

Peak District National Park Core Strategy. Refined Options Consultation

1	Introduction	6
2	Summary Document	14
	Core Strategy Themes	
3	Landscape	49
4	Settlements	67
5	Climate Change and Natural Resources	88
6	Housing	132
7	Economy	160
8	Transport	192
9	Minerals	236
10	Abbreviations	251
11	Glossary	255
	Appendices	
A	Theme Evidence List	268
B	Strategic Context	289

C	Developing Spatial Objectives	307
D	Core Strategy Delivery Plan	321

Introduction

I Introduction

Seeking your views on planning until 2026

Local Development Framework

The Local Development Framework will be the master plan against which all planning applications in the National Park will be judged from 2011 to 2026. This important legal document will affect everyone who makes a planning application, whether they want to alter their property, build a new home, add an extension or create a business.

This consultation gives you the opportunity to influence the direction of future development across the Peak District National Park for the next generation. So it is important that your voice is heard. The Local Development Framework will replace the 1994 Structure Plan and the 2001 Local Plan which the Peak District National Park Authority currently uses to judge planning decisions against. You are being asked to comment on the draft Core Strategy, which will be the Local Development Framework's main policy document.

It is written in **seven themes**.

They are:

1. landscape
2. settlements
3. climate change and natural resources
4. housing
5. economy
6. transport
7. minerals

Each theme has several different options for you to consider. These are followed by an explanation of the evidence used to come up with each option.

All the options have been examined against a set of criteria that measures how sustainable or practical an option it is. Examples of the criteria used include the impact on the economy and the impact on air quality.

When making comments you will see that in some cases you need to pick one option or the other. However, there are also some options that could happen alongside others. When making comments you can discuss all, some or even parts of options. Please explain why you are in favour of them or against them.

As well as the seven themes you will also find a number of appendices describing the area and explaining the methodology of the research. There are also sections describing other information which has been used in preparing this consultation document.

What has happened so far?

- The process began in 2005 with a document called 'Help Shape The Future', which looked at the general issues and options.
- In 2006 the National Park Management Plan was completed, which sets the overall context for the Local Development Framework.
- A public consultation period was held between March and May 2007 to look at some initial options.
- Following feedback it was decided that more detailed evidence was needed to help produce a firmer set of options. These options are the basis of this consultation.

What happens next?

This consultation runs until 10th April 2009. All responses will be looked at, preferred options selected, and community organisations consulted again. The authority will finalise the draft by the end of 2009.

The document will then go to the Secretary of State for Communities and Local Government to approve. If all goes to plan the new Local Development Framework is due to come into force in March 2011.

Setting the context for planning policy – key facts about the Peak District National Park

- The Peak District became Britain's first national park in 1951. It covers 555 square miles (1,438 ha²)
- This includes areas of gritstone moorland and edges, limestone upland and dales. The area has many attractive villages.
- The landscape is nationally and internationally important. Many areas are designated to give extra protection for geological, biological and historical features and sites.



Picture I.1 Settlements in and around the Peak District National Park

Although the whole national park has the highest landscape protection in the UK, planning policy has to respond to different challenges for land use in each area. To do this the policy will look at a range of factors. These are:

I. Valued Characteristics

The Peak District National Park Management Plan sets out the key factors that make the area so special for residents and visitors alike. They are the:

- Outstanding natural beauty and character of the landscape
- Significant geological features
- Sense of wildness and remoteness
- Clean earth, air and water
- Importance of wildlife and the area's unique biodiversity
- Thousands of years of human influence which can be traced through the landscape
- Distinctive character of hamlets, villages and towns
- Wealth of historic buildings, gardens and parks
- Opportunities for quiet enjoyment
- Opportunities for outdoor recreation and adventure
- Easy accessibility for visitors from surrounding urban areas
- Vibrancy and sense of community
- Customs, legends, traditions and arts
- Environmentally friendly methods of farming and working the land
- Craft and cottage industries
- Special value attached to the national park by surrounding urban communities

2. A living and working place

The Peak District National Park is a place where people live and work.

- The population is currently around 38,400. By 2026 it is thought the population will have fallen, although this partly depends on the number of new houses built.
- By 2026 the average age of the population is also expected to increase, with the area likely to see a significant increase in people aged 60 and above but a fall in the working age population.
- Most jobs in the National Park are in the service sector, particularly tourism – 19% of businesses are hotels and restaurants.
- Agriculture accounts for 19% of businesses in the National Park.
- Businesses in the National Park tend to have fewer employees and wages are often lower than regional and national averages.
- Half the people of working age travel to jobs outside the National Park.
- Four out of ten jobs in the National Park are done by workers who live outside the area.

3. Landscape

In 2008 a Landscape Character Assessment (LCA) was produced for the Peak District National Park. This contains maps, photos and written descriptions of different land types and uses in the National Park. The LCA is available on our website

The assessment provides planners with more detail about the types of landscape that make up the Dark Peak, White Peak and South West Peak areas of the National Park.

Combined with all the other information listed above it gives planners more knowledge about the challenges and opportunities facing the area.

All this information has been used to help draw up the options that are in this consultation document.

Planning Policy in the Peak District National Park

Planning rules in national parks are different than in other areas of the UK. This is because of Government laws introduced to protect national parks for the benefit of current and future generations.

National Park authorities have two key purposes that guide all their work, including planning matters. These are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area and
- To promote opportunities for understanding and enjoying the special qualities of these areas by the public.

At the same time authorities also have a duty to 'seek to foster the economic and social well-being of local communities within the national park'.

Working to the National Park Management Plan

To ensure the two purposes and the duty are being met the Peak District National Park Authority adopted a National Park Management Plan in 2006.

That document sets out how the authority, working with a wide range of partners, will deliver an overall **vision** for the Peak District National Park area, as set out in Appendix B of this document.

Planning policy is a crucial part of this process so the Local Development Framework options have been written to help deliver the aims of the National Park Management Plan.

Regional and Local Plans

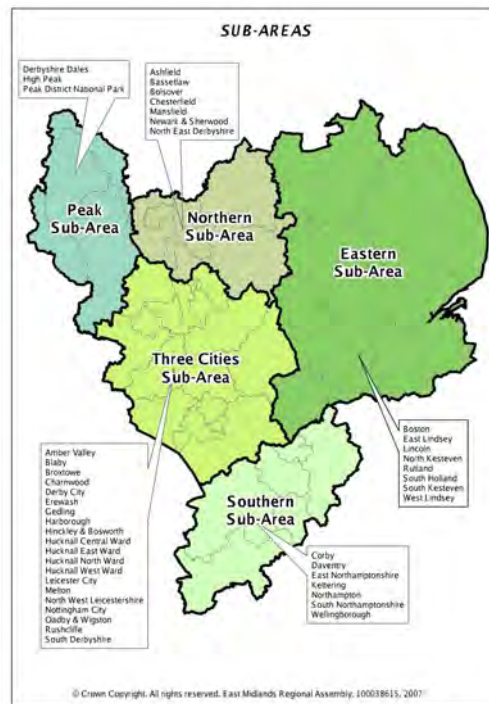
No planning policy can be considered in isolation of what is happening around it. So as well as the national obligations described above we have also taken into account regional and local factors.

Regional Level

The Peak District National Park is unique because it covers four different Government regions. They are the:

1. East Midlands
2. Yorkshire and Humber
3. North West
4. West Midlands

To avoid any confusion that this could cause, all planning policy matters in the whole Peak District National Park fall under the East Midlands region. See map below.



Picture 1.2 Peak Sub Area in the context of the East Midlands region

As a result, planning policy in the National Park must also comply with a regional planning document known as the Regional Spatial Strategy (RSS).

Local Level

The Peak District National Park covers part of 12 different local council areas. All of these councils, and other organisations that operate in the National Park, have a legal duty to take into account the national park purposes and duty described earlier. At the same time the Peak District National Park Authority has a responsibility to take into account the needs of other organisations.

There are many strategies and policies produced by local councils to take into account when developing planning policy in a national park. Some of the most important are called community strategies. Each local council is required by law to produce these documents, which set out the priorities of local people in that area. This can be accessed via the Landscape Theme Evidence list in Appendix A.

The Local Development Framework options take all these regional and local factors into account.

How to comment

Summary and full-length versions of the document have been produced.

You can comment on either section by:

1. Giving your comments online within this consultation document
2. Sending responses by e-mail to: policy@peakdistrict.gov.uk
3. Sending your comments by letter to:
Brian Taylor,
Policy Planning Manager,
Peak District National Park Authority,
Aldern House,
Baslow Road,
Bakewell,
Derbyshire,
DE45 1AE
4. If you prefer you can read the summary document and then pass any comments on to your local parish, district, borough or city councillor. Alternatively, if you are a member of an organisation (for example, the chamber of trade or National Farmers' Union) you can approach them to give views on your behalf.

Summary Document

2 Summary Document

Introduction

2.1 To encourage as many people to take part in the consultation as possible we have produced this summary version of the full consultation document.

It follows the seven themes of the full document. Under each theme the key issues are described followed by the different options. This is supported by a brief explanation of the background to each option.

As this is a summary version it does not contain all the evidence that you will find in the full-length consultation document.

Landscape

Issue L1

Using planning policy to help the management of National Park landscapes

2.2 Option L1.1

Identify zones where greater protection of the landscape is needed and put tighter planning controls in place to make this happen.

2.3 Initial comment

There does not seem to be a need for this based on current evidence.

2.4 Option L1.2

Keep the existing planning policy which severely restricts new development in areas collectively called the Natural Zone, which includes the most sensitive and wild areas of the National Park.

Existing policy limits development across the rest of the open landscape to particular uses appropriate to the National Park

2.5 Initial comment

This is a sound approach because it continues to protect the Natural Zone but gives planners and developers more detailed information to work with.

2.6 Option L1.3

Allow a more flexible approach to planning that guides the landscape through gradual change. This may mean that existing features change (e.g. moorland, meadow and pasture management, traditional boundaries and barns etc). The Landscape Character Assessment could be used to help do this.

2.7 Initial comment

This approach is difficult to justify in a national park, and each case would have to be fully assessed on its merits, balanced against the merits of existing features.

2.8 Option L1.4

Include separate core policies to conserve and enhance the valued characteristics of the National Park such as wildlife and cultural heritage.

2.9 Initial Comment

This would strongly support the conservation of the National Park but would require development of a greater number of policies.

Issue L2

Having a planning policy which encourages people to access, enjoy and understand the landscape and also conserves and enhances the National Park

2.10 Option L2.1

Keep the existing planning policy which provides guidance on areas that are best suited for recreation, tourism and educational developments (called Recreation Zones). The Landscape Character Assessment will be used to help decision making for each location.

2.11 Initial comment

This option should provide better information for planners and applicants to work with.

2.12 Option L2.2

Revise the existing policy so that it only provides guidance for the most sensitive areas including those of heavier recreation pressure.

2.13 Initial comment

This option may make it harder for planners and developers to understand what type of development is suitable in a particular location

2.14 Option L2.3

Take a more flexible planning approach to meet the demand for tourist attractions and accommodation in the National Park. Use the Landscape Character Assessment to help decide if a proposed development is in keeping with the National Park landscape.

2.15 Initial comment

This approach is more difficult to justify in a national park to be fully assessed on its merits, balanced against the need to conserve and enhance national park landscape.

Settlements

Issue S1

Decide the best places to build new houses and other buildings in the National Park while balancing the need to conserve and enhance the landscape with ensuring the long-term vitality of rural communities

2.16 Option S1.1

Build most houses and other buildings in towns and large villages so less is built in small villages.

2.17 Initial comment

This would help larger communities to thrive but may lead to loss of services in small ones. Also, many of the towns and large villages have few potential sites left to build on.

2.18 Option S1.2

Update the existing list of 63 villages and towns in the National Park that are suitable for further development. The list takes into account their population size, services (e.g. shops, doctors) and their ability to cope with more housing or business units.

2.19 Initial comment

This policy works well but the perception among communities not on the list is that they do not receive help to become more sustainable.

2.20 Option S1.3

Put all towns and villages into categories, ranging from large to small, and use this as a guide to decide how suitable they are as places to have further new buildings.

2.21 Initial comment

This approach is encouraged by Government but is possibly not suitable for the Peak District National Park where all the villages and towns are relatively small.

2.22 Option S1.4

Look to meet the identified affordable housing needs of all towns and villages while making sure any new houses do not damage the special qualities of their setting.

2.23 Initial comment

This approach goes against standard Government guidance on the best places to build new homes. However, in a national park where there is very little development it may be possible to conserve and enhance the landscape and still meet the needs of all communities.

2.24 Option S1.5

Encourage new building development in places that are best able to cope with it, provided it is in a location with access to services (e.g. shops) and transport.

People living in places with little known room for further development would need to work together as a community, and with the Peak District National Park Authority, to provide evidence that their community needs new buildings and that there are good sites for them to be built on.

2.25 Initial comment

This is a more flexible approach which identifies villages or towns with development potential. Development would be encouraged in these places. However, it also encourages other communities to work with the Peak District National Park Authority to demonstrate a need and capacity for housing.

Climate Change and Natural Resources

Issue CCI

The scale of energy installations

2.26 Option CCI.1

Only permit small scale technologies to meet the local needs of the area.

2.27 Initial comment

This option should refer to renewable energy installations. This would be in line with regional planning policy and Government requirements for the National Park. Small scale technologies would be acceptable provided there is no harm to the National Park's special characteristics.

2.28 Option CCI.2

Take a stronger line to insist that other options such as energy efficiency are explored before small scale technologies.

2.29 Initial comment This is good environmental practice which encourages people to reduce the need for energy, use energy more efficiently and only then use renewable energy.

2.30 Option CCI.3

Climate change should be recognised as a cross cutting issue in the introduction to the Core Strategy.

2.31 Initial Comment

This would usefully show how climate change across all areas of planning.

2.32 Option CC I.4

Encourage small-scale renewable energy and carbon saving technologies to meet the local needs of areas subject to national park purposes.

2.33 Initial Comment

This would be compatible with the current policy but enable us to be more proactive.

Issue CC2

Location of renewable energy installations

2.34 Option CC2.1

Set out those areas where the landscape should be strictly protected from development and those areas where small scale renewables could be encouraged.

2.35 Initial comment

This option protects areas of natural wilderness from development. National parks were set up to map and protect such areas. This helps people to know where the highly-sensitive areas are.

2.36 **Option CC2.2**

Do not set out specific wilderness areas where development should be prohibited, allowing a more flexible approach to change in the landscape. This would be done using Landscape Character Assessment to inform and guide proposals (a document that contains maps, photos, written descriptions and uses of land-types).

2.37 Initial comment

This is a dangerous approach in an area that is required by the Government to protect its landscape character. A better approach would be a combination of Options 1 and 2: an area of strict protection with Landscape Character Assessment used as guidance for other areas.

Issue CC3

Including renewables and energy efficiency measures in developments

2.38 **Option CC3.1**

Require all new developments to include some renewables to provide energy, as long as it does not harm the special character of the National Park.

2.39 Initial comment

It would be better practice to look at energy efficiency and reduction measures before considering renewables in developments. There is a danger that asking everyone to provide renewables would reduce affordability – this is particularly worrying for individual affordable houses. On the other hand, conventional energy costs are increasing and fossil fuels are in limited supply. This option maintains the special character of the National Park in line with Government guidance.

2.40 **Option CC3.2**

Require certain developments to supply a proportion of their energy needs by renewables, and incorporate water efficiency measures, provided the special character of the National Park is maintained. The exceptions to this policy would be affordable housing (including conversions), conversions of listed buildings, extensions, farm buildings with a low energy output, temporary buildings and places of worship.

2.41 Initial comment

This option would allow the National Park to help lessen the impact of climate change without affecting the affordability of homes for local people or temporary farm buildings. It would also protect heritage buildings from inappropriate alteration. It would also be in line with regional policy on water conservation.

2.42 **Option CC3.3**

Do not make specific requirements for renewable energy, but focus on the conservation of the environment.

2.43 Initial comment

It would be better to look at energy efficiency and reduction measures before considering renewables. This option would rely on encouraging renewable energy, as is current practice.

2.44 **Option CC3.4**

Major developments should be required to generate renewable energy to offset at least 20% of their predicted carbon emissions, unless this is damaging to the character of the National Park.

Major housing developments are classed as 10 or more homes, or on more than 0.5 hectares. Other major developments are where the floor-space is more than 1,000 sq metres or on a site bigger than one hectare.

2.45 Initial comment

This option is the same as one adopted by Dartmoor National Park Authority. It is based on a European directive. By making only major developments offset 20 per cent of their emissions, this does not prevent the provision of small scale affordable housing or small businesses. A Peak sub-region climate change study (to be completed in 2009) will help in assessments of targets for renewable energy.

2.46 **Option CC3.5**

Policy should reduce the need for energy, promote energy efficiency and only then encourage the use of renewable energy.

2.47 Initial comment

This is a key principle in adapting to and mitigating climate change. This should be part of all climate change policy.

Issue CC4:

Flood-risk reduction and water conservation

2.48 **Option CC4.1**

Only locate new development in areas of no flood risk.

2.49 Initial comment

This option is not compatible with Government guidance which seeks to manage and reduce risk rather than prohibit development. The option should therefore be removed.

2.50 **Option CC4.2**

Locate development in the least risky areas. Design buildings to be flood-resistant. Manage land to reduce water and soil run-off. Include sustainable drainage schemes such as reed-beds and water conservation schemes such as 'grey' water harvesting.

2.51 Initial comment

This is the practice recommended by Government and the Environment Agency. It would be improved if there was a separate policy for water conservation as, at the moment, the policies are too broad.

Issue CC5

Impact of climate change on land management, biodiversity and air quality

2.52 **Option CC5.1**

Continue to promote traditional techniques relating to land, air and biodiversity in order to protect the special qualities of the National Park.

2.53 Initial comment

This option does not take into account the impacts of climate change, and should therefore be removed.

2.54 **Option CC5.2**

Manage the land and habitats to mitigate against and adapt to climate change.

2.55 Initial comment

This is in line with Government guidance, which recognises that over time habitats, species and the land will be affected by climate change.

Issue CC6

The need for sites to deal with household and building waste

2.56 **Option CC6.1**

Look for sites outside the National Park but, where there is no alternative, waste management facilities should be accepted to deal only with waste arising from the National Park. However, the special character of the National Park should be conserved.

2.57 Initial comment

This option is in line with regional guidance which recognises that the National Park should not make a significant contribution to waste management. It is also part of neighbouring authorities' waste policy. With the management of most waste dealt with outside the National Park, this option recognises the statutory purpose of conserving the National Park. It allows for small scale recycling points, such as bottle banks, in the National Park.

2.58 **Option CC6.2**

There should be no waste management facilities, as it is considered an unacceptable land use in a national park.

2.59 Initial comment

This option is considered inappropriate as it would stop the provision of small scale collection areas for recycling.

Issue CC7

Management of household and building waste

2.60 **Option CC7.1**

Identify redevelopment sites where demolition waste could be used on-site.

2.61 Initial comment

Recycling construction waste is good practice provided it does not damage the special character of the National Park.

2.62 **Option CC7.2**

Identify places suitable for waste management facilities – for example, existing industrial sites.

2.63 Initial comment

The National Park Authority is not a waste disposal authority. This option could encourage waste to be brought into the National Park from outside. It is more appropriate for waste management facilities to be sited outside the National Park, where there is more scope in landscape terms. Waste authorities neighbouring the National Park are in agreement with this.

Issue CC8

Waste arising from all development inside the National Park

2.64 **Option CC8.1**

Construction and demolition waste, including soils, should be disposed of elsewhere.

2.65 Initial comment

This option is contrary to Government guidance because it would increase the use of resources rather than promote their re-use and recycling.

2.66 **Option CC8.2**

Construction and demolition waste, including soils, should be incorporated into the development.

2.67 Initial comment

This is in accordance with Government guidance, but does not take account of the special qualities of the National Park. Retaining construction waste on site may lead to undesirable changes in the landscape if, for example, the ground levels were significantly altered or harm to soil or water quality.

2.68 Option CC8.3

Waste materials from development should be used within the same site unless this is detrimental to the character of the National Park.

2.69 Initial comment

This option is in accordance with Government guidance, whilst recognising that the National Park is a place of special protection.

Housing

Issue H1

What is the overall strategic role for the National Park in terms of housing provision and should targets be set for the number of houses to be provided?

2.70 Option H1.1

Any decisions about future housing in the National Park should be based on:

- Meeting the requirement for National Park Authorities to:
 - conserve and enhance the landscape and
 - give people more opportunities to understand and enjoy the National Park
- Addressing housing need and the shortage of affordable housing
- The needs of a changing population e.g. older people.
The plan will not contain targets or limits on the number of houses built but it will give an indication of what is likely to happen.

2.71 Initial comment

This is the only reasonable option to comply with national and regional policy.

Issue H2

To what degree should the local need for affordable housing be met?

2.72 Option H2.1

Meet local need completely regardless of the need to conserve and enhance the National Park landscape.

2.73 Initial comment

This goes against law (national park purposes in the Environment Act 1995) and planning policy.

2.74 Option H2.2

Meet local need for affordable housing as much as possible without compromising the need to protect the National Park environment.

2.75 Initial comment

The preferred option.

Issue H3

How can we best provide additional affordable housing without causing harm to the National Park?

2.76 Option H3.1

Continue the current policy that sees new homes built to meet most of the affordable housing need.

2.77 Initial comment

Reduces costs to the housing providers but will cause more harm to the environment.

2.78 Option H3.2

Increase the amount of affordable homes provided in situations where:

1. existing buildings are re-used, for example a former mill or barn; this would re-use existing buildings and reduce the need for new houses or
2. housing is needed to bring a significant improvement to an area (e.g. improving the look, removing eyesore buildings, removing pollution, restoring a barn or mill etc). Under current policy the cost of doing this work can be partially met by the developer being allowed some houses that are sold on the open market rather than having to all be affordable homes.

2.79 Initial comment

Reduces harm to the environment and could provide employment for traditional craftspeople e.g. stone masons.

2.80 Option H3.3

Buy existing homes as they come up for sale and offer them as affordable housing instead of building new houses.

2.81 Initial comment

The housing providers would need to develop a system to enable this to happen and to ensure these homes do not return to the open market in the future. This method could have environmental and social benefits and bring existing housing up to modern standards. However, it could increase costs to housing providers.

2.82 Option H3.4

Introduce option H3.3 gradually over time.

2.83 Initial comment

This would allow time to test and introduce a new system that would bring clear environmental and social benefits. It would still mean fewer new homes need to be built than in option H3.1.

Issue H4

Should planning policies set affordable housing targets (either for the whole National Park or different parts of it) that:

1. **Respond to the needs of different groups, such as families, key workers, the elderly and gypsies and travellers?**
2. **Take into account different types of ownership, for example outright, shared or rented, and the size and type of home?**

2.84 Option H4.1

To set targets in planning policies for all the categories listed in issue H4.

2.85 Initial comment

Seems to be preferred by the Government but is inflexible and unable to meet local circumstances.

2.86 Option H4.2

Take these housing needs into account at the time schemes are being considered by getting the advice of housing authorities and also referring to their strategies.

2.87 Initial comment

A flexible approach which provides more opportunities to involve local housing authorities.

2.88 Option H4.3

Do everything in option H4.2 but also look at the housing needs of the different groups (see issue H4). However, no housing targets would be set.

2.89 Initial comment

Complies with regional planning policy and combines the best parts of options H4.1 and H4.2.

2.90 Option H4.4

This would be in addition to either option H4.1, H4.2 or H4.3. The actions in the option picked would be applied to housing sold on the open market as well as to affordable housing. This would be used in the few circumstances where open market housing is allowed.

2.91 Option H4.5

Keep the current policy towards Gypsy caravan sites - which says sites will not normally be allowed in the National Park except in exceptional circumstances – but add sites for travellers and showmen to this policy.

2.92 Initial comment

This is an update required by national and regional planning policies.

2.93 Option H4.6

Restrict housing designed specifically to support infirm or older people (e.g. sheltered housing, warden controlled housing) to meeting local needs. This would operate in the same way that the occupancy of affordable housing is restricted.

2.94 Initial comment

This prioritises local needs above those of people from surrounding areas.

2.95 Option H4.7

Do as in option H4.6 but also allow the special circumstances in individual cases to be taken into account.

Issue H5

How can we best increase the proportion of affordable housing in these types of development?

This issue looks at where housing is needed to bring improvement to an area, for example, improving the look, removing eyesore buildings, removing pollution or restoring a mill. Under current policy the cost of this work can be partially met by allowing the developer to build some houses for sale on the open market rather than solely affordable homes.

2.96 Option H5.1

Set a standard proportion of affordable housing for all schemes that bring a significant improvement to an area.

2.97 Initial comment

A one size fits all policy does not take into account all individual circumstances.

2.98 Option H5.2

Decide the most suitable proportion of affordable housing for each scheme on a case-by-case basis

2.99 Initial comment

This is a more flexible option. It should provide the maximum environmental and social benefits. The economic viability of each scheme will need to be tested thoroughly. A model is being developed to help do this.

2.100 Option H5.3

Where it is not possible or viable for developers to include affordable housing they might be required to make a financial contribution. This could be used for affordable housing in the area and perhaps for other social benefits (e.g. public transport, open space etc).

2.101 Initial comment

This could work with option H5.2 to increase flexibility and benefits.

Issue H6

Should this planning document (the Local Development Framework) identify specific sites or buildings to be used for new homes?

2.102 Option H6.1

Produce a map showing sites suitable for all newly built affordable housing

2.103 Initial comment

It may mean sites suitable for affordable housing risk being used for homes sold on the open market and such a search process would need to be very detailed and exhaustive and is not an appropriate task for the Local Development Framework production.

2.104 Option H6.2

Keep the existing planning policy which uses what are called 'rural exception sites'. This does not identify specific sites for new homes on a map. However, it allows new homes to be built to meet identified local need if suitable development sites become available.

2.105 Initial comment

Continues an existing well tried policy. Some housing agencies believe can cause delays in finding housing sites. However, others point out that this option helps reduce the cost of buying housing sites. It also allows the timely identification of sites, responding to changing data and circumstances.

2.106 Option H6.3

Produce a map showing all the homes that could be provided in housing schemes needed to bring a significant improvement to an area (e.g. improving the look, removing eyesore buildings, removing pollution, restoring a barn or mill etc).

2.107 Initial comment

It would be very difficult to get all the information necessary to implement this option. It could also increase the value of housing sites. However, it would help to conserve and enhance the National Park.

2.108 Option H6.4

Produce a map like in option H6.3 but restrict it so it only includes the most significant opportunities for providing this type of housing.

2.109 Initial comment

A more practical option than H6.3 and still helps to conserve and enhance the National Park.

Issue H7

What will happen if housing providers start buying more existing homes for affordable housing as they come up for sale instead of building new ones? How should they decide which hamlets, villages and towns to buy houses in?

2.110 Option H7.1

Give priority to housing providers to buy houses in larger towns and villages

2.111 Initial comment

Housing would be in a good location for access to services (e.g. shops) and transport. However, large villages and towns are more likely to have had affordable housing provided recently.

2.112 Option H7.2

Prioritise any place where there have been no affordable houses provided recently

2.113 Initial comment

This could be seen to be a fair way of taking decisions. However, large villages and towns that still have a significant need could risk not getting the affordable homes required.

2.114 Option H7.3

Prioritise buying existing homes in those places where there is proven need about the least likely prospect of identifying acceptable sites for newly built affordable homes are least likely to get planning permission.

2.115 Initial comment

Helps meet local need that could not otherwise be met.

2.116 Option H7.4

Prioritise buying existing homes in small villages and hamlets where there is a proven need but that are not on the current list of places judged to be suitable to build new affordable homes.

2.117 Initial comments

Similar to option H7.3, and concentrates on the smallest villages and hamlets. The smaller the hamlet or village the less viable public transport and other services (e.g. shops) are likely to be, so those factors will also need to be considered in making judgements on meeting need.

2.118 Option H7.5

Give priority to buying existing homes in places that have been assessed as having the most need for affordable housing.

2.119 Initial comment

This option would help to meet identified local needs. Buying an existing house to use for affordable housing does not require planning permission unless the proposal was to split an existing property. However, the amount of houses bought back will have an impact on the number of newly built affordable houses needed. This option assumes that, in making decisions on whether to buy an existing home, the housing providers will take into account the issues raised in options H7.1 to H7.4. This option would work best if these decisions also involved the Peak District National Park Authority.

Economy

Issue E1

Businesses in the countryside

2.120 Option E1.1

Helping farmers to be or remain viable by setting up subsidiary businesses in traditional buildings on the farm, such as tourist accommodation or ice-cream making.

2.121 Initial comment

This option excludes the use of modern farm buildings for other businesses, whereas Government policy is to be more flexible on this.

2.122 Option E1.2

Allow a wider range of businesses in both modern and traditional farm buildings, provided they are appropriate activities and developments in the countryside, where they support looking after the National Park landscape, biodiversity and heritage, and where they need to be in that location.

2.123 Initial comment

This is more flexible, and in line with Government policy. It both cares for the National Park environment and offers more opportunity for businesses. However, it may increase unsustainable traffic-movements and other inappropriate impacts on the National Park.

2.124 Option E1.3

Allow a wider range of businesses in both modern and traditional farm buildings, but not requiring any direct link to looking after the landscape or need to be in that location.

2.125 Initial comment

Although this would be a very flexible approach, it would be unacceptable to have this option unless the special character of the National Park could be safeguarded.

Issue E2

Employment in towns and villages

2.126 Option E2.1

Allow new businesses in any town or village across the National Park.

2.127 Initial comment

This is flexible and offers the widest opportunities for job-creation. Government policy seeks flexibility but favours locating businesses in larger villages or towns. It could increase traffic both for deliveries and commuting. Large-scale businesses would not suit a village setting and it may be difficult to identify appropriate sites for business developments in villages, but that should not prevent the principle of suitable development being acceptable.

2.128 Option E2.2

Limiting new businesses to Bakewell and the larger villages.

2.129 Initial comment

The larger settlements have better public transport and other services, but this option risks driving away opportunities in other locations.

2.130 Option E2.3

Limiting new businesses to sites with public transport, or access by walking or cycling.

2.131 Initial comment

In practice this differs little from the previous option, because it would tend to limit businesses to Bakewell and the larger settlements.

Issue E3

Identifying and safeguarding employment sites

2.132 Option E3.1

Identify more potential business sites commensurate with the need to ensure a sustainable mix of uses in settlements and communities and appropriate to the National Park.

2.133 Initial comment

Evidence suggests there is no need to identify new sites as there are already enough to meet the needs of the National Park population. It risks excluding other potential uses for sites, such as affordable housing. However, where the socio-economic structure of a community is at risk it may be appropriate to encourage new small scale business developments.

2.134 Option E3.2

Safeguard existing employment sites and do not bring any more forward as we do not foresee a sudden increase in demand.

2.135 Initial comment

Not all existing employment sites are ideally located. Evidence confirms additional sites are not required to meet known demand but the assessment of settlements may indicate the need to promote more business activity in some communities.

2.136 Option E3.3

Allow changes of use on existing employment sites, such as housing.

2.137 Initial comment

We can identify which sites are most attractive to businesses and which could be developed for other uses. Allowing a mix of uses could provide essential funding for development. Some sites would need to be safeguarded to prevent unwanted reduction in employment sites and activity over time.

2.138 **Option E3.4**

Concentrate business development on the best sites.

2.139 Initial comment

This more flexible option would allow us to identify and safeguard the best sites for employment, taking into account travel issues and support services. It would allow us to propose other uses for less-suitable existing sites.

Issue E4

New tourist facilities and attractions

2.140 **Option E4.1**

No new tourism and recreation sites.

2.141 Initial comment

This is a negative approach. It is not compatible with the requirement for the authority to promote understanding and enjoyment of the National Park. It could restrict tourism businesses and limit economic benefit. However, regional guidance is that new tourism development may be better sited outside the National Park.

2.142 **Option E4.2**

Identify new tourism sites in suitable locations, for sustainable recreation activities appropriate to a national park setting.

2.143 Initial comment

This is more positive. It would focus tourism development on locations with good access and support services. But there is no driving need to identify potential sites.

2.144 **Option E4.3**

Only allow small-scale tourism or recreation facilities due to concerns about traffic and environmental impact.

2.145 Initial comment

This approach prevents major development. It accords with public concerns about harm to the environment.

Issue E5

Hotels, bed-and-breakfast and self-catering accommodation

2.146 Option E5.1

Allow additional holiday accommodation by converting traditional buildings or extending existing premises, but not new buildings.

2.147 Initial comment

This provides a positive opportunity for new provision, although it may limit opportunities to increase and broaden the range of visitor accommodation. Government policy promotes conversions and extensions for holiday use. There is little evidence of demand for newly built accommodation.

2.148 Option E5.2

Allow newly-built holiday accommodation only in Bakewell, and additional accommodation elsewhere by converting traditional buildings or extending existing premises.

2.149 Initial comment

This offers more opportunities than the previous option and is in line with Government policy. But there is little evidence of demand for newly-built accommodation.

2.150 Option E5.3

Allow newly-built holiday accommodation in Bakewell and larger villages, with scope for conversions elsewhere.

2.151 Initial comment

This could maximise the provision of holiday accommodation and benefit the local economy. Again, there is little evidence of demand for newly-built accommodation.

2.152 Option E5.4

No newly-built holiday accommodation unless replacing an existing establishment, due to concerns about traffic and environmental impact.

2.153 Initial comment

Limiting newly-built holiday accommodation can be justified by environmental considerations. But it would restrict opportunities to increase sustainable tourism accommodation. Also, this option gives no indication of the approach on extensions or conversions.

2.154 Option E5.5

Explore opportunities for eco-tourism.

2.155 Initial comment

This type of tourism fits well with understanding and enjoying the National Park. The idea need not stand alone, and could be added to other options.

Issue E6

Caravans and camping

2.156 Option E6.1

Only allow small-scale camping and caravan sites.

2.157 Initial comment

This should enable additional camping and caravan sites without harm to the landscape and special qualities of the National Park. It may offer farmers a chance to supplement their incomes. Small sites cannot be expected to offer the range of facilities which some holiday-makers may want.

2.158 Option E6.2

Allow large camping and caravan sites, permanent lodges, chalets and static caravans, where they do not harm the special landscape of the National Park.

2.159 Initial comment

This could increase the quantity and range of accommodation. However, such sites are more likely to be intrusive in the landscape and to increase traffic, unless located within larger settlements.

2.160 Option E6.3

Allow large camping and caravan sites (excluding permanent lodges, chalets and static caravans) where they do not harm the landscape and special qualities of the National Park.

2.161 Initial comment

Touring camping and caravan sites are preferable to permanent lodges, chalets and static caravans, which are a year-round intrusion on the landscape of the National Park, but they are still likely to be intrusive in the landscape during the holiday season and lead to increased traffic possibly on unsuitable roads and lanes.

2.162 Option E6.4

Encourage existing camping and caravan sites to improve quality, for example by landscaping, or by painting, updating or renewing static caravans.

2.163 Initial comment

This would be better as an addition to other options rather than an option on its own.

Transport

Issue T1

Trying to make sure roads, road signs and bus stops etc are in keeping with a National Park

2.164 Option T1.1

To let individual highway authorities (county councils, city councils or metropolitan borough councils) take the lead in designing roads, road signs and bus stops etc, in the Peak District National Park providing they comply with the law and national policies about protecting national park landscape. The Peak District National Park Authority would play no active part in this process.

2.165 Initial comment

This is a weak option and would lead to the many highway authorities taking inconsistent approaches to this issue with negative results.

2.166 Option T1.2

To persuade all highway authorities to take a consistent and sympathetic approach when designing street lighting, lining, road signs and traffic calming measures etc. Where possible this will enhance - or minimise damage to - the look of the national park landscape.

2.167 Initial comment

This is a stronger approach, and would help to minimise the effect of road signs, lights and lines etc on the look of the national park landscape.

2.168 Option T1.3

To encourage highway authorities and rail companies to provide crossings on roads and railways to protect wildlife e.g. tunnels for badgers, bat bridges.

2.169 Initial comment

This is important if we are to protect wildlife in its natural habitat from the dangers posed by modern roads and railways. However, the sympathetic design of these crossings is important.

2.170 Option T1.4

To allow highway authorities and the Highways Agency to decide road speed limits by themselves.

2.171 Initial comment

This is a weaker option, which means that specific traffic problems in certain areas might be overlooked.

2.172 Option T1.5

To allow highway authorities and the Highways Agency to decide road speed limits, while working with them to resolve speed related problems in particularly sensitive areas of the National Park.

2.173 Initial comment

This is the current approach and it has proved successful in resolving traffic management problems in some areas e.g. the Upper Derwent Valley.

2.174 **Option T1.6**

The Peak District National Park Authority should seek to influence proposed changes to speed limits as a result of the current reviews, by working in partnership with highways authorities.

2.175 Initial comment

This is a strong approach, and is most likely to get the most consistent use of speed limits and road signs across the National Park.

Issue T2

The demand for new roads to cope with current and future traffic growth

2.176 **Option T2.1**

To allow highway authorities and the Highways Agency to decide when and where to build roads providing they comply with the law and national policies about protecting national park landscape.

2.177 Initial comment

This approach is inappropriate as it goes against the purposes of a national park and Government policy.

2.178 **Option T2.2**

To continue to set aside land where the Highways Agency or highway authorities want to build new roads in the future. This does not necessarily imply that the road building scheme will be supported by the Peak District National Park Authority.

2.179 Initial comment

This is the current approach but it goes against Government policy about building roads in national parks.

2.180 **Option T2.3**

To prevent all road building - apart from in exceptional circumstances.

2.181 Initial comment

This is a strong approach that follows Government guidance on road building in national parks.

2.182 Option T2.4

To remove ‘in principle support’ included in previous planning policies for proposed or new road schemes in the National Park.

2.183 Initial comment

This is a strong option, which follows current Peak District National Park Authority opinions.

2.184 Options T2.5

To remove ‘in principle support’ included in previous planning policies for the proposed A628 Tintwistle Relief Road only.

2.185 Initial comment

This is a strong option, which follows current Peak District National Park Authority opinions.

2.186 Option T2.6

To keep the ‘in principle support’ included in previous planning policies for proposed or new road schemes in the National Park.

2.187 Initial comment

This is a weak option, which goes against current Peak District National Park Authority opinion, and Government guidance on road building in national parks.

2.188 Option T2.7

Investigate the benefits and disadvantages of introducing a National Park-wide 7.5 tonne weight limit and look at the benefits and disadvantages of introducing environmental levies to address National Park issues. Any money raised would be invested in providing alternative means of access to the National Park.

2.189 Initial comment

This would be a radical move and would require the support and commitment of highway authorities and other partners to be implemented, if the benefits were thought to be big enough.

Issue T3

The negative impact of traffic

2.190 Option T3.1

To allow traffic levels to grow as much as the roads system will allow.

2.191 Initial comment

This is not a viable option as it goes against national park purposes and Government policy.

2.192 Option T3.2

Keep the current approach. This means not actively doing anything to prevent further traffic growth but taking measures to encourage drivers to use main roads rather than minor ones.

2.193 Initial comment

This is out of touch with Government policy which aims to minimise the growth of traffic levels by providing alternatives e.g. public transport.

2.194 **Option T3.3**

Investigate the benefits and disadvantages of introducing environmental levies to address National Park issues. Any money raised would be invested in providing alternative means of access to the National Park

2.195 Initial comment

This would be a radical move and would require the support and commitment of highway authorities and other partners to be implemented, if the benefits were thought to be big enough.

2.196 **Option T3.4**

To influence Satellite -Navigation system companies to direct vehicles to main roads so that heavy goods vehicles (HGVs) are not being directed down minor or sensitive routes, and cross-park traffic travels by the best route.

2.197 Initial comment

This option particularly supports options T3.2 and T3.3

2.198 **Option T3.5**

Investigate the benefits and disadvantages of introducing a 7.5 tonne weight limit for HGVs travelling through the National Park. It would not apply to HGVs starting or ending their journey in the National Park.

2.199 Initial comment

This could support options T3.2 and T3.3, but would be a radical move, requiring the support and commitment of highway authorities and other partners if it was to be implemented

2.200 **Option T3.6**

Work with all local authorities to get standard car parking charge rates in all car parks in the National Park.

2.201 Initial comment

This would require the commitment of all local authorities to work. It would remove the option of setting prices according to local circumstances.

Issue T4

The negative impact of all motor vehicles on environmentally sensitive areas of the National Park

2.202 **Option T4.1**

Let congestion levels determine the amount of vehicles going to particularly popular destinations in the National Park, like the Upper Derwent and Goyt Valleys.

2.203 Initial comment

This is not a realistic option because the number of vehicles would damage the environment. Current evidence suggests numbers are not greatly affected by congestion levels in popular locations.

2.204 **Option T4.2**

Continue to maintain existing traffic management schemes to control vehicle numbers, including measures like reduced speed limits, limited parking and improving public transport. Current schemes are at the Upper Derwent and Goyt Valleys, Roaches and Stanage.

2.205 Initial comment

This is the current and favoured approach, and has proved effective in these locations.

2.206 **Option T4.3**

This builds on option T4.2 by reviewing current traffic management schemes and identifying locations for new ones. This work would be done in partnership with highway authorities and other interested bodies (e.g. water companies, Natural England).

2.207 Initial comment

This is a strong option, checking the effectiveness of current traffic management schemes, and building on any successes.

Issue T5

Balancing the need for car and coach parks against their impacts

2.208 **Option T5.1**

Allow the demand for car parking spaces to dictate the number provided, as long as this complies with regional government guidance.

2.209 Initial comment

This option contradicts national park purposes.

2.210 **Option T5.2**

Keep the current approach of allowing new off-street parking – where appropriate – providing an equal number of on-street parking places are removed. In addition parking for new non-food shops or businesses must comply with regional government guidance.

2.211 Initial comment

This is the current approach.

2.212 **Option T5.3**

Keep the current approaches to residential and visitor parking but reserving the right to impose tougher restrictions on a case-by-case basis (see the main consultation document for a fuller explanation).

2.213 Initial comment

This builds on the current approach by allowing tougher restrictions to be imposed where needed.

2.214 **Option T5.4**

Keep the existing policy that the number of car parking spaces proposed for new residential developments are in keeping with the setting, particularly in conservation areas.

2.215 Initial comment

This is the current approach which aims to reduce conflict between different types of parking use.

2.216 **Option T5.5**

Continue the current approach of providing coach parks and improving them where necessary. This means the number and size of coach parks is decided on a case-by-case basis (see the main consultation document for a fuller explanation). Proposed new tourist attractions would need to provide coach parking facilities where needed.

2.217 Initial comment

This approach seeks to minimise the impact of coaches on the National Park by providing them with adequate facilities.

Issue T6

Managing the demand to reopen, build or improve railway lines as an alternative to car travel in and through the National Park; this includes light rail schemes such as trams

2.218 **Option T6.1**

To allow local authorities and the rail industry to decide when and where to build railway lines and stations providing they comply with the law and national policies about protecting the National Park landscape.

