and support the Park's cultural heritage? (e.g. history, traditions, customs and literary associations and the spaces and places these rely upon or relate to).		
	Will it recognise and respond to the special qualities and sensitivities of designated and non-designated buildings and heritage assets?		
4. To protect and improve air, water and soil quality and minimise noise and light pollution			
4a Reduce air pollution and its effects.	Will air quality be protected or improved?	AQMAs designated	None
4b To maintain and improve water quality and, natural hydrological system and security of supply.	Will it allow water to be used efficiently and managed with care?	Environment Agency/ Local Authority baseline monitoring	
	Will water quality in the natural environment be protected and improved and natural drainage	% Applications approved contrary to	None

	processes allowed to function?	EA advice	
4c To maintain and improve soil quality.	Will it protect the soil resource from loss, particularly peat and unimproved soils?	% Applications approved contrary to Local Authority Environmental Health advice	None
	Will it support remediation of contaminated land?		
	Will BMVL (grades 1, 2, 3a) be protected from loss where alternative sites of lower quality soil sites are feasible?	% change in areas considered as being 'dark skies'.	No net loss
4d To protect and increase a sense of remoteness and tranquillity.	Will it serve to control noise and light pollution from roads, industry and other development so as to protect tranquillity and dark skies?	Tranquillity mapping changes	No net loss
5. To minimise the consumption of natural resources			
5a To safeguard mineral reserves for future generations and promote the reuse of secondary materials.	Will it prevent the sterilisation of known or suspected mineral resources by development?	Applications approved contrary to strategic minerals safeguarding policy	None
	Will it ensure efficient/prudent use of mineral and other resources, such as recycling aggregates?		
5b To reduce waste generation and disposal and increase recycling.	Will it result in a reduction in the amount of waste requiring treatment and disposal, and encourage recycling or 'Energy from Waste' in line with the waste hierarchy?		
5c To reduce water consumption.	Will it help encourage a reduction in water consumption through maximising water efficiency and encouraging recycling/re-use of 'grey water'?	Applications permitted with embedded sustainable construction measures	National Park Authority to determine
5d To increase opportunities for walking and cycling	Will it support reduction in vehicular traffic and related emissions by promoting alternative sustainable modes of transport?	Applications approved which facilitate non-motorised traffic infrastructure	National Park Authority to determine
6. To develop a managed response to climate change			
6a To conserve and enhance the carbon absorption function and capacity within the National Park.	Will it conserve and protect the functionality and increase capacity of carbon sinks, such as peat soils, unimproved grassland and woodland?	Woodland/Forested area	No Net loss
		Peat Moorland area	Net gain, improvement in condition
6b To promote the use of renewable energy, exploring innovative techniques.	Will it promote or facilitate the use of alternative renewable energy where it is within the capacity of the National Park's special qualities to accommodate it?	Renewable energy generation capacity across the National Park	Net gain
6c To achieve efficient energy use.	Will it help improve energy efficiency in the built environment?		
6d To ensure development is not at risk from flooding and will not increase the threat from flooding elsewhere.	Will it reduce the vulnerability to fluvial flooding and flash flooding within settlements both within and outside the National Park through reduced run-off rates and increase water absorption / management?	Recorded flood events / properties affected against historic events	Net reduction
		Applications approved with	National Park Authority to

6e To ensure all new development is resilient to climate change.	Will development facilitate natural urban cooling in larger settlements through planting schemes and avoidance of reflective materials?	integrated SuDS Development permitted with climate change adaptive landscaping schemes.	determine National Park Authority to determine
7. To achieve and promote sustainable land use and built development			
7a To maximise the use of previously developed land and buildings.	Will it allow for the conversion of existing buildings where overall effect is a more sustainable development?	Planning applications refused for change of use of buildings	National Park Authority to determine
7b To promote sustainable construction solutions in the design of development which also meet landscape and built environment conservation priorities.	Will local materials be sourced which will not pressure the wider landscape and natural environment of the National Park? Will it seek to support sustainable design and construction techniques embracing energy efficiency measures, micro-generation, water and waste conservation whilst respecting conservation priorities?	Applications permitted with embedded sustainable construction measures	National Park Authority to determine
	Will it encourage sensitive design of road infrastructure? (e.g. reduced signage road markings, use of local materials and alternative traffic calming methods).		
Ensuring a Strong, Healthy and Just Community			
8. Increase understanding of the special qualities of the National Park by all, including the specific target groups of: young people; people from disadvantaged areas; people with disabilities; and, those from ethnic minority backgrounds.			
8a Facilitate learning opportunities, information availability and interpretation resources.	Will it facilitate and encourage provision of accessible resources and opportunities which can improve understanding of the special qualities, pressures and management of the National Park to all?		
9. To promote access for all			
9a Increase enjoyment of the National Park by under-represented groups from surrounding urban areas.	Will it help remove real or perceived barriers to target group understanding and enjoyment of the Park and facilitate enhanced accessibility to these groups?	Planning applications approved which will deliver/facilitate interpretation opportunities.	National Park Authority to determine
9b Manage the range of recreational activities which depend upon the special qualities of	Will it allow for improved access to and provision of high quality and a wider scope of formal and informal recreational	Target group visitor monitoring Facilities approved	National Park Authority to