2.219 Initial comment

This approach is inappropriate as it goes against the purposes of a national park and Government policy for national parks.

2.220 **Option T6.2**

Continue to set aside land where local authorities or the rail industry want to build new railway lines in the future or reinstate an old one. This does not necessarily imply that the railway scheme will be supported by the Peak District National Park Authority.

2.221 Initial comments

This is the current approach. It recognises that reinstating an old railway line could have a number of impacts, (e.g. on the number of leisure trails that follow former railway routes), but could also bring transport benefits.

2.222 **Option T6.3**

To prevent all rail schemes except in exceptional circumstances.

2.223 Initial comment

This option will continue to enable former railway lines to be used for leisure, and keep the environmental benefits associated with this usage. However, this option could lose the benefits that rail travel might bring compared to use of the roads by vehicles. This option is in keeping with Government policy.

2.224 **Option T6.4**

Keep the current approach of protecting land earmarked for improvements to the Hope Valley Railway Line, although the exact route is not yet known. This does not necessarily imply that any scheme would be supported by the Peak District National Park Authority.

2.225 Initial comment

This is our current approach.

2.226 **Option T6.5**

Remove the planning protection currently given to land earmarked for improvements to the Hope Valley Railway Line.

2.227 Initial comment

This option goes against our current approach. It may remove the potential transport benefits arising from improvements to the Hope Valley Line.

Issue T7

Accessibility to community services, such as shops, schools or doctors, and leisure activities for residents and visitors

2.228 **Option T7.1**

Put the protection of the National Park above measures to improve access to community services or leisure activities.

2.229 Initial comment

This would help to protect the National Park but conflicts with the aim of promoting understanding of what a national park is and also measures to support local communities.

2.230 **Option T7.2**

Adopt transport policies that balance the need to protect the National Park against promoting access to community services, public transport, cycling and walking opportunities.

2.231 Initial comment

This takes a balanced approach to protecting and managing a national park.

2.232 **Option T7.3**

Promote measures to improve access to community services or leisure activities above the protection of the national park landscape.

2.233 Initial comment

This option goes against the Peak District National Park Authority purposes.

2.234 **Option T7.4**

Encourage developers to build new houses, shops, industry and recreation facilities in areas which are close to where people live, or where there are good public transport links.

2.235 Initial comment

This continues our existing approach and is in line with current Government policies.

2.236 **Option T7.5**

Encourage and support the introduction of park and ride schemes to the main visitor areas by transport authorities and companies. Park and ride car parks will only be allowed in the National Park where they are appropriate to the environment.

2.237 Initial comment

This is the current approach.

Issue T8

The availability of safe walking, cycling and horse riding routes

2.238 **Option T8.1**

Work with other local authorities to encourage new or improved walking, cycling and horse riding routes and associated measures (e.g. new road crossings).

2.239 Initial comment

This is the current approach but the amount that can be provided is dependent on funding being available.

2.240 **Option T8.2**

Encourage the use of legal agreements when giving planning permission to get building companies to provide better or new walking, cycling or horse riding facilities, close to their developments.

2.241 Initial comment

This follows Government guidance.

2.242 **Option T8.3**

To protect the route of a public right of way whenever a development is proposed. If this cannot be achieved then the developer needs to provide an alternative route.

2.243 Initial comment

This is the current approach.

2.244 **Option T8.4**

To work with highway authorities to give priority to public transport, cycling and walking over cars and HGVs. This could involve providing measures like cycle lanes, bus priority routes etc.

2.245 Initial comment

This is a pro-active approach which provides benefits but might involve widening roads or pavements, and providing more signs and lining.

Minerals

Issue M1

Achieving a gradual reduction in the impact of mineral activity (quarries, mines)

2.246 Option M1.1

To maintain the current position, which is not to identify new sites for quarries or mines. Neither would we accept any new development where there is no exceptional need, or where there is adverse impact on the environment or communities.

2.247 Initial comment

We believe this is a strong option. It ensures that mineral activity only takes place where essential in the interests of the National Park.

2.248 Option M1.2

To maintain the current position, as in Option M1.1, but before looking to sources of stone in the National Park, ensure there are no alternative sources outside the boundary.

2.249 Initial comment

This is also a strong option and ensures that mineral activity only takes place where essential in the interests of the National Park.

2.250 Option M1.3

To maintain the current position, as in Option M1.1, but to make an exception in the case of fluorspar, which is in scarce supply outside the National Park.

2.251 Initial comment

We believe this is a weaker option because of its potential to harm the valued characteristics of the National Park. Globally, there are alternative sources which could support the chemical industry.

Issue M2

Safeguarding potential quarry and mining resources

Identifying land where minerals exist below the surface to prevent other development taking place on the surface of the land which could inhibit access to the minerals and prevent future generations from exploiting them, also known as 'safeguarding' mineral resources

2.252 Option M2.1

Not to safeguard any mineral resources.

2.253 Initial comment

This is a strong option because the land is already protected, so there is little likelihood of it being used for other purposes.

2.254 **Option M2.2**

Safeguard all mineral resources in the National Park.

2.255 Initial comment

The entire National Park has minerals underneath. It is unclear what development would take place which would potentially sterilise the resources.

2.256 **Option M2.3**

Safeguard some minerals

2.257 Initial comment

This is not a strong option as it is unclear what development would be approved which would potentially sterilise the resources. The entire National Park has minerals under the surface of the land and safeguarding some mineral resources but not others might suggest that it would be acceptable to be worked.

Issue M3

Reviews of old mineral permissions (1948-1982) and seeking opportunities to reduce the environmental impact of mining and quarrying

2.258 **Option M3.1**

To formalise the National Park Authority's approach of promoting and negotiating the consolidation and/or exchange of old mineral permissions.

2.259 Initial comment

This approach is compatible with national policy and would be an effective means of achieving a gradual enhancement to the National Park but could be achieved without a specific policy.

Issue M4

Restoration and after-use of quarry and mining sites

2.260 **Option M4.1**

To seek the best solution on a site-by-site basis.

2.261 Initial comment

This would be consistent with national policy, which already limits after-uses to agriculture, forestry and nature conservation.

2.262 Option M4.2

To seek the best solution on a site-by-site basis, but to promote after-uses that benefit wildlife or enhance the character of the landscapes of the National Park.

2.263 Initial comment

This option would be a more distinctive local approach, helping to conserve and enhance the special qualities of the National Park.

Landscape

3 Landscape

Introduction

3.1 This Core Strategy Theme takes its direction from the Peak District National Park Management Plan 2006 -2011 (NPMP). The vision for the National Park is for, *"a conserved and enhanced Peak District where the natural beauty and quality of its landscapes, its biodiversity, tranquillity, cultural heritage and the settlements within it continue to be valued for their diversity and richness."*

3.2 The strategic outcome for Natural Beauty states that by 2011:

- landscapes are still attractive places to live in and visit
- and that they are assets to communities and the economy
- the landscape has been conserved and enhanced in accordance with the Landscape characterisation of the whole National Park.

3.3 A Landscape Character Assessment (LCA) for the whole National Park was completed in 2007. A Landscape Strategy is under development and by May 2009 there will be clear guidance on what is to be achieved in each landscape character type.

3.4 The NPMP also requires Local Development Framework (LDF) policies that ensure that the conservation value of settlements, conservation areas, listed buildings and structures, historic parks and gardens and other sites of historic and archaeological interest are conserved.

3.5 This theme considers 2 key issues. **Issue 1** concerns the need to find the most appropriate patterns of development for all national park landscapes. The options refer to the Natural Zone. For ease of understanding the options, these are described in the Local Plan (para 3.7) as, *"those areas of the National Park that are particularly important to conserve"*. The 4 options are outlined below.

- Option 1 - Greater control on development in areas where there is evidence of landscape deterioration.
- Option 2 - Strict protection in the Natural Zone (NZ), areas displaying the most natural and undeveloped character). A limited set of exceptional circumstances where development could take place would be set out for the rest of the landscape .This option could use landscape character work to establish a more sophisticated basis for decision making.
- Option 3 - Allow more flexibility in policy so that it allows a greater degree of change to the landscape provided it is in line with landscape character guidance.

- Option 4 - This option gives specific policy reference to biodiversity and cultural heritage if the landscape strategy proves to offer insufficient policy guidance. It could be adopted alongside other options if necessary.

3.6 Issue 2 is how to enable facilities for the public to access, enjoy and understand the landscape and settlements of the National Park. The three options associated with this issue relate to the Local Plan Policy, LRI - recreation and tourism development. This clarifies the circumstances and forms of recreational development that are considered appropriate across the different landscapes of the National Park by using Recreation Zones (RZs). These are described as follows:

- Zone 1: Informal, low impact, active recreation uses acceptable with careful management, such as hostels, farmhouse accommodation, walking, cycling and riding routes.
- Zone 2: Informal recreation uses acceptable with careful management, such as small car parks, picnic sites, facilities linked to walking, cycling and riding. Consideration should be given to the re-use of existing buildings wherever possible in preference to new build.
- Zone 3: Development associated with the more intensive levels of recreation use, including larger car parks, information provision and visitor facilities.

3.7 The 3 options are outlined below.

- Option 1 Retain the RZ policy, leaving the zones as they are now, and use the landscape character work to give greater guidance.
- Option 2 Simplify the recreation zones to offer guidance only for those areas of highest landscape sensitivity and areas under the greatest pressure for recreational development.
- Option 3 Remove the RZs altogether and take a more flexible approach to tourist and recreational uses to satisfy demand for attractions and accommodation. (This too would be informed by landscaper character guidance).

3.8 Some of the issues in this topic cross refer to matters dealt with in other themes such as climate change and the rural economy. For instance the need to mitigate and adapt to the impacts of climate change is a significant issue and something which the final Core Strategy will need to draw out strongly and we will explore the scope for cross cutting strategic policies at the beginning of the document that will set the scene for all policies.

Background

3.9 The issue of landscape quality would always be expected to be important in a national park and it was first addressed in 2005 in the 'Help Shape the Future' consultation for the NPMP.

3.10 This informed the new NPMP. However the process also started debate that has been useful in developing policy options for the LDF.

3.11 The proposition was put that we should "*manage the Natural Zone to protect the distinctive character of the wilder areas of the Park*". There was strong support from the Council for National Parks, the Countryside Agency (now Natural England) and the Campaign to Protect Rural England (CPRE) but some resistance from some local business interests in the quarrying sector.

3.12 The proposition was also put that we should "*undertake landscape character assessment to give detailed maps of the natural and historic character as the basis for management of landscapes and settlements in the landscape*." This received good support from organisations such as the CPRE, English Heritage (EH) and the National Trust (NT). It was also suggested that this work should inform land use policy in the emerging LDF.

3.13 Further consultation on the 2007 issues and options identified continued support for the Natural Zone and no desire amongst practising planners to remove it from land use policies. On the whole it is felt that it works well and is a useful first principle on which to make recommendations about development in the landscape. However, it is felt that clarity is needed to give planners better information on which to make recommendations for development in particular landscape types.

3.14 The LCA and subsequent landscape strategy work has involved many of the stakeholders all of whom want clearer landscape policy. Consultation responses on the whole welcome the use of LCA but many stakeholders cautioned that the landscape character work should be used as guidelines more than prescriptions.

3.15 The Peak District National Park (PDNP) landscape strategy is due to be completed by May 2009; therefore it is not yet known in detail how the landscape strategy will prescribe land management priorities or guide future land use decision making. Early indications are that the descriptions of development patterns for the landscape character types will be a major factor in any landscape strategy recommendations for future built development. This means that the LDF policy would need to consider the existing pattern of development across broad landscape areas to inform the potential for new development that conserves and enhances the valued characteristics of the landscape and built environment.

3.16 Consultation showed little cause for concern over cumulative impact of development in particular areas of the open landscape. Stakeholders generally felt that our existing policies and planning powers were proving sufficient to control inappropriate development in most cases. There was little support for more flexibility towards development proposals in landscape, other than from business interests. Therefore, on the balance of evidence and consultation responses the three landscape options from the 2007 Issues and Options consultation are retained for this stage.

3.17 The RZ policy was not explored in the 'Help Shape the Future' consultation in 2005. However it is being explored in this LDF consultation because it is strongly related to principles for management of landscape albeit for recreational purposes. It is primarily a

zoning mechanism to inform decision makers of the broad expectation for recreational facilities in particular areas of the National Park. There are three zones and these are outlined in Local Plan Policy LRI.

3.18 There has been limited response from consultations on all three RZ options and certainly insufficient evidence or comment to remove them from this stage of the consultation. Zoning has proved helpful for decision makers as it provides clear principles from which to build a recommendation on particular proposals for development. Recreation zoning is less relevant in resolving wider visitor management issues that do not involve new built development. Recreation and Transport Strategies will help to inform the development of policy in this area, along with planned research into holiday parks and campsites.

3.19 Conservation organisations valued the recreation zoning approach as long as it was informed by the landscape character work. Business organisations tended to favour a more flexible approach. Until the Landscape Strategy is published in May 2009, all three options have been retained.

Issue LI

Issue LI

Principles for the management of development across all National Park landscapes

International

3.20 Compliance with the European Landscape Convention (ELC) is now a requirement in all plan making and its application is particularly important in a national park. The ELC was signed by the UK government on 24 February 2006 and was ratified by the Council of Europe on the 21 November 2006. The Convention became binding on the UK from 1 March 2007. Natural England (NE) has worked with Department for Environment Food and Rural Affairs (Defra) and EH to produce a framework for implementing the ELC in England. This was published in October 2007.

3.21 The Convention is devoted to the protection, management and planning of all landscapes in Europe. It highlights the importance and need for public involvement in the development of landscapes. It encourages a joined up approach through policy and planning in all areas of land-use, development and management, including the recognition of landscape in law. This is added justification for a strong landscape basis for LDF policy in the National Park.

National

3.22 Defra's Review of National Park Authorities in 2002 and reported the findings of the review in 2003; however, no changes were made to the purposes and duty for English national parks. This re-affirmed Government Circular 12/1996 which explains that fostering

social and economic well being is not a primary purpose of National Park designation and Authorities must only do so in pursuing the twin purposes set out in the Environment Act 1995. Therefore, although issues such as sustainable development are now totally integral to all planning policy and guidance through Planning Policy Statement (PPS) 1: Sustainable Development, the primary purposes of National Parks remains to prioritise the conservation and enhancement of the natural beauty, wildlife and cultural heritage and the promotion of opportunities for understanding and enjoying these special areas. This presents a real challenge for the creation of a policy framework and much depends on a thorough understanding of the characteristics and dynamics of the area in order to understand its sensitivities and capacity for change. This reflects the fact that National Park status is the highest landscape designation in the country and confers the highest levels of protection.

3.23 The State of the Countryside Report produced by NE confirms that the landscape character areas that cover the National Park have been protected. However its future protection is not being taken for granted.

3.24 Natural England is undertaking work to establish landscape policy. They state that 23% of England is designated as a national park or an Area of Outstanding Natural Beauty (AONB) and that the continued conservation and enhancement of these iconic landscapes is a priority. In addition, NE is exploring the potential for improving the way protected landscapes contribute to a healthy environment and a healthy society.

3.25 In recent years there has been a quantitative study produced that put a value on the National Park landscapes of the Yorkshire and Humber region (Prosperity and Protection: The economic impact of National Parks in the Yorkshire and Humber region, Council for National Parks, 2006) It shows the intrinsic value of National Parks as places that attract inward investment. A comparable study for the East Midlands Development Agency (EMDA) has also recently been completed.

3.26 The Taylor Review of Rural Economy and Affordable Housing (Living Working Countryside, 2008) argues for far more flexibility for business to operate from rural locations in order that people can live and work in the countryside. However, any policy change that encouraged a wider business use of the countryside would require strict conditioning of planning permissions and strict monitoring for compliance with these conditions. This would need a shift in resources towards monitoring and enforcement of planning permissions because of the difficulty of monitoring across a large rural area.

3.27 Planning Policy Statement (PPS) 7- Sustainable Development in Rural Areas (para 21) states that, "*National Parks are afforded the highest level of protection in relation to landscape and scenic beauty and that this should be given greater weight in planning policies and development control decisions.*"

3.28 Planning Policy Guidance (PPG) 8- Telecommunications (para 64) also states that, "*[in designated areas] telecommunications apparatus should blend into landscape (through sympathetic design and camouflage) and that developers must demonstrate that there are no suitable alternative locations.*" This is a clear statement that national parks must not be regarded in the same way as other rural areas.

3.29 PPS9- Biodiversity and Geological Conservation (para 5) states that, "*Local authorities should [in LDFs] indicate the location of designated sites of importance for biodiversity and geo-diversity, making clear distinctions between the hierarchy of international, national, regional and locally designated sites; and identify any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets, and support this restoration or creation through appropriate policies.*" Clearly, in an area where 38% of land has an additional biodiversity designation, this is an important consideration in any policy for landscape.

3.30 PPS12- Preparing Local Development Frameworks (para 8.1) explains how Local Development Frameworks should be presented and what they should include. It states that, "*all planning authorities should identify areas of protection, such as nationally protected landscape and internationally, nationally and locally-designated areas and sites, and Green Belt land.*" This demonstrates the importance placed on protecting designated landscapes across the country and reinforces its importance in National Park Plan documents.

3.31 PPG15- Planning and the Historic Environment (para 1.6) urges local authorities to, "*maintain and strengthen their commitment to stewardship of the historic environment, and to reflect it in their policies and their allocation of resources.*" It states that it is important that, "*as planning authorities, they adopt suitable policies in their development plans, and give practical effect to them through their development control decisions.*" Para 2.1 also states that, "*planning authorities are required in development plans to include policies for 'the conservation of the natural beauty and amenity of the land' and for 'the improvement of the physical environment'.* The Town and Country Planning (Development Plan) Regulations 1991 require authorities to have regard to environmental considerations in preparing their plan policies and proposals. The protection of the historic environment, whether individual listed buildings, conservation areas, parks and gardens, battlefields or the wider historic landscape, is a key aspect of these wider environmental responsibilities, and will need to be taken fully into account both in the formulation of authorities' planning policies and in development control."

3.32 The fact that the National Park has its own Historic Landscape Characterisation and that this is reflected in the LCA demonstrates the importance the historic environment lends to the landscape.

3.33 PPG16- Archaeology and Planning (para 15) states that, "*Development plans should reconcile the need for development with the interests of conservation including archaeology. Detailed development plans (i.e. local plans and unitary development plans) should include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings.*" The National Park has a rich archaeological heritage and this heritage is an integral part of the landscape.

3.34 PPS1- Delivering Sustainable Development (para 5) states that one of the Government's objectives for the planning system is that planning should, "*facilitate and promote sustainable urban and rural development by protecting and enhancing the natural and historic environment and the quality and character of the countryside.*"

3.35 PPS1 (para 13.iii) also states that, "*a spatial planning approach should be at the heart of planning for sustainable development*". Para 13.iv states that: "*design which fails to take the opportunities for improving the character and quality of an area should not be accepted.*" Para 27

states that when preparing development plans, "*planning authorities should seek to enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character.*"

3.36 PPS7- Sustainable Development in Rural Areas (para 13) states that, "*Landscape Character Assessment, along with Village or Town Design Statements and Village or Parish Plans, is recommended as a tool to assist Local Authorities in the preparation of policies and guidance that encourage good quality design throughout rural areas.*"

3.37 PPS22- Renewable Energy (para 11) states that, "*planning permission should only be granted where National Park designation will not be compromised and any significant adverse effects are clearly outweighed by the environmental, social, and economic benefits. It also encourages Local Authorities to write criteria based policies which state the circumstances under which different types and size of renewable energy developments will be acceptable in nationally designated areas.*"

3.38 PPS22- Renewable Energy (Companion Guide) (para 3.29) makes clear endorsements of the landscape character approach when planning for renewable energy at the regional level. It states that, "*the intrinsic qualities of each landscape character areashould be considered when addressing broader landscape issues at the regional planning level. These 'intrinsic qualities' should be set down in writing, and all parties involved or interested in development for renewable energy should be encouraged to consult this supporting information before making reference to a particular landscape character area.*"

3.39 PPS22 (para 3.29) also states that, "*regional planning authorities should identify the sensitivity of any landscape character areas referred to in plans for renewable energy development to particular types of change/development at a broad scale, and that landscape character areas may be described in relation to their suitability as a location for particular types and scales of renewable energy development"* . Para 3.33 goes on to state that: "*applying LCA at the regional level is recommended to inform strategic planning for renewables.*"

Regional

3.40 Work is under way at East Midlands regional level to understand landscape capacity and develop indicators against which the effects of land management generally, including land use planning, can be measured. This work goes beyond simply trying to measure the extent to which the area can be conserved and enhanced, into the potential for increasing the carrying capacity of the area. This means that this plan needs to consider the extent to which landscapes can be managed for example to improve water and carbon capture whilst retaining the biodiversity (species and habitats) that are so crucial to the area. This is a significant issue which stems from the need to mitigate and adapt to the impacts of climate change. The fact that the area is a National Park with many other conservation designations heightens the challenge, but it needs to be met.

3.41 The Peak District National Park (PDNP) spans four regions but for planning purposes it is all part of the East Midlands and must accord with the Regional Spatial Strategy (RSS) for the East Midlands, which is RSS8. The RSS8 Peak Sub Area priorities (para 2.4.27) state that: "*the Peak District National Park is a unique asset, not only for the people who live and work there, but also for the East Midlands, surrounding Regions and the nation as a whole. National Park*

designation confers the highest status of protection for landscapes and scenic beauty. The purposes of National Parks are to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities. All relevant authorities are required to have regard to these purposes when acting in a way that could affect a National Park (Environment Act 1995; Section 62). Major developments should not take place in the Peak District National Park save in exceptional circumstances and where it is demonstrated to be in the public interest and that it is not possible to meet that need in another way. This entails a rigorous examination of the requirement for the development in terms of national considerations, the scope for developing elsewhere and any detrimental effect on the environment and landscape. Planning policies will continue to be applied to protect the National Park whilst addressing the social and economic needs of the Park's communities and supporting the regeneration of the surrounding urban areas."

3.42 Spatial priorities in the Peak Sub-area of the East Midlands RSS are to, "*help to secure the conservation and enhancement of the Peak District National Park, respecting the statutory purposes of its designation, address the social and economic needs of the Park's communities, for example, by the provision of appropriate business premises and affordable housing and protect and enhance natural and cultural heritage of the Sub-area, in particular the Peak District Moors Special Protection Area, and the Special Areas of Conservation covering the South Pennine Moors, Peak District Dales, the Bee's Nest and Green Clay Pits and Gang Mine and the Peak District Moors Specially Protected Area and Special Area of Conservation.*"

3.43 The RSS Policy for the Peak Sub-area says that the sub-area is mainly within or close to the PDNP and large scale renewable generation will always be difficult to accommodate as a result. However it also states that there are many opportunities for small scale hydro and some opportunities for small wind generation. The National Park Authority (NPA) realises this. The area has a history of small scale hydro schemes and some of these have been re-instated, for example, at Alport and at Chatsworth.

Local

3.44 A map showing Community Strategies in and around the PDNP can be accessed via the Theme Evidence list for Landscape in Appendix A. This sets out the broad spread of community strategy priorities across the various constituent authorities that make up and share the area of the National Park. It is clear that there is a strong desire for healthy communities and quality environment that people value. Indeed, recent consultation with communities and stakeholders of the National Park has confirmed the values attached to the Peak District as a cherished resource. Furthermore, local strategies confirm the desire for a sustainable environment that values and supports its natural resources.

3.45 The Peak District National Park Authority (PDNPA) Annual Monitoring Report (AMR) 2006/07 highlighted the need to review the scope for development in the open countryside particularly when proposals to enhance the National Park come forward. The AMR 2006/07 also highlighted a need to review policy on conversions in terms of use and scope. Landscape character work will help inform decision making on proposals for building conversion. The AMR 2004/05 also highlighted a need for policy to consider the ability of the landscape to absorb building for educational purposes, supporting the second purpose of the national park. Such buildings are not specifically mentioned in the Local Plan.

3.46 Many businesses rely on the valued characteristics of the National Park for their success, for example farming, tourism, utilities and services. For many businesses their demands for services such as premises and transport are consistent with the National Park landscape. Some businesses, such as those in high quality services and creative industries benefit from being located in a quality environment. The quality of the landscape can be an asset in attracting skills and investment. However, some businesses require high levels of services, such as accommodation and transport or raw materials that may be of a scale or impact greater than that which is compatible in a National Park and they are better located outside the National Park.

3.47 The impact of large modern agricultural buildings remains an issue. In spite of the guidance available in the Agricultural Developments in the Peak District National Park Supplementary Planning Guidance. However, the response to the issue depends on the extent to which this impact is a particular problem in its location. This requires analysis of the LCA and the subsequent landscape strategy. The changes in farm practices and regulations, for example requirements for extra storage capacity for slurry, will continue to exert a pressure on landscape. In some areas the impact of large modern buildings is immediate because of the open nature of the landscapes.

3.48 Since the adoption of the Local Plan in 2001, an increasing pressure has emerged relating to the need for, in particular, third generation telecommunications masts to be integrated into the National Park landscape. Particular areas include the Snake Pass and the Woodhead Pass and this reflects the important cross park transport connection between Sheffield and Manchester. This pressure has eased in the last few years but it highlighted the need for clear guidance on new development in the most sensitive parts of the National Park.

3.49 The impact of climate change on landscape is difficult to predict with certainty but will be informed by climate change studies currently commissioned for this LDF. This will include work that considers the capacity of landscapes to accept development without harm. The threat in and on the edge of the National Park is increasingly from developers wishing to install large scale wind turbines.

3.50 Additional challenges will be faced from poorly designed and located domestic scale renewable energy infrastructure. The recent change to permitted development rights outlines the rights to install solar panels and other building mounted technologies although, as yet, it does not give rights to install wind turbines. Even though the permitted development rights do not extend to conservation areas, it still leaves a lot of the National Park landscape open to new development, and this may possibly be accelerated by rising domestic and industrial fuel prices and falling renewable energy infrastructure costs.

3.51 In spite of the strength of protection given by PPSs and the RSS, there has been difficulty for us recently in determining applications for wind turbines. These cases demonstrate the difficulty of successfully incorporating even small scale renewable energy infrastructure into the National Park landscapes and the fine judgements that have to be made when there is pressure to be seen to be positively addressing issues such as energy costs and climate change mitigation.

3.52 A commissioned study is currently assessing the landscape sensitivity of the Peak Sub-area to those technologies that have the potential, in the wrong location, to have significant landscape impact over significant areas, namely wind energy developments and biomass planting. Sensitivity would be assessed at the scale of the landscape typologies identified in the LCA. For each landscape type and for each technology the assessment will consider those characteristics of the landscape that the renewable technology is most likely to affect and the degree to which these characteristics are present in the landscape type under consideration and provide a sensitivity assessment. The final results of this assessment are due at the end of January but interim findings have already reaffirmed the high sensitivity of the National Park to all but small scale technologies.

3.53 The State of the Park Report (SoPR) and its 2004 Update show a decrease in the quantities of traditional landscape features, such as dry stone walls, hay meadows, hedges, unimproved enclosed pastures, lead rakes and ponds. It also shows that the sparse nature of development outside settlements has been retained, in particular the wild and undeveloped character of the Natural Zone (NZ). The impact of loss of features will be different from place to place. LCA will help in judgements about quality of landscape in the future.

3.54 Other direct impacts on landscape include pressures stemming from Minerals and Transport development, both of which are developed further under those themes.

3.55 The NZ is described in Local Plan Policy LCI. It has proved to be a useful tool because it puts an automatic presumption against development across large parts of the National Park to offer strict protection for wildest, least developed sections of the landscape. However, stakeholder opinion is that our knowledge of the landscape needs to be better in order to better justify our decisions and, where necessary, facilitate essential development such as utilities infrastructure, communication networks whether roads and rail or electronic, for example involving the installation of masts.

3.56 Current local plan landscape policies can stifle development of facilities that are otherwise justified by national park purpose to promote people's enjoyment and understanding of the PDNP. This is especially relevant because there is increasing:

- demand for structured visitor experiences
- reluctance to come to the countryside because of society's more risk averse culture
- government desire to see a wider user profile including representation from those who do not use the National Park currently
- government desire to see people adopting healthier lifestyles
- society demand for space for active sport such as mountain biking and climbing and good facilities to go with them.

3.57 Whilst some of the development pressure will be based on economic growth arguments, there will be cases where development proposals are legitimate positive responses to national park purposes and legitimate social expectations.

3.58 The valued characteristics listed in the Structure Plan are often landscapes. The basis for decisions on development in the National Park is the extent to which any development impacts positively or negatively on these valued characteristics. There is support from some of our officers and some key stakeholders to retain these characteristics in future policy because the policy has to a great extent worked. However there is greater detail that could be used, such as the Biodiversity Action Plan (BAP), the Cultural Heritage Strategy (CHS), the LCA and air, soil and water quality, which may enable more objective judgements about the potential impact of a new development on valued characteristics to be made.

3.59 We have recently updated its Building Design Guide, re-enforcing the importance of good design across the National Park. The dual focus of the latest Design Guide is "*at home with the past, but fit for the future.*" It covers local building traditions and craftsmanship, the importance of access and the space around buildings. It blends contemporary with traditional and considers the neighbourhood. It also sets the tone for the way forward, encouraging affordable housing to support communities, energy, water and waste efficiency, use of sustainable materials and re-using buildings and provision for wildlife. It states that pressures for development, new infrastructure or the desire to extend gardens and make fields into amenity space pose a long term threat to parts of the National Park landscape. It states that an understanding of the area's landscape character, how it evolved and how individual buildings, roads and settlements contribute to that character, allow informed decisions to be made on new development to enhance local identity.

3.60 It is important to state that the principal approaches to landscape protection are not related to land use planning. Over £8 million of funds goes directly to land managers in the Peak District for conservation land management (National Park Management Plan, para 3.7, 2006).

3.61 The threat from more extreme weather, such as extremely high levels of rainfall over short periods of time, may reduce the ability of particular landscapes and watercourses to capture water, and in turn cause problems for development in that area. The Strategic Flood Risk Assessment (SFRA) does not however, show any significant reduction in areas where development may be acceptable. A changed climate will result in changes in the ability of flora and fauna to thrive in the area. However the resulting species and habitat gains will happen irrespective of any land use planning policy and are more matters for biodiversity action plans and other land management plans and programmes.

Option LI.1

More control based on deterioration of landscape and loss of traditional features and habitats and introduce the concept of enhancement zones to target degraded areas (and possibly link to planning gain)

Impact of Evidence and Consultation

This not a strong option because previous consultation responses showed little desire for more control and some thoughts that change does not have to mean deterioration for example, redundant field walls and buildings in a derelict state have a historical value.

However, the overall response was small and not sufficient to justify retention or loss of this option. There is little evidence that particular areas require more control to improve the standard of development or quality of landscape. The SoPRs note loss of traditional landscape features but this is a quantitative measure that does not place any value on the particular feature lost, for example some dry stone walls are more critical to landscapes than others.

Previous consultation has cautioned the wisdom of assigning different values to areas when the whole area has equal national park status. It would need a very clear understanding of value based not only on the Landscape Character Assessment but also an understanding of the value attached by the people who live and visit locally.

Planning gain has received little positive or negative opinion but the scale of development in the park is unlikely to justify planning gain to a level where significant landscape works can be financed.

Sustainability Appraisal

This showed compatibility with landscape and natural resource objectives but highlighted a concern that this option could inhibit the plan's ability to meet affordable housing needs, its ability to enable better access to a range of local service centres and amenities, its ability to enable development that might encourage reduced car use, and thus reduced resource use, and its ability to enable the development required for a healthy park wide economy.

Option L1.2

No change in principle to saved policies* until further debate has taken place with key stakeholders to agree the future of landscapes. This could begin to be informed by Landscape Character Assessment to aid the integration of new development and scope for landscape enhancement.

* Strict protection of the NZ, with scope for exceptional development outside the Zone, and of towns and villages relating to agriculture, forestry, farm diversification, extension of residential buildings, development promoting opportunities for the understanding and enjoyment of the National Park, mineral working and the conversion of traditional buildings for tourism accommodation or for affordable housing for local need where a contribution can be secured in larger schemes. All development should be compatible with other policies in the plan and should not adversely affect the character and setting of the valued characteristics.

Impact of Evidence and Consultation

This is a strong option because consultation responses showed that on balance there is support for the LCA approach to landscape, and support for its integration to land use plans. The emerging landscape strategy based on the LCA could be adopted as formal supplementary planning advice which will provide a detailed elaboration of the way landscapes are to be protected in considering planning applications.

However, we are cautioned by stakeholders that any landscape strategy needs guidelines for management of areas rather than strict prescription.

We were advised at previous consultations and are now instructed, through the European Landscape Convention, that local people should be consulted to help shape the guidelines to ensure cultural value is built in. This happened at workshops in October 2008.

The NZ provides a clear spatial intent for the sensitive conservation of the wildest and undeveloped parts of the National Park but has not always offered sufficient detail to aid planning decision making. More detailed Landscape Strategy would complement rather than replace the Natural Zone.

RSS8 retains the principle of limited development in the National Park, which is the underlying principle in current policies.

Sustainability Appraisal

This showed compatibility with landscape and natural resource objectives but highlighted a concern that this option could inhibit the plan's ability to meet affordable housing needs, its ability to enable better access to a range of local service centres and amenities, its ability to enable development that might encourage reduced car use and thus reduced resource use, and its ability to enable the development required for a healthy park wide economy.

Option LI.3

Allow a more flexible approach that enables the landscape to change and evolve even if this means loss of the valued character of the National Park, such as grazed land, stone walls, traditional barns, etc. Could be informed by Landscape Character Assessment

Impact of Evidence and Consultation

This is not a strong option because it represents the real potential for supporting on going harm to the National Park and would be contrary to the statutory purposes of designation. On balance, there is no demand for a more permissive approach towards proposals for development in the landscape.

Consultation responses implied that flexibility was needed on the balance between landscape conservation and enhancement and social and economic well being, that is balancing purposes and duty. Organisations with an economic remit have asked for a loosening up of policy to enable a much wider business use of the National Park. However, in many cases the benefits to the business of locating in the countryside may well be outweighed by the damage it does to the environment.

A possible exception to this principle is a recreation business that relies on the landscape as its 'playground'. In this case the business is meeting the second purpose of a national park by providing opportunities for people to enjoy the National Park whilst fostering the economic well being of the business owner. However, whilst the business may have more justification to be in the countryside it would still need to demonstrate that it conserves and enhances the countryside.

A more flexible business use of the countryside may accelerate adverse changes in land management and landscape at a time when the latter is already under pressure through small farm sell off and mergers to larger units and such uses as horse stabling and training facilities.

The RSS requires no weakening of the current strong protection of landscape against major development.

Sustainability Appraisal

This option scores well against more social and economic objectives but poorly against landscape and natural resource objectives. The commentary concludes that the option would be significantly strengthened if the wording recognised that the reduction of green house gas emissions and adaptation to climate change were the reasoning behind the need to allow landscape change. The commentary suggest the insertion of the words '*in response to drivers for change including climate change reduction and adaptation*' so that the reason for the flexibility is transparent.

Further Suggestions from Initial Consultation on Refined Options

3.62 Initial consultation on refined options was to confirm their acceptability as options for this stage and to tease out any other options that should be presented. The broad question was raised about the potential coverage of the newly emerging Landscape Guidelines. Do they adequately cover all those elements of strategic policy set out under the current Structure Plan to conserve and enhance the various valued characteristics of the National Park? If not, is there a need for separate core policy coverage of matters such as wildlife and cultural heritage? Until this is clarified a further option could be:

Option LI.4

Include separate core policies to conserve and enhance the valued characteristics of the National Park, such as Wildlife and Cultural Heritage

3.63 We welcome your comments on these options.

Issue L2

Issue L2

Provision of a positive framework for the public to access, enjoy and understand the landscapes and settlements of the National Park

3.64 This issue concerns the need to make sure that planning policy enables the public to access enjoy and understand the National Park. The current policy for achieving the right recreational buildings in the right place is known as the recreation zones policy. It describes what types of buildings and uses are appropriate in three different recreation zones.

3.65 Friends of the Peak District support retention of current zoning of recreation and tourism activity They say that weakening this policy could result in inappropriate recreational activities in sensitive locations. They add that the current zones should be amended to take account of buildings required for educational purposes, which is a statutory purpose of national parks. They further add that decisions about development in Recreation Zones should be informed by the LCA and subsequent Settlement Strategy.

3.66 The NT strongly supports recreation zones and there is strong support from Macclesfield Borough Council and the Royal Society for Protection of Birds.

3.67 Some of our officers would prefer the clarity of the recreation zones as a first principle for judging planning applications, whilst others have no use for the zoning because it is a land use planner's tool. However the location of recreational development does impact on traffic flows and this is covered under the Transport Theme.

3.68 Other officers would prefer to see education and learning incorporated, along with recreation and tourism, as justifications for development with gateway areas identified in association with constituent authorities and potential user groups around the National Park.

3.69 This need for policy to cover educational buildings was also highlighted in the AMR 2004/05 as a result of difficult planning cases where it was not clear whether proposals for buildings used for educational purposes could be considered alongside other named uses in the recreation zone policy.

3.70 There are also those who do not support the recreation zoning policy. The Country Landowner's Association view is that most of the National Park is zoned as areas of low visitor pressure so there is little merit in recreation zones. They feel that there might be potential for provision of facilities, for example for walkers, using the relatively new Countryside and Rights of Way Act 2000 access rights and that zoning will prevent the provision of visitor facilities which may be needed and would supply an income stream to the provider.

3.71 Castleton Chamber of Trade says that the noticeable lack of buoyancy in the area over a period of years now renders a more positive approach essential to sustaining the visitor based economy.

Option L2.1

Retain the current approach to zoning recreational and tourism activity and amend the policy to accommodate educational uses. The zoning policy must be informed by the Landscape Character Assessment

Impact of Evidence and Consultation

The 2007 consultation on issues and options brought a limited response to this issue. Conservation interests and land use planners generally support retention of the recreation zones because it retains a strong principle of protection for some areas.

There is some support for extending the policy to include education establishments because these are important places from which to promote understanding of the National Park.

Sustainability Appraisal

The SA says that this option provides a positive framework for using LCA to inform the zoning policy. The addition of buildings used for educational purposes would not be a problem but would need to be examined on a site specific basis through detailed development control policies, to ensure that potential impacts on landscape and biodiversity are fully considered.

Option L2.2

Simplify the current recreation zones to refer only to the most sensitive areas and areas of heavier recreation pressure

Impact of Evidence and Consultation

A simplified approach would be acceptable to some of our staff but would make it harder for others to make finely balanced judgements on applications for development. In addition, the location of recreational development has impacts on traffic flows and this is covered under the Transport Theme.

There was limited response from stakeholders about this option.

Sustainability Appraisal

The SA says it would not provide a comprehensive approach for management of recreation and tourism across the National Park.

Option L2.3

Take a more flexible approach to tourism and recreational uses in the National Park to satisfy the demands for attractions and accommodation. The approach must be informed by Landscape Character Assessment

Impact of Evidence and Consultation

Where business interest expressed a view it was that zoning is too restrictive and would prevent provision of visitor facilities which may be needed and which would provide income stream to the provider.

Removing the recreation zones would however, make it more difficult for land use planners to make finely balanced assessments on applications for development.

In addition, the location of recreational development has impacts on traffic flows and this is covered under the Transport Theme.

Sustainability Appraisal

The SA says this is a demand led option and could potentially score negatively, leading to cumulative impacts from visitor pressure and disturbance to key habitats and species.

Further suggestions from initial consultation on Refined Options

3.72 Initial consultation on refined options was carried out to confirm their acceptability as options for this stage and to tease out any other options that should be presented. No further options were proposed.

3.73 We welcome your comments on these options.

Settlements

4 Settlements

Introduction

4.1 This Core Strategy Theme takes its direction from the Peak District National Park Management Plan 2006-2011 (NPMP). The vision is for, *"a conserved and enhanced Peak District where the natural beauty and quality of its landscapes and the settlements within it continue to be valued for their diversity and richness."*

4.2 The vision is also for, *"a living modern and innovative Peak District that contributes positively to vibrant communities for residents; and demonstrates a high quality of lifeand a viable and thriving peak district economy that capitalises on its special qualities and promotes a strong sense of identity."*

4.3 Two of the outcomes of the NPMP are particularly relevant. These are:

- Outcome 2 Cultural Heritage requires that, *"by 2011 communities and organisations have worked together to conserve and enhance distinctive characteristics of landscape and settlements."*
- Outcome 9 People and Communities requires that, *"by 2011 communities ...within the National Park have better access to services and more affordable homes for those who need them."*

4.4 This section considers **one issue** concerning the appropriate location for housing and other development. It considers the best pattern of development for the National Park and its communities.

4.5 Local Plan Policy LC2 is a particularly important policy for the National Park communities because it identifies a set of 63 settlements where new development is acceptable in principle. The policy was designed using an assessment of each settlements' capacity to accept new development combined with an audit of its services and facilities. Inevitably this meant that many very small villages were not expected to receive new development other than limited exceptions, for example from domestic extensions or farm and tourism related development. The overall effectiveness of this approach in terms of the conservation of the built heritage of the National Park is a key consideration and close attention has been paid to the impact on Conservation Area character, alongside the wider sustainability of National Park settlements. The need to prepare a new spatial plan presents the opportunity to review the current approach and this has necessitated a new analysis, taking into account a broad range of national and regional policy and the conservation values of the National Park, alongside new thinking on accessing rural services, social integration and the fostering of a range of services facilities. The table at Appendix 5 of the Peak District National Park Local Plan 2001 forms the basis of the current policy. The options below investigate the degree to which this approach is appropriate, or whether new criteria should be considered. A Review of Settlements in the Peak District National Park has been compiled to help inform the Core Strategy. This can be accessed via the Settlements Theme evidence list in Appendix A.

4.6 Five options have been proposed to address this issue. The first three options were consulted on in 2007. The remaining two options, 4 and 5, were introduced through workshops held in 2008 and this is the first time options they have been part of a wider consultation.

4.7 The options are:

- Option 1 Narrow the range of settlements where development is acceptable in principle. This would consolidate the role of larger settlements and give added protection to many smaller settlements.
- Option 2 Use the criteria on which the current designated local plan settlement policy, LC2, is based to produce a new list. This could result in a longer or a shorter list. However, on the basis that services, access to services and development potential are more limited in many settlements than they were when policy LC2 was adopted, it is likely to mean a shorter list.
- Option 3 Create a settlement hierarchy which shows different development expectations based on a settlement's size, location, range of services, capacity for new build, and its role and function.
- Option 4 Permit development in any settlement in principle, provided it meets criteria around affordable housing need, access to services and conservation area constraints etc. and that all evidence has been used to determine the best place for development.
- Option 5 Create a list of preferred settlements for development, applying the same principles, but not necessarily selecting the same places, as are listed now in LC2. Leave the potential for further review of the settlement strategy if later evidence proves there to be local need for affordable housing and the capacity to develop. This would mean that development would only take place where there was clear evidence of capacity and local need for affordable housing but any list would be flexible over the lifetime of the plan.