<p>the National Park so that all types of users can enjoy its recreational offer.</p>	<p>opportunities?</p>	<p>with multi-user access integrated to design</p>	<p>determine National Park Authority to determine</p>
	<p>Will it facilitate the meeting of educational, sports and recreational needs of the local community, children and disadvantaged groups?</p>		
<p>10. Promote good governance</p>			
<p>10a To improve opportunities for participation in local action and decision-making.</p>	<p>Will it empower all sections of the community to participate in decision-making and increase understanding of how those decisions are reached?</p>	<p>Number and proportion of community led plans that are adopted and/or endorsed by the National Park Authority</p>	<p>National Park Authority to determine</p>
	<p>Does the plan set a process for engagement with communities, including specific approaches to reach particular groups/sectors?</p>		
<p>10b Raise partners' awareness and understanding of National Park purposes and standing.</p>	<p>Will it encourage positive partnership involvement and joint working with other stakeholders and sectors?</p>		
<p>10c To ensure compliance with Race, Disability and Gender Equality Duties.</p>	<p>Does the policy avoid potential for inequality of effect, or serve to positively address existing identified inequalities through its implementation comes?</p>	<p>Facilities approved with multi-user access integrated to design</p>	<p>National Park Authority to determine</p>
<p>11. To help meet local need for housing</p>			
<p>11a To meet identified local affordable / social housing need both in terms of quantity and type.</p>	<p>Will it deliver housing that meets the needs of the young, elderly, local people and those on limited incomes, and allow for the changing needs of residents within affordable housing?</p>	<p>No. of affordable /social housing units approved Range of size of occupancy restricted dwellings</p>	<p>National Park Authority to determine</p>
<p>11b To ensure housing in the National Park is appropriate in terms of quality, safety and security.</p>	<p>Will it provide good quality, safe, and secure housing, resilient to climate change and avoid areas at risk from flooding?</p>	<p>No of homes for the needs of older age groups by Housing Market Assessment? Falls within remit of Building Regulations BREEAM Average Environmental Impacting rating and Dwelling CO₂ emissions rate of new dwellings</p>	
<p>12. Secure better access to a range of sustainable local centres, services and amenities</p>			
<p>12a To improve access to and retention of schools, shops, post offices, pubs and medical facilities in order to meet local need.</p>	<p>Does it allow for delivery of new and improved healthcare, schools and other community services?</p>	<p>Percentage of communities with access to key facilities Young people not in education, employment or training Numbers employed in agriculture and land</p>	
	<p>Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?</p>		

<p>12b To increase opportunities for skills development and access to post-school education and training.</p>	<p>Will it facilitate improved access to vocational training, education and skills for all, including young people?</p> <p>Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider National Park purposes?</p>	<p>based sectors, including age, skills, seasonality.</p>	
Achieving a Sustainable Economy			
13. Promote a healthy and resilient Park-wide economy			
<p>13a To encourage a viable and diversified farming and forestry industry which is influential in positively shaping the valued landscape of the National Park</p>	<p>Will it support the changing needs of sustainable agriculture and forestry, including diversification within the capacity of the National Park's special qualities to accommodate it?</p>	<p>Number of farm diversification schemes approved Number and diversity of business types that exist in the National Park.</p>	<p>National Park Authority to determine</p>
<p>13b To increase and improve the quality of jobs related to National Park purposes including tourism</p>	<p>Will it facilitate sustainable tourism opportunity?</p> <p>Will it help improve the creation of good quality of jobs in the tourism sector, and reduce seasonal dependence?</p> <p>Will it offer alternative opportunities for employment, to offset declining traditional employment activity and reduce pressure for commuting?</p>	<p>Number of jobs created and supported by local enterprises in the National Park</p> <p>Planning permissions granted for new employment spaces or expansion of established businesses</p>	<p>National Park Authority to determine</p>
<p>13c To encourage business growth</p>	<p>Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up?</p> <p>Will it support existing business viability and local employment growth?</p>		<p>National Park Authority to determine</p>
14. To reduce the need for, and impacts of road traffic.			
<p>14a To improve the provision of public transport</p>	<p>Will it promote sustainable forms of transport (public transport including bus and rail, cycle and pedestrian routes) and ensure that the necessary associated infrastructure is made available?</p> <p>Will it increase access to special qualities of the National Park by sustainable transport modes?</p>	<p>Number of community transport schemes.</p> <p>Modal split of visitors to/from NP</p> <p>Traffic flow data and identification of congestion points.</p>	<p>National Park Authority to determine</p> <p>National Park Authority to determine</p>
<p>14b To reduce the impact of transport infrastructure on the National Park's special environmental qualities and quality of life?</p>	<p>Will it reduce the net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking?</p>		<p>National Park Authority to determine</p>

APPENDIX 1: Plans Programmes and Strategies which help set direction for Sustainability Objectives within the Local Plan Part 2 Sustainability Appraisal.

Plans Programmes and Strategies

INTERNATIONAL PROGRAMMES, PLANS AND STRATEGIES

Biodiversity/Flora & Fauna

- Convention on biodiversity Rio De Janeiro 1992
- Johannesburg Summit on Sustainable Development 2002 Biodiversity, Fauna and Flora
- European Biodiversity Strategy 1998
- Bern Convention on Conservation of European Wildlife and Natural Habitats 1979
- International Convention on Biological Diversity – Nagoya Japan 2010
- Habitats Directive (1992/43/EC)
- Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora
- Wild Birds Directive (79/409/EEC)
- EU Biodiversity Strategy to 2020 – Towards Implementation
- *Population and Human Health*
- European Sixth Environmental Action Programme – Environment 2010. Our future our choice
- European Strategy for Sustainable Development A Sustainable Europe for a Better World
- Aarhus Convention- Convention to Access to information, public participation in decision making and access to justice in Environmental Matters (UNECE,) 2001

Material Assets

- European Spatial Development Perspective: Towards Balanced and Sustainable Development of the Territory of the European Union

Soil, Water and Air

- Council Directive 75/442/EEC on waste, as amended by Council Directive 91/156/EEC.
- Water Framework Directive (2000/60/EC)
- Air Quality Framework Directive (96/62/EC) (and Amending Acts)
- EU directive 2002/49/EC Assessment & Management of Environmental Noise

Climatic Factors

- UN Framework Convention on Climate Change 1994
- Kyoto Protocol 1997
- European Climate Change Programme
- European Renewable Energy Directive 2012
- Green Paper: A European strategy for sustainable, competitive and secure energy
- White paper: European transport policy for 2010

Landscape

- European Landscape Convention, Council of Europe Treaty 176, 2000
- Pan-European Biological and Landscape Diversity Strategy

Cultural

- UNESCO World Heritage Convention, 1972, Budapest
- Valetta Convention (Archaeology) 1992
- The European Charter for Sustainable Tourism

Transport & Accessibility

- Europe 2020 Growth Strategy – Priorities for the UK (2013)
-

Economy

- **European Agricultural Fund for Rural Development**

NATIONAL PROGRAMMES, PLANS AND STRATEGIES

- **English National Parks and the Broads – UK Government Vision and Circular 2010**