Background

4.8 The issue was first explored in the 2005 'Help Shape the Future' consultation for the review of the NPMP.

4.9 At this stage the proposition was that we should, "*Review the 63 'designated settlements' in terms of the possibility of a settlement being classified as a key settlement to which 'higher order' services serving several settlements and parishes should be steered or their possible closure resisted (e.g. surgeries, schools, sports halls, larger stores).*" There was limited response at this stage from the Council for the Protection of Rural England (CPRE) and one or two parish councils, but the issue of service loss was raised by Derbyshire County Council (DCC) and the National Trust (NT).

4.10 Local Development Framework Issues and Options 2007 consultation stages showed far more support to review the current policy (LCI in the Local Plan) because the perception amongst several parish councils is that many small villages have suffered as a result of them not being on the Designated Local Plan Settlements list. This generates debate on the degree to which policy may be made more flexible, which may be at odds with the statutory purposes of the national parks and Planning Policy Statements (PPS) on sustainable development.

4.11 The most popular spatial settlement option used by many other planning authorities is a settlement hierarchy. It has been used in other national parks such as Dartmoor, the Lake District, and the North York Moors. It has many benefits where there are expectations and targets for development of housing and employment sites. It also has support from the Planning Inspectorate for use in national parks where all settlements are relatively small and there are low expectations for new development. This option can however, appear contrived when all settlements bar one are smaller than a market town.

4.12 In all consultations to date people value the quality of the built environment and bemoan the threat to services. There is a general wish to retain the vibrancy of settlements in the National Park and to try and help other authorities to retain the health of large towns around the National Park. However, there is also a wish to allow all communities some scope for development.

4.13 Most of the evidence and opinions support a flexible approach to development across those settlements which display a limited level of service provision and are considered to have some development potential without harming the character of the place. However, local engagement commonly raises the opinion without clear evidence, that all communities, including the tiny hamlets, can become more sustainable if limited development is permitted.

4.14 The issue is how to achieve a sustainable network of communities. All options will inevitably impact in different ways on different scales of settlement and it is less certain that sustainable development will result. Recent treatment of this issue by the Planning Inspectorate during the Inquiry into the Derbyshire Dales Local Plan suggested that small villages are not considered sustainable locations for new development and that only very limited exceptions for development should be considered.

4.15 Two new options, Options 4 and 5, have been developed that reflect the weight of opinion and dislike for simple lists and hierarchies and the limited capacity for new build across many settlements in the Peak District. These options were explored at workshops in 2008 where the reaction was mixed because they are challenging. However, we agreed to bring them into this wider consultation alongside the original three options consulted on in 2007.

Issue S1

Issue S.1

Establishing the best pattern of development for the National Park and its communities

National

4.16 National Park purposes, as defined in the 1995 Environment Act, are, "to conserve and enhance the natural beauty, wildlife and cultural heritage [of the national parks], and to promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public." Our duty, and that of other organisations, whilst meeting the purposes, is to 'seek to foster the economic and social well-being' of their local communities. In spite of different purposes being established for Scottish National Parks, and a review of English National Parks, there is no change to purposes and duty and their relative weight in legislation.

4.17 National planning policy and sustainable development principles urge planning authorities on the one hand to cluster housing, jobs and services to reduce travelling, associated pollution and fuel use, to ease service provision, particularly difficult in dispersed rural areas and to promote economic viability and encourage social interaction (PPS1 Sustainable Development 2005, PPG 13 Transport 2006, UK Sustainable Development Strategy 2005). On the the hand it urges them to be more flexible about provision of very small numbers of houses for those in need to enable them to remain in the communities in which they live and work (PPS3 Housing 2006, PPS7 Sustainable Development in Rural Areas 2004). This creates a very difficult challenge for us in discharging statutory purposes and creating an appropriate framework for locally needed homes, service and business opportunities.

4.18 PPS1 Sustainable Development asks that, "*planning authorities should demonstrate how their plans integrate sustainable development and seek to achieve outcomes which enable social, environmental and economic objectives to be achieved together. Considering sustainable development in an integrated manner when preparing development plans, and ensuring that policies in plans reflect this integrated approach, are the key factors in delivering sustainable development through the planning system.* Planning Policy Statement 1 also states that, "*in some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations*". Clearly, in a national park the weighting in favour of environmental objectives will be high because this is the purpose of national parks. However, the social and economic well being of communities has to be fostered in managing the environment and this ensures sustainable development in a national park context.

4.19 The quality of the rural environment often counter balances more social and economic factors such as job availability and access to services. The Commission for Rural Communities (CRC) believes that rural communities on balance perform as well as many urban areas. However, they do not argue that planning can introduce sustainability where it does not

exist, overcoming the pattern of life and culture that has naturally developed. Instead they argue that sustainability can be improved where people and services co-exist. More traditional planning approaches would suggest that this means looking at places with more services and better accessibility. This does not mean however, that small communities cannot become more sustainable and often improvements in sustainability can be made without the need for new built development. A toolkit for assessing the sustainability of rural communities was published in late July 2008 by the CRC to address the difficulty of demonstrating and achieving sustainability in rural areas. The model on which this was produced showed it to be an extremely useful way for communities themselves to assess their sustainability and to decide what steps can be taken to improve. However, it is not intended as a tool that local planning authorities should use to determine where development should and should not take place.

Regional

4.20 The vision in the Regional Spatial Strategy for the East Midlands (RSS8) is for, *"sustainable patterns of development that make efficient use of land, resources and infrastructure; reduce the need to travel; incorporate sustainable design and construction; and enhance local distinctiveness."* RSS8 Core policy I states that, *"policies should improve accessibility to jobs, homes and services through the: promotion and integration of opportunities for walking and cycling; promotion of the use of high quality public transport; and encouragement of patterns of new development that reduce the need to travel especially by car."* RSS8 has retained the presumption against major development in the Peak sub area. Its objectives for housing delivery in the Peak Sub-area / the Peak, Dales & Park Housing Market Area are to, *"comply with the statutory purposes of the Peak District National Park; consolidating the roles of the market towns of Buxton, Matlock and Glossop; meeting affordable housing needs in a way that promotes a more sustainable pattern of development."* Despite the importance of Bakewell as the largest town and a service centre for many residents of smaller villages it is not considered to be as regionally significant as the towns listed above. Indeed, there are many larger urban areas when one considers the range of towns and cities in close proximity to the National Park boundary. A map of settlements in and near to the Peak District National Park which shows the context of the National Park can be accessed via the Settlements Theme evidence list in Appendix A.

4.21 On transport policy, RSS8 states that the objectives for the Peak Sub-area include, *"overcoming the problems of rural isolation for those without access to a private car, particularly in the National Park itself."*

4.22 In pursuit of positive impacts on climate change, RSS8 states that, *"policies should aim to reduce the causes of climate change by minimising emissions of carbon dioxide in order to meet the national target through.... maximising 'resource efficiency' and the level of renewable energy generation; making best use of existing infrastructure; promoting sustainable design and construction; and ensuring that new development, particularly major traffic generating uses, is located so as to reduce the need to travel, especially by private car."*

4.23 A prominent objective of RSS8 is to, *"promote the prudent use of resources, in particular through patterns of development and transport that make efficient and effective use of existing infrastructure, optimise waste minimisation, reduce overall energy use and maximise the role of renewable energy generation. It is easier to achieve this objective if development is linked to existing*

infrastructure." This exists in the larger villages and to some extent smaller villages but not in the smallest villages and hamlets. Whilst service providers will not express a preference for location of new development, the caution has been expressed in consultation, for example by the local Primary Care Trust and the Derbyshire Dales Council for Voluntary Services, that it will be more expensive and more difficult to provide essential services to small hamlets and tiny villages and that consequently it is likely to cost people more to get these services if they live there.

4.24 No target for delivery of housing in the National Park is proposed in the latest East Midlands Regional Spatial Strategy Review 2006. However, the East Midlands Regional Economic Strategy suggest that there is untapped potential to develop the area as a tourist destination and that one of the main goals would be to increase average visitor spend. Should marketing of the area be successful, it could cause more people to consider the economic benefit of second and holiday homes in the area. However, the pattern of visitor use of the area and the relatively undeveloped longer stay visitor market means that there is no immediate general concern. The pattern has not changed despite previous economic peaks and troughs so it would be alarmist to suggest that the proportion of stock used as second homes will significantly increase (Census 2001).

Local

4.25 The NPMP has 10 outcomes to be achieved by 2011. One of these, Outcome 9 - People and Communities, is that, "*communities within the National Park have better access to services and that there are more affordable homes for those who need them.*" Another, Outcome 10 - Economy, requires, "*the local planning authority to work with business and social enterprise to develop a sustainable economy.*" The achievement of these outcomes is, to some extent, dependent on establishing a policy to achieve the best pattern of development across the many settlements in the National Park.

4.26 The Community Strategy for High Peak and Derbyshire Dales prioritises affordable housing as a key issue to be addressed by all those in the Local Strategic Partnership. We are acutely aware of this and work closely with the District Council Housing Managers and policy planning officers, as well as local housing associations and the Rural Housing Enabler, to enable housing development that meets local need.

4.27 Peak District National Park Structure Plan 1994 Policy GS2 defines Bakewell as the major centre for development in the National Park and makes exceptional provision for a replacement livestock market, a relief road and for town centre redevelopment. Apart from the relief road this has been achieved.

4.28 Policy for retail development is to normally confine it to settlements, unless it is part of a farm diversification programme, a simple policy encouraging services nearest to those that need them.

4.29 Current policy is that community services will normally be permitted, recognising the fluid nature of community needs, but change of use from shops and community services will normally be resisted unless it is proven that it is not viable and / or is surplus to community needs. This policy ensures at least some level of service in most settlements. It

further states that a change of use from a shop should preferably be to meet another community need to ensure the community benefits from the loss of a shop by gaining a compensatory service. The loss of services indicates a need to continue safeguarding local services wherever this is viable (State of the Park Report Update 2004). We have recently commissioned a retail study which will develop a picture of retail provision and identify potential requirements for new floor-space and where this might come forward.

4.30 Structure Plan (1994) Conservation Policy 3 states that, "*development should normally be confined to towns and villages, and should enhance the valued characteristics of the area.*" Again, this works on the basis that development should be nearest to the people that need them.

4.31 Structure Plan (1994) Conservation Policies C3 and C4 state that, "*development should respect, and where possible enhance, the valued characteristics of the area including important open spaces and the wider landscape setting. Scale, siting, landscaping and building materials must all be appropriate in this context with design to a high standard. Development which would not preserve, or enhance the valued character of the conservation area will not be granted, other than in exceptional circumstances.*" These are strict criteria but the result is that no consultations over the past four years have evidenced any dissatisfaction with the quality of the built environment.

4.32 Local Plan (2001) Conservation Policy LC2 lists 63 settlements designated as being able to accommodate development based on the level of services and facilities, its physical ability to absorb new development and its relationship with surrounding parishes, towns and villages. This has largely ensured that development has not been widespread across the landscape although it is important to recognise that a more dispersed settlement pattern is a feature in the south west of the National Park.

4.33 The levels of service provision across a wide number of National Park communities has been reviewed with a view to refreshing the criteria that applied to the Local Plan Designated Settlement Policy. These can be found in the table which can be accessed via the Settlements Theme evidence list at Appendix A. This will be supplemented by the findings of the Strategic Housing Land Availability Assessment (SHLAA) prior to wider public consultation. The SHLAA is not yet finalised so the next task is to look at where housing sites are and determine the extent to which this matches the needs of the housing market and the strategic need for affordable housing. This means looking across the Housing Market Assessment, the Strategic Housing Needs Survey and the Strategic Housing Land Availability Assessment as well as up to date local housing needs surveys to finalise the broad locations for development

4.34 The Annual Monitoring Report (AMR) 2005/6 recommended that the definition of Local Plan Settlements be addressed indicating some confusion over the policy and its intent.

4.35 Peak District communities range from the largest town down to smallest communities of no more than a few houses. Bakewell is by far the largest settlement within the National Park and acts as a service centre for a wide rural area with a catchment of more than 20,000 people. The new livestock market is very successful and has secured its role serving the region's farmers.

4.36 Bakewell is also a very popular tourist centre and a focus of public transport services linking surrounding villages with major towns and cities. Future strategy must understand this wider role. Accessibility, both into Bakewell from surrounding villages and the rural area and out to the next tier service centres beyond the National Park, is essential to enable choice and to cater for the needs of all sectors of the community.

4.37 We want to retain the role and status of Bakewell within the National Park as a thriving and vibrant town centre with its historic and market town character maintained and enhanced, with housing and employment opportunities appropriate to the needs of the population of Bakewell and its hinterland, services and facilities in easily accessible central locations for the residents of Bakewell and its hinterland and adequate public transport provision and parking for residents and visitors.

4.38 Because we want to see Bakewell thrive as the primary service centre within the National Park, detailed development management policies must focus on confirming and enhancing this role.

4.39 For all other settlements, the challenge for planning policy is to recognise their role and consolidate them because settlements work as a network not as individual sustainable communities. All National Park settlements, including Bakewell, are extremely small in comparison with the cities neighbouring areas and many other rural areas of England. Apart from Bakewell, their populations range from around 2000 population to just a few hundred. These are small by comparison with many towns around the area such as Buxton, Matlock, Leek, and Macclesfield. All of them rely on the larger towns for some services and none of them is self sufficient in its own right. The many small settlements rely on bigger villages in the National Park and larger towns outside the National Park for most services and facilities. This has always been the case. All of these places are so small that there will always be very little need or expectation for new development. In other areas a settlement hierarchy helps to determine different levels of development for different tiers of a hierarchy. In the National Park there is one level of development and it is low with no targets for housing or employment development. Given this fact, a hierarchy could appear contrived and overly complicated. Whilst other National Park Authorities (NPAs) such as the Lake District, North York Moors and Dartmoor have used them, they are relatively simple because all national parks are areas for very limited new development.

4.40 None of the National Park's settlements are sustainable in all respects when judged against PPSI Criteria, though many have a good range of services for their size. There is a poor rail network but a good network of B and minor roads allowing relatively easy access into, out of and across the National Park. Though extremely small, many communities are very close to major centres of jobs and services so their apparent isolation is not as acute as it first appears. The Taylor Review of Rural Economy and Affordable Housing (Living Working Countryside 2008) states that commuting patterns across rural England are no worse than those on average for urban dwellers. Whilst distance is not the only factor, Peak District settlements do not exhibit the characteristics of villages in more remote areas, such as the Lake District and Snowdonia, where there are few large towns and cities surrounding the area and a limited network of roads on which to travel easily in the National Park.

Commuting is therefore something that is relatively easy and inexpensive to do compared with other more isolated rural areas and the distances travelled are not excessive because of the large network of larger towns and cities in relatively close proximity.

4.41 Many communities need some affordable housing but the availability of good sites and adequate finance combines to leave a significant backlog of unmet housing need. This issue is developed in the Housing Theme drawing on key evidence within the Strategic Housing Market Assessment (2008), Strategic Housing Needs Survey (2007), the Draft Strategic Housing Land Availability Assessment (2008) and the Parish Needs Surveys undertaken year on year. Once settlements reach their capacity to accept new buildings without harming the valued built environment it becomes harder to conserve and enhance the environment and sustain community needs.

4.42 There is a low demand for workshop units in some villages (Employment Land Review 2008) and strategic choices are necessary to determine whether such sites should continue to be safeguarded or released for other community uses such as affordable housing. The Taylor Review of Rural Economy and Affordable Housing (Living Working Countryside 2008) cautions against the release of business units for housing on the evidence of a borough or district wide surplus of business sites, arguing that this is too broad brush to release sites in small rural areas. In earlier debates stakeholders warned against releasing employment land for housing.

4.43 High numbers of people in this area, around 20%, work from home (Strategic Housing Market Assessment 2008) This sector may need incubator type units rather than big business units. If space is released, there is an argument for replacing this with a mix of housing and small incubator units, rather than houses alone.

4.44 The problem for the area is low wages, offered by relatively low skills industries, combined with high house prices. This combination of factors means local people have to live elsewhere in order to work in the National Park, whilst the people who buy open market houses have the ability to commute to better paid jobs around the National Park. This may be a positive contribution to economic development in surrounding urban areas, whose success depends in part on high skills employment. The Strategic Housing Market Assessment (SHMA 2008) shows good self containment of people and jobs in the area. However, if trends continue the result will be increased levels of in and out commuting.

4.45 The SHMA states that the best way to keep people working and living locally is to create opportunities for them to live and work in the larger centres. In a national park context this means a few larger villages and Bakewell. However, it is not easy for planning policy to address issues such as low wages. If industry can get labour, from inside or from outside the Park, without raising wages it will. If local people are not filling local jobs it may be as a result of the wages on offer as much as the price of houses in the area. The provision of new affordable homes therefore goes some way towards addressing shortages of this house type. The SHMA contends that this may actually perpetuate a low wage economy by taking pressure off industry to develop its products, its prices and its wages.

4.46 In addition, the SHMA states that the numbers of new houses required to exert a downward pressure on prices is beyond the expectation for the area and that the numbers of new housing in any one place will not drive down prices across the housing stock. So, new affordable housing will provide homes but will not depress overall house prices.

4.47 The age profile of people moving into the area is 30 - 45 year olds with the means to afford houses. There is a lack of 16 - 30 year old resident population. (AMR 2007/08, Census 2001, Population, Household and Labour Force Projections 2001- 2026)The slow ageing in the population is felt to be bad for the sustainability of the community and the local economy although it is typical of rural England. This population balance is worse in smaller settlements, although the balance is relatively poor across all settlements because none is big enough to accommodate houses in the numbers required to redress the balance.

4.48 There is little merit in locating jobs where no local labour source exists, which would encourage worker in-migration, and there is little merit in putting houses in places remote from work opportunities, which would require the lowest income residents to spend scarce income travelling out to jobs. Sustainable development is more likely to be achieved with mixed schemes. However, the number of sites where this is likely to be possible is low. Potential enhancement and redevelopment opportunities exist in Bakewell, Bradwell, and Hartington. The logistics of providing for mixed use in the same scheme makes delivery more complicated. Even with mixed use development, it is not possible for planning policy to dictate who occupies jobs and there is always likely to be high levels of low distance commuting into and out of the area.

4.49 Despite recent successful bids by Derbyshire Dales District Council for Housing Corporation funds, Registered Social Landlords (RSLs) have limited money to spend in rural areas and there are few alternative sources of funding to enable local needs housing to be built. The lack of access to affordable mortgage finance may be a problem for several more years. There are no Community Land Trusts in the National Park and few opportunities for disposal of surplus public land for development to meet local needs.

4.50 Experience from the Authority's village planning work demonstrates that there are few villages where a 'community spatial plan' or vision exists. However, we already offer flexibility to determine the best place for housing with communities and developers because it is recognised that good site opportunities are scarce in protected areas.

4.51 The current policy of no site allocations and no village boundaries has proved successful because it has still allowed edge of settlement development and protection of important open spaces. This offers much needed flexibility because most settlements have conservation areas within them and this greatly restricts the potential for new build. In spite of the flexibility, the policy is occasionally unpopular amongst communities and developers. Under these circumstances the current approach may become more unpopular because the view of our planners, conservation officers and landscape architects is that sites within and on the edge of settlements are now scarce. It may therefore become increasingly common for communities, RSLs and developers to try and bring forward unsuitable sites with factors that make housing development more difficult. The case for continuing without housing allocations or settlement boundaries was however, accepted recently by the Inspector of the North York Moors National Park Core Strategy.

4.52 Experience over the last plan period has been that a flexible policy gives no guarantee of greater or faster delivery because the process may be stalled at the stage of finding and agreeing the best sites. Problems persist in spite of the fact that we have invested time and money in community engagement to bring about housing development. For example, there have been recent cases where potential housing land has been deliberately blocked by people buying the land to ensure it remains undeveloped. So, while the right planning policy framework was in place, other barriers have emerged which have prevented potentially good schemes from being realised.

4.53 Evidence shows that housing has mainly gone to the bigger settlements whilst the smaller ones have not been subjected to undue pressure for new build. In addition, the flexibility has allowed limited new build to meet local need across a large range of settlements (Annual Housing Report 2007). There is no reason to suspect that this pattern will change unless policy specifically prevents development in particular types of settlement. For example, even though very small places such as Froggatt and Great Hucklow are currently included in a list of settlements where new housing development can take place, there has been very little new development.

4.54 Permanent residential stock and typically smaller houses have been lost to holiday homes. They are still homes but they are no longer permanent residences. Others have tried to curtail the right to use houses for this purpose but have failed. The number of holiday and second homes is around 10% of housing stock in some wards of the National Park (Census 2001) and therefore probably higher in some villages within those wards such as, for example Litton, Alstonefield or Monyash. Anecdotal evidence suggests this is true but there are no hard and fast figures available for each village.

4.55 Whilst some wards and villages have high numbers of holiday and second homes, the proportion of total National Park housing stock used as second or holiday homes is around 4% (Census 2001). This is higher than the regional and national average but, unless the profile of visitors changes significantly, there is no reason to expect high numbers of houses will be sold as second or holiday homes. There is no evidence that the profile of visitors is changing significantly and the Peak District is still primarily a day visit destination. The Visitor Survey Summary (2005) states that a quarter of visitors spent at least one night away from home and half of those stayed in the National Park.

4.56 There has been some service loss (Review of Settlements in the Peak District National Park 2008, State of the Park Report and Update 2004). The loss is very limited considering the relatively small settlements across the National Park. All places except Bakewell are marginal for service viability but most survive, possibly due to the combination of resident and visitor trade. Where services have been lost it is often because of wider programmes for closure or removal, for example of post offices and telephone boxes. Several villages have shops identified as 'vulnerable to closure' (Rural Services in the Derby and Derbyshire Economic Partnership Area A review of Rural Service Provision, Evolve, 2007).

4.57 The available evidence suggests that the level of services remains fairly stable but access to services is worsening. This may be down to increased people having the same access to known services rather than the services being further away from houses. The biggest change is poorer access to NHS dental services as a result of government policy and

the reaction of NHS dentists to this. However, the number of homes with poorer access to petrol stations, post offices, a primary and a secondary school and a supermarket has also increased.

4.58 The Commission for Rural Communities report on Rural Services Data Series (2008) shows a pocket of the National Park that has relatively poor access to services. It is in the Hartington, Sheen, Biggin, Warslow, Butterton, Wetton, Grindon area.

4.59 Housing delivery is falling (Annual Housing Report 2007) and we predict that the larger windfall opportunities, for example for large mill conversions or reclamation of large brown-field former industrial sites, may be fewer in future. So the overall opportunities to increase dwelling figures through windfalls may reduce. However, policy does not say that housing is automatically the best way of conserving and enhancing a windfall site so even if there do prove to be more windfall opportunities than anticipated, it does not necessarily mean there will be more good housing sites than anticipated.

4.60 The population profile of the National Park is likely to include a higher proportion in older age groups. Even with development and in-migration of families, the realistic expected scale of these will lead to a continued ageing profile in the near future. Increased levels of development will increase the burden on service providers and make it more likely that the poorest of the ageing population will suffer loss of services and inability to buy them privately or to travel to where they do exist. The current imbalance in the age profile of communities is a national phenomenon. The imbalance is currently exaggerated by the bulge of post war baby boomers now reaching 'pensionable' age. As the baby boom bulge works out of the system, communities will naturally become more balanced, although rural areas will tend towards older age profiles. The Government does not necessarily see natural change as negative and there is plenty of anecdotal evidence that new people bring ideas, money, and business to an area and are a positive addition to communities (Summary of Responses from Landscape Strategy Workshops, 2008).

4.61 There is natural turnover in existing housing stock as people move out of the area. However, these houses will generally not be affordable to local people unless they are acquired by social landlords and re-let. Few people are likely to sell their house at discounted rate to a RSL or private individual, so subsidy is the only likely route to buying back existing stock. This requires government funding and can occur irrespective of any settlement policy. It is an option proposed by the Taylor Review of Rural Economy and Affordable Housing (Living Working Countryside 2008).

Option SI.1

Narrow the range of designated settlements to allow for greater growth in larger, serviced settlements and removing smaller, less well serviced settlements from the list to aid sustainability and conservation aims

Impact of Evidence and Consultation

The option does have some advantages. PPS3 and PPS7 encourage more flexibility of location in rural housing and business premises and sustainability of the smaller villages is not significantly poorer than that of larger ones. The less well serviced villages are often very close to larger villages, examples include Litton to Tideswell, Sparrowpit to Peak Forest and Brough to Bradwell and Hope. It is arguably therefore that development in larger villages would not put residents from smaller villages at unacceptable disadvantage in terms of access to services.

PPS1 and PPG13 suggest this is a good option for sustainability reasons, but the evidence shows that this is not a good option in the National Park for a number of reasons which are given below.

Many of the larger settlements have limited landscape capacity to accept new development. Many are now unable to meet the development needs of their own community, let alone others.

Removing smaller villages from the list will increase pressure to deliver houses for a larger group of communities in places that are already at capacity.

The size of all settlements in the National Park, including Bakewell, is too small to justify a clustering approach in larger villages. Even the largest places are typically below 3000 population and very small levels of development are unlikely to trigger new services. However, the sensitive nature of many of these small villages means that, on environmental grounds, it is more likely to have negative impacts, for example in places such as Foolow or Pilsley.

The settlements across the National Park work as a network, each with its own role and character. The smaller ones support the larger by providing people to use the services. The smaller ones also have more of a role to play in attracting visitors for example, who in turn spend money in the larger villages.

The sustainability of communities in terms of balance of population across the National Park will not be improved by clustering development into larger villages. It may in fact, accelerate the trend in smaller villages towards older communities and more dormitory style communities with more people commuting out to work or becoming more isolated by ever more marginal service provision.

Sustainability Appraisal

This predicts a mixed or uncertain impact across most of the sustainability objectives. However, the commentary states that encouraging growth in large settlements may create negative transport impacts, such as congestion within the large settlements, but may help protect small settlements from transport pressures. On the other hand, a lack of development in small settlements may adversely affect their economies and poorer access to services and affordable housing in small settlement may ultimately undermine their viability. It also notes that growth anywhere is likely to increase the consumption of natural resources. This however, can be minimised but not prevented

totally, by good siting, design and construction of housing that takes account of landscape character, the historic environment, biodiversity, water and soil resources and greenhouse gas emissions.

Option SI.2

Review the 63 designated settlements within Local Plan saved policy (LC2) with a view to using existing *criteria to establish a new list on the basis that it should accommodate a similar range of settlements, all classified with the same status as per saved policy.

(*Review of Settlements in the Peak District National Park 2008)

Impact of Evidence and Consultation

This is a popular option amongst some communities, currently given limited recognition within policy.

Using current criteria, evidence shows it to be a reasonable option because any new list is unlikely to embrace smaller villages and make development patterns more unsustainable.

There is no capacity for development in the smallest places without harming their essential character and therefore no justification on all other reasonable sustainability grounds for extending the list to include the smallest communities. The evidence of capacity to accommodate new development would lead overall to a smaller list of places where policy would presume in favour of development.

A simple re-casting of this list may perpetuate a 'them' and 'us' tension which underplays the significant role of even the smallest settlements as part of the National Park community and the economy.

Sustainability Appraisal

This predicts a mixed or uncertain impact across most of the sustainability objectives. The commentary states that the expected effects of this policy will be dependent on individual sites.

Option SI.3

Review designated settlements and the criteria for designation on the basis of a new approach to classification under categories defined by national planning guidance, e.g. Market Town, Rural Service Centre and Small Rural Centre. This could allow a large, flexible list to be retained but across which different levels of growth could be managed, for example by way of thresholds and/or allocations. This approach should also be linked to Landscape Character Assessment.

Market towns are defined in this option as being the only settlements with over 3000 population and with a large range of services and businesses. They service their own residents and those in surrounding villages and hamlets with services not typically found in the smaller places, such as opticians, chemists, banks or supermarkets.

Rural service centres have populations typically up to 2000 and they largely serve their own community and surrounding villages and hamlets with a good, but not comprehensive, range of services. For example, they will rarely have a bank or a chemist. There are around a dozen places that might reasonably meet these criteria.

Small rural centres have fewer people, fewer services and rely to a large extent on surrounding rural service centres and market towns both inside and outside the national park for all or most of the communities needs There are around 100 of these places in the National Park

Impact of Evidence and Consultation

This is a popular route taken by many district authorities because they need to deliver higher levels of development than a national park and they need to be clear about what levels of development go where. It is also a recommendation of PPS7. However, it is not so obviously a good option here because settlement hierarchies can appear contrived when all settlements are very small. The recent Dartmoor Core Strategy Inspector's report criticised that Authority for over complicating things when the different development expectations between tiers in the hierarchy was insufficient to justify different tiers. Their hierarchy effectively lists 44 villages where development should be concentrated and lists development that can occur exceptionally outside this list.

Bakewell is the only small market town with around 4000 population; There are also five reasonably well serviced villages of around 1000-2000 population plus many smaller communities of just a few hundred people and less.

The National Park has different settlement patterns. This is attributable to the very different geology, geography and topography across the area and the ways in which man has managed the landscapes. The White Peak has a nucleated settlement pattern. The South West Peak has a more dispersed settlement pattern. The Dark Peak has

settlements around the upland moorland edges of the National Park. The Landscape Character Assessment highlights these differences and asks that they be respected in planning policy.

Consultation responses have included a concern that a settlement hierarchy approach could be overly prescriptive and fail to recognise the inter connections between settlements. Some stakeholders are also concerned that settlement hierarchies can become a policy for ‘stagnation’ or at best ‘managed decline’ in rural areas. The fear is that such a policy puts many small settlements into what the Taylor Review of Rural Economy and Affordable Housing (Living Working Countryside, 2008) now calls the ‘sustainability trap’, that is not big enough in terms of population or services to warrant growth but small enough to need some growth to balance population and sustain services or exhibit any greater signs of sustainability.

Consultation responses have shown us that the reality of delivery in rural areas is that service providers, including the voluntary and community sector, and housing delivery bodies already operate according to local need and circumstances. They benefit from flexibility and not rigidity because circumstances change from village to village and area to area. However, it is difficult for public service providers to provide a full range of services to all communities. A hierarchy creates an expectation of particular levels of development based on the role each place plays. In that sense it is a useful for service providers and developers. However, a hierarchy might create expectations for socially and economically driven development rather than development that conserves and enhances the environment of the National Park.

Sustainability Appraisal

This showed concern that this option could prevent us from improving and protecting air, soil, and water quality or adversely affect our ability to minimise noise and light pollution. However, the commentary states that the option is likely to result in a sustainable network of communities because it would only permit development to a level compatible with an area’s size, form, function, and role within the landscape type. It states that the option offers more opportunity to meet local needs and provide better access to services and amenities than option SI.1. It also considers that encouraging locally appropriate growth across a number of different settlements should reduce the need to travel. This will potentially reduce the need to use natural resources, with a potentially reduction in greenhouse gas emissions.

Option SI.4

Achieve a network of sustainable communities by permitting development that respects the national park designation and any constraints imposed by conservation area appraisals but also the exceptional needs of all communities. This is a policy that relies on criteria to determine the acceptability of a development in a particular location. There would be no settlement list.

This should be achieved by the following examples of criteria that could be applied to policy:

Presume in favour of development of affordable local needs housing and small scale business development in any size settlement, for that settlement, outside of the Natural Zone provided that there is evidence of a backlog of unmet housing need within the community and it cannot be met in a large village or nearby market town with capacity. This situation is more likely in future if capacity for new build and site availability is as limited as professional opinion suggests. It is also likely that known capacity will sometimes be in places without housing need and housing needs will sometimes be in places without capacity. It is therefore over simplistic to assume that a capacity adequate to meet strategic need is, in itself, enough to ensure delivery.

Presume in favour of business diversification outside of the Natural Zone and within existing buildings provided it conserves or enhances the valued characteristics of the location as shown in the landscape strategy and any conservation area plans, as long as it cannot be provided in suitable existing business premises in adjacent settlements and does not have an adverse impact on the surrounding road network or nearby communities.

Use all available spatial evidence to determine the best site for all development once evidence of need is proven. This would include the views of landscape, conservation and village officers, development control planners, as well as robust, community produced, spatial village plans where they exist together with any evidence from housing enablers.

Presume against all development in the Natural Zone and steer development to nearby market towns or cities according to regional spatial strategies, constituent authorities Local Development Frameworks and community strategies, recognising the importance of the areas around the National Park for homes and jobs

Impact of Evidence and Consultation

The option is less directional because it does not identify a list or a hierarchy of settlements or development expectations for each settlement. There would need to be very strict criteria applied to this option which ultimately means many settlements

will get no development to meet local need. Therefore, whilst at first it appears to offer potential for development across all size settlements for local need, in reality it is unlikely that proposals will meet the criteria.

This option recognises the problem of capacity having been met in many of the bigger settlements, working on the principle that development for local need has to go somewhere or be dislodged further away to surrounding areas.

The option has the caveat that development is only acceptable up to the point that backlog of unmet and newly arising need housing need within the plan period is satisfied. This means that at the start of the plan period beyond this LDF there will be extremely limited need for new houses to meet local need.

The option recognises the relatively easy accessibility of services and jobs from locations outside the bigger settlements and the fact that new development in small places does not necessarily put pressure on service providers.

The potential problems with this option are that limited development of housing or business space in what was previously called general countryside will do no more than stabilise the community balance of very small settlements and will do little to add strength or sustainability to the local economy.

The ability of small settlements to absorb new development is extremely limited and it is rarely going to conserve or enhance the built environment of these places. The built and cultural heritage of the National Park is therefore more likely to be at risk under this policy.

Early thoughts on this option are that it will invite challenges from developers wishing to develop in relatively open countryside locations. This could lead to an increase in refusals of planning permission and difficult challenges to those decisions. The result would be time consuming and costly 'planning by appeal'.

Another early thought is that the community planning process needed to justify new development would be time consuming and could result in slower decision making. Also, the process would not always result in enabling the development that the community needs.

Sustainability Appraisal

The appraisal is happy that the option has the ability to improve or protect the natural resources of air, soil, and water or minimise noise and light pollution. However, the option scores less well on its ability to demonstrate a managed response to climate change, possibly because of concern about whether the option can meet the objective of reducing private car use or freight movements if development is encouraged outside of bigger settlements. The SA findings are therefore inconclusive.

Option SI.5

Review the 63 designated settlements within saved policy with a view to using existing *criteria to establish a new list on the basis that that it should accommodate a similar range of settlements, all classified with the same policy as per saved policy.

Clearly define the exceptional circumstances under which development can take place in places outside the list, for example conversions for affordable homes for local people, essential workers and for holiday homes, re-use of buildings for business diversification where the main business is land management.

Establish a process for determining the capacity of those places on the list but currently causing concern based on evidence from the Strategic Housing Land Availability Assessment and professional views of planners, landscape architects and conservation officers.

Presume firstly in favour of development in places where it is agreed that capacity exists and secondly in those places under review.

The community should be central to the process of confirming a settlements place on the list of places where development is acceptable in principle or removing it from the list.

(*Review of Settlements in the Peak District National Park 2008)

Impact of Evidence and Consultation

Evidence suggests a settlement hierarchy would be too contrived in this area so this option avoids creating one

The suggested option allows places currently outside the list to move on provided they meet sensible landscape, built environment and sustainable development criteria.

The option potentially retains a wide range of places where development can happen in principle but introduces scope to declare places to be at capacity. This ultimately takes pressure off places where it is agreed that there is no room for development and allows them to be removed from the list.

The option better recognises the role of every community across the National Park whilst creating a policy to develop only in sustainable locations across the National Park.

The option encourages judgements on harm to the built environment to be made jointly by the community with the National Park Authority. It could trigger a more spatial form of community (i.e. village) planning and bring community views closer to the point of decision making. Current community planning generally steers clear of land use planning issues.

The option steers development to places with known capacity without closing off the potential for development elsewhere subject to community based work on capacity to accept new development revealing capacity that we consider acceptable given all conservation considerations.

This option does not try to solve wider social issues, such as an ageing population in rural areas, by building a few new houses because received wisdom suggests this will not work and it is likely to be contrary to good conservation practice.

This option ensures that new development conserves and enhances the National Park ahead of any considerations towards social and economic aims.

The option may be 'sound' in planning terms but may ultimately result in a development pattern that is unpopular to some communities and their representatives. For example, the number of places where development is acceptable in principle may have to reduce for good conservation reasons.

Sustainability Appraisal

This option scores well on social and economic objectives but the impacts on the environment are uncertain. The lack of overt references to national park purposes or climate change has led to this result. However, the option was not written to repeat national park purposes, which are a 'given' and would be up front in all development decisions, or climate change objectives which are developed in the Climate Change Theme. The SA findings are therefore inconclusive.

Further Suggestions from Initial Consultation on Refined Options

4.62 Initial consultation on refined options was to confirm their acceptability as options for this stage and to tease out any other options that should be presented. No proposals for further options were suggested.

4.63 Some of the issues in this topic cross refer to matters dealt with in other themes such as housing and transport. The final Core Strategy will need to draw this out strongly and we will explore the scope for cross cutting strategic policies at the beginning of the document to set the scene for all policies.

4.64 We welcome your comments on these options.

Climate Change and Natural Resources

5 Climate Change and Natural Resources

Introduction

5.1 The National Park Management Plan 2006 – 2011 (NPMP) has as one of its overarching strands sustainable development. Actions to address or adapt to climate change are woven through a range of the Management Plan's outcomes. National park purposes require long term thinking on the state of the environment and the use of the area by visitors. This has important implications when we consider climate change scenarios alongside this. Of particular concern are:

- *Changes to temperature, rainfall and other aspects of climate that impact on major habitats such as blanket bog, woodlands and grasslands and impact on water catchments*
- *Changing patterns of land use, farming and other land management practices that have impacts on the landscape*
- *Changing use of the National Park or changing impacts of recreation over vegetation or the environment, such as through impacts of fire and erosion.*

5.2 The NPMP sets out the key issues in relation to climate change and actions to address those issues. It recognises the importance of managing the natural resources of the National Park sustainably so that we:

- *reduce our adverse impact on climate change, and future generations are better able to manage, mitigate and adjust to the changes that are starting to take place*
- *are better placed to hand on a diverse, healthy and resilient natural environment to future generations*
- *retain and improve the National Park's natural resources as the basis for our survival, well-being and prosperity.*

5.3 Actions to address those issues are set out in the NPMP of which most relevant here is that to, "*promote low carbon technologies, and how they can be adopted in building design, to architects and developers to reduce the extent of climate change (capacity studies for micro-hydro and funding for low carbon technologies through the Sustainable Development Fund).*"

5.4 There is now an overwhelming body of scientific evidence highlighting the serious and urgent nature of climate change. Scientific evidence from the fourth report from the Intergovernmental Panel on Climate Change (IPCC) published in November 2007 has shown that the debate over climate change science has moved from whether or not it is happening to what action we need to take. Other key findings are:

- *the probable temperature rise by the end of the century will be between 1.8 ° C and 6.4°C (3.2- 7.2°F)*
- *possible temperature rise by the end of the century ranges between 1.1°C and 6.4°C (2-11.5°F)*
- *sea levels are likely to rise by 28- 43cm*
- *arctic summer sea ice is likely to disappear in the second half of the 21st century*

- *it is very likely that parts of the world will see an increase in the number of heat waves.*

5.5 Work continues to better understand how climate change will impact specific geographic areas like the Peak District National Park (PDNP). The UK Climate Impacts Programme (UKCIP) has produced a series of climate change predictions (UKCIP02) based on different greenhouse gas emissions forecasts. These models are due to be updated in the spring of 2009. They are not however, expected to lessen the severity of the predicted climate change. Recent studies indicate that the rate the climate is changing is faster than even that predicted by IPCC's fourth report.

5.6 The Peak District National Park Authority (PDNPA) as a planning authority has an important role to play, ensuring it supports and influences action on climate change whilst still delivering its statutory purposes under the Environment Act 1995 S61 and S62:

- *"to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park*
- *to promote opportunities for the understanding and enjoyment of the special qualities by the public."*

5.7 In pursuing these purposes the National Park Authority (NPA) has a further statutory duty to seek to foster the economic and social wellbeing of the communities within the National Park.

5.8 The formulation of the PDNP's planning policy to try to adapt to and mitigate for climate change is an ongoing process informed by public and stakeholder consultation. For the purposes of consultation the issues have been grouped under headings, some of which formed part of the 2007 consultation which dealt with 'Natural Resources and Utilities' but did not consider climate change as a specific issue. Since the 2007 consultation, in the light of further research, the necessity for action on climate change has become evident.

5.9 For the formulation of policy, it is clear that matters such as the distribution of development, and transport are also important factors relevant to this theme and the cross functional characteristics are debated below. Waste management issues have been included under the broad heading of climate change because of the potential for carbon reduction by prudent use of resources, recycling and reduced transportation of waste. The list of issues may not be exhaustive and we welcome your comments to assist us in the formulation of effective policy. The following issues have been put forward for consultation.

- Issue 1 The scale of energy installations. This issue has seven options.
- Issue 2 Spatial distribution of renewable energies. This issue has three options.
- Issue 3 Incorporating on-site renewables and energy efficiency. This issue has six options.
- Issue 4 Flood risk and water conservation. This issue has four options.

- Issue 5 Impact of climate change on land management, biodiversity and air quality. This issue has five options.
- Issue 6 - The need for waste management facilities. This issue has three options.
- Issue 7 Environmentally acceptable sites for waste management facilities where need has been demonstrated and no alternatives less damaging to the National Park exist. This issue has three options.
- Issue 8 Waste arising from all development in the National Park. This issue has three options

Background

5.10 In May 2005 the first stage of a major review of the management of the PDNP and the NPA's land use policies was carried out to assist in the preparation of the NPMP and the Local Development Framework (LDF). 'Help Shape The Future' was the consultation document for the issues and preferred options in this process. There was no specific policy put forward for climate change at that time and renewable energy installations came under the broad heading of 'Utilities'. Consultation responses at the time showed strong support for retention of Natural Zone and strong support for landscape character assessment. Consultees supported encouragement of small-scale renewable energy technology that will directly support individual properties or local communities, but considered that tight control should be retained over the development of larger scale renewable energy technologies. It was considered that the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. For development proposals in a sensitive area consultees considered that the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

5.11 The LDF consultation process in 2007 also considered renewable energy development along with telecommunications development under the broad heading of 'Utilities'. Consultation responses called for a more flexible policy towards renewables and for more clarity in the policy option. There was a preference for considering applications in the context of landscape and design policies and retaining the current approach to encourage on-site renewables whilst focusing principally on conservation. There was a slight preference for seeking more energy efficient solutions. A further option was suggested to seek green infrastructure or climate adaptation provision from all developments, either directly or as a contribution to a central fund.

5.12 In October 2006 a report on the economics of climate change was produced by Sir Nicholas Stern, the former Chief Economist of the World Bank. It considers in particular the economic costs to the world of action versus no action and concludes that the benefits of strong, early action to reduce climate change outweigh the costs

5.13 The increased use of electricity produced from renewable energy sources constitutes an important part of the package of measures needed to comply with the Kyoto Protocol to the United Nations Framework Convention on Climate Change and of any policy package to meet further commitments.

5.14 The Government has charged National Park Authorities with the challenging task of conserving and enhancing the National Park whilst responding to and mitigating for the impacts of climate change. It is important to understand the planning policy context for development within the National Park to avoid any misunderstanding. National park planning policy is criticised by some for being protectionist, for hindering development and for demanding standards that are too high. As a National Park Planning Authority we would not be acting in accordance with Government requirements if we did not seek to conserve and enhance the National Park and its iconic landscapes for future generations, to conserve the tranquil wilderness areas and to take care of our national heritage.

5.15 The Environment Act 1995 states in Section 62(2) that, *"if there is a conflict between the purposes, the National Park Authority shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area."* All relevant authorities are required to have regard to these purposes when acting in a way that could affect a national park.

5.16 To some this may seem to limit what we, as a NPA, are able to do to respond to climate change but we are looking at innovative ways to reduce the carbon footprint of the National Park whilst meeting our statutory purposes. The Peak District Moorlands store between 16 and 20 million tonnes of carbon. Active management and moorland restoration can help the peat to absorb carbon and can stop degradation which releases more carbon. The Peak District moorlands have the potential to sequester up to 13,000 tonnes of carbon per year (Peak District Moorland Carbon Flux -moors for the Future Research Note 12, June 2007). The NPA, through the Moors for the Future Team, actively monitors the quality and extent of natural resources of the moorland, soil, air and water across the National Park in conjunction with the Environment Agency and local authorities and restores degraded blanket bog to provide a stable peat resource to reduce atmospheric carbon release (carbon dioxide emissions) and reduce the extent of climate change.

5.17 The NPMP and the Climate Change Action Plan (see below) set out the ways that we can be pro-active in adapting to and mitigating for climate change. The energy hierarchy is also an important principle to reduce the carbon footprint of the National Park, putting energy reduction and conservation before energy generation using renewables.

5.18 The following is an overview of national, regional and local planning policy which it is hoped will help to explain the context which binds the PDNPA in its preparation of the Core Strategy and in its response to climate change.

National Planning Policy

5.19 **The Climate Change Act 2008** sets a legally binding target for reducing UK carbon dioxide emissions by at least 26% by 2020 and at least 80% by 2050, compared to 1990 levels. This is an ambitious target which we will have to work hard to achieve.

5.20 Recent legislation under the **Planning and Energy Act 2008** enables local planning authorities to set requirements for energy use and energy efficiency in development plan documents. Previously there was no legal basis for targets such as the London Borough of Merton Rule's target of 10% of electricity for new development to be provided by renewables.

5.21 Planning Policy Statement (PPS)12 for Local Development Frameworks sets out the overarching principles for the spatial planning process. It recognises that spatial planning provides a means of safeguarding the area's environmental assets both for their intrinsic value and for their contribution to social and economic well being by protection and enhancing designated sites, landscapes, habitats and protected species;

5.22 PPS12 recognises that core strategies may impact on environmental or cultural assets and may affect how much the area contributes to mitigating and reducing climate change and advocates joint working between local authorities on action and on the evidence base.

5.23 PPS12 explains that the Core Strategy is the principle Development Plan Document (DPD) which sets out the policies which will guide development in the PDNP for at least 15 years. The views of the local community and others who have a stake in the future of the area are an important part of the plan making process.

5.24 National Parks in England cover approximately 8% of the land area and are recognised as important assets for the nation. As well as the requirements of the Environment Act (1995) for national parks, the government sets out the planning policy context for national parks within topic based planning policy statements which are prepared by the government after public consultation. Local authorities must take their contents into account in preparing their development plan documents. The national park context and climate change are important issues addressed in many of the Planning Policy Statements

5.25 PPS 1 Delivering Sustainable Development sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system and states that landscapes with national and international designations should receive the highest levels of protection. The environmental issues to take into account (para 20) reflect those issues that the PDNP's Climate Change Action Plan is seeking to address:

- *mitigation of the effects and adaptation to climate change through the reduction of greenhouse gas emissions and the use of renewable energy, air quality and pollution, land contamination; the protection of groundwater from contamination; and noise and light pollution*
- *the protection of the wider countryside and the impact of development on landscape quality; the conservation and enhancement of wildlife species and habitats and the promotion of biodiversity; the need to improve the built and natural environment in and around urban areas and rural settlements, including the provision of good quality open space; the conservation of soil quality; and the preservation and enhancement of built and archaeological heritage*
- *the potential impact of the environment on proposed developments by avoiding new development in areas at risk of flooding and sea-level rise, and as far as possible by accommodating natural hazards and the impacts of climate change and*

- *the management of waste in ways that protect the environment and human health, including producing less waste and using it as a resource wherever possible.*

5.26 In 2007 Government published **PPS I Supplement** which sets out how regional and local planning can best support major reductions in carbon emissions from domestic and non-domestic buildings.

5.27 The government confirmed in **PPS 7 Sustainable Development in Rural Areas**, that nationally designated areas comprising national parks have the highest status of protection in relation to landscape and scenic beauty and that the conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas.

5.28 **PPS 22** states that renewable energy projects in national parks should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits. Regional planning bodies and local planning authorities should set out in regional spatial strategies and local development documents the criteria based policies which set out the circumstances in which particular types and sizes of renewable energy developments will be acceptable in nationally designated areas. This is the purpose of the **Peak Sub-area Climate Change Study – Focusing on the capacity and potential for renewable and low carbon technologies**, which has been commissioned by the local planning authorities making up the Peak sub-area. This study is due for completion by the end of January 2009. PPS 22 points out that, "*care should be taken to identify the scale of renewable energy developments that may be acceptable in particular areas and that small-scale developments should be permitted within areas such as National Parks where there is no significant environmental detriment to the area concerned.*"

5.29 **PPS 23 for Planning and Pollution Control** points out that, "*In the preparation of development plan documents the potential sensitivity of the area to adverse effects from pollution should be considered in particular reflected in landscape, the quality of soil, air, and ground and surface waters, nature conservation (including Sites of Special Scientific Interest, National Parks, Areas of Outstanding Natural Beauty, Special Areas of Conservation, Special Protection Areas, Wetland of International Importance, agricultural land quality, water supply (Source Protection Zones), archaeological designations and the need to protect natural resources.*"

Regional Planning Policy

5.30 The PDNP is recognised as a unique asset for the East Midlands Region with population in the region of 38,000, 457 scheduled ancient monuments, 109 Conservation Areas, 2,899 listed buildings, 74,788 ha Environmentally Sensitive Areas, 50,929 ha moorland and 50,013 ha of sites designated as Sites of Special Scientific Interest (SSSI).

5.31 Regional Spatial Strategy RSS8: The East Midlands Plan expects local plans and LDFs to protect key environmental assets and the integrity of designated sites (para 4.3.59). RSS8 Policy 41 sets priorities that require provision to be in locations where environmental, economic and social impacts can be addressed satisfactorily.

5.32 The East Midlands Regional Plan with the Secretary of State's proposed changes, which sets out the spatial priorities for the PDNP in paragraph 2.4.27 confirms that national park designation confers the highest status of protection for landscapes and scenic beauty. It recognises the Peak District as, *"a unique asset, not only for the people who live and work there, but also for the East Midlands, surrounding Regions and the nation as a whole". It sets out the requirements of the Environment Act with regard to National Parks and states that 'Major developments should not take place in the Peak District National Park save in exceptional circumstances and where it is demonstrated to be in the public interest and that it is not possible to meet that need in another way. This entails a rigorous examination of the requirement for the development in terms of national considerations, the scope for developing elsewhere and any detrimental effect on the environment and landscape. Planning policies will continue to be applied to protect the National Park whilst addressing the social and economic needs of the Park's communities and supporting the regeneration of the surrounding urban areas.'*

5.33 Policy 8 of the Draft East Midlands Regional Spatial Strategy (RSS8) sets out the spatial policies for the Peak Sub-area:

"The preparation of policies and programmes in the Sub-area should:

- *help to secure the conservation and enhancement of the Peak District National Park, respecting the statutory purposes of its designation*
- *address the social and economic needs of the Park's communities, for example, by the provision of appropriate business premises and affordable housing and*
- *protect and enhance natural and cultural heritage of the Sub-area, in particular the Peak District Moors Special Protection Area, and the Special Areas of Conservation covering the South Pennine Moors, Peak District Dales, the Bee's Nest and Green Clay Pits and Gang Mine and the Peak District Moors Special Protection Areas/Special Areas of Conservation."*

5.34 Policy 30 sets out the Priorities for the Management and Enhancement of the Region's Landscape and confirms that the Region's natural and heritage landscapes should be protected by,

- *"the promotion of the highest level of protection for the nationally designated landscapes of the Peak District National Park*
- *the establishment of criteria-based policies in Local Development Frameworks to ensure development proposals respect intrinsic landscape character in rural and urban fringe areas and*
- *the identification in Local Development Frameworks of landscape and biodiversity protection and enhancement objectives through the integration of Landscape Character Assessments with historic and ecological assessments."*

5.35 The Draft RSS8 considers that where not already in place, Local Authorities should prepare Landscape Character Assessments (LCA) to inform the preparation of LDFs. These can also be used to develop Supplementary Planning Documents.

5.36 The Draft RSS8 promotes the energy hierarchy - the reduction in use of energy and the conservation of energy before the need to generate renewable energy. The Draft Regional Plan recognises that local resources and constraints will impact on the renewable technologies that are appropriate in different areas. While micro-generation can be applied anywhere, either grid linked or with battery back-up, the opportunities for non electricity generating renewables should not be underestimated. Ground source heat pumps and solar water heating as well as biomass space heating can contribute to a reduction in demand for electricity, coal, oil or gas that will deliver carbon savings across the Region. Other technologies may be more appropriate at specific locations.

5.37 The Draft RSS8 upholds the government's protection of the National Park landscape by setting out broad area guidance. This guidance along with national guidance from the planning policy statements informs the policy making process, *"The sub-area is mainly within or close to the Peak District National Park and large scale renewable generation will always be difficult to accommodate as a result. However there are many opportunities for small scale hydro and some opportunities for small wind generation."*

5.38 The **Panel Report on the Examination in Public** of the draft review on sub-area spatial priorities calls for more work to provide realistic, evidence based targets and monitoring for different parts of the region. It recommends that this should involve landscape character assessment and should establish the suitability and capacity of different sub-areas for different technologies (paras 11.5 and 11.18). It questions whether the region-wide targets set out in Appendix 5 of the review consultation document are achievable, particularly without an improved evidence base (paras 11.9 to 11.11). It considers that the new evidence base (including landscape capacity assessment) should precede the review of targets (para 11.17).

National Park Policy and Actions

5.39 The Draft RSS8 cites the PDNPA's supplementary planning guidance as a means to encourage appropriate renewable energy installations. The PDNPA published **Supplementary Planning Guidance (SPG) for Energy and Renewables** in October 2003. The SPG supports the positive role that renewable energy and energy efficiency can play in an area of high environmental quality such as the Peak District and offers guidance on the most appropriate ways for future development. It is a useful guide to planners when considering applications for renewable energy installations but would from being updated to take into account updated planning law with regard to householder development.

5.40 The spring 2007 consultation on issues and options for the PDNP's core strategy was on a limited number of issues relating to renewable energy, utilities development and waste disposal. Since that time scientific evidence from the fourth report from the Intergovernmental Panel on Climate Change has shown that the debate over climate change science has moved from whether or not it is happening to what action we need to take.

5.41 In order to adapt to or mitigate for the effects of climate change the PDNPA, as part of the Derbyshire Partnership Forum which consists of 40 public sector organisations in the county, are working together and have produced a **Climate Change Strategy**.

5.42 **The National Park Management Plan 2006 - 2011**, as described in the introduction to this chapter, proposes a set of outcomes to address climate change in the PDNP.

5.43 In March 2008 at a Ministerial seminar with the Department for Environment, Food and Rural Affairs (Defra) the English National Park Authorities Association (ENPAA) identified the potential unique contributions that NPAs have to play in tackling climate change. They were:

- *carbon/ecosystem management on a landscape scale*
- *national parks as test beds for climate change adaptation on a landscape scale*
- *promoting energy conservation and micro-generation in remote rural economies*
- *communicating with millions of visitors there to explore & learn about the environment.*

5.44 Following consultation with external partners / stakeholders in September 2008 on nine themes that reflect the role that national parks play in taking action on climate change and cross cutting issues that need to be addressed to deliver greenhouse gas emission reductions a **Climate Change Action Plan** was presented and agreed at the National Park Authority Meeting on 5 December 2008. Alongside the adoption of the Action Plan, the Authority has also made a commitment to bring forward an update to the existing SPG.

5.45 As a result of greater understanding of the issues surrounding climate change and the importance of action to address those issues, in addition to the issues considered in the 2007 consultation, we have added the following issues and options for consultation:

- the scale of energy installations
- the energy hierarchy
- flood risk reduction and water conservation
- impact of climate change on land management, biodiversity and air quality
- waste arising from all development in the National Park.

5.46 A stakeholder workshop was held in September 2008 where stakeholders' comments on the expanded issues and options were recorded. Any comments from this workshop are set out with the issues and options. Key questions arising from the workshop are also put forward for you to comment on.

5.47 Since the publication of the SPG the PDNPA has, with Derbyshire Dales District Council and High Peak Borough Council, commissioned a sub-regional study, the **Peak Sub-area Climate Change Study**, focusing on the capacity and potential for renewable and low carbon technologies.

5.48 Interim results of the study were presented in a stakeholder workshop in December 2008 to enable discussion about different possibilities for adaptation to climate change within the sub-region and to involve stakeholders in the LDF process. Interim results focused on

the sensitivity of the area to the various technologies proposed and demonstrated a high degree of sensitivity to renewable energy installations, particularly large and medium scale wind turbines and clusters of wind turbines and show certain types of renewables as being more appropriate within the sub region than others. The most favourable technologies to the study area, ranging from those with the highest potential energy output to the lowest, included biomass, anaerobic digestion, existing mills for hydro, ground source heat pumps, combined heat and power, new hydro, solar thermal, small and micro wind turbines and photovoltaic. Response from Stakeholders was that energy reduction should be promoted before development of renewables and that a more positive approach was required to development of all types of renewables with no set hierarchy. It is a fair comment that we will be taking into consideration as part of the Core Strategy process.

Issue CCI

Issue CC I

The scale of energy installations

5.49 The Draft East Midlands Regional Spatial Strategy (RSS8) recognises the many opportunities for small scale hydro and some opportunities for small scale wind generation within the sub area but points out that as the Peak Sub-area *"is mainly within or close to the Peak District National Park large scale renewable generation will always be difficult to accommodate as a result."*

5.50 The scale and type of renewable energy installations appropriate for different landscape character areas within the National Park will be informed by a Peak sub-area climate change study focusing on the capacity and potential for renewable and low carbon technologies. Interim results of the study based on landscape character assessment with capacity analysis presented at a stakeholder workshop in December 2008 show a high degree of sensitivity to renewable energy installations, particularly large and medium scale wind turbines and clusters of wind turbines and show certain types of renewables as being more appropriate within the sub region than others.

5.51 The Draft RSS8 cites the PDNP's Supplementary Planning Guidance For Energy, Renewables and Conservation, October 2003 'to encourage appropriate renewable energy installations'.

5.52 The key principle behind PDNP's Supplementary Planning Guidance for Energy Renewables and Conservation for sustainable development is the promotion of the energy hierarchy:

- reducing the need for energy
- using it more efficiently
- using more renewable sources
- making clean and efficient use of fossil fuels.

5.53 The SPG will need updating to a Supplementary Planning Document as part of the LDF process but the core principles of sustainable development will remain the same in line with government policy. Whilst a hierarchical approach may be useful from a technical feasibility viewpoint to assist developers, the NPA will continue to encourage any renewable energy development which does not compromise its statutory purposes.

5.54 It is important to explain how the options for consultation for climate change policy have evolved because there are some significant additions since 2007. Some of the 2007 options, which must still be put forward as part of the consultation process, need reworking as our understanding of the importance of policy on climate change has increased. For this consultation process the first two options presented here were from the Spring 2007 consultation which included renewable energy technology with utilities development, hence the reference to telecommunications etc in the second option. Five further options have been put forward for this consultation following initial consultation with stakeholders in order to give a more comprehensive range of climate change policy options. The five further options have not been subject to sustainability appraisal.

Option CC 1.1

Only permit small scale technologies to meet the local needs of the area

Impact of Evidence and Consultation

This option is based on existing policy C17 of the Structure Plan which states, "*small-scale development to generate or store energy to meet a local need will normally be permitted provided that it does not detract from the appearance of the landscape or the buildings it serves.*" PPS 22 for Renewable Energy (para 12) makes it clear that, "*Small-scale developments should be permitted in National Parks provided that there is no significant environmental detriment to the area concerned.*" There will be a need to define small scale development and this will be informed by the Sub-area Climate Change Study.

This option is broadly in line with the Regional Spatial Strategy and the Draft RSS8. It would be improved by following the sequential approach in the Energy Hierarchy which is a key principle in government, regional and the Peak District National Park's Supplementary Planning Guidance for Energy Renewables and Conservation.

Sustainability Appraisal

The Sustainability Appraisal considered that this option may not maximise the potential of the area but recognised the importance of the statutory designation of the national park.

Option CC 1.2

As Option I but take a stronger line to insist on all other options being explored

(including greater requirement for energy efficiency, non-development solutions, e.g. roaming on telecoms or undergrounding solutions, such as overhead wires and ground source heat pumps, before permissions for utilities infrastructure are granted. Seek review of Energy SPG to SPD. Should be informed by Landdscape Character Assessment)

Impact of Evidence and Consultation

In the context of government and regional policy on climate change this option is unclear. This option will need re-wording to address climate change issues rather than the wider issue of infrastructure in the landscape for which consultation responses were sought in 2007. The importance of the promotion of the energy hierarchy may be addressed in this option but the wording is unclear. Clear reference to the energy hierarchy option would be in conformity with PPS1, the draft RSS8 (Policy I - Regional Core Objectives) and the SPG (mentioned in the draft RSS8) which require its consideration. As the option currently reads it could be criticised for placing undue constraint on development, as PPS 22 states that, "*planning policies that rule out or place constraints on the development of all or specific types of renewable technologies should not be included in local development documents without sufficient reasoned justification.*"

Sustainability Appraisal

The Sustainability Appraisal considered that this option, which should refer to renewable energy installations, was likely to have more significant positive effects than option CCI.1 and that reducing the need for energy was more beneficial than increasing energy production.

Further Suggestions from Initial Consultation on Refined Options

5.55 Stakeholders at the September 2008 workshop wondered whether the issue should be visual and environmental intrusion rather than scale. Stakeholders were surprised that a general strategic policy had not been included at the front of the whole core strategy taking into consideration the statutory purposes of the national park whilst stating the significance of climate change. Stakeholders considered that climate change, environmental sustainability and the need to mitigate and also build in resilience or adapt to change should be recognised as a cross cutting strategic issue similar to policy GSI affecting the policies within the core strategy.

5.56 With regard to the policy option, 'Only permit small scale technologies to meet the local needs of the area,' stakeholders considered that the wording of the option was unclear and wondered whether the option was referring to renewables and a presumption in favour

of renewables. It was also considered that the option was too negatively worded and that it was possibly too restrictive with regard to hydropower which may be able to be provided on a larger scale without detracting from the landscape. It was suggested that a more positive way of framing the option would be, ' Encourage small scale renewable energy and carbon saving technologies to meet the local needs of areas '. It was considered that 'subject to national park purposes' be added to Option CCI.1, along with the proviso, ' where it is located next to and serves its property ' in order to rule out large scale development.

5.57 Interim results of the Peak Sub-area climate change study focusing on the capacity and potential for renewable and low carbon technologies based on landscape character assessment with capacity analysis show certain types of renewables as being more appropriate within the sub region than others. For the presentation to the stakeholder workshop in December 2008 they were set out in a hierarchical decision tree:

- *most favourable technologies to the study area - biomass, anaerobic digestion, existing mills for hydro*
- *next favourable technologies to the study area - ground source heat pumps, combined heat and power, new hydro*
- *less favourable technologies to the study area - solar thermal, small and micro-wind turbines, photovoltaic.*

5.58 The response from stakeholders was that energy reduction should be promoted before development of renewables and that a more positive approach was required to development of all types of renewables with no set hierarchy.

5.59 The majority of the limited consultation responses from 2007 were broadly in favour of a more proactive approach but stressed the importance of energy conservation through insulation and increased energy efficiency through design either instead of or before consideration of on site renewable energy.

5.60 Part L of the Building Regulations has since been amended to require improved levels of energy efficiency. It is intended that the regulations will be amended progressively to accommodate the Code for Sustainable Homes.

5.61 Stakeholders at the September 2008 workshop were not sure whether 'insisting on all other options being explored' conforms with PPS22 but thought that if this was a reference to adherence to the energy hierarchy it would be useful as the energy hierarchy should be promoted. It was considered that 'subject to national park purposes' be added to the option. Stakeholders considered that there should be a review of Energy SPG to SPD which should be informed by LCA.

Option CCI.3

Climate change should be recognised as a cross cutting issue in the introduction to the Core Strategy

Option CC 1.4

Encourage small scale renewable energy and carbon saving technologies to meet the local needs of areas subject to national park purposes

Option CC 1.5

The National Park Authority will seek to encourage best practice in new development placing an emphasis on firstly reducing the need for energy, then using energy more efficiently, then using renewable energy

Option CC 1.6

As part of the energy hierarchy encourage small scale renewable energy and carbon saving technologies to meet the local needs of areas without compromising the spectacular environment of the National Park

Option CC 1.7

As part of the energy hierarchy encourage small scale renewable energy and carbon saving technologies to meet the need of an individual property without compromising the spectacular environment of the National Park

5.62 We welcome your comments on these options.

Issue CC2

Issue CC 2

Spatial distribution of renewable energies

5.63 PPS 22 (para 10) states that, "*if renewable energy development would have an adverse effect on the integrity of an internationally designated nature conservation site, planning permission should only be granted where there is no alternative solution and there are imperative reasons of overriding public interest.*" This option conforms to Draft RSS8 in that it distinguishes between levels of protection within PDNP and establishes that micro-renewables may be appropriate in some areas. Consultation responses from 2007 suggested that this option should be retained but amended to include a combined role with LCAs.

5.64 This issue will be very much informed by landscape policy and the recent study commissioned by the PDNPA with two sub-regional partners on the Peak Sub-area Climate Change Study, focusing on the capacity and potential for renewable and low carbon technologies). In line with advice in RSS8 there is benefit in placing emphasis on LCAs and Landscape Strategy to lend greater weight to policy decisions.

5.65 There is a need to ensure that any requirements for renewable energy provision are proportionate to the development to which it may be related in accordance with advice in PPS1.

5.66 The first two policy options formed part of the spring 2007 consultation. Following initial consultation with stakeholders in 2008 a third option has been added. This has not been the subject of sustainability appraisal.

Option CC 2.1

Differentiation of areas

Identify those areas where there should be strict protection (e.g. Natural Zone) and those areas where there may be scope for encouragement of micro-renewables

Impact of Evidence and Consultation

Under Section 3 of the Wildlife and Countryside (Amendment) Act 1985 the government requires the Authority to map categories of land "*whose natural beauty is in the opinion of the Authority particularly important to conserve.*" The Section 3 maps have been set out as an area known as the 'Natural Zone' showing land most sensitive to change such as Special Areas of Conservation and SSSIs in moors and heaths, limestone hills and dales and semi-natural woodland areas This policy option could be more

positively worded but is in accordance with government and regional guidance and national park purposes and is considered an important means of protecting the iconic landscapes of the Peak District National Park. This option provides greater certainty for developers of the appropriateness of development and can save the expense of feasibility studies in highly sensitive areas.

This policy option covers householder development without permitted development rights under the Town and Country Planning (General Permitted Development) (England) Order 2008 (SI 2008 No 675) or other development which has the potential to be more detrimental to the landscape. The extension of permitted development rights for micro-renewables gives more scope for energy generation for householders within the Natural Zone. In most instances, for example, solar panels and photovoltaic cells are now permitted development on dwellings, as are ground and air source heat pumps in the garden of a dwelling.

The policy option would be strengthened if it was combined with a landscape character approach to give a clearer understanding of the potential for low carbon technology and renewables across the National Park.

Sustainability Appraisal

The Sustainability Appraisal found that this option has little flexibility but that it has the potential to greatly benefit the natural environment bearing in mind the requirements of Schedule 3 of the Wildlife and Countryside Act.

Further Suggestions from Initial Consultation on Refined Options

5.67 Stakeholders considered that there should be a policy presumption in favour of energy conservation in all development before any consideration of renewables in line with the energy hierarchy. This would have the effect of protecting the National Park's iconic landscapes whilst promoting the practice of energy conservation. The Sub-area Climate Change Study commissioned by the PDNPA, Derbyshire Dales District Council and High Peak Borough Council should assist in the appraisal of different landscape character areas. Interim results of the study based on LCA and capacity analysis show a high degree of sensitivity to renewable energy installations, particularly large and medium scale wind turbines and clusters of wind turbines and show certain types of renewables as being more appropriate within the sub region than others. These are set out in a hierarchical decision tree. Response from stakeholders at the stakeholder workshop was that a more positive approach was required to development of all types of renewables with no set hierarchy.

Option CC 2.2

Considering all applications for renewables in the context of landscape and design policies

Impact of Evidence and Consultation

This option may lessen protection as it would rely on generic design policies and would not specify particular areas for protection.

Sustainability Appraisal

The Sustainability Appraisal found that effort is needed to be put into minimising the impact of renewable energy, and finding the most suitable forms of technology for particular sites.

5.68 This option will require reference to LCAs and Landscape Strategy to ensure conformity with government guidance and the Regional Spatial Strategy.

Further Suggestions from Initial Consultation on Refined Options

5.69 Participants at the 2008 Stakeholder Workshop thought that there should be a presumption in favour of energy conservation. They saw the need to have a criteria based policy with a clear evidence base to support the policy and that decisions should be made according to landscape, visual amenity and ecological impacts. They considered that SSSIs, habitats etc should be protected from inappropriate development and that the wording 'strict protection' is too negative. Stakeholders considered that the term 'micro' should be better defined as hydro schemes have the potential to be larger with little landscape impact. A principle of development of a renewable installation where it is located next to and serves its property customer was suggested in order to rule out large scale of development. The only exception might be sensitively located small hydro schemes which could serve a group of properties.

Option CC 2.3

Identify the areas where there should be encouragement of micro-renewables and those areas where there may need to be protection against them taking into account the statutory purposes of the national park

5.70 We welcome your comments on these options.

Issue CC3

Issue CC 3

Incorporating on-site renewables and energy efficiency

5.71 PPS22 for Renewable Energy sets out the governments requirements for renewable energy and the aim of a 60% cut in UK carbon Emissions 2050 (now 80% under the Climate Change Act 2008). PPS22 encourages Planning Authorities to require a percentage of renewable energy in new residential, commercial or industrial developments. It states that the policy should be proportionate only be applied to developments where the installation is viable given the type of development, location and design and that it should not place an undue burden on developers, for example it is unreasonable to require all energy to come from on-site renewables.

5.72 Following on from PPS22 the Planning and Energy Act 2008 now enables local planning authorities to legally set requirements for energy use and energy efficiency in development plan documents. A local planning authority may require a proportion of energy used in development in their area to be energy from renewable sources or low carbon energy in the locality of the development and may require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. Policies included in development plan documents must not be inconsistent with relevant national policies for England. Within the National Park, policies would need to be consistent with the purposes of national park designation under the Environment Act.

5.73 PPS7 - Sustainable Development in Rural areas, re-affirms the regard that must be had to the statutory designation of the national park and states that, "*Planning Authorities should continue to ensure that the quality and character of the wide countryside is protected and, where possible, enhanced. They should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.*" With regard to development for renewable energy PPS7 states that Local Authorities should provide for sensitive exploitation of renewable energy resources in accordance with the policies set out in PPS22.

5.74 PPS22 recognises the special status of national parks and considers that there should be scope for small scale developments to be permitted within such areas. It expects regional planning bodies and local planning authorities to detail *the criteria based policies which set out the circumstances in which particular types and sizes of renewable energy developments will be acceptable in nationally designated areas.*

5.75 The NPA is exploring the scope for requiring on-site contributions of renewable energy along the lines of the 'Merton Rule'. The London Borough of Merton was, in 2003, the first local authority in the UK to include a policy in its Unitary Development Plan requiring renewable energy infrastructure to provide a proportion of predicted energy needs of new development. The Peak Sub-area Climate Change Study, commissioned in October 2008

and based on landscape character assessment and capacity study, will give us an evidence based approach to help us determine an appropriate level of on-site contributions within the National Park in line with the requirement set out in PPS22.

5.76 As an example of a nationally recognised target for renewable energy Merton's policy wording is, *"The council will encourage the energy design of buildings and their layout and orientation on site. All new non residential developments above a threshold of 1,000sqm will be expected to incorporate renewable energy production equipment to provide at least 10% of predicted energy requirements. The use of sustainable building materials and the re-use of materials will also be encouraged, as will the use of recycled aggregates in the construction of buildings. This will be subject to the impact on the amenity of the local environment, taking into account the existing character of the area."* The justification for the Merton Rule points out that where the incorporation of renewable energy equipment would make the development unviable it will not be expected.

5.77 The Draft RSS8 does not give a target for renewable energy specifically from within the National Park. It confirms that, *"the Peak District National Park is a unique asset, not only for the people who live and work there, but also for the East Midlands, surrounding Regions and the nation as a whole. National Park designation confers the highest status of protection for landscapes and scenic beauty."*

5.78 The current Regional Spatial Strategy sets a target for the Derbyshire area of 223.93 Giga-watt hours per year for electricity generation from renewables for 2010 and a target of 2495.12 Giga-watt hours per year for the East Midlands Region as a whole. The Draft RSS8 Report of the Panel for the Examination in Public in July 2007 notes that the overall target of 6.4% by 2010 appears to be a reduction from the 10.6% in the approved RSS8 but notes that the previous target included a contribution from offshore wind. The panel concluded that the 6.4% target is appropriate and recommended no change to the figure.

5.79 The Report of the Panel for the Examination in Public for the Draft RSS8 pointed out that there is a need for further work to be carried out in terms of sub-regional assessments to ascertain the capacity of the sub-regions to accommodate the different technologies and how each area can contribute to achieving the regional target to assist the production of broad sub-regional targets.

5.80 The findings of Peak Sub-area Climate Change Study, which has been supported by the East Midlands Regional Assembly, will show from the data available the overall installed renewables in the PDNP and assess the level of renewable energy achievable within the sub-area under different scenarios which will assist in developing criteria for setting a target.

5.81 The Draft East Midlands Regional Spatial Strategy with the Secretary of State's Proposed Changes July 2008 sets out the Regional Spatial Priorities in the Peak Sub-area which include helping to secure the conservation and enhancement of the PDNP respecting the statutory purposes of its designation, addressing the social and economic needs of the Park's Communities and protecting and enhancing natural and cultural heritage of the sub area in particular the Peak District Moors Special Protection Area, Special Areas of Conservation covering the Peak District Dales.

5.82 The Draft East Midlands Regional Spatial Strategy expects development for low carbon energy generation needs to respect the statutory designation of the national park whilst helping to meet national energy targets. The draft regional plan sets out points to consider when establishing criteria for onshore wind energy. These include the use of local LCAs to assess landscape and visual impact and the effect on the natural and cultural environment, historic assets and their settings (including biodiversity, the integrity of designated nature conservation sites of international importance and historic assets and their settings). The Draft Regional Spatial Strategy states that, "*assessments should be based on relevant information, for example, relating to bird movement patterns. Such policies should concentrate on mitigating potentially adverse effects and encouraging co-operative planning of infrastructure, for example 'cable sharing'.*"

5.83 The Draft RSS8, in Policy 38 (Regional Priorities for energy reduction and efficiency), makes the following comments with regard to the Peak Sub-area, "*The Sub-area is mainly within or close to the Peak District National Park and large scale renewable generation will always be difficult to accommodate as a result. However there are many opportunities for small scale hydro and some opportunities for small wind generation. The Peak District National Park Authority has produced supplementary guidance to encourage appropriate renewable energy installations.*"

5.84 Two options were put forward for the Spring 2007 Consultation, "*Require all new development to incorporate some on-site renewables to supply a proportion of its energy needs (subject to sensitivity of buildings and their place within the landscape or settlement)*" and "*Retain current approach which seeks to encourage sustainable practices but focuses principally on conservation objectives.*"

5.85 Key options in line with more recent government guidance were missing and therefore three more options were explored with stakeholders. One option has been put forward in order to consider the energy hierarchy and the two further options were added to include a Merton style approach for on-site renewable energy generation equipment to off-set a percentage of the predicted carbon emissions of the development. Following consultation with stakeholders a fifth option was added but this has not been the subject of sustainability appraisal.

Option CC 3.1

Require all new development to incorporate some on-site renewables to supply a proportion of its energy needs (subject to sensitivity of buildings and their place within the landscape or settlement)

Impact of Evidence and Consultation

The plans are on course for adoption by the time Code for Sustainable Homes will be part of Building Regulations in 2010. The evidence base provided by the sub-area climate change study will inform the Peak District National Park Authority as to whether there is the capacity to require all new development to incorporate some on-site renewables to supply a proportion of its energy needs, subject to sensitivity of buildings and their place within the landscape or settlement, and what that proportion should be. There

is the possibility that demanding standards higher than those of new building regulations would conflict with the need for affordability or compromise built heritage conservation. Furthermore require the policy to relate to all new development could be considered as not proportionate in terms of minor development and contrary to advice in PPS1.

Sustainability Appraisal

The Sustainability Appraisal considered that this option has the potential to have a beneficial effect in terms of tackling climate change whilst still protecting the landscape character and historic environment of the area.

5.86 The Peak sub-area climate change study will assess the capacity of the National Park for renewable energy development and carbon emission reduction and will inform the policy.

Further Suggestions from Initial Consultation on Refined Options

5.87 Stakeholders at the 2008 Workshop considered that the issue was reasonable except that it should encourage the reduction in greenhouse gases and follow the energy hierarchy with energy reduction and efficiency before the incorporation of renewables. It was considered by stakeholders that the energy hierarchy should be introduced much earlier as a general pro-active and encouraging principle and that the issue should be to reduce the carbon footprint of development and be entitled 'The energy hierarchy and the use of on-site renewables'. They therefore considered that there should be a separate option, before any reference to on-site renewables, with the aim of reducing greenhouse gas emissions / minimising CO₂ emissions and which should refer to the energy hierarchy. Stakeholders wondered whether the proportion of energy required should be specified or whether it would encourage developers to provide the minimum. They thought it useful that a sub-regional climate change study has been commissioned to provide an evidence base to inform this option.

Option CC 3.2

Require any new development other than those listed below to supply a proportion of their energy needs by renewable energy or to require energy and water efficiency measures above the requirements of the current Building Regulations or by reference to the Code for Sustainable Homes

(subject to sensitivity of buildings and their place within the landscape or settlement)

Exceptions

- **Development for affordable housing**
- **Conversions of traditional buildings to affordable housing**

- **Conversions of listed buildings**
- **Extensions to existing buildings including by conversion**
- **Farm buildings with a low energy output**
- **Other buildings exempt under SI 2007:991, The Energy Performance of Buildings (Certificates and Inspections) (England and Wales) 2007**

Impact of Evidence and Consultation

Exceptions listed under this policy option highlight the different issues that may need to be addressed if it is not considered appropriate in a national park context for all development to off-set a proportion of the predicted carbon emissions. Energy efficiency in affordable housing is important to reduce fuel poverty but it is also important not to reduce the supply of affordable housing by putting too many financial constraints on the developer. An increasing level of energy efficiency is being addressed over time through the Building Regulations. Affordable housing by a Housing Provider is already required to meet the higher standards of the Code for Sustainable Homes.

For listed buildings any requirement by the Authority for energy efficiency measures above the requirements of the current Building Regulations or for proportion of energy need to be supplied by renewable energy could be inappropriate.

The Climate Change Study commissioned by the National Park Authority with the sub-region will inform means by which to secure a reduction in carbon emissions and greater energy efficiency. It should set out the level of carbon reduction that can be anticipated with spatial criteria for appropriate scale and siting of renewable energy installations.

Sustainability Appraisal

The Sustainability Appraisal found that major development would need to be defined more clearly and that this option should be stronger and require all new development to meet this target.

5.88 Paragraph 1.4.4 of the Draft RSS8 states that, "*Paragraphs 30-33 of the Climate Change PPS recognise that there will be situations where it could be appropriate for local planning authorities to anticipate levels of building sustainability, for identified development areas or site-specific opportunities, in advance of those set out nationally. The Draft RSS8 makes clear that local planning authorities must be able to demonstrate the local circumstances that warrant and allow this and that any local requirement must be set out in a development plan document to ensure it is properly tested. It also makes clear that local requirements should be specified in terms of achievement of nationally described sustainable buildings standards (the Code for Sustainable Homes in the case of housing).*"

5.89 New development of significant scale is limited within the National Park but currently the Authority has no means by which to require developers to contribute to reduction of CO² levels within the region or to improve the energy or water efficiency of development. Providing the proposed development would be in accordance with National Park policy and statutory purposes this new option would allow the NPA to contribute to CO² reductions and climate change mitigation within the region without compromising affordability of affordable housing or built heritage conservation.

5.90 For proposals meeting the criteria for replacement dwellings within the National Park there has been no requirement under policy to ensure the incorporation in the scheme of energy and water saving methods. This has meant that opportunities for sustainable development such as the incorporation of heat pumps and grey water recycling, have been missed.

5.91 The conversion of detached traditional buildings to holiday cottage accommodation and to ancillary domestic accommodation present opportunities to enhance the energy efficiency of the building and/or to reduce carbon emissions whilst conserving and enhancing the building.

5.92 Non residential buildings that would be covered by this policy option would include community/day centres, emergency services, hotels, industrial process building, laundrettes, libraries/museums/galleries, miscellaneous 24 hour activities, IT/ data/call centres, nursing/residential homes and hostels, offices, primary health care buildings, restaurants/public houses, retail, retail warehouses, primary schools, secondary schools, social clubs, sports/leisure centres, sports grounds, arenas, telephone exchanges, theatres/cinemas/music halls and auditoria, warehouse and storage and workshops/maintenance depots.

5.93 Non-residential buildings that would be exempt under SI 2007: 991 would include places of worship, temporary buildings with a planned time of use less than two years, stand alone buildings with a total useful floor area of less than 50m² that are not dwellings, industrial sites, workshops and non-residential agricultural buildings with very low energy demand.

Further Suggestions from Initial Consultation on Refined Options

5.94 Stakeholders considered that the option for certain types of development to supply a proportion of their energy needs by renewable energy or to require energy and water efficiency measures above the requirements of the current Building Regulations or by reference to the Code for Sustainable Homes, should mention reducing greenhouse gas emissions. Some stakeholders considered that this option provided a good balance, others considered that it could lead to fuel poverty issues in single affordable homes and that energy and water efficiency is important for all development. Stakeholders considered that it is possible to achieve energy efficiency in listed buildings and conversions and did not see why listed buildings and conversions should be included in the exceptions. They also thought that affordable housing should be included where a registered social landlord is not involved. Stakeholders wondered whether extensions to existing properties could also be required to support a proportion of their energy needs by renewable energy or provide energy and water efficiency above the current Building Regulations.

Option CC 3.3

Retain current approach which seeks to encourage sustainable practices but focuses principally on conservation objectives

Impact of Evidence and Consultation

This option is in line with guidance in the Authority's Design Guide (Supplementary Planning Document) to promote sustainable design principles. The inclusion of micro-renewables in new development would be market led and therefore would not impact on the affordability of small scale affordable housing development.

Sustainability Appraisal

The Sustainability Appraisal considers that this option is a missed opportunity in tackling climate change, reducing the consumption of natural resources and also taking advantage of the economic opportunities that renewable energy can bring.

5.95 Part L1A of the Building Regulations for the conservation of Fuel and Power in new dwellings which came into force in April 2006 has set out more stringent energy efficiency requirements

Further Suggestions from Initial Consultation on Refined Options

5.96 Stakeholders considered that retaining the current approach which seeks to encourage sustainable practices but focuses principally on conservation objectives is too loose as an option and not pro-active enough.

5.97 In the absence of findings from the Climate Change Study, based on the findings from Dartmoor National Park the PDNPA would welcome responses to a new option.

Option CC 3.4

Major development will be expected to provide on-site renewable energy generation equipment to off-set at least 20% of the predicted carbon emissions of the development, unless impracticable because of technical, landscape or environmental reasons

(Major development is ten or more houses to be constructed (or if the number is not given, the area is more than 0.5ha) For all other uses where the floor space will be 1,000sq. m or more (or site is 1 ha or more) floor space is defined as the sum of the floor area within the building)

It is not considered unreasonable to expect major development to provide on-site renewable energy generation equipment to off-set at least 20% of the predicted carbon emissions of the development, unless impracticable because of technical, landscape or environmental reasons.

Impact of evidence and Consultation

It is not considered unreasonable to expect major development to provide on-site renewable energy generation equipment to off-set at least 20% of the predicted carbon emissions of the development unless impracticable because of technical, landscape or environmental reasons. The threshold for renewable energy development as major development is a means of ensuring that requirements for energy generation do not prevent the provision of small scale affordable housing by requiring a contribution to reducing carbon emissions.

Sustainability Appraisal

The Sustainability Appraisal considers that the option should be stronger and all new development should be required to meet this target. sequential approach of the energy hierarchy should be employed to ensure that the minimum scale of renewable energy is required for each development.

5.98 This option is the same as the core strategy adopted by Dartmoor and is based on EU Directive 2002/91/EC for the promotion of electricity from renewables. As part of the European Parliament's Resolution on Climate change Parliament supported the proposal of a binding target to increase the level of Renewable energy to 20% by 2020 as a good starting point. Building costs are higher in the National Park because of the high standard of design and building materials.

5.99 The Draft RSS8 in Section 1.4.3 states that, "In securing a proportion of energy from decentralised and renewable or low-carbon sources, the Planning Policy Statement -Planning and Climate Change (which supplements PPS1) expects development plan documents to include policies which promote and encourage a proportion of the energy supply of new development to be secured from decentralised and renewable or low-carbon sources. In the interim period, before Development Plan Documents are in place, all new developments of more than ten dwellings, or for others uses exceeding 1,000m² floor space, should secure at least 10% of their energy from decentralised and renewable or low-carbon sources unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, this is not feasible or viable."