Biodiversity Flora and Fauna

- **Countryside & Rights of Way Act 2000**
- **Wildlife & Countryside Act 1981**
- **Natural Environment and Rural Communities Act 2006**
- **Working with the Grain of Nature. A Biodiversity Strategy for England (2002)**
- **Planning for Biodiversity and Geological Conservation: A Guide to Good Practice (March 2006), OPDM, Defra and English Nature**
- **England Biodiversity Strategy Climate Change Adaptation principles conserving biodiversity in a changing climate (DEFRA 2007)**
- **Biodiversity 2020: A strategy for England's wildlife and ecosystem services, 2011**
- **DEFRA An invitation to shape the Nature of England (2010)**
- **England Biodiversity Strategy Climate Change Adaptation principles conserving biodiversity in a changing climate (DEFRA 2007)**
- **NPPF 2012**
- **Planning Practice Guidance**
- **The State of Natural Capital: Restoring our Natural Assets, March 2014**
- **Making Space for Nature: A review of England's Wildlife Sites and Ecological Network: Chaired by Professor Sir John Lawton CBE FRS: September 2010**

Population and Human Health

- **NPPF 2012**
- **Planning Practice Guidance**
- **Equality Act 2010**
- **The UK Government Sustainable Development Strategy (2005) (Updated 2012)**
- **The Rural White Paper Our Countryside the Future: A Fair Deal for Rural England (2000)**
- **The Rural Strategy (DEFRA 2004)**
- **Lifetime Homes, Lifetime Neighbourhoods. A National Strategy for Housing in an Ageing Society**
- **Government Circular: Planning for Gypsies and Traveller Caravan Sites**
- **Building a Greener Future: Towards Zero Carbon Development 2007**
- **Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing; DCLG, 2008**
- **The Future of Transport - White Paper CM 6234**
- **The Transport White Paper: The Future of Transport (DfT 2004) A Network for 2030**
- **Game Plan a strategy for delivering government's sport and physical activity objectives**

Material Assets

- **NPPF**
- **Planning Practice Guidance**
- **Waste (England and Wales) Regulations 2011**

Soil, Water and Air

- **NPPF**
- **Planning Practice Guidance**
- **EA Groundwater Protection: Policy and Practice (GP3)**
- **Flood and Water Management Act 2010**
- **Humber Flood Risk Management Plan (2016)**
- **National Flood and Coastal Erosion Risk Management Strategy for England; DEFRA, EA 2011**
- **Planning and Pollution Control (annex 1 pollution control, air and water quality)**

- **Planning and Pollution Control (annex 2) Development on land affected by contamination**
- **Planning Policy Statement 25. Development and Flood risk (2006)**
- **Making Space for Water (Defra 2004)**
- **National Water Resources Strategy**
- **Catchment Abstraction Management Strategies**
- **The Water Supply (Water Quality) Regulations, 2010**
- **Future Water - The Government's water strategy for England (2008)**
- **The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) Defra**
- **The First Soil Action Plan for England: 2004-2006 (2004) Defra**
- **Lighting in the Countryside: Towards Good Practice; DCLG, 1997**
- **Code of Practice for Sustainable Use of Soils in Construction Sites Defra**

Climatic Factors

- **NPPF**
- **Planning Practice Guidance**
- **Climate Change Act 2008**
- **Environment Act 1995**
- **Energy White Paper: Meeting the Energy Challenge, May 2007**
- **England Biodiversity Strategy: Towards Adaptation to Climate Change (2007), Defra**

Cultural Heritage (including architectural and archaeological heritage)

- **NPPF**
- **Planning Practice Guidance**
- **Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment – Historic England (2013).**
- **EH Making the past part of our future (2005-10)**
- **Ancient Monuments and Archaeological Areas Act 1979**
- **The Historic Environment a Force for Our Future (2001), DCMS**
- **Heritage at Risk Register**
- **Climate Change and the Historic Environment (2006) English Heritage**

Landscape

- **English Nature Natural Area Profiles**
- **Countryside Agency Character Areas**
- **World Class Places – The Government's strategy for improving quality of place (DCMS/ CLG 2009)**
- **English Forestry Strategy (EFS)**

SUB REGIONAL PROGRAMMES, PLANS AND STRATEGIES

Biodiversity, Flora and Fauna

- **Lowland Derbyshire Local Biodiversity Action Plan**
- **Peak District Biodiversity Action Plan 2011-2020**

Population and Human Health

- **A Plan for Sport in Derbyshire 2006-09**
- **Defra 8-Point Plan for National Parks**
- **A Guide To Community-Centred Approaches For Health And Wellbeing Full Report - Public Health England 2015**
- **The NHS Five Year Forward View**
- **Derbyshire's Sustainable Community Strategy 2006- 2009**
- **Trent Strategic Health Authority (TSHA) strategic framework 2005-10 'Healthcare for the Modern World'**
- **Derbyshire Supporting People 5-Year Strategy 2005 - 2010 Extra Care Housing in Derbyshire: A Strategic Plan (2005)**

Soil, Water and Air

- **Catchment Abstraction Management Strategy (CAMS)**

- River Dove CAMS
- Upper Mersey CAMS
- Don and Rother CAMS
- Aire and Calder CAMS
- Humber River Basin Management Plan
- Minerals Local Plan April 2000 (Incorporating First Alteration: Chapter 13-Coal November 2002)
- Derby and Derbyshire Waste Local Plan March 2005
- Looking After Derbyshire's Waste October 2005
- Derby and Derbyshire Minerals and Waste Development Framework

Cultural Heritage (including architectural and archaeological heritage)

- Derbyshire County Council Local Cultural Strategy 2002-2007
- Historic Environment Record (HER) (LPAs)

Economy

- The Midlands Engine Initiative
- The Peak District & Derbyshire Growth Strategy For The Visitor Economy 2015 – 2020 (2013)
- Derby and Derbyshire Economic Partnership Business Plan (2005-2008)

LOCAL PROGRAMMES, PLANS AND STRATEGIES

- **Constituent Authority Development / Spatial Plans:**
 - Derbyshire Dales District Council
 - High Peak Borough Council
 - Staffordshire Moorlands District Council
 - Cheshire East Council
 - Oldham Metropolitan Borough Council
 - Kirklees District Council
 - Barnsley Borough Council
 - Sheffield City Council
 - North East Derbyshire District Council
- Dales and High Peak Strategic Housing Needs Survey, 2007, John Herington and Associates
- Peak District Annual Housing Report (2007) Peak District National Park Authority
- Derby, Derbyshire, Peak District National Park Authority and East Staffordshire Gypsy and Traveller Accommodation Assessment (2014)
- Derbyshire Local Transport Plan 2011-2026
- The Peak District & Derbyshire Growth Strategy For The Visitor Economy 2015 – 2020 (2013)

PEAK DISTRICT NATIONAL PARK

- Local Plan Part 1, Core Strategy 2012
- Peak District Biodiversity Action Plan 2001 – 2010 Review
- Peak District Landscape Character Assessment (March 2008) Peak District National Park Authority
- Peak District Flood Risk Assessment for LDF Level 1, Vol 1. Draft (March 2008), report by Halcrow for Derbyshire Dales DC, High Peak BC, Peak District National Park Authority
- River Derwent Strategy – A Flood Management Strategy for the River Derwent Corridor 2003
- Peak District Sustainable Tourism Strategy March 2000 Rural Development Partnership
- Peak District National Park Climate Change Action Plan 2009 – 2011 (May 2009)
- Peak Through Time – Cultural Heritage Strategy for the Peak District National Park
- Peak District National Park Management Plan 2006 – 2011
- Peak District Annual Housing Report (2007)

APPENDIX 2: Interim Sustainability Statement Summary Findings (Options & Alternatives)

	Policy Issue	Summary Sustainability Commentary of NPA's Preferred Approach	Summary Sustainability Commentary for Alternatives Options
CONSERVATION AND LANDSCAPES			
1	Exceptional circumstances for development in the natural zone	Policy presents exceptional circumstances in which development in the Natural Zone may be appropriate. By definition these are tightly defined and focus on protection and enhancement where appropriate of the national park's finest natural assets. Whilst these may limit opportunities for more sustainable forms of energy generation, minerals extraction or utilities infrastructure provision which might have 'global' environmental and / or negative economic sustainability effects, the maintenance of the finest elements of the national park is otherwise highly beneficial in terms of conservation and enjoyment and understanding purposes which in turn will foster sustainable tourism and recreational opportunities, if indirect to the policy's core purpose.	None considered reasonable in context of the Core Strategy
2	Embedding whole landscape thinking into planning decisions	Whilst a significant issue and potential step-change in the approach to embedding landscape matters within development management, the consultation DPD does not present sufficient detail or specificity to enable detailed SEA/SA matrix based assessment. Moreover, the consultation proposal options presents 3 different procedural approaches, all of which could be expected to present a similar and positive sustainability outcome in terms of landscape, with key differences being procedural/policy status only.	(See discussion left)
3	Considering cumulative harm as a material consideration	Whilst an important issue exploring the potential to more explicitly embed cumulative impact considerations within development management decision making, the consultation DPD does not present sufficient detail or specificity to enable detailed SEA/SA matrix based assessment. However the principle of more explicitly having regard to cumulative impacts of development on the sensitive environments of the national park must be seen as an inherently sustainable approach.	The consultation proposal option presents 2 different procedural approaches, but where both options could reasonably be expected to present a similar and positive sustainability <i>outcome</i> in terms of achieving national park purposes, even though approaches differ.
4	Removing modern, non-	Policy principles are considered as broad prompts for debate. The issue considers a more	Policy options suggest a spatial element could be introduced to

	traditional features from the countryside once their original use has ceased	flexible approach to building re-use where economic objectives of the NPA and its plans could be furthered. However the primacy of conservation and enhancement remains the underpinning priority. As policy is further refined and focused it is likely that in sustainability terms there will often be an inherent tension between the reuse of existing buildings for new viable uses, which offer economic benefits and sustainable reuse of material assets (buildings).	recognise landscape capacity/sensitivity to such re-uses. This may enable a more sustainable policy basis to be ultimately achieved where the positive elements of a conservation and economic and sustainable reuse of assets can best be balanced.
5	Settlement limits	Principles of development inside or outside settlements are not set, but policy seeks to clarify <i>how</i> determination will be taken.	Options present alternative approaches to achieve the same end, with no significant differences in outcome for sustainability.
6	Protecting important open spaces in settlements (new)	Examines the best way forward in considering important open spaces in settlements, but does not extend Core Strategy policy application.	The consultation proposal option presents 2 different procedural approaches, but where both options could reasonably be expected to present a similar and positive sustainability outcome in terms of achieving national park purposes.
7	Design layout and landscaping of development	Detailed design policy options appropriate to meet national park core purposes and secure the amenity of a development proposal's setting.	The consultation proposal option presents 2 different procedural approaches, but where both options could reasonably be expected to present a similar and positive sustainability outcome in terms of achieving national park purposes.
8	Conservation Areas	Policy presents the detailed criteria necessary to meet statutory responsibilities of the NPA as the LPA. Alternative approaches are unrealistic. Policy may have limited implications for the sustainable use of previously developed land within settlement limits and increase the imperative for excellence in design of new development which could be seen to have viability implications for affordable housing delivery and business opportunity. However such effects are not certain and are likely to be limited. Conservation of the finest built environment areas across the national park is however more likely to be a positive contributor to a sustainable tourism sector and further support critical National Park purposes.	None considered reasonable in context of the Core Strategy
9	Listed buildings	Policy presents the detailed criteria necessary to meet statutory responsibilities of the NPA as the LPA in relation to listed buildings and their settings. Alternative approaches are unrealistic.	None considered appropriate in context of legislative responsibilities and the Core Strategy framework.
10	Demolition of listed buildings	Policy presents the detailed criteria necessary to meet statutory responsibilities of the NPA as the LPA in relation to demolition of listed buildings. Alternative approaches are unrealistic.	None considered appropriate in context of legislative responsibilities and the Core Strategy framework.