Further Suggestions from Initial Consultation on Refined Options

5.100 Stakeholders considered that the option for major development to provide on-site renewable energy generation equipment to off-set at least 20% of the predicted carbon emissions of the development, unless impracticable because of technical, landscape or environmental reasons is a necessary option. One suggestion to broaden the scope was that a fund for community renewables be set up with smaller developments paying into it.

Option CC 3.5

Should policy foster and promote a sequential approach to energy hierarchy to ensure best practice approach in delivering national park purposes:

- **Reduce the need for energy**
- **Use energy more efficiently**
- **Use renewable energy**

This option could include reference to the Code for Sustainable Homes

Impact of Evidence and Consultation

The promotion of the energy hierarchy is important as a first principle. It is therefore considered that the issue should be entitled 'The energy hierarchy and the use of on site renewables'

Sustainability Appraisal

Sustainability Appraisal considers that this approach should always be promoted with regards to renewables.

5.101 This option is in line with the Draft Regional Spatial Strategy and the SPG and will be informed by the Climate Change Study that has been commissioned by the sub regional partnership.

Further Suggestions from Initial Consultation on Refined Options

5.102 It was considered by stakeholders that the energy hierarchy should be introduced much earlier as a general pro-active and encouraging principle and that the issue should be to reduce the carbon footprint of development.

Option CC 3.6

All development should seek to reduce greenhouse gases by following the energy hierarchy in reducing the need for energy, using energy more efficiently and then using energy from renewables

5.103 We welcome your comments on these options.

Issue CC4

Issue CC 4

Flood Risk Reduction and Water Conservation

5.104 PPS 25 requires that Local Planning Authorities prepare and implement planning strategies that help to deliver sustainable development by:

- *Appraising risk - identifying land at risk and the degree of risk of flooding from river, sea and other sources in their area , preparing Regional Flood Risk Appraisals (RFRAs) or Strategic Flood Risk Assessments (SFRAs) as appropriate, as freestanding assessments that contribute to the Sustainability Appraisal of their plans*
- *Managing risk - framing policies for the location of development which avoid flood risk to people and property where possible, and manage any residual risk, taking account of the impacts of climate change; only permitting development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and benefits of the development outweigh the risks from flooding*
- *Reducing risk- safeguarding land from development that is required for current and future flood management, for example conveyance and storage of flood water, and flood defences; reducing flood risk to and from new development through location, layout and design, incorporating sustainable drainage systems (SUDS); using opportunities offered by new development to reduce the causes and impacts of flooding e.g. surface water management plans; making the most of the benefits of green infrastructure for flood storage, conveyance and SUDS; re-creating functional floodplain; and setting back defences.*

5.105 The Draft RSS8 in policy 35 sets out the regional approach to managing flood risk. LDFs and the strategies of relevant public bodies should take account of the potential impact of climate change on flooding and land drainage. In particular, they should:

- *be informed by SFRAs in order to evaluate actual flood risk*

- *include policies which prevent inappropriate development either in, or where there would be an adverse impact on, the coastal and fluvial floodplain areas*
- *deliver a programme of flood management schemes that also maximise biodiversity, provide townscape enhancement and other public benefits and*
- *require sustainable drainage in all new developments where practicable.*

5.106 Development should not be permitted if, alone or in conjunction with other new development, it would:

- *be at unacceptable risk from flooding or create such an unacceptable risk elsewhere*
- *inhibit the capacity of the floodplain to store water*
- *impede the flow of floodwater in a way which would create an unacceptable risk elsewhere*
- *have a detrimental impact upon infiltration of rainfall to ground water storage*
- *otherwise unacceptably increase flood risk and*
- *interfere with coastal processes.*

5.107 However, such development may be acceptable on the basis of conditions or agreements for adequate measures to mitigate the effects on the overall flooding regime, including provision for the maintenance and enhancement of biodiversity. Any such measures must accord with the flood management regime for that location.

5.108 With regard to water conservation, water supply is a vital resource within the National Park not only for its inhabitants and visitors but also for the wider region. Surface water abstraction from rivers and reservoirs provides a large proportion of the East Midlands public water supply. Water is supplied to the major urban regions from the Derwent Valley (Ladybower Reservoir to Leicester and Derby). The river Derwent is a major source of drinking water. Extraction of water from aquifers has reduced that available to support base flow and wetland habitats. Many aquifers in the East Midlands are now considered to be fully committed to existing water abstractions and most of the surface catchments are fully licensed in the summer. The water companies are forecasting a reduction in Water Available for Use (WAFU) as a result of planned groundwater licence reductions (to alleviate stressed aquifers) and in response to climate change. Increased temperatures and changing rainfall patterns could lead to reduced water available for use in the Region.

5.109 Research has been undertaken in the East Midlands to consider the relationship between land use, soil management and water management. It proposes the creation of so called 'spongy landscapes' across parts of the Region. These would act as landscape scale sustainable drainage systems. 'Spongy landscapes' offer potential major benefits in terms of water resource management, limiting flooding and soil loss, landscape scale habitat creation and management, restoration of historic landscapes and the conservation of wetland archaeology. The PDNP's Moors for the Future project is playing a key role in moorland restoration, land and water management.

5.110 Policy 32 of the Draft RSS8 Secretary of State's Proposed Changes set out the Regional Approach to Water Resources and Water Quality and states that, '*Local Authorities, developers, water companies, the Environment Agency and other relevant public bodies should work together to:*

- *take water related issues into account at an early stage in the process of identifying land for development and in the phasing and implementation of development*
- *assess the scope for reducing leakage of public water supply from current levels*
- *promote improvements in water efficiency in new development and in regeneration to achieve a regional target of 25% (equivalent to an average saving of about 35 litres per person per day)*
- *reduce unsustainable abstraction from watercourses and aquifers to sustainable levels*
- *protect and improve water quality and reduce the risk of pollution especially to vulnerable groundwater*
- *protect the integrity of nature conservation sites designated as being of international importance, particularly through the phasing of development to match the availability of water resources*
- *make provision for the development of new water resources where this represents the most sustainable solution to meeting identified water resource requirements, taking account of predictions of future climate change*
- *use sustainable drainage techniques wherever practical to help mitigate diffuse pollution and support groundwater recharge. These will be required where development is upstream of a designated nature conservation site of international importance or to improve water quality, where the need is demonstrated through water cycle studies*
- *support water conservation measures such as winter storage reservoirs on agricultural land and*
- *ensure that sewage treatment capacity is sufficient to meet the needs of development. Necessary improvements should be in place so that development does not compromise the quality of discharged effluent.*

5.111 Changing rainfall patterns, including more extreme rainfall events, could lead to changing patterns of flooding and associated damage to land and property in the Peak District. The Peak sub-area SFRA sets out likely climate change impacts of changes to Flood Zones and flood probabilities and states that, "*In the upland areas which characterise the Peak Sub-Region, an increase in flood extent is not expected, however, flood water may become deeper and faster flowing. This means that the flood hazard is likely to increase over time, creating increased risk to humans, more damage to property and higher economic damages.....It is expected that flood risk from surface water, sewers and groundwater will generally increase due to the expected wetter winters (causing more frequent groundwater flooding) and incidence of short-duration high intensity rainfall events associated with summer convective forms (causing more frequent surface water and sewer flooding).*"

5.112 The SFRA states that, "*Surface water flooding is known to be a significant problem within the Peak District National Park due to the steep topography and underlying impermeable geology. This can be made worse by local insufficient drainage capacity.*"

5.113 The Catchment Flood Management Plan (CFMP) sets out long term policies for sustainable flood risk management. The River Trent catchment and its tributaries are divided into ten policy units. The policy unit which covers the PDNPA is Policy Unit 3. CFMP Policy Unit 3 has been allocated one of six standard flood risk management policies - Policy Option 6 - "*Take action to increase the frequency of flooding to deliver benefits locally or elsewhere, which may constitute an overall flood risk reduction (for example for habitat inundation).*" The SFRA explains that, "*This means that opportunities to provide increased flood storage and attenuation*

areas should be explored in order to realise benefits downstream..... Areas which currently exist as undeveloped floodplain and any natural flood storage areas should remain intact in order to continue to provide the flood storage and conveyance areas which help to mitigate flood risk downstream."

5.114 The SFRA states that, "Any development in these very important floodplain areas has the potential to increase flood risk downstream by displacing flood water and reducing flood storage." The Authority can therefore help to deliver this Policy Option by safeguarding these areas from development.

5.115 The PDNP's Moors for the Future project for moorland restoration is currently working to reduce runoff to large areas downstream, including improving storage through land and water management.

5.116 When major development is proposed by developers in areas of flood risk there is a set consultation procedures to be carried out. For minor development proposed in areas of flood risk and standard guidance including consultation with the Environment Agency.

5.117 As part of the amendment to Article 10 of the Town and Country Planning (General Development Procedure) Order 1995 which came into force, on 1 October 2006, Planning Authorities are required to consult the Environment Agency on all applications for development in flood risk areas (except minor development), including those in areas with critical drainage problems and for any development on land exceeding one hectare outside flood risk areas.

5.118 With regard to the prevention of surface water run-off from development, from October 2008 Class F of the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 requires that, "*where a hard surface would be situated on land between a wall forming the principle elevation of the dwelling house and a highway and the area of ground covered by the hard surface, or the area of hard surface replaced, would exceed 5 square metres either the hard surface shall be made of porous materials, or provision shall be made to direct run-off water from the hard surface to a permeable or porous area or surface within the curtilage of the dwelling house.*"

5.119 Two options were put forward for consultation in Spring 2007 and are therefore brought forward for this consultation, although the option to only locate development in areas of no flood risk is contrary to Government guidance in PPS25. Two further options have been put forward following consultation with stakeholders in September 2008.

Option CC 4.1

Only locate new development in areas of no flood risk

Impact of Evidence and Consultation

This is desirable but not always achievable as several existing industrial development sites are in flood risk areas. This option is also contrary to guidance in PPS25 which aims to help deliver sustainable development by appraising risk, managing risk and reducing risk. The option is therefore considered inappropriate.

Sustainability Appraisal

Sustainability appraisal considers that this option will significantly benefit the natural environment and assist adaptation to climate change but that it would have a negative impact on development.

Further Suggestions from Initial Consultation on Refined Options

5.120 Stakeholders in the September 2008 Workshop considered that the policies represented a reasonable approach but that Flood Risk Reduction and Water Conservation should be two separate policies. Some stakeholders considered that Flood Risk defence should be included in the title. Stakeholders also considered that there should be some reference to grey-water re-cycling and that the Water Hierarchy should be an overarching policy.

5.121 Stakeholders considered that the option 'Only locate new development in areas of no flood risk ' is against national policy guidance in PPS25 and thought that it should be removed.

Option CC 4.2

Locate new development in least risky areas, giving highest priority to Flood Zone I and to locating the most vulnerable elements of a development in the lowest risk areas

Build resilience into a site's design (e.g. flood resistant or resilient design, raised floor levels)

Promote environmental stewardship schemes to reduce water and soil runoff from agricultural land

Incorporate sustainable drainage and water conservation schemes, provided that ground conditions are appropriate

Impact of Evidence and Consultation

This option is in accordance with PPS25, current practice, guidance from the Environment Agency and the Strategic Flood Risk Assessment carried out in liaison with the Environment Agency and therefore it is considered to be the most appropriate option. It is considered appropriate to have a separate policy for water conservation.

Sustainability Appraisal

Sustainability Appraisal considers that this option takes a more pragmatic approach which is likely to have more balanced benefits

Further Suggestions from Initial Consultation on Refined Options

5.122 Stakeholders in the September 2008 workshop considered that the policies represented a reasonable approach but that Flood Risk Reduction and Water Conservation should be two separate policies. Some stakeholders considered that Flood Risk defence should be included in the title. Stakeholders also considered that there should be some reference to grey-water re-cycling and that the Water Hierarchy should be an overarching policy.

Option CC 4.3

Sustainable drainage and water conservation schemes such as grey water recycling will be required in major development and encouraged in smaller scale development provided that ground conditions are appropriate and the development respects national park purposes

5.123 The Draft RSS8 in Policy 32 sets a target of 25% for an improvement in water efficiency in new development, equivalent to a saving of some 35 litres per person of water daily.

Option CC 4.4

A significant contribution to water efficiency in new development will be required in the case of major development and encouraged in smaller scale development unless this is contrary to national park purposes

5.124 We welcome your comments on these options.

Issue CC5

Issue CC 5

Impact of climate change on land management, biodiversity and air quality

5.125 The blanket bogs or mires of the Peak District are part of a U.K. resource which is globally restricted and hence of international importance for nature conservation. It is one of the most extensive semi-natural habitats in the U.K. which supports around 10-15 % of the global resource. A large part of the blanket bog and associated moorland vegetation communities are found on the higher ground in the northern part of the Dark Peak Natural Area and parts of the South West Peak Natural Area. The Peak District contains the most southerly and easterly blanket peat bogs in the UK, including the extensive plateaux of Kinder and Bleaklow, for example there are 9km² of bog at Kinder going down to a depth of 3 or 4 meters representing a huge amount of carbon. The Peak is effectively where the south-east type climate of the UK finishes and the north-west type climate starts. Hence, landscapes and biodiversity could be highly sensitive to even a slight change in temperature and rainfall. Climate change could just 'tip the balance' to make the bog unstable. The blanket of jelly-like peat on the summits depends on relatively high and clean rainfall. Wetter winters under climate change would certainly help the bogs but higher temperatures and drier conditions result in fungal and bacterial decomposition which releases carbon. The impacts of climate change upon the blanket peat bogs would therefore depend on the precise balance between higher rainfall and higher temperatures.

5.126 Peatlands are the single largest carbon reserve in the UK. With around 3 billion tonnes of carbon more carbon is stored in UK peat than in the forest of Britain and France combined. The entire UK woodland estate contains only around 150 million tonnes of carbon in comparison. Between 40-50% of UK soil carbon is stored in 8% of its land area. This is equivalent to 20 years of UK CO² output. The Peak District moorlands store between 16 and 20 million tonnes of carbon. Peat bogs can actively sequester carbon. Scientists from Durham estimate that all of the peatlands in England and Wales could absorb around 400,000 tonnes of carbon a year if in pristine condition. The Peak District moorlands have the potential to sequester up to 13,000 tonnes of carbon per year (Peak District Moorland Carbon Flux – Moors for the Future Research Note 12 , 2007).

5.127 Moorland restoration for carbon has multiple public benefits:

- **Improvement of biodiversity**
Peatland restoration can help to enhance wildlife habitats and restore species diversity.
- **Reduction in water colour**
Water companies spend millions of pounds removing colour from water coming from upland catchments. Strong evidence suggests peatland restoration can significantly reduce colouration.
- **Reduction in flood events and sedimentation**

Peatland drainage in particular has been blamed for down-stream flash flooding (such as in York) and sedimentation of salmon spawning beds

- **Reduction in wildfire risk**

Degraded peatlands are at high risk to accidental wildfires. Fires severely damage long term carbon stocks and fire fighting costs the UK economy more than a million pounds each year.

- **Improvement of natural beauty and recreational value**

Uplands are among the most popular tourist destinations. Tourism is one of the main income streams to upland communities. These issues have significant economic impacts, which could be mitigated through large-scale restoration of peatland substream.

5.128 The hotter summers predicted as a result of climate change could result in stresses upon moorland habitats and agriculture, an increase in moorland fires, damage to buildings through subsidence, as soils dry out due to higher temperatures and lack of water, changes in the sorts of plant and animal species found and changes in the types of crops grown. Increased temperatures could have the effect of attracting more people to visit leading to more erosion of PDNP's landscape, as well as causing greater congestion due to increased traffic.

5.129 The supporting text for policy 26 the draft Regional Spatial Strategy recognises that:

- *"The Peak District National Park and the Lincolnshire Wolds Area of Outstanding Natural Beauty are unique national and regional assets. However, the area of nationally designated landscapes in the East Midlands is the lowest of all the English regions. Pressures from a variety of sources are leading to an overall trend of erosion in the unique mix of landscape types."*

5.130 The Secretary of State's proposed changes to RSS8 recognise that, *"International designations for nature conservation include Special Areas of Conservation, Special Protection Areas and Ramsar List of Wetlands of International Importance. National sites also include National Nature Reserves and Sites of Special Scientific Interest. All these should be given the highest level of protection. Historic assets are also vital components of the Region's cultural heritage. They include the Derwent Valley Mills World Heritage Site, listed buildings, conservation areas, historic parks and gardens, registered battlefields, scheduled monuments and other archaeological sites of international, regional or local importance, together with other locally designated sites and historic landscapes."*

5.131 Policy 26 of RSS8 is as follows:

Protecting and Enhancing the Region's Natural and Cultural Heritage

Sustainable development should ensure the protection, appropriate management and enhancement of the Region's natural and cultural heritage. As a result the following principles should be applied:

- *the Region's internationally and nationally designated natural and historic assets should receive the highest level of protection*
- *neither direct nor indirect damage to EU designated Natura 2000 sites will not be permitted*
- *damage to other natural and historic assets or their settings should be avoided wherever and as far as possible, recognising that such assets are usually irreplaceable*

- *unavoidable damage must be minimised and clearly justified by a need for development in that location which outweighs the damage that would result*
- *unavoidable damage which cannot be mitigated should be compensated for, preferably in a relevant local context and where possible in ways which also contribute to social and economic objectives*
- *there should be a net increase in the quality and active management of natural and historic assets across the Region in ways that promote adaptation to climate change, and an increase in the quantity of environmental assets generally and*
- *the Region's best and most versatile agricultural land should be protected from permanent loss or damage.*

5.132 The two options below are the same as those put forward for the Spring 2007 consultation. They have been reviewed by stakeholders in September 2008 and have been the subject of sustainability appraisal.

Option CC 5.1

Continue to promote traditional techniques relating to land, air and biodiversity in order to conserve and enhance the valued characteristics of the National Park

Impact of Evidence and Consultation

This option does not take into account the impacts of climate change.

Sustainability Appraisal

Sustainability Appraisal considers that this option is likely to have beneficial effects on the natural environment but may have severe negative consequences in the long term.

Option CC 5.2

Providing opportunities for the beneficial management of strategic nature areas and other habitats and species to promote adaptation to climate change and to sustain their contribution to the mitigation of climate change

Impact of Evidence and Consultation

This option takes into account the impacts of climate change as required by PPS9- Biodiversity and Geological Conservation, which recognises that over time the distribution of habitats and species and geomorphological processes and features, will be affected by climate change and such change will need to be taken into account. This option is considered to be the most appropriate as it is also in line with Policy 26 of the Draft Regional Plan.

Sustainability Appraisal

Sustainability Appraisal considers that this option is likely to result in long term benefits for the natural environment.

Further Suggestions from Initial Consultation on Refined Options

5.133 Stakeholders from the 2008 workshop considered that the first option is not pro-active enough. They considered that land management techniques should be promoted to promote adaptation to climate change. They considered that land management techniques to retain water to prevent flooding and the identification of areas for flood storage are important cross cutting issues with Flood Risk Reduction and Defence. It was considered that identifying areas for linkages to ensure habitat connectivity should be mentioned. Other issues mentioned were retaining farming practice as a means to conserve wildlife and landscape and growing more food locally. Bio-change - the indicators of climate change from wildlife and habitats were considered important. The problem foreseen with these two options within the Stakeholder group is that most of the practices are not related to land use planning processes.

5.134 We welcome your comments on these options.

Issue CC6

Issue CC 6

The need for waste management facilities

5.135 Waste Management issues have been included under the broad heading of Climate Change because of the potential for carbon reduction by prudent use of resources, recycling and reduced transportation of waste. The 2007 consultation included three broad waste management issues which in retrospect could have been dealt with more simply.

5.136 PPS 10 Planning for Sustainable Waste Management sets out government policy on waste management including the overarching principle of the waste hierarchy- reduction, re-use, recycling and composting, energy recovery and disposal. Annex E sets out the locational criteria for testing suitability of sites including in Part C, "*the need to protect landscapes of national importance for example National Parks from visual intrusion.*"

5.137 The Peak District National Park Authority, whilst being a waste planning authority, is not responsible for collection or disposal of waste produced within the National Park. This is the responsibility of the constituent authorities. Within the PDNP there are around 31 recycling collection points operated by the constituent authorities often located in municipal car parks or in the car parks of public houses. Some such as Castleton Recycling

Collection Point which is located in the main car park offer a wide range of facilities - Glass, Paper, Textiles, Cans, Plastic Bottles, others are more limited such as Wetton Car Park where facilities are provided for the collection of paper only.

Option CC 6.1

Where a need is demonstrated and where no alternative exists which is less damaging to the National Park, the National Park Authority should seek to accept sites for waste management facilities to deal with waste arising from the National Park. In all cases the sites must be environmentally acceptable, including in the national park context

Impact of Evidence and Consultation

This option is considered to be in line with the Draft RSS, recognising the statutory purpose to conserve the National Park with the management of most waste dealt with by constituent authorities but allowing for small scale recycling collection points in the local context.

Sustainability Appraisal

Sustainability Appraisal considers that there may be positive effects on the economy providing jobs in recycling and recovery facilities. However there may be negative effects on the natural environment through adversely affecting biodiversity, soil, water and air quality depending on the type of waste management facilities proposed.

5.138 The Draft East Midlands Regional Spatial Strategy for Peak Sub-area sets out the criteria for waste management within the National Park, "*The Peak Sub-area has a high quality environment, including the Peak District National Park, and smaller settlement size such that it would be inappropriate and unsustainable for the sub-area to make a significant contribution to the provision of waste management infrastructure in the regional context. There is also limited commercial and industrial development within the National Park. However opportunities may arise, especially in the larger settlements outside the National Park to accommodate small-scale facilities serving the Sub-area's needs. Where these will not have a significant adverse effect on the environment and local communities, a positive planning approach should be adopted. This should be considered through the policies in the Derbyshire Waste Development Framework and the Peak District National Park Local Development Framework and through the development control process.*"

5.139 Derbyshire Joint Municipal Waste Management strategy of July 2006 (para 3.1) recognises the constraints on waste management due to the National Park's statutory designation and exceptional landscape quality, "*The planning policy of the Park, together with the Parks geological features, could place restrictions on the siting of waste management facilities, and this will need to be taken into consideration in the development of the Waste Strategy.*"

5.140 Similarly Staffordshire County Council and Stoke-on-Trent City Council Joint Municipal Waste Management Strategy which was adopted in February 2008 give consideration to the statutory designation of the national park, "*To the north east of the county there is also the Peak District National Park whose planning policy together with its geological features could place restrictions on the siting of waste management facilities, and this will need to be taken into consideration in the development of the waste strategy.*"

Option CC 6.2

Create a policy presumption against all waste management facilities and consider it an unacceptable land use for a national park

Impact of Evidence and Consultation

This option would preclude the provision of small scale collection areas for recycling which already exist in the National Park and therefore it is considered inappropriate. This option should therefore be removed.

Sustainability Appraisal

The Sustainability Appraisal considers that this option is likely to be beneficial for the environment within the National Park however, waste will have to be dealt with in surrounding districts having a negative impact on the environment of neighbouring authorities

Further Suggestions from Initial Consultation on Refined Options

5.141 Stakeholders considered that use of the Waste Hierarchy as an overarching policy principle could be useful. It was also considered that storage for sorting and recycling within communities should be of an appropriate design in a national park context and that a separate policy or Supplementary Planning Document is needed for design and infrastructure. The European Union Framework Directive on Waste, the revised National Waste Strategy and PPS10 all promote a comprehensive hierarchical approach to waste management:

Option CC 6.3

Waste Management within the National Park should follow the waste hierarchy to protect the special qualities of the National Park

- **waste reduction;**
- **re-use**
- **recycling and composting**

- **energy recovery**
- **disposal**

5.142 We welcome your comments on these options.

Issue CC7

Issue CC 7

Environmentally acceptable sites for waste management facilities where need has been demonstrated and no alternatives less damaging to the National Park exist

5.143 This issue relates to the siting of necessary waste management facilities within the National Park where there are no better alternative sites.

Option CC 7.1

Identify specific sites likely to be developed for other uses where recycling of construction and demolition waste could take place on site in redevelopment

Impact of Evidence and Consultation

Recycling construction and demolition waste on site is good practice and in accordance with the waste hierarchy. Using the waste on site would be appropriate within the National Park provided it does not damage the landscape character. This option could be replaced by a general option that required on site recycling of construction and demolition waste for all development where appropriate in the national park context.

Sustainability Appraisal

The Sustainability appraisal considers that this option is also likely to have a beneficial impact on reducing the consumption of natural resources but that on site crushing of aggregates etc may cause noise and dust pollution, adversely affecting surrounding air quality, biodiversity, water and soil resources.

Option CC 7.2

Set out locational criteria that would be acceptable for waste management facilities (e.g. existing B2 industrial uses)

Impact of Evidence and Consultation

This option is not in accordance with government guidance, the regional spatial strategy or the Waste Strategies of the National Park's constituent authority's and should therefore be removed.

Sustainability Appraisal

The Sustainability Appraisal considers that this option may help to reduce natural resource consumption but that it does not take into account damage to the protected environment.

5.144 The PDNPA is not a waste collection or waste disposal authority. The use of specific sites, for example existing B2 industrial uses, for waste management facilities could encourage waste to be brought into the National Park from areas outside the National Park. The Draft RSS8 and the constituent waste collection and waste disposal authorities recognise that the Waste Strategy will need to take account of the National Park's statutory designation. It is more appropriate and in line with government guidance for waste management facilities to be sited outside the National Park where there is more scope in landscape terms.

Further Suggestions from Initial Consultation on Refined Options

5.145 Stakeholders at the 2008 Workshop considered that in the context of the RSS8 the second option was probably redundant and that it should be removed. They considered that the key issue was a close working partnership with constituent authorities responsible for waste management. A more general option was put forward.

Option CC 7.3

Construction and demolition waste including soils should be retained on site wherever possible, processed if necessary and incorporated into the development provided that there is no harm to the character of the National Park

5.146 We welcome your comments on these options.

Issue CC8

Issue CC 8

Waste arising from all development in the National Park

5.147 The European Union Framework Directive on Waste, the revised National Waste Strategy and PPS10 all promote a comprehensive hierarchical approach to waste management:

- waste reduction
- re-use
- recycling and composting
- energy recovery
- disposal.

5.148 The Draft East Midlands Regional Spatial Strategy in its Policy 37- Priorities for Waste Management, makes the following statement about the high quality environment of the National Park:

- *"The Peak Sub-area has a high quality environment, including the Peak District National Park, and smaller settlement size such that it would be inappropriate and unsustainable for the Sub-area to make a significant contribution to the provision of waste management infrastructure in the regional context. There is also limited commercial and industrial development within the National Park. However opportunities may arise, especially in the larger settlements outside the National Park to accommodate small-scale facilities serving the Sub-area's needs. Where these will not have a significant adverse effect on the environment and local communities, a positive planning approach should be adopted. This should be considered through the policies in the Derbyshire Waste Development Framework and the Peak District National Park Local Development Framework and through the development control process."*

Option CC 8.1

Construction and demolition waste including soils should be removed from site for disposal and treatment elsewhere

Impact of Evidence and Consultation

This option is contrary to guidance in PPS10 and the supplement to PPS1 and PPS1 as it does not meet sustainable development aims. It should therefore be removed.

Sustainability Appraisal

The Sustainability Appraisal considers that it is likely that this practice will increase the use of resources rather than promote their reuse and recycling and that therefore it is not sustainable.

Option CC 8.2

Construction and demolition waste including soils should be retained on site, processed if necessary and incorporated into the development

Impact of Evidence and Consultation

This option is in accordance with PPS10, the supplement to PPS1 and PPS1 but does not take account of regional guidance or the national park context. The retention of construction and demolition waste on site may not always be achievable in the National Park as it could lead to undesirable changes in the landscape if, for example, the ground levels were significantly altered or if there was a negative impact on soil, water or air quality in a sensitive environment.

Sustainability Appraisal

The Sustainability Appraisal considered that this option is likely to encourage a reduction in the consumption of natural resources with secondary benefits for the environment.

Option CC 8.3

Where development takes place waste materials arising from demolition, excavation or construction shall be reused within the same site using temporary on site processing if necessary, unless this is detrimental to the character of the National Park

Impact of Evidence and Consultation

This option is in accordance with PPS10, the supplement to PPS1 and PPS1. It meets the aims of sustainable development. This option is the most appropriate option as it takes into account the Waste Hierarchy, government and regional guidance on waste management and the National Park's statutory purposes, recognising that the National Park is a place of special protection as a result of its statutory designation.

Sustainability Appraisal

The Sustainability Appraisal considered that this option is likely to encourage a reduction in the consumption of natural resources with pronounced secondary benefits for the environment as the character of the National Park is considered.

5.149 We welcome your comments on these options.

Housing

6 Housing

Introduction

6.1 The National Park Management Plan 2006-11 (NPMP) Outcome 9 (People and Communities) includes, "*more affordable homes for those who need them,*" and consequent action includes:

- *identify sites and suitable buildings for affordable housing in designated settlements in line with established need, and*
- *develop close working linkage to the housing authorities, social landlords and financial institutions so that housing can be accessed by those most in need and a stock of social housing is developed and effectively managed for both current residents and future generations.*

6.2 Affordable housing is an important item in community strategies covering the National Park, and particularly that for Derbyshire Dales and High Peak. It is important to point out at the outset that whilst we are the local planning authority for the entire National Park, the nine District and Unitary Councils that cover the National Park are the Housing Authorities. So, through planning decisions based on policies in the forthcoming local development framework, we will control the acceptability of design and location of newly built houses and reused buildings: for both private and socially provided housing. We will also be able to restrict the occupancy of these to meet the needs of people in the locality. However, the District and Unitary Councils are responsible for drawing up housing strategies, advising the Homes and Communities Agency about local resource needs and priorities for social housing. Much of this is actually delivered and managed by social housing providers such as housing associations rather than by local authorities themselves. The responses to this consultation will be of use to all these bodies, who need to work together closely in order to coordinate their various responsibilities and ensure that affordable housing continues to be provided.

6.3 This theme looks at key issues for housing, arranged into three broad groups:

1. Strategic principles for housing

- Issue 1 The strategic role of the National Park in terms of housing provision and whether there should be targets. This issue only has one option.

2. Scale and type of delivery

- Issue 2 The degree to which the local need for affordable housing should be accommodated. This issue has two options.
- Issue 3 How best to provide additional affordable housing without endangering national park purposes. This issue has four options.
- Issue 4 Whether there should be targets in policy for different groups of people or types of tenure. This issue has seven options.

- Issue 5 How enhancement projects (including changes of use) might best deliver a larger proportion of affordable housing. This issue has three options.

3. **Location of newly provided housing, whether in new or existing buildings**

- Issue 6 Whether the Local Development Framework should identify sites for affordable housing. This issue has four options.
- Issue 7 Where priority should be given to 'buy-back' if this is implemented. This is where existing properties are bought as they come up for sale and then kept within the affordable housing sector. This issue has four options.

6.4 Further, more detailed discussion about whether to change the definition of local eligibility for affordable housing or details about their size is considered to be more suited to development control policies than the core principles that are being considered at the moment. Such matters will be turned to once core policies have been agreed.

6.5 The background describes how the current consultation has developed out of work over the past few years. To assist understanding of this relatively complex area for decision making, supporting background papers can be accessed via the Housing Theme evidence list at Appendix A.

Background

6.6 Consultation in 2004 revealed that almost 70% of respondents favoured restrictions on the occupancy of housing based on need arising within the National Park.

6.7 The 'Help Shape the Future' consultation (2005) recognised the importance of mixed and inclusive communities with a choice and range of housing, informed by a needs led approach. This was in the context of the East Midlands Regional Spatial Strategy in which the statutory purposes of national parks are emphasised and new housing in the National Park is required to fit into that context, being delivered by way of exception to a general restriction.

6.8 Options for housing included:

1. Developing the current approach but being more proactive and also securing more homes in settlements through the conversion of existing buildings
2. Considering the allocation of sites for affordable housing in the development plan currently 'rural exception' sites
3. Restricting all conversions to local need housing.

6.9 There was little direct comment on these options by respondents, but related consultation on the draft NPMP pointed to concerns about:

- assessing need across the whole National Park

- prioritising opportunities and 'take-up' by local people
- a variety of tenure including housing to let and both social and intermediate affordable housing
- restrictions or moratoria on second homes, open market sites and luxury homes or flats
- restricting house prices
- the needs of essential workers and the elderly (including opportunities to 'downsize' into bungalows)
- making sure that social housing providers or councils are offered land when it is for sale
- ensuring that any systems put in place work effectively - to make sure that new affordable housing continues (in perpetuity) to meet the locally arising need that justified its development.

6.10 In the 2007 Options Consultation the issues discussed were grouped under the following headings:

- Housing Delivery
- Key Workers
- Institutional Housing
- Gypsies and Travellers
- Defining the local eligibility for affordable housing

6.11 Responses were again relatively sparse. They were made in a broader context of clear support for national park purposes including conservation / enhancement of the landscape, wildlife and habitats. With a note of caution because of the low sample, they indicate:

- general agreement that more needs to be done to provide affordable houses to meet needs that arise locally, within the National Park
- an equal spread of views about whether this can be done within the current policy approach or would need more assistance from the open market (providing subsidy for social housing and / or starter homes)
- a general feeling that the definition of 'local' needs to be extended to avoid anomalies that are caused by the geography of parish boundaries, to offer a little more flexibility in the process including for those that have moved away from the National Park for study or work and now wish to return and those who are key workers, particularly where they contribute towards national park purposes
- support for a more restrictive approach towards conversions to housing, with a policy bias towards their use in the affordable sector, but with some recognition that this:
- might not be viable financially and

- might be more difficult that asking for a financial contribution towards affordable housing provision elsewhere in the National Park
- mixed views on the need for separate policies for nursing homes, sheltered housing or provision for Gypsy and Traveller sites, with a preference towards having them rather than not.

6.12 Since the 2007 consultation, additional evidence has been gathered or is almost completed in the form of:

- A Strategic Housing Needs Survey (2007) for Derbyshire Dales and High Peak
- A Joint Strategic Housing Market Assessment for the Peak Sub region (Derbyshire Dales and the High Peak Districts) - not complete at the time of writing, but available via the Housing Theme evidence list at Appendix A from the beginning of this consultation.
 - (both of these studies cover those parts of the National Park in the two Districts concerned. Comparable additional detailed evidence for other parts of the National Park outside Derbyshire is not available yet).
- A Strategic Housing Land Availability Assessment (SHLAA - not complete at the time of writing but is also expected to be available on our website from the end of January 2009. Please contact the Policy Planning Manager at the address given at the beginning of this document for an up to date statement on the status of this study). This will give a better idea of the availability of sites that might be suitable for housing in the short, medium and longer terms – subject to policy decisions by the National Park Authority (NPA).
- Government’s proposed changes to The East Midlands Regional Spatial Strategy (RSS8) have been published for consultation. These provide important insight into Government’s response to the findings of the Examination in Public held in the summer of 2007 and advance the review process towards completion.

6.13 The Housing Needs Survey has provided a valuable indication of the number of families in the area that can’t afford to find a solution to their housing needs in the open market. This has been used in the discussion below and detailed analysis is given in the Housing Needs Study Implications paper which can be accessed via the Housing Theme evidence list at Appendix A.

Issue H I

Strategic Principles for Housing

Issue H I

What is the overall strategic role for the National Park in terms of housing provision and should policy include targets for housing delivery?

6.14 Legislation (the Environment Act 1995) National Policy (Circular 12/96) and the East Midlands Regional Spatial Strategy (RSS8) are clear on the vision for and role of the National Park. They prioritise the achievement of national park purposes (conservation and enhancement / understanding and enjoyment) and state that development strategies in and around the Peak sub-area should help to secure these. Promoting social and economic well-being is not intended to outweigh or compromise national park purposes them. Instead it should be part of pursuing them. The National Park is a protected landscape and is not expected to contribute to specific regional or sub-regional targets for either the level population or for numbers of houses. Instead, the affordable housing needs of the Park's communities are to be addressed in the context of national park purposes. The Examination in Public into The East Midlands Regional Spatial Strategy tested and upheld this. In particular, it discounted the option of building open market housing (which would increase population levels) solely in order to generate funds for locally needed affordable housing.

6.15 The Government's response and proposed changes to the existing RSS8 maintain this policy approach. In particular, there is no suggestion that the Regional Plan will allocate a housing target to the National Park in a way that suggests a particular contribution to regional or sub-regional / sub-area housing need has to be met within it.

6.16 This position carries forward the strategic logic at the heart of the Structure Plan (1994), that a significant slowing of new development was necessary in order to hand on the National Park to future generations in a relatively 'undeveloped' state. The Regional Plan has affirmed this strategic vision and role. It is not, therefore, open to fresh debate in this consultation.

6.17 Although we did not specifically ask about this in the 2007 Consultation on Core Strategy Issues and Options, responses to other questions on housing also concentrated on meeting the local need for affordable housing and the Strategic Environmental Assessment supported this.

6.18 In this context, the possible drivers for new development (discussed in more detail as part of other issues in this chapter) are:

- **National park purposes, where housing is a necessary part of conserving and enhancing the National Park.** Common examples include the conservation of a valued building and treatment or enhancement of a site that detracts significantly from

the surrounding area, particularly where this requires a sufficiently lucrative scheme to enable a preferred solution.

- **Addressing housing need and the shortage of affordable housing.** This will help local people who cannot compete in the open housing market within the National Park. Applying the recently completed Housing Needs Survey (2007) to the Local Development Framework (LDF) plan period identifies that to offer adequate opportunities to those who can't afford to compete in the open market, some 575 (29 per yr) new affordable homes would be required throughout the entire National Park by 2026 (see the Housing Needs Survey Implications Paper which can be accessed via the Housing Theme evidence list at Appendix A). The actual rate of provision depends largely on government grant (through the housing corporation) in response to bids from District Council led housing strategies. The backlog of existing need could be dealt with more quickly if more resources are available.
- **A need for particular types of home generated by a changing population structure.** Needs generated by a changing population structure include those of key workers, for care homes for the elderly or infirm, and for particular sizes or tenures of home suited for example to single people or young families.

6.19 We recently commissioned population projections for the Peak sub-area and Peak, Dales and Park Housing Market area of the East Midlands . This was to improve understanding of the results of the strategic policy in the Regional Plan (see *Peak District National Park Population Context Paper in Housing theme evidence list in Appendix A*). These show that with fewer people in each household (in common with national trends) there will be fewer people in total. Meeting the backlog of need for affordable housing will result in a 6.7% smaller population by 2026, although the number of households will marginally increase. Any additional housing justified by enhancement would lessen the overall reduction.

6.20 The population projections also show that in common with other parts of the country (and rural areas in particular), there will also be an increase in older age groups and in the numbers of people in need of care. The labour force will reduce. However, this ageing profile is only slightly more evident in the National Park than in Derbyshire Dales outside the Park. They also show that increasing the number of homes does not build a way out of any problems that might be faced by service providers (health, social care etc). Providing more houses results in more people in the older and infirm groups, even though proportions appear more in keeping with sub-area norms. The social impact of these changes can be seen to be complex, difficult to predict and not necessarily problematic.

6.21 Together with enhancement sites, addressing the local need for affordable homes could increase opportunities for younger people and families to stay in the area, counteracting the overall trend. This will help to meet concerns about population balance that have been raised in consultations for Community Strategies and the NPMP.

Targets

6.22 The current RSS8 specifies only a notional or nominal 50 dwellings per year in the National Park, leaving much flexibility to circumstance such as rates of funding and opportunities for enhancement sites. This is in the context of not being part of a regional target to deliver a particular number of homes within the plan period or part of it. The draft

replacement RSS8 and the Examination in Public Panel Report, strengthened this position by recommending that the Regional Spatial Strategy should not contain any form of housing target at all for the National Park. Instead, housing in the National Park is to be in response to local need and all policy should help to achieve national park purposes. This has been accepted by Government in its published proposed changes.

6.23 Nevertheless, clarifying expectations for the future requires a quantified spatial vision to help understand the impact of future development, regard for resources and an estimate of the intended or likely scale of development against which implementation can be monitored.

6.24 The current Structure Plan achieved this and has been monitored successfully, using figures that are *neither a target nor a limit* (para 4.31). These figures are set out in the text of the plan but are not in policy, which concentrates on intention rather than quantity. Given the relationship (described above) between the National Park and the East Midlands Region this approach should be carried forward. It can be applied to the total plan period and/or to phased periods.

Option H 1.1

The spatial policy for housing in the National Park should be based upon:

- **national park purposes**
- **addressing housing need and the shortage of affordable housing**
- **a need for particular types of home generated by a changing population structure**

Figures dealing with the numbers of houses that may be provided should continue to be *neither a target nor a limit*

Impact of Evidence and Consultation

Legislation, national and regional policy lead clearly to this as the only reasonable option. It was not raised specifically in earlier consultation.

Sustainability Appraisal

The Sustainability Appraisal did not consider this point because there are no alternatives to weigh up.

6.25 We welcome your comments on these options.

Issue H2

Scale and Type of Delivery

Issue H 2

To what degree should the local need for affordable housing be accommodated?

6.26 Within the overall strategic role described in Issue H1, the East Midlands Regional Spatial Strategy (RSS8) is less specific about how far it is possible to meet the local need for affordable housing within the National Park. The detail on this point is left for us to determine in the light of principle, practicality and local circumstance.

6.27 The Housing Needs Survey (2007) can be used to identify both the backlog in and any newly arising need. This indicates a need for some 575 (29 per yr) affordable homes in order to arrive at a situation by 2026 where individuals and families who cannot afford open market housing are not disadvantaged unduly. Responses to the 2007 Consultation on Core Strategy Issues and Options concentrated on meeting the local need for affordable housing and supported encouraging more delivery within policy including lobbying for more resources to achieve this.

6.28 A Strategic Housing Land Availability Assessment (SHLAA) is underway at the time of writing and should provide an idea of the number of sites and houses that could be developed without serious harm to the National Park. It should be available on our website from the end of January 2009 (please contact the Policy Planning Manager at the address given at the beginning of this document for an up to date statement on the status of this study). Without that information, it is not possible to be clear about the consequences of meeting need in full. However, the statutory purposes of the national park are clear and our responsibility is to implement them. To disregard or compromise national park purposes would be contrary to strategic principles and is not, therefore, a reasonable option to be pursued in the Core strategy.

Option H 2.1

Meet need completely, regardless of national park purposes

Impact of Evidence and Consultation

Ignoring national park purposes and harming valued character would be contrary to law and to national and regional policy. It was not supported by the 2007 consultation.

Sustainability Appraisal

The Sustainability Appraisal identified potential negative effects on environment, natural resources, traffic congestion and greenhouse gas emission, but benefits to the local population by meeting local affordable housing need. Priority would still be needed for most sustainable use of land and reuse of existing buildings.

Option H 2.2

Meet need as far as possible up to the point that national park purposes become compromised

Impact of Evidence and Consultation

The preferable option in terms of legislation, compatibility with national and regional policy and consultation to date.