11	Conversion of buildings of historic or architectural merit	<p>Overall the sustainability implications of the policy are likely to be mixed. Conservation of vernacular buildings which contribute to the established and valued character of the National Park will depend upon securing viable re-uses in most instances. Preferred approach allows such change whilst protecting intrinsic architectural character. However, the policy will also afford some limited opportunity for development in sub-optimal locations in relation to sustainable access and reducing the need to travel. Implications in relation to specific nature conservation priorities and reduction in a sense of tranquillity may be marginally affected in some instances.</p>	<p>One alternative approach is suggested which considers introducing a finer grain of definition and clarification between buildings of ‘architectural and historic merit’, and more simple ‘vernacular buildings’.</p> <p>Core Strategy sets terminology for conversion of buildings to alternative uses slightly differently and hence inconsistency of approach may be seen to be a problem. However such variation is marginal.</p> <p>Sustainability implications of taking a firmer approach to the lower ranked vernacular buildings would be likely to result in fewer conversions in locations outside settlements, and potentially reduce the need to travel and maintain a lower degree of ‘settlement’ in the wider landscape. However, many simple vernacular buildings are important individually and cumulatively in the landscape character of parts of the national park, and loss of these to neglect as no viable use is permitted will also set negative sustainability outcomes.</p> <p>The NPA would need to take a view in refining policy the relative priority afforded to such outcomes.</p>
12	Guiding new uses for traditional buildings in different locations (new)	<p>Policy examines how to more flexibly guide and address the reuse of traditional buildings across the national park whilst maintaining the primacy for conservation and enhancement. Preferred approach supports development of a new policy adopting spatial distinction or hierarchy for proposals with different degrees of re-uses of traditional buildings, but specific policy criteria are not presented. Sustainability outcomes could be predicted to be positive as a consequence of more positive economic and long-term heritage benefits, whilst landscape capacity and sensitivity considerations are given enhanced weight within less developed parts of the park. In combination with the wider suite of policies, built environment and landscape harm should be mitigated.</p>	<p>Options consider merits of focusing upon an ‘impacts’ (conservation imperative) against one of spatial variation which recognises the different (potential) degrees of sensitivity of sites in settlements and within the settled and more remote rural areas. Both approaches are likely to deliver similar sustainability performance, although the preferred approach affords clearer or more specific guidance to plan users.</p>
13	Important Parks	Procedural matters addressed only by emerging	No alternative approaches

	and Gardens	policy. No significant sustainability considerations.	considered appropriate.
14	Shop fronts	Detailed design guidance only within context of Core Strategy conservation and enhancement objectives.	No significant sustainability implications across the options.
15	Outdoor advertising	Detailed design guidance only within context of Core Strategy conservation and enhancement objectives.	None presented.
16	Agricultural or forestry workers dwellings	<p>Detailed <i>and</i> broad scoped policy in relation to ensuring planning processes for agricultural workers dwellings are not abused to secure new dwellings in the open countryside. Firm criteria demonstrating need and then applying scale, layout, design guidance with occupancy control. All elements set within the context of Core Strategy conservation and enhancement objectives. Reflects former national policy pre-NPPF and suggests limited sustainability implications as a reflection of likely frequency of application and strict level of control over such proposals.</p> <p>Preferred approach also seeks to introduce restraint of dwelling size where agricultural justification is proven and permission granted, so that any subsequent use can be reasonably and properly prioritised as affordable housing for local need.</p> <p>A fundamentally sustainable approach in national park context to tightly control such development but which also can/ does have positive implications for landscape management through maintaining farming and forestry land uses.</p>	<p>Alternative approach examines the refinement of LC12 (as the preferred approach) but without a size limitation criteria, which could then rely upon legal agreements alone to secure suitability subsequent local need occupancy priorities.</p> <p>Policy objectives are similar, with differing approaches to achieve those objectives. Sustainability outcomes may be expected to be similarly positive for both although the 'belt and braces' approach set but within the preferred approach would be expected to be more effective in countering abuse of the planning system.</p> <p>Policy which presents a higher possibility of delivering affordable needs housing following original agricultural needs use may be seen on balance as the preferable approach, but affordable housing in often remote rural locations also raise sustainability complications in respect to accessibility and transport needs.</p>
17	Agricultural or forestry operational development	The policy seeks to ensure that necessary expansion of farming and forestry infrastructure is permitted so that these sectors remain viable and retain their fundamental influence upon landscape and habitat management across the	Alternative approaches are limited to the improved definition of 'close to' in relation to proximity to other farm buildings. This represents minor clarification

		national park. Policy seeks to ensure that such development is not to the detriment of the valued characteristics of the National Park and therefore the policy preference should be seen as a sustainable approach.	to policy rather than to potentially alter any significant sustainability implications.
18	Farm diversification	The policy seeks to ensure that farm diversification is permitted so that these sectors remain viable and retain their fundamental influence upon landscape and habitat management across the national park. Policy seeks to ensure that such development is restricted to existing buildings wherever possible. Such development may have positive local economic and job opportunity implications. Some negative implications may arise as a consequence of the locations of such uses where access by car is the only realistic option.	The single alternative approach offered presents opportunity for more flexible permissions within specific Use Classes. This would potentially afford greater flexibility in relation to economic activity and therefore offer greater viability opportunities as a positive sustainability outcome. The outcome of such an approach may be likely to have some negative sustainability implication outcomes for environmental aspirations, given opportunities for greater intensification of use, worker / customer / supplies travel patterns. This flexibility may also have negative implications for economic diversification and viability within the settlements of the national park.
19	Historic or cultural heritage sites and features	Procedural matters addressed only by emerging policy. No significant sustainability considerations.	No alternative approaches considered appropriate.
20	Archaeological sites and features	Procedural matters addressed only by emerging policy. No significant sustainability considerations.	No alternative approaches considered appropriate
21	Sites features and species of wildlife, geological or geomorphologic al importance	Protection and improved conservation of core environmental components is inherently sustainable policy approach. Restrictions this may impose on some development is considered to be limited and alternatives possible in many cases. Overall impact on economic and social sustainability objectives for the wider community is likely to be low, although on occasion policy will preclude development locally. Overall, the positive objectives and wider economic value a healthy natural ecosystem will afford should be seen to outweigh any locally restrictive implications.	Core Strategy Policy and legislation context does not afford alternative approaches to be realistically developed.
22	Safeguarding, recording and enhancing nature conservation interests where development is acceptable	Protection and improved conservation of core environmental components is inherently sustainable policy approach. Underpins statutory purpose. Procedural matters addressed only by emerging policy. Only positive significant sustainability considerations.	No alternative approaches considered appropriate.

23	Assessing the nature conservation importance of non-statutorily designated sites	Protection and improved conservation of core environmental components is inherently sustainable policy approach. Underpins statutory purpose. Procedural matters addressed only by emerging policy. Only positive significant sustainability considerations.	No alternative approaches considered appropriate.
24	Protecting trees woodlands and other landscape features	Protection and improved conservation of core environmental components is inherently sustainable policy approach. Underpins statutory purpose. Procedural matters addressed only by emerging policy. Only positive significant sustainability considerations.	No alternative approaches considered appropriate.
25	Pollution and disturbance	Protection and improved conservation of core environmental components and the national park's special qualities is inherently sustainable policy approach. Underpins statutory purposes. Procedural matters addressed only by emerging policy. Only positive significant sustainability considerations.	No alternative approaches considered appropriate.
26	Surface water run off	Management of surface water run-off and flood alleviation is an intrinsically sustainable approach to development management. Partially determined by specific legislation and regulation.	No alternative approaches considered appropriate.
27	Contaminated land	Detailed development management considerations where alternative approaches are not feasible. Intrinsically sustainable approach to contaminated land issues.	No alternative approaches considered appropriate.
28	Unstable land	Detailed development management considerations where alternative approaches are not feasible. Intrinsically sustainable approach to unstable land issues.	No alternative approaches considered appropriate.
29	Site briefs	Considers procedural approach only with limited sustainability implications. Promotes a flexible – case by case merits approach.	2 alternative options considering the extent to which development briefs may be used. Negligible sustainability implications between the choices as overall application of wider policy suite will remain consistent.

APPENDIX 3: Scoping Report Review, March 2016 Statutory Consultation Bodies Responses

Mr Brian Taylor
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
Derbyshire
DE45 1AE

Direct Dial: 0121 625 6851

Our ref: PL00013812

31 March 2016

Dear Mr Taylor

Re: Peak District National Park Authority Local Plan - Development Management Policies DPD: SA Scoping Opinion

Thank you for your consultation email in relation to the above. Historic England welcomes the opportunity to engage with you on this document and our comments in relation to the three key points set out in your email are set out below.

Policies, Plans or Programmes updates from 2011 Scoping Report

Since the last Scoping Report was produced, Historic England has produced advice on Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment which can be found via the following weblink:

https://content.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf/

The document sets out a number of international and national policies, plans and programmes specifically relating to the historic environment (or cultural heritage as per the 2011 Scoping Report) which could be included in a revised document and/or SA. It is recommended that the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monument and Archaeological Areas Act 1979 are taken into consideration.

It is noted that the 2011 Scoping Report refers to planning policy statements, and the associated PPS5 practice guide, all which have been replaced by the NPPF so those aspects will need to be addressed.

It would also be worth considering whether to refer to the Town and Country (General Permitted Development Order)(England) Order 2015 in terms of the impact extended permitted development rights may have on development management policies, including those relevant to the historic environment.

Baseline information updates since 2011

The NPPF makes provision for the consideration of non-designated heritage assets as well as designated heritage assets which is a different position from the 2011 Scoping exercise.

In this respect additional baseline information could be obtained from the Historic Environment Record (HER) for the area which is held by Local Authorities. This may involve trans-boundary information from various Local Authorities for the national park area.

In respect of the historic environment additional information could include 'local lists' of locally designated heritage assets, using the HER to identify areas that have a high potential for archaeology, and historic landscape characterisation studies amongst others. The Historic England Heritage at Risk information may also be relevant to the Scoping exercise in respect of development management policies.

View on 'filtering' approach of the 2012 Interim Sustainability Report

Historic England agrees that a SA should be proportionate to the level of document it relates to and is aware that the Development Management Policies DPD will be directly subservient to the Adopted Core Strategy. However, it would be helpful to continue discussions on this aspect with you at present to ensure that the historic environment is considered and addressed appropriately through the SA and DMP DPD.

A key point to note at this stage is that any indicators/measures relating to the historic environment should not have an outcome of 'unknown/uncertain'. Such an outcome indicates that further work is required since, in order to make an informed decision regarding policy wording, the effects for the historic environment should be understood and avoidance/mitigation measures put in place. Compensatory measures would be looked at as a last resort in line with the provisions of the NPPF since heritage assets are a finite resource.

I hope that the above comments are of use to you at this time. If you have any queries about any of the issues raised, please do not hesitate to get in touch. I will be taking up a permanent post with the East Midlands region at the start of May so will most likely be the Historic England contact from now on. Historic England is keen to remain involved in the DMP DPD as it progresses, to offer support and advice wherever possible.

Yours sincerely,



Rosamund Worrall
Historic Environment Planning Adviser
Rosamund.worrall@historicengland.org.uk

Date: 12 May 2016
Our ref: 182877
Your ref: Peak District SA/SEA Scoping



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We welcome the restoration of peat moorlands as a positive biodiversity impact and for mitigating the effects of climate change.

- Water – Planning Practise Guidance on [Water supply, wastewater and water quality](#) can provide additional information to how your plan can protect habitats from water related impacts and seek enhancement, especially N2K and SSSIs, but also local sites and also positively contribute to reducing flood risk by working with natural processes- link with Green Infrastructure policies, SUDs
- Air Quality – We welcome the recognition of Air Quality impacts on nationally designated sites. Again further information on how your authority should consider the monitoring of Air Quality through the plan can be found on the Planning Practise Guidance at this [link](#). The monitoring of air quality impacts on nationally designated sites from different pollutant sources should be considered.
- Noise and Light – As well as having negative impacts on local amenities, your authority should also consider how these may impact on intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Policies (usually design policies) should address impacts on the natural environment
- Biodiversity – Natural England recommends that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks..