Sustainability Appraisal

The Sustainability Appraisal found that care would still be needed to ensure highest standards so that national park purposes are enhanced rather than compromised. This should go beyond landscape and townscape to include best practice in terms of water management, energy efficiency, and resource use considering issues such as light pollution and construction impacts.

6.29 We welcome your comments on these options.

Issue H3

Issue H 3

How best can we provide additional affordable housing without endangering national park purposes?

6.30 Current policy that allows the change of use of existing buildings in settlements to provide open market housing. The great majority of additional affordable homes are in newly built housing, on land which is a scarce commodity in the National Park and which needs to be used sparingly wherever possible. Using new land has an impact on the National Park's landscape and other valued characteristics and cannot continue indefinitely without harm. The SHLAA will help us to understand just how much of the need for affordable housing might be provided on newly developed sites during the next 15 years without harm. In the longer term however, it seems likely that the number of acceptable new sites will fall below the levels required to provide sufficient affordable houses. Unless a significantly more

developed landscape is desired (particularly in the White Peak) many places are full or almost full. This is a major consideration against which options for future housing provision must be considered. The strategic role of the National Park (see Issue H1) and references in the revised Draft East Midlands Regional Spatial Strategy to housing in all rural areas both emphasise the need to explore a variety of ways to provide affordable housing to put them into practise wherever possible.

Option H 3.1

Continue with virtually all newly built homes

Impact of Evidence and Consultation

The 2007 Consultation on Core Strategy and Options recorded support for this from one of the housing authorities on the basis that any additional costs incurred by buying back existing stock (Options H3.3 and H3.4) would reduce the amount of money available to provide affordable housing in areas outside the National Park. The Draft East Midlands Regional Spatial Strategy (RSS8) encourages other forms of provision to be explored.

Sustainability Appraisal

The Sustainability Appraisal found that placing emphasis on newly built homes is likely to have a positive effect on meeting local housing needs and on the local economy through providing employment for those locally in the construction industry, but with a negative environmental impact and significant impact on landscape character.

Option H 3.2

Use more enhancement sites and opportunities to change the use of existing buildings

Impact of Evidence and Consultation

The detailed ways in which this might work are discussed in issue H5. It is not always economically viable and will probably always remain part of the solution rather than the main route. It is compatible with the general thrust of consultation responses.

Sustainability Appraisal

The Sustainability Appraisal found that using more enhancement sites and opportunities to change the use of existing buildings should reduce the impact of development on landscape character and is preferable to emphasising new build. However, any projects involving change of use or similar should seek to adopt sustainable measures, including sustainable water resource management, the reduction of resource and energy use and

take into account conservation and enhancement of biodiversity and landscape. There is potential for this option to be very positive and as with new build it should provide some employment for those locally in the construction/renovation industry. In particular it may support traditional craft skills used in changing the use of existing buildings and the extension of locally distinctive buildings.

Option H 3.3

Buy existing open market properties as they come up for sale and add them to the affordable sector, instead of building new homes

Impact of Evidence and Consultation

This could be called 'buy-back', although it is important to point out that it need not be limited to former public or social sector housing. More work is needed on this concept for both costs and necessary process, before it could substitute for a new build programme, which has more certainty at present for programming investment. It would not require planning permission and would not, therefore be subject to our jurisdiction. Housing providers working with the housing authorities would have the key responsibilities. Close liaison with the planning authority would be needed to assist in joining up all forms of housing investment decisions. New mechanisms would be needed to secure these properties as being affordable in perpetuity. Without this security they could be lost at some future date, requiring further replacement expenditure and, perhaps, reintroducing pressure for more newly built homes.

The revised Draft East Midlands Spatial Strategy (RSS8) asks authorities and providers to explore this route more fully. It is thought to be relatively expensive per house provided. On the other hand it would help to bring existing stock up to modern standards. In addition, it would reduce conflict with national park purposes by removing pressure to use additional land. The 2007 consultation revealed support for this as part of a package to provide more affordable housing within existing policy, so as to better deliver national park purposes.

Sustainability Appraisal

The Sustainability Appraisal found that buy-back could encourage a younger population structure in the National Park and meet the housing needs of key workers, thus benefiting the local economy, without creating undue pressure on the natural environment through the building of new houses (Key worker findings of the Housing Needs Survey can be accessed via the Housing Theme evidence list in Appendix A). It could have beneficial impacts on landscape and townscape, and would be preferable in terms of other natural environment objectives. This would however be a long term measure, dependent on an appropriate number of houses coming up for sale when

required and in-perpetuity arrangements would need to be in place to ensure the benefits continue. There would be economic and social disadvantages in the short term if new build were to cease completely.

Option H 3.4

Increase the amount of 'buy back' and decrease new-build over time

Impact of Evidence and Consultation

This would ensure that in the short to medium term the relatively certain method of building new properties could still address the identified backlog or shortage of affordable homes. In parallel, concerted effort would be required to develop and test a realistic system for buying back homes as they come up for sale. If necessary, additional funding would need to be sought. A target for buying-back a proportion of all new affordable homes could be progressively increased once a practical system exists. It may eventually be possible to meet the large majority of all the new arising need for affordable homes in this way. This would reduce pressures on landscape or other valued characteristics in the National Park. At any stage, it would remain possible to build new affordable homes if buy-back failed to provide a sufficient number and in this way the option provides flexibility and the best of both worlds. These would be on sites that would already have been used if the buy back option is not pursued. The 2007 Consultation did not consider this option.

Sustainability Appraisal

The Sustainability Appraisal found that gradually increasing the proportion of buy back would have the potential for more positive impacts to the natural environment due to a reduction in new build. However, impacts on the economy and on housing need are less clear.

6.31 We welcome your comments on these options.

Issue H4

Issue H 4

Should policies set out targets (in general or for various parts of the National Park) that:

- 1. respond to the needs of different groups, such as families with children; key workers; the elderly or infirm (including supported housing or accommodation), and Gypsies and Travellers?**
- 2. Distinguish between different types of tenure (e.g. outright ownership, shared ownership or rented), size and type of home?**

6.32 Government policy in PPS3- Housing states that local planning authorities should plan for a mix of housing on the basis of the profile of different types of households that are likely to require housing over the plan period, with particular regard to:

- demographic trends and profiles
- the requirements of particular groups (in particular families with children, key workers, older and disabled people) and
- the need to accommodate Gypsies and Travellers.

and that they should set targets for different tenures, types and sizes of affordable housing where appropriate and for particular locations.

6.33 In the National Park, developments are relatively small scale and strategies are very complex because it overlaps parts of nine Housing Authorities. In this context and without the detailed and up to date parish needs assessments required in order to justify new housing schemes, it is difficult to see how targets for meeting the needs of particular groups (advised by PPS3) can be developed in the spatial strategy itself that are in any way meaningful. In addition, where individual affordable houses are permitted, the applicants cater for their own needs.

6.34 It is likely that different tenure mixes and the requirements of particular groups (including for dwelling size and type) will vary by location. Dealing with these issues properly requires detailed information that only becomes available when parish based surveys are carried out and when a project is being put forward. The small scale of most housing projects means that the mix of tenures, size and type is dealt with best by looking at stated need at the time rather than basing it on a theoretical approach such as analysis of existing stock against family incomes etc. It is not, therefore, something that is practical to prescribe in policy or set out in plan led targets.

6.35 Policy could (as at present) require the involvement of social housing providers and housing authorities to ensure that a given scheme meets identified needs in the best manner possible. Involving them in the planning decision making process on a scheme by scheme basis and in regular review will enable us, as the Local Planning Authority, to plan for an appropriate mix based on up to date and authoritative advice throughout the plan period, in a flexible and responsive manner. An important thing to remember is that current land-use planning agreements do not prevent social housing providers from amending the priority given to particular groups on a scheme by scheme basis as long as they also respect the systems that are in place to ensure that the needs arise in the locality and within the National Park.

6.36 The 2007 Consultation on Core Strategy and Options revealed some support for addressing the needs of key workers including those who contribute directly to national park purposes (via estate management etc). The Housing Needs Survey (2007) shows that the needs of key workers can be managed within current strategic estimates and do not imply a need to increase overall numbers. Key Worker findings of the Housing Needs Survey can be accessed via the Housing Theme evidence list at Appendix A. Review of the criteria that justify meeting the needs of key workers in newly provided dwellings is in general, therefore, dealt with best in policies for delivery rather than in core spatial strategy. However, one matter of principle can be addressed in core policy: Should the current approach towards housing for agricultural and forestry workers be extended to others involved in land management? This would have the potential advantage of enabling either temporary or permanent new homes in the countryside where they are fully justified by work that is essential to the delivery of national park purposes (in conserving and enhancing biodiversity or landscape for example including their relationship to recreation management). Exceptional permission for a new home in the open countryside would, as now, only be granted where it is absolutely essential to live on-site rather than simply nearby, when a home in a settlement would often be more appropriate.

6.37 Monitoring these matters would be led by housing strategies and housing authorities.

Option H 4.1

Address needs in targets in the Core Strategy

Impact of Evidence and Consultation Responses

PPS3 states that LDFs should, "*set separate targets for social-rented and intermediate affordable housing where appropriate and specify the size and type of affordable housing that, in their judgement, is likely to be needed in particular locations....*" The 2007 Consultation on Core Strategy and Options did not address these matters clearly.

Sustainability Appraisal

The Sustainability Appraisal found that if the needs of young families and key workers are addressed in the core policies or targets, they are unlikely to have a differing impact on the environment. However, targeting key workers is likely to have added benefits

for the economy and the provision of services. It is likely that different tenure mixes and the requirements of particular groups including dwelling size and type will vary by location. This is not likely to be practical to prescribe in policy, even though it could provide greater control over future implementation decisions including lower level policy.

Option H 4.2

Address needs at the time that schemes are being considered by getting the advice of housing authorities and referring to their strategies

Impact of Evidence and Consultation

Addressing these matters outside of the local development documents offers flexibility that allows for a more responsive strategy. This is because local housing strategies are not subject to an Examination and their advice can be modified more easily to keep pace with local circumstances. This means that together with recent village based surveys, housing managers can make a real input to planning decisions at the time that schemes are put forward. The 2007 Consultation on Core Strategy and Options did not address these matters clearly.

Sustainability Appraisal

The Sustainability Appraisal found that it is unlikely that addressing this issue outside of the Core Strategy will make any difference in terms of sustainability effects.

Option H 4.3

Combine Option H4.2 with consideration in the Core Strategy and other local development documents but do not set out targets.

Impact of Evidence and Consultation

PPS3 does not require actual targets for the profile of household types. Its statement about targets for tenure says that they should be applied *where appropriate*. The proposed replacement Regional Plan states that, "*the housing market is dynamic so it is not possible to establish static targets on the mix of dwelling size and type...*" The regional policy context for the National Park and the complexity of dealing with many housing authorities, together with the slow and scattered nature of development and need for flexible solutions all suggest that whilst the plan may contain informed discussion of these

matters, target setting is neither necessary nor appropriate. This is consistent with the general strategic approach discussed in Issue H1. The 2007 Consultation on Core Strategy and Options did not address these matters clearly.

Sustainability Appraisal

The Sustainability Appraisal did not consider this option.

Further Suggestions from Initial Consultation on Refined Options

6.38 Initial consultation on this question has suggested a further option as follows:

Option H 4.4

Extend the concern for the mix of size, type and household across the proportion of larger developments such as enhancement that is allowed to cater for open market housing

6.39 **For Gypsy and Traveller caravan sites**, the question is whether or not the current policy needs to be altered. This presumes against gypsy caravan sites with the possible exception of small, temporary family sites. The policy does not quantify need.

6.40 In order to review evidence about the need to accommodate Gypsies and Travellers, we were party to the Derbyshire Gypsy and Traveller Accommodation Assessment (2008) and the assessment was extended to cover the entire National Park. The Assessment can be accessed via the Housing Theme evidence list at Appendix A. It did not identify a pitch requirement in the National Park and does not contain evidence that that would suggest current policy needs changing. This position is accepted in the Government's proposed changes to the East Midlands Regional Spatial Strategy (RSS8).

6.41 However, to conform to national policy in PPS3, the policy needs extending to clarify that it also encompasses travellers and showmen.

Option H 4.5

Retain current policy but with amendment to encompass travellers and showmen

Impact of Evidence and Consultation

The 2007 Consultation on Core Strategy and Options revealed mixed views on this issue, with most favouring a continuation of the current position. The combination of recent accommodation assessment, review of the Regional Spatial Strategy (RSS8) and national policy confirms this as the only reasonable option.

Sustainability Appraisal

The Sustainability Appraisal found that the presumption against new gypsy and traveller sites is likely to bring environmental benefits as with the limiting of any kind of development. However it may have a detrimental social impact and not meet future local need. This is an often excluded group and the situation should be kept under review.

6.42 Population forecasts make it clear that a growing proportion of **elderly and infirm people** will create additional needs for adaptation to existing homes and perhaps for some complexes that are either purpose built or provided from changing the use of larger, existing properties. Further research is needed to fully understand the types of housing and adaptation that might be involved across the sub-region as a whole, both inside and outside the National Park and this is being organised by the authorities. It is most likely that the needs of the elderly and infirm will be taken into account in one or more of 3 main ways that are not mutually exclusive:

1. by encouraging the improvement of the **existing stock** to meet 'lifetime home' standards (where, for example, the needs of the elderly and infirm for stair-lifts, bath lifts or wheel chairs can be more easily met) and using local research to improve on these as need be.
2. by requiring **new homes** to be built to 'lifetime home' standards and using local research to improve on these as need be
3. by separately considering the **need for supported housing** of various kinds and including care-homes It is logical that additional provision should be targeted at need arising within the National Park, which should not become a care location meeting the needs of nearby urban areas. Any consideration of the appropriate amount of provision for supported housing and homes will need to be part of a coordinated approach at the sub-area housing market level.

6.43 The main issue here is whether and to what degree newly built or converted accommodation for the elderly should be restricted to needs that arise in the locality and within the National Park in the same way that new provision of affordable homes is.

Option H 4.6

Restrict the occupancy of newly provided supported housing and including care homes to meeting needs that arise within the National Park

Impact of Evidence and Consultation

There is demand to allow use of buildings to meet needs arising over a much wider area including surrounding urban populations, but as with ordinary affordable homes this creates additional pressures on existing stock and on land for newly built facilities. The 2007 Consultation did not consider this option.

Sustainability Appraisal

The Sustainability Appraisal found that the likely effects of revising the ways in which the needs of the elderly and infirm are taken into account are mixed. Reuse of existing buildings should be encouraged to reduce resource use, greenhouse gas emissions and more sustainable land use. Any new build that is required should be built to the highest sustainability standards. Minimising the amount of building required in the National Park by only meeting the needs of those within the National Park and not from nearby urban areas would be beneficial.

6.44 Initial consultation on this question about meeting the needs of the elderly and infirm has suggested a further option as follows:

Option H 4.7

Make policy sufficiently flexible that even if it prioritises locally arising need it can allow consideration of individual cases of care need that might be outside these agreed norms

6.45 We welcome your comments on these options.

Issue H5

Issue H 5

How can enhancement projects (including changing the use of existing buildings) best deliver a bigger proportion of affordable housing?

6.46 It has proved very difficult to estimate accurately the number of homes that are likely to be provided by enhancement projects. The SHLAA will help to identify and quantify new build enhancement opportunities, but an accurate estimate would also require a full survey of all potential candidates for changing the use of existing buildings together with knowledge of their owners intentions. The uncertainties involved argue against relying on

such an estimate. What is becoming clear is that the number of larger enhancement sites or opportunities to provide housing by changing a building's existing use are limited and finite.

6.47 Under current policy, there is no specific requirement for development justified by enhancement purposes to provide (entirely or in part) affordable housing. The policy does not prevent the inclusion of affordable housing, but recognises that the costs of changing a building's use or of new build enhancement schemes can be high for other reasons and might preclude any planning gain of this type. The 2007 Consultation on Core Strategy and Options revealed support for an increase in the amount of affordable housing to be provided when enhancement projects occur, with a requirement in policy to secure this. In addition, the reviewed Draft East Midlands Regional Spatial Strategy (RSS8) asks local planning authorities to be clearer on all aspects of 'planning gain'. There are three main ways in which an increase in affordable housing could be secured from enhancement projects.

Option H 5.1

Establish a standard proportion that will be sought from all enhancement schemes

Impact of Evidence and Consultation

In practise, it has been possible to negotiate a proportion of affordable housing on new build schemes of sufficient scale (such as in Eyam). However, a one size fits all policy asking for a particular proportion of affordable housing might be difficult to justify given the widely varying nature of schemes and the negotiations that take place about different types of benefit (e.g. housing or other community benefits such as playing fields etc). Arriving at a proportion of affordable housing when the use of a large building is changed has proved even more difficult. On the other hand, a clear minimum expectation of, for example, 50% or 75% would help to reduce the initial value of the land or buildings involved and in that way help make the provision of affordable housing more viable. The 2007 consultation did not consider this option.

Sustainability Appraisal

The Sustainability Appraisal found that whilst it may bring social and economic benefits this option lacks of flexibility, may bring some adverse environmental effects and could restrict other environmental and social benefits being achieved such as negotiations on open space, wildlife space or local amenities.

Option H 5.2

Establish the most suitable proportion on a scheme by scheme basis but based on clear principles in the plan

Impact of Evidence and Consultation

The consultants carrying out the SHLAA for the entire Housing Market Area are also advising on an appropriate model in order to assist the appraisal of development economics (a 'viability tool') and help the sub-area local authorities to adopt similar / shared methodology in this. It makes sense that this model should be used wherever appropriate rather than opt for a figure that is determined in advance and without knowledge of the details of a particular scheme. It should be possible to apply the model to single home provided by changing the use of an existing building as well as to schemes involving larger, or groups of, buildings. The initial value of land and sites can be factored into the model and should help prevent unrealistic expectations, particularly if this is allied to a firm principle of maximising the number of affordable houses to be provided.

If a site by site assessment is favoured, it could be used either:

- in every case, including single properties, whether new build or conversion (the widely used current policy allowing conversion of single buildings to open market homes would need changing to require careful testing of development economics for each proposal before this is allowed), or
- only on larger schemes above a certain size.

The 2007 consultation did not consider this option.

Sustainability Appraisal

The Sustainability Appraisal found that assessing each site on an individual basis to obtain the maximum environmental and social benefits would be the most satisfactory situation. Assessment should include sustainability criteria and consider other social and environmental benefits, especially if higher proportions of affordable housing are not considered possible. Care would be needed to avoid placing the economic viability of smaller sites under too much pressure.

Option H 5.3

Require a financial contribution in cases where a proportion of affordable homes is not possible or viable

Impact of Evidence and Consultation

This would ensure that all enhancement schemes, including changing the use of existing buildings, are assessed with the maximum flexibility to balance on-site requirements against the accepted priority that should be given to affordable housing throughout the National Park. This option could be implemented alongside whichever is chosen from H5.1 and H5.2 and the 'viability tool' being developed by the SHLAA consultants can be used. The 2007 Consultation did not consider this option.

Sustainability Appraisal

The Sustainability Appraisal found that benefits would be largely dependent on what any contribution is spent on. It could go towards housing in another location. It may also have the potential to have significant social and environmental benefits if the contribution is spent for example on improved public transport, supporting other vital rural services, providing open space for the benefit of local residents and the environment etc.

6.48 We welcome your comments on these options.

Issue H6

Location of newly provided housing, whether in new or existing buildings

Issue H 6

Should the plan identify sites or buildings, or just broad locations for affordable housing or enhancement opportunities?

6.49 The location of new development affects the landscape, the future of individual villages or smaller places, their populations, the services and facilities that are needed and the economic viability of these. The important decision about which places are most suitable for new housing needs to be looked at by considering these factors in relation to housing need, possible sites (including significant enhancement opportunities), and travel between homes, services, jobs and leisure. These are all components of the decision about settlement strategy that which the settlement theme deals with and so they are not repeated here.

6.50 However, below the level of decision about which villages or places should accommodate new development, the outstanding issue in the National Park is whether or not the spatial plan should identify on a map those sites and buildings intended for use as housing. In the circumstances that apply in most parts of the country outside national parks, spatial plans identify housing sites to clarifying that they are suitable for use within the plan period. This helps to promote investment. It is a starting point for implementing and monitoring the target that has been agreed as part of the relationship between local development documents and the regional spatial strategy. However, in the Peak District

National Park (PDNP), the absence of a housing target (see Issue H1) has led to a housing delivery system that makes use of 'rural exception' sites that are not shown on the development plan. This often involves a level of detailed discussion on a village by village basis, in response to identified needs at a particular time, that would be difficult to carry out in advance: when drawing up the spatial strategy.

6.51 PPS3 allows for (does not require) local planning authorities to consider allocating sites in their spatial plans even where they are to be used entirely for affordable housing in the way the 'rural exception' sites are. There is mixed opinion about whether or not this would be an advantage and make the provision of new affordable housing easier. We are exploring whether there may be legal disadvantages. For those other sites in the National Park where there is a known intention to seek enhancement that could only be paid for by permitting housing including a proportion of open market housing (see Issue H5), their identification in the plan is simpler and involves less risk of administrative or legal difficulty.

6.52 Consultation with local housing providers has suggested that the identification of sites for affordable housing in a plan can make local landowners reluctant to accept housing schemes because they have increased 'hope value' expecting that they will one day be released for market housing.

6.53 The 2007 Consultation on Core Strategy and Options revealed some support for site identification as part of an accelerated implementation package within policy. However, we are not convinced that this will always be possible. Of the following four options, two and four seem to be the most reasonable.

Option H 6.1

Identify sites for newly built affordable housing in the plan

Impact of Evidence and Consultation

The 2007 Consultation did not consider this option. PPS3 allows local planning authorities to consider identifying sites that will be used 100% for affordable housing and the Housing Corporation has shown preference for this route because it gives greater certainty and might ease the task of delivery. However, we have asked for the Government's advice about a potential risk in law if sites for 100% affordable housing were to be allocated in development plans. The risk is of these sites being lost to market housing. Government has not clarified its view about the legal risk, despite a further request from the panel at the Regional Plan Enquiry in Public. A procedural risk seems to remain if this option is pursued, that could affect the integrity of the development plan. The detailed assessment required on a village by village basis would be very difficult to carry out as part of drawing up a spatial strategy, in advance of the real identification of need and resources that will determine that scale of a project.

Sustainability Appraisal

The Sustainability Appraisal found that this option would allow increased control over the allocation of housing sites and may promote the development of affordable housing. However, care would be needed to ensure that sites are in areas where there is a need for more affordable housing and also where services and amenities are available and there are good public transport links, as car ownership maybe lower amongst residents of affordable housing than the general population. The Appraisal also noted that identifying sites solely for affordable housing may put developers off and ultimately result in their loss to the housing market with knock on effects for the economy.

Option H 6.2

Retain the current policy of developing 'rural exception' sites without showing them in the development plan

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. There is no actual requirement to identify sites used under the 'rural exception' route, whether in PPS3 or in the East Midlands Regional Spatial Strategy (RSS8), which does not set a housing target for the National Park (see Issue H1). Furthermore in similar circumstances in the North York Moors National Park, it has been accepted that sites need not be identified in the plan. The current 'rural exception' policy could therefore be continued, allowing for the timely identification of sites, in response to changing data and circumstances. In addition local social housing providers have pointed out the danger to their bargaining ability since the asking price for allocated sites is likely to rise.

Sustainability Appraisal

The Sustainability Appraisal found that this option may cause uncertainty with subsequent problems for delivery. It could have mixed effects on good governance because the transparency of the planning process is reduced. However, not allocating sites may be beneficial because it would avoid the increase in land price that follows allocation in plans which, by removing alternatives and uncertainty, reduces the bargaining power available to housing providers on a village by village basis.

Option H 6.3

Identify all opportunities for new housing that could be justified by national park purposes (enhancement)

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. Given that this would involve identifying all remaining opportunities for changing the use of existing buildings of whatever size, it would require a level of effort that is difficult to justify. In particular, alternative uses for individual buildings (some of which are related to farming or agricultural business diversification) reduce the degree of certainty that could be achieved. The pragmatism and reasonableness of this option is therefore in question.

Sustainability Appraisal

The Sustainability Appraisal found that this option is likely to help good governance by transparently presenting alternatives to the public. It conserves and enhances the natural environment by, "*identifying opportunities... that could be justified by national park purposes*" and helps meet local housing needs. However it should promote affordable housing if areas in need are not to suffer. Identifying all the sites may also inflate their value, with mixed effects on the local economy.

Option H 6.4

Identify only the most significant opportunities for new housing that could be justified by enhancement

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. Larger, more obvious, more significant opportunities might be identified on the plan, as is the case already for employment uses. Detailed judgements on a suitable range of uses and the proportion of affordable housing on individual sites would need to be reserved until a later stage.

Sustainability Appraisal

The Sustainability Appraisal found that this option is likely to be the most practical of the options, provides a focus for the plan and greater clarity about what it promoting. Care would needed to ensure 'significant opportunities' are defined consistently. As with option H6.3 this approach conserves and enhances the environment by limiting identifying opportunities to those that can be justified as enhancement.

6.54 We welcome your comments on these options.

Issue H7

Issue H 7

Where should 'buy-back' be prioritised?

6.55 If providers were to increase the amount of affordable housing provided by buying existing dwellings rather than building new ones they would need to decide where to prioritise resources. The decision would be theirs rather than ours in our role as spatial planning authority. Planning permission would only be required if an existing dwelling was being split into several. Nevertheless, it would clearly have an impact on decisions about settlement strategy and should be coordinated with the possibilities for new-build. For example: where new-build is not compatible with conservation and enhancement, there may nevertheless be opportunities to increase the number of affordable homes by buying existing properties as they come up for sale. Views on this issue are therefore relevant to this spatial plan and will inform the partnership working that will be needed for 'buy-back' to become a more significant form of providing affordable houses.

6.56 Impact of Evidence and Sustainability Appraisal - general point: The 2007 consultation on Core Strategy did not address this issue clearly. The Sustainability Appraisal found that 'buy-back' will have a beneficial impact on the environment by reducing the demand for new homes and that this would apply across all the location options.

6.57 The options are not all mutually incompatible and are as follows:

Option H 7.1

Prioritise larger settlements

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. The larger settlements tend to be the natural focus of most existing housing need and are often the focus for the efforts of housing providers.

Sustainability Appraisal

The Sustainability Appraisal found that focusing buy back in larger settlements may secure housing that is well located in terms of access to services and amenities and transport infrastructure, helping to increase efficiency and reduce resource use. However, there may not be as great a need for such housing in larger settlements as they may already have an affordable housing component.

Option H 7.2

Prioritise settlements where there has been no other form of recent provision

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. Priority could be given to these in sequence based on size and / or any recent housing need surveys. This would provide a sense of fair distribution but may risk under-provision in larger places that still have significant need despite recent provision.

Sustainability Appraisal

The Sustainability Appraisal found that focusing on settlements where there has been no other form of recent provision is likely to meet local needs more than in option H6.1. However, such policies would need to be tied in with public transport provision and other sustainable measures (e.g. mobile facilities) to ensure access to services. This should benefit the local economy by maintaining a viable population.

Option H 7.3

Prioritise those settlements with proven need where new buildings are most difficult to accommodate

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. Its basis would be the outcome of the land availability assessment together with our view on the development potential in all settlements.

Sustainability Appraisal

The Sustainability Appraisal found that focusing on those settlements where new buildings are most difficult to accommodate is likely to have similar effects as option H6.2. It would be increasingly beneficial in meeting local need by creating affordable housing in settlements with severe development restrictions, with further benefits for local economy revival.

Option H 7.4

Prioritise smaller places with proven need that are not on the current designated settlements list

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. It would not be sensible to prioritise these according to the relative harm that might have been caused by newly built development, because current policy would prevent that in any case. They would need to be prioritised by the housing providers on the basis of assessed need.

Sustainability Appraisal

The Sustainability Appraisal found that focusing on smaller places that are not on the designated settlements list may have similar effects to option H6.3. However, the smaller the settlement, the less viable public transport opportunities will be. This is also true of other services.

Option H 7.5

Focus on those settlements or smaller places prioritised by the housing authorities and social housing providers

Impact of Evidence and Consultation

The 2007 consultation did not consider this option. This would reflect the current responsibilities of the providers and authorities for housing investment decisions, involving them more fully in the new LDF implementation process. They would be able to have regard to the factors in options 1 to 4 and would take full responsibility for the decisions. Buying into the existing stock of housing does not require planning permission and is not, therefore, subject to our jurisdiction. Partnership discussions and working could still take place to assist in joining up all forms of housing investment decisions.

Sustainability Appraisal

The Sustainability Appraisal found that focusing on those places prioritised by the housing authorities and providers may have similar effects to H6.3 with the benefit of meeting local needs most appropriately. Partnership discussions and working should take place to ensure all relevant bodies are consulted and all forms of housing investment decisions are joined up to ensure the most sustainable outcomes.

6.58 We welcome your comments on these options.

Economy

7 Economy

Introduction

7.1 The National Park Management Plan Vision is for a viable and thriving Peak District economy that capitalises on its special qualities and promotes a strong sense of identity. By 2011 we and stakeholders want to develop a sustainable economy, capitalising on its special and distinctive location, bringing increased prosperity to the area. Action to achieve this vision should include the adoption of Local Development Framework (LDF) policies that support the further diversification of the farming economy where it contributes positively to the conservation and enhancement of the National Park landscape and where it assists farmers in their transition to area-based support payments.

7.2 Under the Environment Act 1995, National Park Authorities (NPA's) have a duty to foster the economic and social well-being of local communities. This infers looking only at the needs of residents in the National Park, and not seeking to create jobs which bring people into the National Park from outside – this also supports sustainability principles. Department of the Environment (DoE) Circular 12/96 explains that upgrading this duty to a third purpose was rejected because development agencies already exist for these purposes, *"however it is essential that the National Park Authorities take full account of the economic and social needs of local communities in fulfilling the purposes of the Parks, and this can only be achieved by working in close cooperation with local authorities, landowners and land managers and those other agencies and persons with interests in the Parks."*

7.3 Although retail patterns and spending by both residents and visitors are an important part of the economy and settlement themes, they have not been identified as a significant issue for which strategic decisions need to be taken.

7.4 This theme includes tourism development which is a major contributor to the local economy, but it does not cover recreation issues which are more clearly linked to the Landscape topic.

7.5 This theme considers the key strategic issues for the Peak District economy:

- Issue 1 relates to opportunities for economic development in the open countryside. This issue has three options.
- Issue 2 covers economic development within settlements. This issue has three options.
- Issue 3 then considers the need for allocation or safeguarding of specific sites for employment uses. This issue has four options.
- Issue 4 covers the provision of new tourist facilities or facilities aimed at promoting the understanding of the National Park. This issue has three options.

- Issue 5 considers serviced and self-catering visitor accommodation. This issue has five options.
- Issue 6 covers camping and caravan sites. This issue has four options.

Background

7.6 The 'Help Shape the Future' consultation (2005) included three options related to diversification on farms. The first option was:

- *Encourage economic development in the countryside, where it is linked to the farm and at the farmstead or focused upon identified key settlements.*

7.7 Responses to this option were generally supportive of sustainable farm diversification, although it was recognised that often it does not generate much income, and financial assistance may be needed to set it up. Respondents felt that change of use of traditional and non-traditional buildings could help viability of the rural economy. It was suggested that refusing to allow the reuse of agricultural buildings would limit economic potential and lead to increased commuting as employment development is driven elsewhere. Several respondents warned that it may be too restrictive to require economic development to be 'linked to the farm'.

7.8 The two other options were essentially the same, focusing on diversification into recreational and tourist activities. The second was supported, but with some concern about limited income from this kind of activity:

- *Give greater encouragement and advice to farmers to explore environmentally sustainable forms of diversification e.g. farm walks, excursions related to biodiversity, local traditions.*
- *Encourage farmers to explore environmentally sustainable forms of diversification, e.g. farm walks, excursions related to biodiversity, local traditions which increase peoples' enjoyment and understanding of the National Park's special qualities.*

7.9 Issues and Options offered for Consultation in 2007 included a choice of two options on diversifying the agricultural economy, the first continuing the current approach and the second accepting the re-use of a wider range of existing buildings:

- *Retain current policy for agricultural diversification which seeks to retain agriculture as the primary land use, but does not permit the re-use of modern farm buildings for other uses, and does not permit the inappropriate use of traditional farm buildings.*
- *Allow more diversified economic uses in both modern and traditional farm buildings (including uses for promoting understanding and enjoyment of the National Park), where they deliver conservation and enhancement of the National Park landscape and have an essential need to be on site (subject to strong environmental criteria, informed by Landscape Character Assessment).*

7.10 Responses indicated a strong preference for relaxing current policy to allow more diversified economic uses in both new and traditional buildings where they deliver conservation and enhancement and have essential need to be on site. Comments stressed the importance of farming to maintaining landscape quality in the National Park and that farmers need to be able to adapt to remain viable.

7.11 Several options on employment development issues were put forward in the 'Help Shape the Future' Consultation. Two related to employment sites:

- *Instigate a review of need for employment sites in order to encourage businesses to move in and set up in the Peak District, and*
- *Safeguard existing employment sites from residential development pressures, given the difficulty in finding such sites when demand does occur.*

7.12 Comment on these was limited. It was pointed out that although general demand is low, there is a large number of small home-grown businesses and home working for whom a supply of small units could be useful to enable their moderate expansion. Another respondent agreed that the primary need was for relatively small business units, that can be accommodated within the existing stock or by creative changes of use or refurbishment of other buildings, in live-work residential units and small scale new development on the edge of existing urban centres. It was suggested that the focus for the National Park should be for businesses that depend on the special character of the area. Support was given for safeguarding from residential pressures, but with the reservation that residential development may help relocate nonconforming uses.

7.13 The option to "*consider development site allocations in Bakewell*" gained some support, but there was concern in relation to site selection, the character of Bakewell, design and types of uses. However, the stated option did not clarify for what purposes such allocations might be needed and one respondent queried what type of development was generating this pressure. There was also support for, "*Securing further high tech business improvements to help minimise the remaining disadvantages of rural location for industry and business.*"

7.14 The issues concerning new and existing employment sites were developed further in options offered in the Spring 2007 Consultation:

- *Allocate more employment sites in case demand rises,*
- *Safeguard existing employment sites and not bring any more forward, on the basis that we don't foresee a sudden surge in demand, and*
- *Allow changes of use on existing sites, possibly losing employment sites to housing.*

7.15 Responses to these showed mixed opinion on whether it was necessary to allocate more employment sites, and whether to safeguard existing sites or allow changes of use. A new option was suggested which is a combination of elements from the 2005 and 2007 Consultations:

- *Review existing employment sites, identify new sites in accessible locations with appropriate travel policies and propose other uses for sites that are not needed.*

7.16 Options were also offered in 2007 on the spatial distribution of employment sites:

- *Retain the possibility for employment development across all settlements (depending on agreed settlement policy)*
- *Limit the spread of new employment development to just the larger settlements.*

7.17 Responses to these showed a strong preference for retaining the possibility of employment development across all settlements. These options were refined by a suggested new option:

- *Limit the spread of new employment sites to areas with access to sustainable forms of transport.*

7.18 Sustainability is of course a factor which Planning Policy Statements (PPS) including PPS1, PPS7 and the PPS4 consultation advise authorities to consider when determining all development proposals, although it is accepted that in rural areas sustainable transport is more difficult to achieve.

7.19 'Help Shape the Future' options (2005) also addressed other business issues:

- *Positively support some craft-based businesses through conversion of traditional and non-traditional buildings on farms and in settlements where this positively helps the viability of the rural economy e.g. joinery, smithy and small cottage industries.*

7.20 There was cautious support for this option but it was noted that, although craft-based businesses can make a valuable contribution to the character of the National Park, they do not often generate an economic return.

- *Aim to secure further high tech business improvements to help minimise the remaining disadvantages of rural location for industry and business, was supported.*

7.21 This option generated no responses.

7.22 'Help Shape the Future' (2005) offered four options covering different types of tourist development. One raised the general issue of accommodating tourism development such as accommodation and attractions in the National Park and proposed to restrict developments in the open countryside:

- *Limit tourism development in the Park landscape (e.g. accommodation and attractions) to villages and farms. The majority of new tourism development should be by conversion of traditional buildings on farms or in settlements or by extensions to existing accommodation.*

7.23 Responses to this generally supported the principle that tourism development in the Park landscape should be limited, and should seek to maintain and enhance those qualities that tourism relies on.

7.24 A related 'Help Shape the Future' option attempted to maximise the benefits of tourism for the local community:

- *Encourage modernised infrastructure such as visitor accommodation and transport links to ensure that resident communities share the economic and employment benefits of tourism.*

7.25 This generated very little response: one respondent supported in principle, subject to environmental impact.

7.26 Options offered for Consultation in 2007 considered the issue of whether to provide new tourism facilities, or facilities aimed at promoting understanding of the National Park and if so, where these should be:

- *No new sites identified with scope for delivery within recreation zone criteria.*
- *New sites identified in accordance with recreation zones and settlement strategy and linked to sustainable gateways or hubs.*

7.27 Responses showed a clear preference for the identification of sites for new tourist facilities linked to sustainable hubs or gateways, but whether this indicates a desire for additional tourism facilities is not clear because the wording is ambiguous. An additional option with more clarity was suggested:

- *No new major tourism or recreational facilities in view of potential traffic impact and environmental decline.*

7.28 In terms of caravan and camping development, 'Help Shape the Future' (2005) included the following option in favour of touring units rather than static caravans or chalets:

- *Continue to enable development of touring caravan and camping based development rather than static caravans, chalets or other features which have a permanent visual presence in the countryside.*

7.29 Responses supported this approach, although it was suggested that there must be the ability to make exemptions.

7.30 The 2007 options considered both the scale and type of camping and caravan site development in issue 4:

- *Only permit small scale caravan and camping sites.*
- *Permit larger scale facilities and permanent chalets and static caravans where they can be integrated without harm to the valued characteristics of the National Park.*

7.31 In a relatively small number of responses, there was divided opinion on the acceptability of small or large camping and caravan sites, but agreement on the need for these to be sited where they do not harm the environment.

7.32 Issue 3 of the Issues and Options Consultation also separately considered serviced holiday accommodation, offering three options with increasing opportunities for new-build developments:

- *No new build accommodation but scope via extension or improvement of existing accommodation and by conversion of traditional buildings outside settlements.*
- *Favour conversions outside designated settlements, and allow some new build in Bakewell. Put Section 106 agreements on holiday homes to control use and external appearance in sensitive locations.*
- *Permit new build development in Bakewell and other larger settlements such as Tideswell and Hathersage, with scope for conversions inside and outside settlements.*

7.33 There was a very limited response to this issue, with no consensus. An additional option was suggested, focusing only on restricting new build serviced holiday accommodation:

- *No new build serviced holiday accommodation unless replacing existing accommodation, because of potential traffic impact and environmental decline.*

7.34 Throughout the consultations, no options have looked directly at issues surrounding self-catering visitor accommodation. However, the preamble to 'Help Shape the Future' Option SE24 questioned whether the pressure for second home and holiday accommodation was having an undesirable effect on the current policy enabling conversions in the countryside, and was reducing the potential for affordable housing developments:

- *Reconsider Structure Plan Policy C2, which currently permits development outside the confines of towns and villages for various uses including recreation and tourism (such as holiday accommodation) where it is deemed necessary and the character and setting of the buildings is not adversely affected.*

7.35 Responses to this option indicated mixed views but tended to concentrate on the tourism side of the argument. It was suggested that there is a shortage of some types of holiday accommodation at some times of the year, that the NPA should continue to encourage overnight stays to reduce the impact of day visitors and increase revenue and that the provision of more hotel accommodation could create jobs and services as well as bring in spending visitors.

Issue E I

Issue E I

Diversifying the rural economy in the open countryside

7.36 This issue covers all forms of economic development in the countryside, not only those related to farming activity or on a farm holding/in the same ownership. The Panel Report on the examination of the Draft Regional Plan notes that the draft Regional Spatial Strategy refers to the diversification of the whole of rural local economies, not just farm diversification as in PPS7.

7.37 Whatever the source or generation of a rural business proposal, we need to consider whether it would be more sustainable to focus development in settlements than locate in the open countryside. PPS1 wants sustainable economic development which protects and enhances the natural and historic environment, the quality and character of the countryside, and offers communities good access to jobs and services. PPG4 advises that, in rural areas, applications for development necessary to sustain the rural economy should be weighed with the need to protect the countryside in terms of landscape, wildlife, agriculture, natural resources and recreational value. PPS7 advises strict control of development in open countryside, with development focused on local service centres, but also supports small scale development in more remote locations.

7.38 PPG 13 aims to promote sustainable travel opportunities and reduce the need to travel, so in rural areas, employment development should be located in identified local service centres, accessible by public transport, walking and cycling. It accepts that to reduce commuting to jobs in urban areas, it is important to promote adequate employment opportunities. Farm diversification is encouraged, particularly where accessible by public transport, walking and cycling; but authorities should be realistic about alternatives to the car, and not reject proposals where small scale business development would result in modest additional vehicular movements in comparison to other uses permitted on the site.

7.39 The Draft RSS8 (2006) seeks to encourage development opportunities related to the rural economy, including farm based enterprises. Local authorities, East Midlands Development Agency (EMDA) and the Sub-regional Strategic Partnerships should work together to promote continued diversification and further development of the rural economy, where this is consistent with a sustainable pattern of development and the environmentally sound management of the countryside.

7.40 Whilst government guidance and policy emphasises planning for sustainable economic development, the Panel Report on the Draft RSS8 acknowledges that in a rural area, sustainability is hard to achieve, *"it has to be realised that development in rural areas beyond that which is essential to the delivery of local needs can be quite unsustainable, leading to the worsening of unsustainable patterns of commuting between one small village and another, and from villages and urban areas out into the countryside."*

7.41 The full-time agricultural workforce within the Peak District continues to contract although there is an increase in part-time and casual workers (State of the Park Report (SoPR) 2000). Over 3,000 people work in agriculture in the National Park, but it is the main job of only a third of them. Agriculture has experienced particular problems in recent years, with BSE and Foot and Mouth Disease adding to the difficulties experienced with changes to the grant and subsidy systems. Farm income has declined since 1995 for all types of farms.

7.42 Continued decline in farm incomes has led many farmers to diversify. Nearly half of 49 farm businesses who responded to the Survey of Businesses in the National Park (2005) had diversified, most into holiday accommodation but others into agricultural services, recreation and leisure, catering or livestock processing. Current levels of agri-environment funding do not cover the cost of managing landscape features, restoring biodiversity and meeting European Union requirements (Living landscapes: Hidden costs of managing the countryside, Campaign to Protect Rural England / National Farmers Union, 2006). The Peak District Rural Action Zone Action Plan 2008-2011 notes that the employment decline in the agricultural sector, with a shift from full to part time working, and emphasises the need for diversification options. If farm incomes decline further, maintenance and conservation of traditional landscape features will suffer, land may be abandoned or exploited more intensively. In the 'Help Shape the Future' public survey (2004), 42% thought farming should develop by linking environment and economy, 35% by environmental and landscape management, 17% by economic diversification; 59% thought it would be acceptable for farmers to change the landscape to improve their income.