You may wish to consider listing each site individually along with their [conservation features](#) and notified features in order to help you determine potential specific impacts and to help with monitoring of the plan. We would suggest that Impact Risk Zones (IRZs) should be considered within the assessment criteria. IRZs define zones around each Site of Special Scientific Interest (SSSI) which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites which are underpinned by the SSSI designation. Natural England has published a set of mapped IRZs for SSSIs. This helpful GIS tool can be used by LPAs to help consider whether a proposed development is likely to affect a SSSI and determine whether they need to consult Natural England to seek advice on the nature of any potential SSSI impacts, their avoidance or mitigation. The dataset and user guidance can be accessed from the gov.uk website, <https://www.gov.uk/government/organisations/natural-england>.

Overall impacts should be considered for habitats and species, we welcome that your authority recognises this, your authority should make reference to [Habitats and species of principal importance in England](#) which lists priority species and habitats (i.e. those material to planning).

- Geology – We welcome the need to consider geodiversity in the wider environment, but recommend that you also make mention to geology in relation to designated sites. There are some Geological SSSIs within the Peak District but these have not been mentioned under this heading.
- Agriculture and soils – We welcome the intention to consider agriculture and soils as part of your scoping stage. We recommend that as part of your consideration that you assess soil as a finite resource, which fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. Key considerations within the overall plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil

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disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. We also advise that any policies refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#).

As well as soils in general, we recommend that you have a separate section specifically on Best and Most Versatile Agricultural Land. BMV land is Grades 1, 2 and 3a in the Agricultural Land Classification. Under NPPF 112. Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, Local Planning Authorities should seek to use areas of poorer quality land in preference to that of a higher quality. You may wish to refer to Natural England's advice on BMV [Land](#).

- Woodland – where possible distinction should be made between semi-natural and ancient woodland.
- Landscape – Planning Practise Guidance on [Landscapes](#) paragraph 3 notes the duty public bodies to have regard to the purpose of NP/AONB is relevant in considering development in their setting and which you should take into regard.

We recommend that you reference National Character Areas as part of your overall landscape considerations. NCAs divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment.

For further information on NCAs please see the gov.uk website as follows:
<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

The NCAs that fall within the Peak District National Park are as follows:

NCA 50: Derbyshire Peak Fringe and Lower Derwent

NCA 51: Dark Peak

NCA 52: White Peak

NCA 53: South West Peak.

- Transport – We welcome the intention to consider the environmental impacts of traffic to the Peak District, specific mention should be made to internationally and nationally designated sites, particularly those vulnerable to associated pollutants.

Sustainability Framework

Natural England generally supports the sustainability objectives contained within the framework as they satisfactorily cover our interests in the natural environment.

Potential Indicators

We suggest that the indicators should be able to demonstrate the potential changes that may occur as a result of the implementation of the local plan rather than simply recording the numbers of designated sites or open space etc. For example you may want to consider using the following indicators:

- Number of planning applications with conditions to ensure works to manage/enhance the condition of SSSI features of interest.
- Area of SSSIs in adverse condition as a result of development (information available from Natural England website).

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- BAP habitat - created/ managed as result of granting planning permission (monitored via planning obligations) and which meet Biodiversity Action Plan targets
- Number of new green infrastructure projects associated with new developments.

Natural England also considers that GI should be an integral part of the creation of sustainable communities, therefore we recommend the Sustainability Appraisal reflects this by ensuring that GI is a cross-cutting theme throughout the assessment. Green Infrastructure can provide many social, economic and environmental benefits close to where people live and work including:

- Space and habitat for wildlife with access to nature for people
- Places for outdoor relaxation and play
- Climate change adaptation - for example flood alleviation and cooling urban heat islands
- Environmental education
- Local food production - in allotments, gardens and through agriculture
- Improved health and well-being – lowering stress levels and providing opportunities for exercise.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Andy Stubbs on 02080261978. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Andy Stubbs
Lead Adviser
Land Use Operations – Midlands
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Mr. Brian Taylor

October 2016

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Policy Planning Manager
Peak District National Park Authority
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Bakewell
Derbyshire
DE45 1AE

Our ref: LT/2006/000238/SE-01/SP1-
L01

Date: 31 March 2016

Dear Mr. Taylor,

**PEAK DISTRICT NATIONAL PARK AUTHORITY: DEVELOPMENT
MANAGEMENT POLICIES DEVELOPMENT PLAN DOCUMENT**

**STRATEGIC ENVIRONMENTAL ASSESSMENT AND SUSTAINABILITY
APPRAISAL SCOPING REPORT CONSULTATION – UPDATE 2016**

Thank you for giving us the opportunity to provide up to date information for the Peak District National Park Authority Strategic Environmental Assessment and Sustainability Appraisal.

Since we last responded on 31 May 2011, a number of updates have taken place to our plans, policies and programmes that may be pertinent to the Sustainability Appraisal process.

We draw to your attention the following additional plans, policies and programmes that may be pertinent to the Sustainability Appraisal process:

Water

<p>Catchment Abstraction Management Strategy, 2013</p>	<p>We previously provided information about the Environment Agency's Catchment Abstraction Management Strategy (CAMS) for the Derbyshire Derwent that was published in 2006. Since our last response the 2nd Cycle of CAMS assessments has been released in 2013. The Derbyshire Derwent CAMS is available at: https://www.gov.uk/government/publications/cams-derbyshire-derwent-abstraction-licensing-strategy</p> <p>The Peak District National Park also covers other river catchments and I have provided the following links to strategies that partially impact the Peak District National Park.</p> <p>Dove CAMS: https://www.gov.uk/government/publications/cams-dove-abstraction-licensing-strategy</p> <p>Upper Mersey CAMS: https://www.gov.uk/government/publications/upper-</p>
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	<p>mersey-abstraction-licensing-strategy</p> <p>Don & Rother: https://www.gov.uk/government/publications/don-and-rother-abstraction-licensing-strategy</p> <p>Aire & Calder: https://www.gov.uk/government/publications/abstraction-licensing-aire-and-calder-strategy</p>
Humber River Basin Management Plan	<p>The Humber River Basin Management Plan was updated in 2015. The plan uses updated information to set out the latest understanding of the pressures facing the water environment in the Humber River Basin District. As before, the Plan has been prepared in accordance with the Water Framework Directive, and this update is the second of a series of six-yearly planning cycles. Pages 89 – 100 provide further information about the changes that have taken place since 2009.</p> <p>The Plan and associated supported documents are available at: https://www.gov.uk/government/collections/river-basin-management-plans-2015#humber-river-basin-district-rbmp-2015</p>
Environment Agency’s Groundwater Protection: Policy and Practice (GP3)	<p>Our GP3 documents describe how we manage and protect groundwater now and for the future. It is an evolving document and was updated in 2013. The position statements in Part 2 are intended to help planning authorities and other public bodies appreciate the importance of groundwater, the risks posed by specific activities and the measures that can be taken to mitigate those risks. A copy of the GP3 documents is available on our website at: https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3</p>

Flood Risk

Flood and Water Management Act 2010	<p>The Flood and Water Management Act, 2010 takes forward some of the proposals from the Future Water and Making Space for Water publications and the UK Government’s response to Sir Michael Pitt’s Review of the Summer 2007 floods.</p> <p>The Act gives the Environment Agency a strategic overview of flood risk management in England and upper tier authorities responsibility for preparing and putting in place strategies to manage flood risk from groundwater, surface water and ordinary watercourses in their areas.</p>
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	<p>A copy of the Act is available at: http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf</p>
National Flood & Coastal Erosion Risk Management Strategy for England	<p>The National Flood and Coastal Erosion Risk Management Strategy for England has recently been laid before Parliament. When approved, it will be the first statutory framework on how flood risk will be managed in England.</p> <p>The Strategy considers the level of flood risk and how it might change in the future; the risk management measures that may be used; roles & responsibilities; future funding; and the need for supporting information.</p> <p>On the basis that Parliament resolves that the Strategy should be issued, it is expected to become a Statutory document in Summer 2011. A copy of the Strategy is available to view at: http://www.official-documents.gov.uk/document/other/9780108510366/9780108510366.pdf</p>
Climate Change Allowances (2016)	<p>As of February 2016, new climate change allowances have been brought in that should be used in all flood risk assessments and strategic flood risk assessments. There is now a range of climate change allowances that can be used based on time periods, and the likelihood of it occurring. Further detailed information can be found here on gov.uk</p>
Humber Flood Risk Management Plan (2016)	<p>A flood risk management plan for the River Humber was released in March 2016. The flood risk management plans (FRMP's) explain the risk of flooding from rivers, the sea, surface water, ground water and reservoirs. Each FRMP set out how risk management authorities will work with communities to manage flood and coastal risk over the period 2015-2021. The Humber FRMP can be found at gov.uk. Key areas to look at would be the summary document which gives an overview of the FRMP. Also, within Part B (Sub Areas of the River Basin District), I would highlight the river catchments that fall within the boundaries of the Peak District National Park Authority. These are the Aire and Calder (Pg 50 – 67), Derbyshire Derwent (Pg 68 – 82), Don & Rother (Pg 101 – 116) and the Dove Catchment (Pg 117 – 129).</p>
North West Flood Risk Management Plan (2016)	<p>A flood risk management plan for the River Humber was released in March 2016. The Peak District National Park Authority boundary falls slightly within our North West region and therefore this should be considered by your Authority. All information can be found at gov.uk.</p>
Derbyshire's Local Flood Risk Management Strategy (2015)	<p>Derbyshire County Council is responsible for developing, maintaining, applying and monitoring a Local Flood Risk</p>

	<p>Management Strategy for Derbyshire Dales District Council. The Strategy is used as a means by which the LLFA (Derbyshire County Council) co-ordinates Flood Risk Management on a day to day basis. Please contact the LLFA for more information on this strategy.</p>
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Waste

<p>Waste (England and Wales) Regulations 2011</p>	<p>Since our response in May 2011, the Waste (England Wales) (Amendment) Regulation 2012 were laid before Parliament and the Welsh Assembly on 19 July 2012 and come into force on 1 October 2012. The amended regulations relate to the separate collection of waste. They amend the Waste (England and Wales) Regulation 2011 by replacing regulation 13.</p> <p>Further information can be found at: https://www.gov.uk/guidance/waste-legislation-and-regulations</p>
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National Park Baseline Conditions for Environmental Limits

In our previous response in 2011 we noted that the data used in Paragraph 72 on Page 20 of the Scoping Report relates to the General Quality Assessment (GQA) way of measuring river quality, which looked at the chemical and biological quality of rivers. The GQA method has now been superseded by the EU Water Framework Directive, which came into force in 2000 and was transposed into UK law by The Water Environment (Water Framework Directive) (England and Wales) Regulations, 2003.

Under the Water Framework Directive, water quality assessments use a new, tougher methodology which focuses on the ecological health of waters. Up to 37 measures of water quality are used to assess the ecological status of water bodies. Water bodies are then classed as having high / good / moderate or poor ecological status.

The aim of the Water Framework Directive is for water bodies to achieve good ecological status by 2021, or if this is unachievable, then achieve good ecological status by 2027. If the water body has been heavily modified by human impact (e.g. for navigation and flood risk management purposes), the objective is to achieve good ecological potential by 2027. The Water Framework Directive also requires that there is no deterioration in the ecological status of the water bodies. The Humber River Basin Management Plan was updated in 2015 and provided further information updates for the waterbodies within the Humber catchment.

I have attached six maps which show the updated WFD classifications for waterbodies within the Peak District National Park.

Alternatively, the current ecological status and objectives for each water body can be found at Catchment Data Explorer for all waterbodies across the country:

<http://environment.data.gov.uk/catchment-planning/>

Feedback

We welcome feedback on our consultation responses to ensure that they provide information that is useful. Please do not hesitate to contact me on Tel: 02030 253277 or by sending an e-mail to joe.drewry@environment-agency.gov.uk should you wish to discuss our consultation response.

Yours sincerely

Joe Drewry
Sustainable Places Advisor

Direct dial: 02030 253277

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