7.43 A particular concern is whether 'diversified' uses in the countryside need to be tied to the farm business. Previously, the main justification for permitting diversification has been to support the farm enterprise and the primary business of farming. This has meant that the new business must be in the same ownership as the farm and cannot be separated from it. In the context of changes to farming practise and how land is managed now and in the future, this may be unnecessarily restrictive.

7.44 To achieve the NPMP vision and outcome for the economy, we want to develop LDF policies that support the ongoing diversification of the farming economy, where it contributes positively to the conservation and enhancement of the National Park landscape and where it assists farmers in their transition to area-based support payments. However, it is not only 'farmers' nowadays who can be responsible for maintaining the landscape, so the potential to set up businesses in the countryside in order to sustain its management should be less restrictive. The prime determining factor could be that the new venture supports the protection, enhancement or management of the landscape and special qualities of the National Park.

7.45 Schemes such as New Environmental Economy and Environmental Quality Mark have been set up by the NPA and its partners, which offer important support, advice and funding to those interested in setting up new businesses linked to the high quality environment.

7.46 A further issue concerns re-using or replacing existing agricultural buildings for diversified uses. The Peak District landscape is dotted with many very large modern agricultural buildings which however softened by materials, landscaping etc are intrusive in

the landscape. The current policy view is that, whilst it might be appropriate for small-scale, farm-related businesses to re-use modern buildings in some locations, it is not generally acceptable to accommodate new uses in large, modern farm buildings. This is because the construction of such buildings was only justified because of a proven agricultural need, and we would not otherwise have accepted large new buildings for employment uses or haulage businesses in locations remote from towns and villages. It follows that such large scale or non-conforming uses should not be accepted at a later stage, simply because there is a large enough building available.

7.47 The re-use or replacement of modern farm buildings is now firmly advocated by government in PPS7. Responses to the 2007 Consultation suggested that many people favour relaxing the circumstances in which diversified uses should be permitted on farms and in the open countryside. The Land Managers Forum wants more flexibility on reuse of traditional and modern farm buildings for a wider range of uses, and the reuse of redundant agricultural buildings for small scale business is supported by Derby and Derbyshire Economic Partnership / Rural Action Zone. A more flexible approach might widen the opportunities that farmers have to supplement their incomes at a time when they are finding it difficult to survive, as well as offering other residents wider job opportunities within their local area. There could be benefits of enhancement, encouraging sustainable rural enterprise or opportunities to improve local services. However, permitting reuse or replacements of modern farm buildings for diversification may be a step too far in the National Park unless substantial enhancement in terms of scale, siting, design, materials and landscaping can be achieved. Removing restrictions and increasing flexibility for employment development in the countryside must not adversely affect the landscape and valued characteristics of the National Park, particularly through cumulative impact over time.

7.48 A further issue is whether policy should require businesses to have an essential need to be in a particular location, for example, if only people living on the property were employed in the business, or goods produced on a farm were being processed. If this were not the case, there are sustainability implications of introducing additional traffic movements by employees, deliveries etc to and from a countryside location away from other services and public transport access. Locating a business in an adjacent village may offer advantages as well as minimising intrusion in the landscape.

7.49 It may be advisable to try to define what uses would be acceptable in a countryside location. Large, modern buildings may lend themselves to a wider range of possible economic activities, such as caravan storage, haulage business or even archive storage, whose impact may actually be no different from agricultural use.

Option E 1.1

Retain current policy for agricultural diversification which seeks to retain agriculture as the primary land use, but does not permit the re-use of modern farm buildings for other uses, and does not permit the inappropriate use of traditional farm buildings

Impact of Evidence and Consultation

This option continues current policy based simply on farm diversification. In line with National Park Management Plan Outcome, it supports farmers to diversify and supplement their incomes, with the potential for strong control to conserve and enhance. However, it fails to recognise that agriculture is not the only means of supporting landscape conservation and enhancement. It allows new build for economic uses in some circumstances, but is contrary to PPS7 on re-use or replacement of existing agricultural buildings. There was no support for this option in responses to the 2007 Consultation.

Sustainability Appraisal

The Appraisal indicates a mixed impact, but overstates the potential negative impacts on consumption of natural resources, sustainable development and access to services and amenities.

Option E 1.2

Allow more diversified economic uses in both modern and traditional farm buildings (including uses for promoting understanding and enjoyment of the National Park), where they deliver conservation and enhancement of the National Park landscape and have an essential need to be on site (subject to strong environmental criteria, informed by Landscape Character Assessment)

Impact of Evidence and Consultation

This option allows economic development where it helps conserve and enhance the National Park landscape, but not necessarily linked to a farm business. This is a more flexible approach, allowing reuse of both traditional and modern farm buildings, subject to environmental and location criteria, in line with government policy. It recognises that businesses other than farming can support conservation and enhancement. Landscape Character Assessment analysis of landscape elements could assist decision making.

Consultation responses preferred this option, stressing the importance of farming in maintaining landscape quality and the need for farmers to be able to adapt to remain viable.

This option may be preferable because it offers more opportunity and focuses on national park purposes. However, it does not consider sustainability implications of location in the open countryside, or whether businesses should be required to prove an essential need to be on a particular site. Policy could also positively promote the potential links between economy and environment, and seek landscape enhancement by the removal of intrusive modern farm buildings when no longer required for agriculture.

Sustainability Appraisal

Sustainability Appraisal shows this option as generally favourable.

Further Suggestions from Initial Consultation on Refined Options

7.50 Stakeholders suggested that potential employment uses could be identified within option E1.2.

7.51 It was suggested at the stakeholder workshop that a further option could remove the tie to land management. This would provide even greater flexibility, permitting development which does not directly deliver conservation and enhancement but provides supplementary income which may ensure the landscape is protected. This accepts that development may have a negative impact upon the immediate area, which should be weighed against wider indirect benefits. This is a difficult option to develop further because policy decisions would be based on subjective judgements balancing benefits and harm. There may be scope for Section 106 agreements to retain a different kind of link to purposes, with other caveats around design, operation and landscape impact. However, there was concern that such an option would lose National Park distinctiveness.

Option E 1.3

Permit a wider range of economic uses within both modern and traditional farm buildings, with no requirement for a link to agriculture or land management

7.52 We welcome your comments on these options.

Issue E2

Issue E 2

Employment development within settlements

7.53 PPS7: Sustainable Development in Rural Areas wants to see strict control of development in the open countryside, so development should be focused on identified local service centres, but it does support small scale development in more remote lesser settlements. PPS6 explains that the Government's key objective is to promote vitality and viability by planning for growth focused in town centres, which should provide a range of facilities, shops and services at a scale appropriate to needs and size of their catchment,

enhancing consumer choice and improving accessibility. Authorities should assess the need for new office floorspace, informed by regional assessments, the physical capacity of centres to accommodate new development, and their role in the hierarchy of centres.

7.54 PPG4 and PPS1 say that plans should be flexible, positive, and allow for changes in the economy. The PPS4 consultation document says that sustainability demands a flexible and supportive approach to planning for economic development.

7.55 The Draft RSS8 requires the provision of appropriate economic opportunities for National Park communities. It notes that within the regional context, High Peak and Derbyshire Dales are, "*economically lagging*." Because of the acknowledged constraints, public intervention is needed to provide sites for office and industrial space. Authorities should promote continued diversification and further development of the rural economy, where consistent with a sustainable pattern of development and environmentally sound management of the countryside. The Panel Report on the East Midlands RSS8 Examination in Public (2007) advises that development in the Peak sub-area should be restricted, in order to support urban regeneration in the North West and Yorkshire. In order to be sustainable, development in rural areas should be limited to that which is essential to the delivery of local needs.

7.56 The National Park has higher levels of self-employment and lower levels of full-time employment than nationally and home working is increasing. There is a close relationship with surrounding towns and cities, with travel to work movements both in and out of the National Park. Wage rates are lower in the National Park than in surrounding urban areas. Peak District businesses tend to be small, with local markets and suppliers. Some businesses are finding difficulty recruiting staff with particular skills or experience. (Business Survey 2005, State of the Park Report 2004, Census 1991 & 2001)

7.57 The National Park economy cannot be treated in isolation. In addition to those who work within the National Park's communities, many people travel to work both out of and into the National Park. The adjoining urban areas can provide a much more varied range of job opportunities than the small settlements in the National Park, and usually offer higher salaries. From the employers' point of view, these urban areas offer advantages including grants and incentives to businesses, proximity to suppliers and markets, and access to a skilled workforce.

7.58 The Employment Land Review (2008) identifies the factors which define those locations most suitable for employment as good access to strategic road network, high quality environment, close proximity to key settlements, and IT / broadband access. It sees potential for the development of small, flexible, managed workspace, but suggests that some sites may need public funding or enabling development to unlock them. It identifies opportunities for creative and knowledge-based businesses, and identifies Bakewell as the preferred location.

7.59 We must also balance national park purposes and duty whilst looking for sustainable solutions. Schemes such as New Environmental Economy and Environmental Quality Mark have been set up by the Authority and its partners to help local businesses; although time-limited and relying on ever-changing grant schemes, they are successful models of sustainable development. East Midlands Rural Affairs Forum and the Rural Action Zone

recommend schemes such as these which show how to bring together business and high quality environment, and the NPMP supports their continued development. It has been demonstrated that a key method of delivering economic prosperity and well being, particularly for sparse rural populations, is active maintenance and enhancement of high quality environments.

7.60 Employment development could be permitted throughout the settlements of the National Park, or focused only upon the larger or better serviced settlements. Small businesses can fit satisfactorily within village environments, although sites or building change of use opportunities may not always be available. It may be necessary to define what types of business would be acceptable. Sustainability arguments point towards selective location in those settlements with larger working populations and which possess a number of other shops and services; but this may unnecessarily restrict small-scale development which would have little adverse impact. Allowing changes of use of traditional buildings in villages to workspace may also bring benefits to the built environment; despite greater need for affordable housing, changes of use to workspace are often preferable where the fabric and integrity of historic buildings are concerned. It may be appropriate to apply a sequential approach through affordable housing / tourism / economic uses, or to consider each case on an individual basis depending on local needs. The Settlements options are also relevant here.

Option E 2.1

Retain the possibility for employment development across all settlements (depending on agreed settlement policy)

Impact of Evidence and Consultation

This option offers flexibility as recommended by PPS1 and PPS4 Consultation but is contrary to PPS7's focus on service centres and may be less sustainable in terms of vehicle movements for employees, deliveries etc. Although this option gives the widest opportunity to businesses throughout the National Park, it should clarify that only small scale businesses are appropriate in most village locations. It could be more specific about what types of business would be acceptable, and could promote opportunities for the development of specific sectors of the economy.

There was strong support for this option in response to the 2007 Consultation.

Sustainability Appraisal

Sustainability Appraisal indicates that there may be negative impacts depending on which sites are selected.

Option E 2.2

Limit the spread of new employment development to just Bakewell, or Bakewell and the larger settlements

Impact of Evidence and Consultation

This is in line with PPS7 but less flexible than option E2.1. It focuses employment development in the larger settlements, where it can support, and be supported by, service provision. These are usually the most sustainable locations, but may not necessarily have site opportunities for employment provision without detriment to landscape setting. The Employment Land Review identifies Bakewell as best location, and several sites have already been identified as having development potential (see Issue E3). However, this approach risks driving away opportunities which may arise in other locations.

The 2007 consultation responses did not show much support for this option.

Sustainability Appraisal

Sustainability Appraisal shows negative impacts on road traffic, access to services and economic objectives.

Option E 2.3

Limit the spread of new employment sites to areas with access to sustainable forms of transport

Impact of Evidence and Consultation

This option clearly incorporates sustainability considerations into the choice of employment sites, as recommended by PPS1, PPS7, PPS4 Consultation, PPG4 and the Draft RSS8. However, in reality it is likely that this approach would limit employment provision to Bakewell and the larger settlements, as in Option E2.2. It risks driving away opportunities arising in other locations. This option was proposed in response to the 2007 Consultation.

Sustainability Appraisal

This refinement scores better in Sustainability Appraisal across most objectives.

Further Suggestions from Initial Consultation on Refined Options

7.61 Home working needs to be considered within this issue, as it is often the first step for business.

7.62 Options limiting development to sustainable locations might be unreasonable in rural areas where cars are often a necessity. If the jobs could be provided the public transport might follow.

7.63 We welcome your comments on these options.

Issue E3

Issue E 3

Allocating or safeguarding sites for employment uses

7.64 This issue considers whether it is necessary to identify new sites for employment development in the National Park, or to safeguard existing employment sites in the face of pressure for other uses.

7.65 PPSI advises that suitable and appropriate land should be made available for economic development, to cater for current and future needs. Planning authorities should recognise the wider sub-regional, regional or national benefits of economic development and consider these alongside any adverse local impacts. PPG4 says that plans should be positive and flexible and should ensure that sufficient land is allocated which is readily available and well served by infrastructure – a variety of sites to meet differing needs. Plans should offer a positive framework for sustainable economic growth and be flexible to allow for changes in the economy.

7.66 The Draft RSS8 requires the provision of appropriate economic opportunities for the National Park communities. The Panel Report on the Regional Plan Examination in Public advises restricting development in the Peak sub-area, in order to support urban regeneration in the North West and Yorkshire. It says that to be sustainable, development in rural areas should be limited to that which is essential to the delivery of local needs.

7.67 The Peak District economy shows high levels of self-employment and home working, with a net outflow to surrounding conurbations. However, significant labour force decline and falling levels of overall economic activity are predicted 2001-2026 (Population and Labour Force Projections for the Peak District National Park 2006), which may lead to even greater recruitment problems for existing businesses.

7.68 There is now substantial evidence that future demand for business space / employment land in the National Park is likely to remain static or diminish. The Employment Land Review(ELR) (2008) concludes that more than enough employment land is in use or has been allocated to accommodate predicted needs in the National Park to 2026. The study

recommends that the best located and serviced existing employment sites should be safeguarded, and less satisfactory sites should be considered for other uses. Some safeguarding is advisable for two reasons, firstly to retain a local economic base with job opportunities for local people and secondly, because once employment land and buildings are lost through demolition, redevelopment, or changes into other uses, any upturn in demand may lead to pressure to identify new sites in less acceptable locations.

7.69 The ELR does identify modest opportunities for growth in some sectors, encouraged by high skill levels and quality environment, but constrained by recruitment and high house prices. It sees potential for development of small, flexible, managed workspace, but warns that private developers may need public funding or enabling development to unlock some sites.

7.70 The ELR notes that many highly skilled people live in the National Park and work outside. Many people have chosen to move into the National Park because they can afford to live here whilst enjoying the benefits of a range of better paid job opportunities outside. The Government response to the Panel Report on the Draft Regional Plan (2008) requires the promotion of adequate employment opportunities in rural areas to ensure economic growth and reduce the need for long-distance commuting to jobs in urban areas. However, the National Park will never be able to offer significant competition because of the benefits of city location, inter-relationships of companies, motorway access etc. In future, increased travel/public transport costs may dissuade some commuters, but is unlikely to affect the better qualified, and therefore highest earning, ones. Lower paid commuters may choose not to continue to commute to the cities and may make themselves available for the local jobs.

7.71 Factors influencing the success of an employment site can include its access in relation to major transport routes, location near an urban area close to public transport services, and the quality of site and buildings. The ELR recommends that the main focus should be in Bakewell as a key service centre. It could accommodate the predicted low level of demand for a mixture of employment uses to meet local needs, whilst not eroding its character. The preferred approach would be to maximise employment use of the best existing sites, particularly those on the A6 corridor which are relatively close to the town centre but have opportunity for car parking provision.

7.72 The ELR identifies the factors defining those sites which are most suitable for employment as good access, a high quality environment, close proximity to key settlements and IT / broadband access. It advises that many existing employment sites require investment, so it may be best to focus on providing a moderate number of good quality sites; private developers may need public funding or enabling development such as a mixture of uses to unlock some sites. However, it has been difficult to secure regional support because of the low priority of the area in regional terms.

7.73 As well as safeguarding existing employment sites, current policies have allocated new employment sites in Bakewell and the Hope Valley. These have had mixed success in achieving development, probably influenced by factors such as changes in the national and regional economy, high local house and land prices, grant and subsidy regimes, labour supply and skills. Development on the three allocated sites in Bakewell was restricted to Use

Classes B1 (business) and B2 (general industrial), anticipating a relatively simple employment market operating in the National Park. In recent years, the dynamics of employment uses have changed: there is now little or no demand for pure office or industrial space, and an increased demand for mixed manufacturing / warehousing / teaching / retail use, which is not generally acceptable under existing policy. Full use of these sites might be assisted by relaxing the restrictions to enable other types of employment-generating development.

7.74 It is also possible that a wider definition of what is considered to be ‘employment use’ might lead to vacant sites elsewhere in the National Park coming back into use, increasing local job opportunities. Consultation responses suggested that we should clarify what type of businesses are appropriate, or should only allow businesses which depend on or develop the special character of the National Park, such as food processing. However, changes to the economy and employment market may make such restrictions unreasonable in future. Alternatively, policy could be widened to allow any form of employment activity provided that development criteria including scale, amenity, access and traffic movements etc are considered.

7.75 Consultation responses showed mixed opinion on whether it was necessary to allocate more employment sites, and whether to safeguard existing sites or allow changes of use.

Option E 3.1

Allocate more employment sites in case demand rises

Impact of Evidence and Consultation

This option is contrary to evidence in the ELR and elsewhere, showing that additional sites are not required to provide for employment needs of the National Park population. It risks sterilising land from other uses. A small number of consultation responses supported this option.

Sustainability Appraisal

In Sustainability Appraisal, this option scores very badly overall despite allowing flexibility in case of changing economic circumstances.

Option E 3.2

Safeguard existing employment sites and not bring any more forward, on the basis that we do not foresee a sudden surge in demand

Impact of Evidence and Consultation

Evidence suggests that additional sites are not required but the Employment Land Review says that some sites and floor space ought to be available to accommodate potential indigenous growth. This option would ensure that existing employment sites are retained in the face of pressure for other development e.g. housing, but these may not be the most appropriate sites with the best opportunities. There was limited support for this option in consultation responses.

Sustainability Appraisal

Sustainability Appraisal indicates mostly neutral impact but there are negatives on sustainable land use and economic objectives.

Option E 3.3

Allow changes of use on existing sites, possibly losing employment sites to housing

Impact of Evidence and Consultation

This approach could use evidence from the Employment Land Review's up-to-date audit / analysis, to identify those sites most attractive to businesses, and others which could be developed for other uses. Live-work units would be an option. Allowing a mix of uses may provide funding for infrastructure improvements to make sites more attractive to businesses. There would probably need to be some safeguarding in order to prevent total loss of all employment sites over time. A small number of consultation responses supported this option.

Sustainability Appraisal

Sustainability Appraisal is generally neutral or positive.

Option E 3.4

Review existing employment sites, identify new sites in accessible locations with appropriate travel policies and propose other uses for sites that are not needed

Impact of Evidence and Consultation

This option takes a more realistic view of the likely need for employment land. It is a logical extension of Option E3.3, using sustainability considerations and conclusions of the ELR to identify those employment sites best placed to attract businesses. Evidence

suggests that although additional sites will not be required, important existing sites may need to be safeguarded. This option was proposed in a response to the 2007 consultation.

Sustainability Appraisal

Sustainability Appraisal indicates many positive impacts of this option, but also several uncertainties depending on locations selected for new sites.

Further Suggestions from Initial Consultation on Refined Options

7.76 Whilst retaining an overall balance, there is a need to protect higher order business use class sites, which can provide scope for high value jobs.

7.77 The flexibility incorporated in option E3.4 may be useful for non-conforming uses relocating to more suitable sites.

7.78 We welcome your comments on these options.

Issue E4

Issue E 4

Provision of new tourist facilities and attractions, and facilities to promote understanding of the National Park

7.79 National and regional policy strongly recommends that authorities should recognise and promote the potential benefits of the tourist economy, and emphasises the importance of protecting designated landscapes. PPS7 says that even in designated areas there will be scope for tourist and leisure developments, subject to appropriate control over number, form and location to ensure that qualities or features that justified designation are conserved. PPS1 requires planning authorities to ensure that suitable locations are available for tourism and leisure developments (*inter alia*), so that the economy can prosper. In relation to tourism, the Draft Regional Spatial Strategy, Policy 24 seeks to maximise economic benefit, minimise impact on the environment and amenity, and respect national park purposes. However, the Panel Report considers that the East Midlands Regional Plan (2007) over stresses the economic value of tourism compared with the wider social benefits of leisure and recreation.

7.80 The Good Practice Guidance on Planning for Tourism (2006) promotes the provision of tourist facilities including accommodation. It wants authorities to develop policies suited to the particular circumstances of their area, which maximise the benefits to the economy and local communities. The Guide encourages sustainability, good design, and integration with the surroundings, and seeks to avoid adverse impacts such as disturbance to adjacent activities.

7.81 Tourism contributes greatly to the economy of the National Park and the wider Peak District, in terms of income, jobs and service provision, particularly from staying visitors. In 2005, approximately 35.8 million tourist trips were made to the Peak District and Derbyshire (over 90% of them day visitors), generating total expenditure of £1.29 billion. There are over 24,000 Full Time Equivalent jobs within the Peak District and Derbyshire tourism sector, although many jobs are seasonal, part time and poorly paid.

7.82 Over many years we have worked on developing a sustainable approach, including preparation of the Sustainable Tourism Strategy jointly with partners in and around the wider Peak District, recognising the relationship between the National Park and its immediate surrounding area. The larger proportion of the area's popularity and income (and problems!) derives from day visitors, who mainly come to enjoy its natural and built environment rather than rely on attractions. Effective management of this number of visitors relies to a great extent on having adequate facilities, including information provision, car parking and public toilets. The NPMP proposes actions to increase the quantity and quality of tourism products that are based on the Peak District's special qualities.

7.83 Tourism relies heavily on the attractiveness of the landscape to encourage people to visit. Responses to the 2007 consultation supported the need to control tourism development to prevent damage to the National Park environment and its special qualities; traffic volume and parking facilities were a particular concern. Other stakeholders said that properly managed tourism does not harm villages or landscapes, and the Park is far from full. It is not necessary for the We welcome your comments on these options. to accede to all tourism demands placed upon it; regional policy makes it clear that the surrounding authorities should take some tourism pressure off the National Park.

7.84 Encouraging more visitors would meet one of the National Park's statutory purposes, to promote understanding and, particularly relevant here, enjoyment and it would also bring economic benefits and support for services such as shops and public transport. However, it must not harm the landscape and environment that visitors come to see, upon which the future of tourism depends.

7.85 Tourism is both an opportunity and a problem for the National Park. The tourist industry is already an important part of the economy. The traditional industries, such as farming and quarrying, are restructuring; they employ fewer people and consumer demands are challenging existing supply patterns. No other sector of the economy is in a position to replace these incomes. Developments such as the creative industries, IT, and working from home can help, but none has the potential to sustain the economy as tourism does. The careful identification of key locations with opportunities for enhanced facility provision and improved access for everyone, could help trickle down visitor spending from the most obvious places to locations throughout the National Park

7.86 Earlier consultation identified fundamental differences of opinion as to how far tourism should be encouraged to develop in the National Park, given our purposes and duty. Some believe that the two purposes of conservation and enhancement, and promoting understanding and enjoyment of the National Park's special qualities, should be a higher priority than the duty to promote development that contributes to the social and economic well being of the community. Consequently, policy should only seek to foster social and

economic wellbeing in the carrying out of work towards fulfilling national park purposes, not as an end in itself. The contrary view is that the duty is equally important as managing the National Park in accordance with the two purposes; this is more in line with the fundamental principles of sustainable development, but does not correctly reflect the Environment Act (1995). Some people believe that we are not doing enough for tourists and should be more proactive.

7.87 The second purpose of a national park is to “promote understanding and enjoyment”. In view of the visitor pressure on the Park, there may be a greater need to develop the element of promoting ‘understanding’, through access work and cultural heritage projects, than actively developing tourism attractions which could contribute to even bigger visitor numbers. Current policy does not properly address this purpose. There is no evidence of need for additional attractions, particularly considering our location surrounded by countryside and urban areas offering a vast array of things to see and do. Promoting ‘enjoyment’ through a limited development of tourist facilities based upon the National Park’s valued characteristics is a reasonable approach to meeting this element of the purpose, excluding developments with no connection to the landscape, heritage etc.

Option E 4.1

No new sites identified with scope for delivery within recreation zone criteria

Impact of Evidence and Consultation

This option makes no specific provision for the development of recreation and tourism facilities and attractions, other than the continuation of Recreation Zone criteria applying to parts of the National Park. This approach is very negative, is not compatible with the national park purpose to promote understanding and enjoyment, and restricts opportunities to enhance the tourism offer and increase economic benefits. However, there is little evidence of need to identify specific sites for development, and the Regional Spatial Strategy advises that new development may be better accommodated outside the National Park.

A number of responses to the 2007 Consultation supported this option.

Sustainability Appraisal

In Sustainability Appraisal, this option scores highly against environmental objectives but negatively against objectives for the economy, promotion of access, and understanding of the National Park.

Option E 4.2

New sites identified in accordance with recreation zones and settlement strategy and linked to sustainable gateways or hubs

Impact of Evidence and Consultation

This approach seeks to pro-actively identify new sustainable locations for development, despite the lack of evidence of need. This is compatible with the second national park purpose, and was supported in some consultation responses. It would pro-actively direct development to the more sustainable locations, in line with PPS7, and it links sustainability, environment and capacity considerations. However, since there is no clear identification of need, it may not be necessary to identify sites 'up front'. Need and demand for particular types of facility should be considered, as required by PPS7. Policy could then be framed so as to enable appropriate developments as and when proposals came forward, subject to criteria covering type, landscape impact, scale, access, amenity etc. Landscape Character Assessment could be used to help identify areas where development may be acceptable.

Opinion was divided in consultation responses between the current zoning or a more flexible approach to satisfy demand.

Sustainability Appraisal

Sustainability Appraisal shows many uncertain outcomes depending on the nature of the sites selected; environmental capacity of sites must be carefully considered to ensure tourism is not developed to the detriment of valued characteristics of the National Park.

Option E 4.3

No new major tourism or recreational facilities in view of potential traffic impact and environmental decline

Impact of Evidence and Consultation

This is a very negative approach, and therefore less compatible with the national park purpose to promote understanding and enjoyment, although it accords with some public concern about harm to the environment. Although it resists 'major' developments, it could still allow small-scale provision, which may be acceptable in some locations. This option was supported by a number of consultation responses.

Sustainability Appraisal

Sustainability Appraisal notes that this option clearly supports environmental objectives, but limiting it to small-scale would have negative impact on the economy.

Further Suggestions from Initial Consultation on Refined Options

7.88 Under options E4.1 and E4.3 no new sites would be specifically allocated for tourist facilities or attractions, although E4.3 allows small-scale development proposals to come forward freely. The options could include the clear opportunity to consider proposals for tourist facilities or attractions of an appropriate type, scale and location. They also need to recognise that private facilities/attractions may be delivered for economic purposes rather than for National Park management reasons.

7.89 These options do not clearly address the identified need for policy relating to the national park purpose of promoting understanding of the area, for example through educational developments.

7.90 It was also suggested that the options do not consider the needs of leisure activities that require facilities in specific locations, such as water sports and mountain biking, which may not be able to locate in accordance with the settlement strategy, gateways or hubs.

7.91 Scale is crucial to the acceptability of tourist developments. There is a feeling that there should be no major developments in the National Park at all. However, size is a difficult concept, it may be better to say 'appropriate' or 'minimum impact' than to determine what is 'major' in the context of the National Park.

7.92 We welcome your comments on these options.

Issue E5

Issue E 5

Serviced and self-catering holiday accommodation

7.93 PPS7 recommends converting suitable existing buildings to hotel and serviced accommodation, and supports self-catering where it would accord with sustainable development objectives. Conversions to holiday accommodation can be effective in securing the fabric of traditional buildings from dereliction. However, cumulative development may harm local character, particularly in the open countryside. The Good Practice Guide on Planning for Tourism (2006) advises that particular care needs to be taken over the number, scale and location of accommodation facilities in National Parks, to ensure that the particular qualities that justified designation are conserved.

7.94 The tourism industry naturally seeks to derive the maximum from staying visitors, because income per head to the local economy is far greater from them than from day visitors. This inevitably means an increasing pressure for development of accommodation and facilities for that sector. East Midlands Regional Spatial Strategy Policy 24 recommends additional accommodation provision and improvements to quality. The Regional Economic Strategy 2006-2011 targets for tourism are to raise visitor expenditure and increase visitor value rather than volume by an emphasis on overnight stays. The Peak District Sustainable Tourism Strategy (2000) aims to increase staying visitors by encouraging more accommodation in the National Park and surrounding market towns.

7.95 East Midlands Tourism identifies a shortage of serviced holiday accommodation (Peak District and Derbyshire Investment Opportunities Assessment Report 2007). Consultation response also suggested that there is a shortage of hotel accommodation in the National Park and that developing this could create jobs and services as well as bringing in spending visitors. However, although evidence seems to back up the quantitative assessment, it indicates that increasing serviced accommodation stock may not be a viable economic proposition. Current policies, although strict, do not prevent additional hotel provision by conversion or change of use of existing buildings in the National Park, or extending existing establishments, but few proposals have come forward. The large number of units approved at the Marquis of Granby will have a considerable impact on the serviced accommodation bedspaces available in the area, but it is the only significant development proposal. Considering the evidence showing low and seasonal demand, there may be little justification for promoting new build hotel provision.

7.96 The greater Peak District area already provides a substantial quantity and variety of hotel and other serviced accommodation. In 2005, 3.5 million overnight trips were made to Derbyshire and the Peak District; a third of the total expenditure of £1.29 billion was from overnight visitors. Between 2003 and 2006, the number of staying visitor trips, nights and spend have increased steadily (up by 10%, 9% and 13% respectively), over a time when day visitor trips decreased by 4%. Staying visitors spend over five times more than those day visitors who spent money – and many day visitors spend nothing at all. (Tourism Investment Opportunities Assessment Reports: East Midlands and Peak District & Derbyshire 2007).

7.97 The total number of places for holidaymakers to stay is not known. There were around 700 second and holiday homes in 2001 and an additional 316 completed by 2006/7 (Annual Monitoring Report (AMR) 2006/07). In the Peak District and Derbyshire there are approx 751 serviced establishments (13,139 bedspaces), and 1350 self-catering units (5,358 bedspaces). The main focus of serviced accommodation is in Bakewell and surrounding market towns. Tourist stays in Derbyshire declined marginally in 2004-5. Estimated hotel occupancy 2005 was 56.3% in High Peak, 48.8% in Derbyshire Dales – significantly lower than the 69-71% over the past 7 years in the English regional hotel market. Rural hotels in Derbyshire rely extensively on leisure and weekend demand, with significant downturns in winter months. Leisure visitors to the Peak District prefer well-priced traditional small hotels and B&Bs in countryside locations. Chain hotel operators generally look for larger developments, urban locations, corporate activity and good road access, and are therefore unlikely to locate in the National Park. (Derby and Derbyshire Economic Partnership Hotel Demand Study 2007).

7.98 On the other hand, a large amount of self-catering holiday accommodation has been provided under current policy. Since 1991/92, 316 holiday units by conversion have been completed (more than 19 per year); over that period 555 were permitted, and 84 lapsed. In 2006/07, 14 self-catering holiday conversions were permitted, and there were 113 outstanding permissions (AMR 2006/07). Much of this has been diversification, providing a valuable supplement to farm incomes: farm-based holiday accommodation addresses in the National Park increased by 45% between 1991 and 2000. Holiday developments may reduce the number of smaller properties for local need, and earlier consultations showed that this can increase frustrations amongst local people. However, not all the buildings allowed for holiday homes could have provided affordable housing for locals, because of unsuitable access through the farm or lack of living space / curtilage necessary for permanent housing.

7.99 The Tourism Investment Opportunities Assessment by East Midlands Tourism (2007) notes that, "*there is a perceived over-supply of self-catering accommodation, which is not being met by demand.*" There is anecdotal evidence that over-supply of self-catering holiday accommodation is affecting profitability. However, bookings and requests at Tourist Information Centres suggest that demand for holiday accommodation is strong, particularly at the higher end of the market. Self-catering units show significant seasonal variations in occupancy. It is difficult to decide whether there is so much provision that providers cannot rely on making a reasonable profit from their enterprise. However, there may be conflict over the future use of converted buildings if holiday accommodation is no longer viable. There is also some concern that conversions or changes of use to holiday accommodation are taking precedence over potential affordable housing in the countryside, and a perception that current policies favour tourist accommodation over housing for locals. However there may be some reverse movement. The 2008 AMR noted that the removal of 3 holiday occupancy conditions formed two new dwellings for the open market and one for local needs.

7.100 The NPMP aims to improve both quantity and quality of tourism products. Although the quality of holiday accommodation is an area for improvement, the price range should be as wide as possible to enable more people to enjoy the Peak District in line with national park purposes. Operators could be encouraged to explore quality improvements and niche marketing opportunities.

7.101 Because of the complex factors that influence the holiday visitor market (including the weather, the state of the economy, fuel prices, exchange rates, international disasters etc), it is very difficult to conclude whether or not there is a case for more tourist accommodation.

7.102 There was a very limited consultation response to this issue, with no consensus.

7.103 The 2007 Issues and Options referred only to serviced holiday accommodation, but the wording has now been taken to cover both serviced and self-catering accommodation. The options also need to consider holiday conversions within settlements. This issue must also be integrated with options for developing affordable housing by conversions.

Option E 5.1

No new build holiday accommodation, but scope via extension or improvement of existing accommodation and by conversion of traditional buildings outside settlements

Impact of Evidence and Consultation

This option continues the current policy approach. It is the most restrictive option, limiting opportunities to increase and broaden the range of visitor accommodation on offer, particularly serviced development. However, it is in line with Government policy in PPS7 since it promotes conversions and extensions to existing establishments. Wording of the option could be amended to include changes of use of modern buildings of traditional design. There was a very limited response to consultation on this option.

Sustainability Appraisal

Sustainability Appraisal is generally favourable, except implications for the provision of local needs housing by conversions.

Option E 5.2

Favour holiday accommodation conversions outside designated settlements, and allow some new build holiday accommodation in Bakewell. Put Section 106 agreements on holiday homes to control use and external appearance in sensitive locations

Impact of Evidence and Consultation

This approach offers more opportunity than current policy, in line with government policy and guidance. There is no clear evidence to suggest that proposals for new-build serviced holiday accommodation are likely to come forward, but Bakewell would probably be the preferred location. Section 106 agreements are an additional planning control which could be used to limit use and alterations to external appearance in sensitive locations, in line with national park purposes and the protection of valued characteristics.

There was a very limited consultation response.

Sustainability Appraisal

Sustainability Appraisal over stresses the negative impacts of new build holiday accommodation in Bakewell, which will depend on individual sites chosen.

Option E 5.3

Permit new build holiday accommodation in Bakewell and other larger settlements such as Tideswell and Hathersage, with scope for holiday conversions inside and outside settlements

Impact of Evidence and Consultation

This is the most proactive option, and has the potential to maximise the provision of holiday accommodation and its contribution to the local economy. However, there is little evidence of demand for new-build serviced accommodation. There was no consultation response on this option.

Sustainability Appraisal

Sustainability Appraisal again over stresses the negative impacts, as above for option E5.2

Option E 5.4

No new build serviced holiday accommodation unless replacing existing holiday accommodation, because of potential traffic impact and environmental decline

Impact of Evidence and Consultation

This approach limits new build serviced holiday accommodation, justified by sustainability considerations advised in PPS4 consultation and the Good Practice Guide. By preventing new build accommodation, it restricts opportunities to enhance the tourism offer and increase economic benefits. It gives no indication of the approach to extensions or conversions for tourist accommodation. This option was proposed in response to the 2007 consultation.

Sustainability Appraisal

Sustainability Appraisal shows a mixed impact, several positive, but uncertainties in relation to some environmental objectives and negative on the economy objective.

Further Suggestions from Initial Consultation on Refined Options

7.104 It was suggested at the stakeholder workshop that a new option could refer to eco-tourism, but that this need not be exclusive and could be added to other options. The term requires definition, but it is often used in a wider tourism context than simply

accommodation provision. The concept is likely to fit well with the second national park purpose (to promote opportunities for the understanding and enjoyment of the National Park's special qualities) so a new option is proposed below.

Option E5.5

Explore the greater potential for eco-tourism opportunities

7.105 Concern was expressed at the number of holiday conversions coming forward, with a consequent impact on local communities.

7.106 It was further suggested that this Issue should be separated into two distinct elements for holiday accommodation by new build and by conversions.

7.107 We welcome your comments on these options.

Issue E6

Issue E 6

Caravans and camping

7.108 Camping and caravanning is one of the most popular forms of holiday accommodation in the Peak District. There were an estimated 151 camping and caravan sites (4,500 pitches) in the Peak District and Derbyshire in 2005, ranging from small backpacking sites to larger holiday parks with touring and static caravans. There are some parts of the National Park where sites and pitches are in short supply, and new provision could meet perceived demand. A comprehensive audit will be carried out shortly. We have no evidence of demand for and occupancy of camping and caravan sites.

7.109 In a relatively small number of responses to 2007 consultation, opinion was divided on the acceptability of small or large sites, but there was agreement on the need for them to be sited where they do not harm the environment. There is pressure within the holiday park industry for larger sites with the capability to provide the quality and facilities that holiday makers may demand. Although there are some large sites in the National Park, the Peak District landscape is generally too open in character to accommodate large scale developments. Large holiday parks with extensive recreation facilities may not be in sympathy with the longstanding objective that visitors should be encouraged to come to the Peak District to enjoy the particular qualities of the landscape and valued characteristics such as tranquillity, nor the NPMP Outcome that tourism development should capitalise on the location in a special and distinctive environment.

7.110 There may be conflict here between national park purposes, but Government guidance supports limiting the provision or size of camping and caravan sites in order to protect the landscape and character of national parks. The development of additional small sites carefully sited and attached to farms, and supporting farm incomes, could probably be more easily accommodated without harming the National Park's special qualities. Large sites could be located outside the National Park within the 'Greater Peak District', in line with East Midlands Regional Spatial Strategy Policy 11 to ease pressure on the National Park.

7.111 As standards improve and aspirations rise, there are increasing calls from operators for sites to be able to provide facilities including shops, restaurants, sports and leisure facilities. Many site operators consider that such upgrading will be vital to the continued competitiveness of Peak District sites in the UK and European market. Our current approach is that additional facilities may be acceptable, but only where they will not have a significant adverse effect on the vitality and viability of existing facilities in surrounding communities. Government guidance supports this approach. The construction of new dwellings for site wardens has also been resisted since policies have required that sites must be close to existing farmsteads to enable supervision. Although the Tourism Good Practice Guide Annex A (2006) acknowledges that there may be case for providing living accommodation for key staff on camping and caravan sites, there would be few instances where this is necessary if a strict approach to the development of new sites is continued.

7.112 A small number of consultation responses were in favour of chalet / lodge developments, which they felt could be acceptable in well-screened locations, and which because of greater occupancy were more beneficial to the area in terms of income and employment. However, the advantages of quality accommodation, higher occupancy, less seasonality, higher visitor spending, lower carbon emissions etc can be better provided in permanent holiday cottages and conversions than in static caravans or chalets, and with less intrusion in the landscape.

7.113 Comments were made at consultation events that chalets and timber lodges are not appropriate in the Peak District landscape. Static caravans and chalet / lodge developments are generally inappropriate in the National Park, because their materials, form, size and regular placing on a site are extremely difficult to blend satisfactorily into the open nature of the Peak District landscape, particularly in the winter months. Chalets or lodges may be more easily accommodated in the fringe areas outside the National Park. This approach is supported by Government guidance, which gives a high priority to the restraint of potentially damaging development in national parks, and the particular location and pressures on the Peak District may justify a clearly restrictive policy.

7.114 The preferred policy approach may need to be reconsidered when comprehensive evidence of existing provision and demand becomes available.

Option E 6.1

Only permit small scale caravan and camping sites

Impact of Evidence and Consultation

This option continues the current approach. Small scale sites can be provided in line with national park purposes and may offer farmers an opportunity to supplement their incomes. It should enable additional camping and caravan provision without harm to landscape and special qualities. However, small sites cannot offer the range of facilities which some holiday makers may demand. The approach could be broadened to enable the provision of additional facilities at existing sites, subject to landscape and other criteria, without encouraging the provision of additional large sites. Consultation responses were divided on the acceptability of small or large sites, but all agreed that they need to be sited where they would do no harm to the environment.

Sustainability Appraisal

Sustainability Appraisal is generally favourable.

Option E 6.2

Permit larger scale facilities and permanent chalets and static caravans where they can be integrated without harm to the valued characteristics of the National Park

Impact of Evidence and Consultation

This option follows calls for larger sites and more facilities, and to permit permanent chalets and static caravans. This approach considers the character and qualities of the National Park as advised in PPS7, draft Regional Spatial Strategy and Tourism Good Practice Guide and could increase the quantity and range of accommodation. However, large permanent sites, chalets / lodges or static caravans are more likely to be intrusive in landscape, so careful control and stringent criteria would be necessary. This could be a more proactive approach, but acknowledging that there may only be limited opportunities. It may be possible to identify situations where holiday parks might be acceptable. Some developments may be better accommodated outside the National Park, as recommended by Regional Spatial Strategy.

Consultation responses were divided on the acceptability of small or large sites, but all agreed that they should be sited where they would do no harm to the environment.

Sustainability Appraisal

According to Sustainability Appraisal, negative impacts arise from likely increase in private car use and increased visitor pressure.

Further Suggestions from Initial Consultation on Refined Options

7.115 Stakeholders suggested that it may be better to accommodate demand on larger sites rather than a greater number of smaller ones, but felt that permanent chalets and static caravans should be excluded because they would be a year round visual intrusion and out of character. Large scale caravan and camping sites could be permitted where they can be integrated without harm to the valued characteristics of the National Park. 'Large scale' would need to be clarified.

Option E 6.3

Allow larger camping and caravan sites where they can be provided without harm to the valued characteristics of the National Park, but not permanent chalets, lodges or static caravans

7.116 Stakeholders also suggested that an additional option should give scope to existing sites to improve quality. This could also include opportunities to improve existing static caravans by colouring or replacement, in order to reduce landscape impact. This may not be an alternative option on its own but could be added to other options.

Option E 6.4

Encourage existing caravan and camping sites to improve quality, for example by landscaping or by colouring / replacing static caravans

7.117 We welcome your comments on these options.

Transport

8 Transport

Introduction

8.1 This Core Strategy Theme takes its direction from the Peak District National Park Management Plan 2006-11 (NPMP), Section 6 Traffic, Travel and Accessibility. The stated outcome contained within the NPMP is that,

"By 2011 highways, transport infrastructure and services have been improved because they:

- *Meet the needs of residents, visitors and surrounding areas.*
- *Increase the proportion of visitors using sustainable means of travel.*
- *Reduce the adverse environmental impacts of travel on the National Park.*
- *Enable more sustainable travel patterns to reduce levels of emissions of carbon dioxide".*

8.2 This outcome is accompanied by a number of actions to achieve it, two of which have a direct relevance to this document:

- Research an environmental levy in partnership with key Stakeholders as a means of securing resources for conserving and enhancing the National Park, promoting its understanding and enjoyment as well as constraining the proliferation of traffic.
- Adopt Local Development Framework (LDF) policies that balance the needs for access within and across the National Park with the need to conserve and enhance the built and natural environments of the National Park.

8.3 Where there are specific links between particular issues and the actions within the NPMP, these are given within the accompanying text.

8.4 There are eight specific Issues within the National Park Authority's Issues and Options for Transport Theme. The Issues cover all forms of transport that are relevant to the National Park, from road travel, to rail and walking and cycling. The issues addressed are as outlined below.

- Issue 1 The need to ensure that design criteria for roads and transport infrastructure conserve and enhance the valued characteristics of the National Park. This Issue has six options.
- Issue 2 The demand for new road schemes to accommodate current and future levels of traffic growth. This Issue has seven options.
- Issue 3 The adverse impact of cross-Park traffic. This Issue has six options.

- Issue 4 The adverse impact of motor vehicles on environmentally sensitive areas of the National Park. This Issue has three options.
- Issue 5 Balancing the need for car and coach parking facilities against their impact. This Issue has five options.
- Issue 6 The demand for new rail schemes (including light rail) to provide alternative means of transport to, from, within and across the National Park. This Issue has five options.
- Issue 7 Accessibility. This Issue has five options.
- Issue 8 The availability of safe walking, cycling and equestrian routes. This Issue has four options.

8.5 The list of issues may not be exhaustive and we welcome your comments to assist us in the formulation of effective policy.

Background

8.6 These Issues and Options have progressed from the initial ones developed by the NPA's Transport Policy Team during summer 2006. These were formulated from core issues emerging from the Transport Chapters of the Peak National Park Structure Plan (1994), the Peak District National Park Local Plan (2001) and more current evidence. The initial Issues and Options were refined later in 2006, with the refinement process mainly resulting in minor word changes. These were then further refined in Spring 2007, to give the Issues more clarity rather than a more generic approach.

8.7 We undertook a consultation exercise in 2005 to inform the development of the NPMP and Development Plan. Entitled 'Help Shape the Future', the consultation was based upon an Issues and Options Document. Issues were highlighted within this document according to the Purposes and Duty of the NPA. Transport and Infrastructure are dealt with under the 'Conserving and Enhancing the National Park purpose, with four particular options:

- Investigate charging an environmental levy to drive in or across the National Park
- Aim to achieve a general reduction in traffic speeds in the National Park
- Ensure the highest standards of environmental design for new transport infrastructure, and oppose cross-Park infrastructure improvements unless they result in an overall environmental benefit to the National Park
- Establish a National Park car parking strategy to guide management of the overall level of parking.

8.8 The 'Promoting the understanding and enjoyment of the National Park's special qualities by the public' purpose, produced three particular options:

- Work with partners to link the travel experience to the whole visitor experience
- Investigate ways to rationalise parking
- Create ways to move around the National Park by bus instead of car.

8.9 The 'fostering social and economic well being' duty, produced five particular options:

- Encourage modernised infrastructure such as visitor accommodation and transport links, to ensure that resident communities share the economic and employment benefits of tourism
- Formulate a clear, integrated accessibility strategy that can be implemented via authority wide policy processes
- Promote public transport and its marketing, and review bus subsidy
- Investigate ways to secure more sustainable use of the car
- Ensure that travel and traffic implications are taken into account when making decisions that affect local services.

8.10 The response to these options was as follows:

- General support for the broad aims of an environmental levy to help reduce the impact of traffic and raise more funds for public transport but,
- Need to consider impact on wider accessibility, commercial users and local people, and should not prevent people from getting to and enjoying the National Park
- General support to reduce the impact of quarrying (traffic, noise, dust, etc) by seeking green travel plans
- Strong support for reduction in traffic speeds to preserve tranquillity, reduce road kill, increase safety for cyclists, pedestrians and horses and reduce the potential for road traffic collisions
- Some support for raising the design standards of essential new transport infrastructure, but recognition that it will be costly and could result in fewer schemes being delivered
- “Overall environmental benefit” needs to be clarified
- Suggestion that this could be expanded to address creeping urbanisation of all types of development, indeed making a case for an overall signing/street furniture policy

- Support for establishing a National Park car parking strategy to guide the management of all parking although this would require agreement with the various district/borough councils.

8.11 In Spring 2007, we consulted on our Core Strategy for the LDF. The Transport Section of the Spring 2007 Consultation was based upon an earlier iteration of the Transport options contained within this document. The responses to the Spring 2007 consultation were:

- A preference for introducing measures to reduce vehicle numbers & speeds, rather than accepting current and future traffic levels and seeking to reduce their impact
- A preference for measures including road user charging to mitigate and manage environmental impact of traffic and parking
- Slight preference for policies seeking improved public transport, but without introduction of fiscal charges for driving in the National Park or Green Travel Plan
- Divided opinion about the approach to 'access to services'
- Slight preference for seeking a stronger approach to achieve appropriate road and transport infrastructure in keeping with the National Park setting.

8.12 Since Spring 2007, we have continued to refine the Options, taking into account stakeholder and sustainability appraisal comments. We have also focused the Issues on ones that are core and have spatial planning implications. The focusing exercise has resulted in the following options being removed from this consultation document:

- The need to increase the perceived attractiveness of public transport
- The availability of access to public transport
- Climate change
- Pressures of freight transport and provision for lorry parking
- The detrimental impact of air transport on the National Park
- Pipelines, conveyors and overhead lines.

8.13 These Issues will either be taken forward when detailed policy decisions on the LDF are made, or by other more appropriate means if there are no spatial planning implications in the Issue. This has resulted in the below Issues and Options, which are now the core spatial Issues and Options for transport within the National Park.

8.14 It should be noted that although the majority of the Issues and Options have been through the sustainability appraisal process, as a result of stakeholder comments and the refinement process, some have yet to go through the process. As work on the LDF progresses, these Issues and Options will be taken through the sustainability appraisal process, so the results of this can be taken into account.

Issue T1

Issue T1

The need to ensure that design criteria for roads and transport infrastructure conserve and enhance the valued characteristics of the National Park

8.15 The objective of this Issue and Options is to ensure that the design for roads and other transport infrastructure conserves and enhances the built and natural environments of the National Park. In addition, this issue and options seek to reduce average speed across the National Park and achieve the benefits of improvements in road safety, and vehicle speeds that are more in keeping with the sense of place of the National Park. This is in keeping with the NPMP Actions of seeking a reduction in the carbon emissions caused by motorised transport, and constraining the proliferation of traffic.

8.16 The 1991 report of the National Parks Review Panel defined the essence of the concept of national parks as lying in, "*the striking quality and remoteness of much of their scenery, the harmony between man and nature it displays...*" (Department of the Environment Circular 12/96, para 3, 1996). Therefore, "*the Government regards National Park designation as conferring the highest status of protection as far as landscape and scenic beauty are concerned*" (Department of the Environment Circular 12/96, para 6, 1996). The impact of transport on the landscape of the National Park has been brought into focus recently, by both the proposed A628 Tintwistle Relief Road and the increase in number and size of road signs within the We welcome your comments on these options.

8.17 Many improvements in transport infrastructure do not require planning permission; these include additional road signs, carriageway lining schemes and railway bridge replacement. However, such improvements in infrastructure may have impacts on the valued characteristics of the National Park, particularly when they are located within conservation areas or in environmentally sensitive locations.

8.18 The effects of transport infrastructure on the natural landscape can be significant and range in the type of impact. The type of impact can be divided into two; direct and indirect. An illustrative example of the two types of impact is in building a new road; the road infrastructure (tarmac, lighting, signing) has a direct impact on the landscape. However, the vehicles travelling on the road have an indirect impact, as they are associated with the infrastructure but are not actually part of the road itself. In addition, the direct impact is permanently present whereas the indirect impact varies in significance, for example, the impact increases in rush hour traffic.

8.19 The Peak National Park Structure Plan (1994) takes the view that any scheme should be constructed in a manner and to a design that respects the valued characteristics of the National Park. The Local Plan (2001) adds detail to this stating that, to meet an agency's duty under the Environment Act (1995), the highest standard of environmental design and materials should be used in transport infrastructure to conserve and enhance the valued characteristics of the area.

8.20 This approach was taken to ensure that the design of new road schemes or other transport infrastructure, such as lighting and signing are in keeping with, rather than detrimental to, the valued characteristics of the National Park. The Structure Plan (1994) states that the nature of the roads within the National Park are an important feature, describing them as being, "*narrow, steep and twisting and enclosed by ancient walls or hedgerows.*" The Structure Plan further states that, "*major changes in alignment or width; the introduction of urban features such as kerbing, lighting and over-generous signing can have detrimental effects on the valued characteristics of the National Park.*"

8.21 Unfortunately, the very nature of the roads within the National Park that make them an important feature can lead to problems with road safety. The National Park is surrounded by several towns and conurbations, which are linked by a number of 'A' roads. In addition the National Park contains a number of settlements that are in turn linked to each other and the 'A' Road Network by many 'B', 'C' and Unclassified Roads. These roads vary between high speed dual-carriageway and designated 'Quiet Lanes'. However the majority of these roads are rural in nature, and have traditionally, with few exceptions, been subject to the National Speed Limit of 60mph, except where they pass through settlements.

8.22 The main 'A' and 'B' roads through the Peak District traditionally consist of bends linked with long straight sections, and often feature steep ascents and descents. In addition many of these routes cross the National Park at a relatively high altitude and are often exposed and subject to harsh weather conditions, including rain, sleet, snow, fog, ice and strong winds. Where the roads pass through low-lying valleys, they have in recent years been increasingly subject to flood conditions. All of these factors potentially make roads within the National Park dangerous in poor weather conditions. In addition to these factors, the roads of the Peak District carry a mix of road users, including local residents wishing to access jobs and services, cross-Park traffic, traffic servicing National Park businesses and residents, and visitor traffic.

8.23 In addition to the mix of road users; the traffic itself comprises different elements including cars, vans, a high proportion of Heavy Goods Vehicle (HGV) traffic on certain roads, plus agricultural vehicles. At weekends the situation changes with an influx of motorcycles and, in the summer, caravans along with walkers, cyclists and equestrians. This mix of traffic and road users often creates disparity in the desired speed of travel, with resident and commuter traffic often being more familiar with the roads than visitors. This in turn can lead to dangerous high-speed overtaking manoeuvres. When combined with the nature of National Park roads, this mix of road users and traffic types has led to a number of accidents on National Park roads, many of which are regarded by the European Road Assessment Programme as being of High and Medium-High risk for road users; these routes include the following:

- A537 – Buxton to Macclesfield (High Risk)
- A54 – Buxton to Congleton (Medium to High Risk)
- A53 – Leek to Buxton (Medium to High Risk)
- A515 – Ashbourne to Buxton (Medium to High Risk)
- A619/A623 – Chesterfield to Barmoor Clough (Medium to High Risk)
- A628 – Flouch to Hollingworth (Medium to High Risk).

8.24 Remedial measures to improve road safety almost always necessitate the introduction of additional infrastructure in the form of engineering or signage solutions. The Structure and Local Plans seek to improve both road safety and a ‘sense of place’ within the National Park through traffic management measures to achieve reduced speeds on National Park roads.

8.25 A reduction in speed limits, particularly on cross-Park routes is seen within the Local Plan, as possibly acting as a deterrent to cross-Park traffic. However, the Plan states that this should take the form of selective and appropriate speed reduction measures, rather than the introduction of a blanket speed limit across the whole of the National Park.

8.26 In recent years, the Department for Transport has produced guidance on the setting of local speed limits (Circular 01/06 New Guidance on Setting Local Speed Limits, 2006). This Guidance tasks highway authorities with reviewing speed limits on all A and B roads, and implementing any necessary changes in speed limit by 2011. The Guidance was produced as a result of concern regarding the number of casualties occurring from road traffic collisions, and in particular on rural roads.

8.27 In light of this guidance, a number of roads within the Peak District have undergone speed limit reviews, resulting in reduced speed limits. The effects of these new speed limits on reducing speed and accidents is not yet known across the whole of the National Park, as changes have only been implemented recently. Where speed limits are reduced following review, they usually result in the need for additional signage, which can detrimentally impact on the National Park’s landscape. This is particularly the case with regard to Vehicle Activated Signs, which are generally of a larger scale than normal road signs. Such signs are often desired by highway authorities and the police where regular enforcement of speed limits is problematic or to warn of a specific hazard.

8.28 Finally, in order to achieve the modal shift from the private car to more sustainable modes of transport, it may be necessary to implement infrastructure improvements such as improved waiting facilities, cycle lanes or new footpaths. Such improvements should be undertaken in a way that they conserve and enhance the valued characteristics of the National Park.

Option T1.1

Assume that the highway authorities are in the best position to determine the design of roads and transport infrastructure and that it is not the concern of the National Park Authority, provided that Section 62 of the Environment Act (1995), PPS7: Sustainable Development In Rural Areas (2004) and other relevant National and Regional Policies and Guidance are adhered to

Impact of Evidence and Consultation

This option is not the best for achieving transport infrastructure that is consistent across the National Park. The National Park has seven constituent highway authorities, each of which is responsible for the provision of transport infrastructure and road maintenance within their own area. In addition the Highways Agency is responsible for all such infrastructure and maintenance along the A628 Trunk Road through the National Park.

The introduction of stricter standards for signing within the Department for Transport Traffic Signs Manual, has led to higher numbers and larger sizes of signs within the National Park. The visual impact of such signs on the landscape has resulted in the establishment of a closer working relationship between ourselves and some highway authorities, in order to mitigate the effects of both road signs and other transport infrastructure.

Sustainability Appraisal

Where we are not involved in the design of transport infrastructure, there is a risk of negative impacts on the natural environment, with landscape considerations not being given due attention.

Option T1.2

Ensure the design of transport infrastructure conserves and enhances the valued characteristics of the area. This includes lighting, lining, signing, including the removal of unnecessary clutter, and other street furniture. Ensure consistency between the differing highway authorities for all infrastructure

Impact of Evidence and Consultation

This option is more in keeping with the aspirations of the National Park Management Plan, to minimise the impact of roads and transport infrastructure on the built and natural environments of the National Park. The close working relationships between ourselves and some constituent highway authorities to minimise the impact of signage and other transport infrastructure is supported within this option.

Sustainability Appraisal

This option is in keeping with the National Park setting and should benefit the natural environment, landscape and townscape.

Option T1.3

Encourage and support the provision of measures to mitigate wildlife severance effects, where transport infrastructure is introduced or diverted

Impact of Evidence and Consultation

This option is important to minimise the impact of transport infrastructure such as roads on wildlife. Such measures could include bat bridges, or tunnels for badgers and amphibians to cross roads/railways. However this must be balanced against the potential impact of mitigation measures on the valued characteristics of the National Park.

Sustainability Appraisal

This option is new, and therefore has not yet been Appraised. The option will go through a Sustainability Appraisal in the future.

Option T1.4

Accept current speed limits as adopted by respective highway authorities and the Highways Agency

Impact of Evidence and Consultation

This option makes no allowance of the need for particular speed limits arising from traffic management schemes within specific areas of the We welcome your comments on these options. In recent years we have successfully worked with partners to implement lower speed limits in particularly environmentally sensitive areas as part of wider traffic management measures, such as in the Upper Derwent Valley and Stanage. The adoption of this option would be contradictory to such an approach in the future.

Sustainability Appraisal

Lower speed limits have the capacity to increase tranquillity, reduce emissions and also reduce accidents.

Option T1.5

Retain the current approach of acceptance of current speed limits as adopted by respective highway authorities and the Highways Agency, whilst seeking to influence a change, usually a reduction, in speed limits within specific geographical areas or settlements where problems arise

Impact of Evidence and Consultation

This option takes the approach that whilst highway authorities and the Highways Agency are best placed to judge the need for, and implement, speed limits within the National Park. There are some specific locations where we can influence highway authorities and the Highways Agency to implement specific speed limits to assist in minimising traffic or visitor impact.

Sustainability Appraisal

Reducing speed limits may bring improved safety, tranquillity, air pollution, and greenhouse gas emissions. However, such reductions may also cause an increase in signage, with subsequent detriment to the historic environment and landscape.

Option T1.6

Take a more pro-active role in partnership with Local Authorities and SPITS, seeking to influence the review of rural speed limits currently being undertaken by highway authorities to ensure consistency of speed limits across the whole of the National Park

Impact of Evidence and Consultation

This option is in keeping with the SPITS Business Plan 2005-2015 and would seek to ensure that new speed limits are consistent between highway authorities throughout the National Park. This would also require that accompanying infrastructure such as signage is also applied consistently across highway authority boundaries.

This was very much supported. The reference to SPITS was questioned. Is it necessary? Does SPITS add value?

Sustainability Appraisal

The possible effects of any speed limit reductions are outlined under T1.5.

Further Suggestions from Initial Consultation on Refined Options

8.29 Comment on Issue T1:

- Attractive option to reduce speed limits - there would be traffic reduction and climate change benefits
- This needs to be the first issue, as it is key
- What about making signage distinctive – the National Park is all about place so it should be distinctive?

8.30 We welcome your comments on these options.

Issue T2

Issue T2

The demand for new road schemes to accommodate current and future levels of traffic growth

8.31 The background to this Issue is to ensure that the desire for new roads within the National Park is balanced against national park purposes, and the aspiration expressed within the Peak District NPMP to constrain the proliferation of traffic.

8.32 There has been a general presumption against the building of major new roads in national parks since Lord Sandford's review of English and Welsh National Parks in the early 1970s. This review resulted in the DoE Circular 4/76 (1976), which stated,

"It is now the policy of Government that investment in trunk roads should be directed to developing routes for long distance traffic which avoid National Parks; and that no new road for long distance traffic should be constructed through a National Park, or existing road upgraded, unless it has been demonstrated that there is a compelling need which would not be met by any reasonable alternative means."

8.33 This position was further emphasised by the DoE Circular 125/77 (1977), which stated,

"Where there is a compelling need for some solution to be found to the problem of increased through traffic, or to problems of road safety, in a National Park, a determined search should be made for alternatives which do not involve upgrading the existing route or new construction."

8.34 The Government White Paper, *A New Deal for Transport: Better for Everyone* (1998), emphasised a need to look at solutions to congestion other than road building.

8.35 PPS 7: *Sustainable Development in Rural Areas* (2004), when referring to Nationally Designated Areas, including national parks, states,

"Major developments should not take place in these designated areas, except in exceptional circumstances. This policy includes major development proposals that raise issues of national significance. Because of the serious impact that major developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination. Major development proposals should be demonstrated to be in the public interest before being allowed to proceed."

8.36 Department for Transport (DoT) Circular 02/07 *Planning and the Strategic Road Network* (2007) provides guidance to Planning Authorities in the formulation of their LDF documents. This guidance focuses upon the provision of Smarter Choices where new development is proposed, in order to avoid impacts upon the Strategic Road Network. Circular 02/07 states,

"It is Government transport policy, wherever possible, to look for alternatives to building new roads, by reducing the impact of road users on each other and the environment, improving road performance through better network management and making smarter journey choices easier. Any strategic road capacity constraint on sustainable economic development should be identified at the RSS stage. Where appropriate, measures to overcome such constraints should be promoted through the Regional Transport Strategy, although the presumption should be to give preference, where possible, to solutions other than the provision of new road capacity."

8.37 The Draft East Midlands Spatial Strategy (2007), Policy 9 *Development in the Peak Sub-area* states, *"wherever practicable, routes for long distance traffic should be developed to avoid the National Park."*

8.38 This issue has recently been brought into sharp focus by two proposed road schemes that, if they gain the necessary approvals to proceed, would have a significant impact on the National Park. The schemes are the A57/A628 Mottram -Tintwistle Bypass and A628/A616 Route Restraint Measures, which is being promoted by the Highways Agency, and the associated Glossop Spur, which is being promoted by Tameside Metropolitan Borough Council.

8.39 The A628 is situated in the north of the National Park and is a cross-Park route that links Manchester and Sheffield. Although it is a trunk road, which means it is a strategic route of national importance, it passes through the three villages of Mottram, Hollingworth and Tintwistle. Part of the village of Tintwistle is in the National Park, and the two other villages are wholly outside the National Park.

8.40 In the case of both the January 2006 and February 2007 Draft Orders for the scheme, the Authority resolved to object to the Bypass as it currently stands due to the predicted adverse impacts on the National Park. The Authority also objected to the Glossop Spur proposal. A Public Inquiry into both of these schemes is currently being held. The Inquiry

opened in June 2007, but due to the Highways Agency finding a number of errors in their traffic model, at the time of writing this, the Inquiry has been adjourned until an undetermined date. This is because the Highways Agency are currently checking the traffic model and running it again, after they found the last series of errors. Therefore, until this data is presented, the Inquiry cannot reconvene.

8.41 In terms of the relationship with the LDF, the last formal report to NPA Members regarding the scheme was presented on 30 March 2007. At this meeting, Members were being asked for an Authority decision on whether the Authority wished to support, object or make a representation to the Highways Agency regarding the February 2007 Draft Order documents. A total of five resolutions regarding the proposed A628 Mottram-Tintwistle Bypass were made at the meeting, with the majority focusing on the Authority's response to the Draft Orders. However, one resolution is critical to the development of the LDF and reads as follows,

"That the Authority makes it clear in its response that, subject to due process and consultation and because of concerns that the current road scheme as proposed fails to achieve modern transport objectives in a National Park, that Members are minded to remove the Authority's present in principle support for a relief road solution. Officers are asked to consider this as one of the land use options in the development of new planning policies within the Local Development Framework."

(Reference 37/07).

8.42 At the meeting, there was much Member led discussion regarding the Authority's adopted policy position on the A628 Tintwistle Relief Road, as set out in the adopted 1994 Structure Plan and the adopted 2001 Local Plan. Due to concerns regarding the February 2007 version of the proposed Bypass, Members wished to examine the Authority's adopted policy, and officers suggested that the most appropriate time to undertake such a review would be as part of the options for the development of the LDF. Therefore, removing the Authority's in principle support for a Tintwistle local relief road, as set out in Issue T5 of the adopted 1994 Structure Plan and in the 2001 Local Plan, is being examined in this part of the LDF development process.

8.43 For further information regarding the Authority's in principle support for a Tintwistle local relief road, and the significance of this in principle support, please see the NPAs Traffic Evidence for the proposed A628 Bypass, which has an Inquiry reference of OBJ/0494/PI and can be found on the Inquiry website.

8.44 Therefore, one of the objectives of this issue is to determine whether it is appropriate for the NPA to give 'in principle support' to new road schemes, when the presumption within DoT Circulars 4/76 and 125/7, and PPS7 is against the building of new roads in national parks, except in exceptional circumstances. Examining this issue is in keeping with the NPMP action of, *"adopting Local Development Policies that balance the needs for access within and across the National Park, with the need to conserve and enhance the built and natural environments of the National Park."*

Option T2.1

Permit the building of new road schemes as and when deemed necessary by the Highways Agency and relevant highway authorities, provided that proof is provided of adherence to Section 62 of the Environment Act (1995), PPS7: Sustainable Development In Rural Areas (2004) and other relevant National and Regional Policy and Guidance

Impact of Evidence and Consultation

This option is inappropriate for the National Park Authority, being in contravention of national park purposes. In addition this option is in direct conflict with current Government thinking which favours management of the existing road network in preference to building additional capacity, except in exceptional circumstances.

Some new roads are proposed for safety reasons. However, even then some safety issues can be overcome with other methods.

Option should be deleted because statutory and policy statements oppose road building in national parks other than in exceptional circumstances.

Sustainability Appraisal

Although new roads may improve congestion in the short term and accessibility for those with access to a car, they will have a negative effect on the natural environment and climate change.

Option T2.2

Retain the current approach, which includes the safeguarding of land for new road schemes where considered appropriate and within the limits of DoE Circulars 4/76 and 125/77

Impact of Evidence and Consultation

This option is based upon the Policies of the current Structure and Local Plans for the National Park. However, the option is at odds with PPS7, except where there is an exceptional need for new development, including road schemes. In addition, this option goes against the Peak District National Park Authority's Member resolution to investigate the removal of the Authority's 'in principle support' for the A628 Tintwistle Relief Road.

Since safeguarding land for any road scheme is a policy that favours a solution (road building), this option must be deleted because statutory and policy statements oppose road building in national parks other than in exceptional circumstances.

Sustainability Appraisal

As noted under Option T2.1, new roads may improve congestion in the short term and accessibility for those with a car available, however, they will have a negative effect on the natural environment and climate change.

Option T2.3

Resist all new road schemes within the National Park, except in exceptional circumstances

Impact of Evidence and Consultation

This option is based around the DOE Circulars 4/76 and 125/77 and The Future of Transport White Paper 2004, all of which oppose the building/upgrading of new roads in national parks except in exceptional circumstances, and PPS7 which opposes major development in national parks except in exceptional circumstances. This option would be a radical approach and would by its nature necessitate the removal of 'in principle support' for those routes which are supported within the current Local Plan Policy LT4, including the Tintwistle and Bakewell relief roads. The option is partially supported by the Peak District National Park Authority's Member resolution to investigate the removal of the Authority's 'in principle support' for the A628 Tintwistle Relief Road.

Sustainability Appraisal

This option has the potential to have significant benefits on the natural environment and climate change, including reduced volumes of road traffic. However, there may be short term negative impacts on congestion.

Option T2.4

Removal of 'in principle support' for any already proposed or new road scheme within the National Park

Impact of Evidence and Consultation

This option is in keeping with the spirit of the Authority Member resolution regarding the A628 Tintwistle relief road, but would extend to all road schemes currently offered in principle support within the Structure and Local Plans. Such an approach would show a firm commitment to resist road building within the National Park and is in keeping with Department for Transport Circular 02/07 Planning and the Strategic Road Network (2007).

Need to remove all in principle support for all road schemes, including the Bakewell Relief Road and Tintwistle Relief Road.

Sustainability Appraisal

This option has the potential to have significant benefits for the natural environment and climate change. Resistance of road schemes may however have short term negative impacts on congestion.

Option T2.5

Removal of ‘in principle support’ for a Tintwistle relief road, but not for other already proposed road schemes within the National Park

Impact of Evidence and Consultation

This option is in accordance with the resolution of National Park Authority Members regarding the A628 Tintwistle relief road. This option would not preclude the investigation of and possible support by the National Park Authority of those other road building schemes contained within the Structure and Local Plans.

Option should be deleted because statutory and policy statements oppose road building in national parks other than in exceptional circumstances.

Sustainability Appraisal

‘In principle support’ for existing proposed road schemes could have a negative effect on the natural environment and climate change if proposals go ahead. However, new road schemes may provide travel opportunities for those with access to a car and congestion may be improved in the short term.

Option T2.6

Retention of ‘in principle support’ for any already proposed road schemes within the National Park

Impact of Evidence and Consultation

This option would retain ‘in principle support’ for those road schemes listed within both the Structure and Local Plans. This option is in contradiction to the National Park Authority Member resolution regarding the A628 Tintwistle relief road.

Option should be deleted because statutory and policy statements oppose road building in national parks other than in exceptional circumstances.

Sustainability Appraisal

'In principle support' for existing proposed road schemes could have a negative effect on the natural environment and climate change if proposals go ahead. However, new road schemes may provide travel opportunities for those with access to a car and congestion may be improved in the short term.

Option T2.7

Research an environmental levy in partnership with key Stakeholders as a means of securing resources for conserving and enhancing the National Park, promoting its understanding and enjoyment as well as constraining the proliferation of traffic. Investigate the potential benefits and disadvantages of a National Park-wide 7.5 tonne weight limit excluding all vehicles of more than 7.5 tonne Gross Laden Weight except those that begin or end their journey within the National Park (i.e. those with a legitimate purpose). In parallel investigate the introduction of improved public transport infrastructure and services to overcome the traffic issues in Tintwistle

Impact of Evidence and Consultation

There is currently an adjourned Inquiry into the Highways Agency proposal for the A628 Mottram-Tintwistle Bypass. Should the outcome of the Inquiry be that the Bypass is not approved by the Secretary of State, the Authority would wish to investigate an alternative way of resolving the traffic problems in Tintwistle. This option is based on the principle that if introduced, a weight limit and route specific environmental levy would reduce traffic in the village, but that the revenue stream from the demand management would be used to fund alternative modes of transport, to ensure access is maintained.

However, we do not have the power to unilaterally introduce such a scheme, and would rely upon our constituent highway authorities to do so. In addition, the option makes no allowance for the impact of proposed or possible future congestion charging in the urban areas surrounding the National Park.

Sustainability Appraisal

Reducing the number of motorised vehicles in the National Park is likely to have an overall beneficial impact on the natural environment, reducing air pollution with secondary benefits for human health and the historic environment. Economic impacts are likely to be mixed.

Restricting Heavy Goods Vehicle through traffic will have a beneficial effect on the natural environment of the National Park without restricting visitor or local access to the Park. However, diverting Heavy Goods Vehicles around the National Park may have an adverse impact on the environment outside the National Park boundary and the economy may suffer slightly from the loss of cross-Park trade.

Further Suggestions from Initial Consultation on Refined Options

8.45 Comment on Issue T2: Guidance is for no new roads, and to make the best use of existing infrastructure; so Natural England would like a resistance to all new roads.

8.46 Comment on Issue T2: There needs to be a presumption against new road building except in exceptional circumstances. Not all road schemes are for additional traffic, so it is a wider issue than this issue.

8.47 We welcome your comments on these options.

Issue T3

Issue T3

The adverse impact of traffic

8.48 The objective of this Issue and Options is to ensure that the desires for connectivity between the surrounding urban areas and to visit the National Park are not achieved through the unconstrained growth of traffic on roads within the National Park. This is in keeping with the desire expressed within the Peak District NPMP to constrain the proliferation of traffic through researching an environmental levy. It is also in keeping with the NPMP's action of adopting Local Development Policies that balance the needs for access within and across the National Park, with the need to conserve and enhance the built and natural environments of the National Park.

Cross-Park Traffic

8.49 As a National Park, the Peak District is unique with regard to its location, within the centre of England, but spanning four regions and the boundaries of twelve constituent authorities. The Peak District is also surrounded by a number of large urban areas including Manchester, Sheffield, Derby, Huddersfield, Chesterfield, Barnsley, Oldham, Stockport and Macclesfield, and smaller market towns including Ashbourne, Leek, Matlock and Buxton. Interconnectivity between these areas is seen to be of some importance, particularly from an economic point of view, with the movement of goods, people and services. However in many instances, the most direct route for such movements is through the PDNP. There are a number of roads that whilst they also provide routes for local and visitor traffic are seen as through routes for cross-Park traffic including:

- A6 – Derby to Manchester
- A53 – Leek to Buxton
- A54 – Buxton to Congleton
- A57 – Sheffield to Mottram-in-Longdendale (Manchester)
- A515 – Buxton to Ashbourne
- A537 – Buxton to Macclesfield
- A619/A623 – Chesterfield to Chapel-en-le-Frith (A6 to Manchester)
- A621/A623 – Sheffield to Chapel-en-le-Frith (A6 to Manchester)
- A628 – Barnsley (Sheffield) to Hollingworth (A6 to Manchester)
- A635 – Holmfirth to Greenfield (Greater Manchester).

8.50 The majority of these routes run in an East – West orientation, and the desire for connectivity between the East and West appears to be greatest, particularly between South Yorkshire and Greater Manchester. The Northern Way, whose aim is to achieve sustainable economic development in the North, identified trans-Pennine movements as important in achieving this, stating in a press release on 01/03/07, that, *"the Trans-Pennine corridor is a very important focus to us but not only for Leeds and Manchester, but for the connections through to the North East, as well as those to Liverpool, Central Lancashire, Sheffield and Hull."*

8.51 At the heart of the Northern Way are the eight city regions, three of which lie in close proximity to the National Park with two, Sheffield and Manchester, being linked by a number of cross-Park routes. The Sheffield City Region Shared Transport Vision expresses a desire for the following, *"To have enhanced connections by road and rail to the neighbouring City Regions of Manchester, Leeds, the East Midlands and the Humber Ports."* In a similar way the Manchester City Region, in its 2006 Development Programme, identifies the investigation of, *"the measures needed to improve Trans-Pennine connectivity, in particular to Leeds, in relation to improving labour market efficiency,"* as a priority action for Central Government and its Agencies. The Leeds City Region also recognises the importance of trans-Pennine movement citing the Leeds-Huddersfield-Manchester corridor as being of importance to economic growth within the City Region. However, within the Transport Vision and Investment Plan, widening of the M62 and enhanced rail services are seen as the solutions to the constraints of congestion and overcrowding.

8.52 Cross-Park traffic is of particular concern to us, bringing external costs in its environmental impact within the National Park, whilst not assisting in the achievement of national park purposes. Indeed it could be said that it is at odds with the purpose related to the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park due to its visual impact and its detrimental effect upon air quality, noise and tranquillity. This impact is further exacerbated by the fact that a number of cross-Park routes pass through areas with particularly high conservation designation. The A54, A57, A537, A628 and A635 all pass through areas that have been given the designation of Site of Special Scientific Interest, plus two European designations, Special Protected Area and Special Area of Conservation.

8.53 Likewise, through traffic does not benefit from our purpose of promoting opportunities for the understanding and enjoyment of the National Park's special qualities. Because such traffic is seen as bringing environmental disadvantages to the National Park

with no reciprocal benefit, we would prefer all such cross-Park movements to be made around the outside of the National Park using more suitable existent roads such as the M1, M6, M62 and A50.

8.54 The Peak National Park Structure Plan (1994) makes reference to the Peak Park Joint Planning Board's belief that, "*road traffic should go round the Park rather than through it (unless convinced otherwise).*" This was re-emphasised within the Peak District National Park Local Plan (2001), which stated that the NPA supported, "*the Government view that routes for long distance traffic should avoid National Parks.*"

8.55 The Draft East Midlands Regional Spatial Strategy (2007) Policy 9 – Development in the Peak Sub-area states,

"wherever practicable, routes for long distance traffic should be developed to avoid the National Park

."

8.56 Proposed changes to the Draft East Midlands Regional Spatial Strategy, were announced in July 2008 by the Secretary of State, following its Examination in Public. These changes include the following elements:

- Reducing the need to travel, especially by car, and managing traffic growth and congestion
- Making better use of existing transport networks through better management.

Traffic accessing the National Park

8.57 The geographical location of the Peak District National Park means that it is a popular location to visit. According to the 2001 Census, 32.6% of the population of England live within one hour's drive of the National Park (16 million people). The recent National Parks Awareness Survey, undertaken by GFK NOP (2007) suggested that the PDNP receives 10.1 million visitors per annum from elsewhere in England. The 2005 Peak District Visitor Survey undertaken by the NPA found that approximately 85% of all such visits are made by private car or van, with an average occupancy of 2.8 persons. In some cases, the decision to travel by private car is made out of preference but for other visitors public transport provision may be insufficient to provide a cost effective alternative to the private car.

8.58 This factor brings its own conflict of interest; visitors, who are predominantly arriving by car, generally wish to visit those places where the impact of their vehicle is going to be greatest. Unfortunately these locations are also the ones that are least likely to be easily accessible by public transport, particularly to those visitors travelling from some distance. The impacts of vehicles on environmentally sensitive areas are considered under Issue 4.

8.59 Residents of the National Park may also experience difficulties in accessing jobs and services without resorting to private motorised transport. Almost 87% of households within the National Park have access to a car or van, compared with 73% for England as a whole. This is reflected within the 'travel-to-work' patterns of National Park residents, with 61% travelling to work by private car or van, compared with 55% in the whole of England.

8.60 The Structure Plan combines the issues of Traffic Management and Parking, stating that *traffic management measures will be introduced in order to make the best use of the road network*. The measures suggested include; controls of the movement of heavy lorries, segregated public transport routes, park and ride schemes, traffic restraint in residential/recreational areas and restraint on volumes of traffic entering the National Park. The Structure Plan goes on to state that,

"The foremost method of dealing with predicted traffic growth, especially that of lorry and visitor traffic, must be traffic management in some form, using, for the most part, the existing road network."

8.61 The Structure Plan emphasises that *measures must be taken to manage the demand for travel to match the road space and parking facilities available*.

8.62 The Local Plan takes quite a general approach, stating that traffic management measures will be sought to achieve a general reduction in speeds on roads in the National Park. However the supporting text goes on to specify a number of measures that could be introduced, including road pricing, speed reduction, and reducing both road capacity and parking provision.

Option T3.1

Accept current and future traffic growth, whilst allowing the limitations of the road network to act as a management tool

Impact of Evidence and Consultation

This option is unfeasible, being contrary to national park purposes. The approach would also be contradictory to current Government Policy, which looks to reduce the need to travel where possible and to manage the road network accordingly. Similarly this option is in conflict with the Draft East Midlands Spatial Strategy (2007) and the changes to it proposed by the Secretary of State.

Contrary to Secretary of State revised East Midlands Spatial Strategy (July 2008), which recognises national park statutory purposes and includes a traffic reduction policy.

Sustainability Appraisal

This option could have a negative impact on congestion, increasing air pollution with detrimental effects on human health, and also on access to and within the National Park. Self regulation is unlikely to work in a rural setting where other transport options are limited.

Option T3.2

Retain the current approach accepting, to an extent, current and future traffic growth but seeking to use the Strategic Road Network to direct traffic through and within the National Park by the most appropriate route(s)

Impact of Evidence and Consultation

For the purposes of this option, the definition of the Strategic Road Network is taken from Structure Plan Policy T2, as the Trunk Road and the majority of other Class A roads. This option takes the current approach, as detailed within the Structure and Local Plans; however, it could be construed as being out of touch with current Government Policy and the Draft East Midlands Spatial Strategy (2007). The option takes no account of the desire to reduce the need to travel, and then manage traffic growth and congestion.

Contrary to Secretary of State revised East Midlands Spatial Strategy (July 2008), which recognises national park statutory purposes and includes a traffic reduction policy.

Sustainability Appraisal

Because the road network is not being extended this will have a beneficial impact on the natural environment, particularly if traffic is kept away from the most environmentally sensitive routes.

Option T3.3

Research an environmental levy in partnership with key stakeholders as a means of securing resources for conserving and enhancing the National Park, promoting its understanding and enjoyment as well as constraining the proliferation of traffic. This would provide an additional funding stream for alternative means of access

Impact of Evidence and Consultation

This option shows a firm commitment to address the adverse impact of the private car upon the National Park by setting a value upon this impact. The use of the revenue to provide alternative means of access minimises risk of social exclusion. If introduced, the Strategic Road Network would be used to direct other vehicles, outside of the levied areas, through and within the National Park by the most appropriate route. However, the National Park Authority does not have the power to unilaterally introduce such a scheme, and would rely upon its constituent highway authorities to do so. In addition, the option makes no allowance for the impact of proposed or possible future congestion charging in the urban areas surrounding the National Park.

There are other ways the visitor could pay than congestion charging, such as parking levy.

Could put walking and cycling under this option – encouraging people to walk and cycle rather than use the private car.

Sustainability Appraisal

Reducing the number of motorised vehicles in the National Park is likely to have an overall beneficial impact on the natural environment, reducing air pollution with secondary benefits for human health and the historic environment. Economic impacts are likely to be mixed.

Option T3.4

Influence Sat-Nav companies to direct traffic via the Strategic Road Network, by the most appropriate route according to destination and vehicle type. Seek to influence highway authorities to provide Sat-Nav companies with up-to-date mapping inclusive of Traffic Regulation Orders in order that Sat-Nav devices take account of weight limits and revised speed limits

Impact of Evidence and Consultation

This option is supplementary to Options T3.1, T3.2 or T3.3, being aimed at ensuring that all vehicles are directed according to the most appropriate road for the vehicle type and destination. This option would help to alleviate the impact of misdirected vehicles, and in particular HGVs, upon villages, hamlets and those roads falling outside of the Strategic Road Network.

It is not realistic to influence Sat-Nav companies.

Sustainability Appraisal

This should have positive impacts on environmental objectives within the National Park but may have negative effects on the environment outside the National Park. This option may also result in net increases in greenhouse gas emissions as drivers take longer routes.

Option T3.5

Investigate the potential benefits and disadvantages of a Park-wide 7.5 tonne weight limit, excluding all vehicles of more than 7.5 tonne Gross Laden Weight, except those that begin or end their journey within the National Park (i.e. those with a legitimate purpose)

Impact of Evidence and Consultation

This option could be an extension to either Option T3.2 or T3.3 and looks to remove cross-Park Heavy Goods Vehicles from the road network. If introduced, this option would require the co-operation of the National Park's constituent highway authorities in order to be implemented, and would then require enforcement to ensure its success. The introduction of such a weight limit upon the A628 Trunk Road inside the National Park would require the cooperation of the Highways Agency.

There would be no conflict with the National Park Authority duty because the Park-wide Heavy Goods Vehicle ban would still allow access to businesses in the National Park.

Sustainability Appraisal

Restricting Heavy Goods Vehicle through traffic will have a beneficial effect on the natural environment of the Park without restricting visitor or local access to the National Park. However, diverting Heavy Goods Vehicles around the National Park may have an adverse impact on the environment outside the Park boundary and the economy may suffer slightly from the loss of cross-Park trade.

Option T3.6

Act in partnership with other Constituent Authorities to introduce standardised parking charges for all car parks within the National Park

Impact of Evidence and Consultation

This option could be introduced alongside all other options, and looks to introduce standard charges for Local Authority owned car parks throughout the National Park. This option could help to reduce the use of railway station car parks etc by non-rail users. However it could also lead to more inappropriate roadside parking, if all car parks had charges.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Further Suggestions from Initial Consultation on Refined Options

Comment on Issue T3: The options in this issue do not appear to be mutually exclusive. We would like to see options 3, 4 and 5 together, as these would protect the National Park. These are the more innovative ones.

We welcome your comments on these options.

Issue T4

Issue T4

The adverse impact of motor vehicles on environmentally sensitive areas of the National Park

8.63 The objective of this Issue and the Options arising from it is to ensure that environmentally sensitive areas of the National Park can be enjoyed without being harmed by motor vehicles. This objective supports the desire expressed within the Peak District NPMP to reduce the adverse environmental impacts of travel on the special qualities of the National Park.

8.64 The PDNP is one of the most visited National Parks in the world. The PDNP's 2005 visitor survey indicates that roughly 85% of its visitors arrived in the Park by car or van. These vehicles can have a variety of direct negative environmental impacts, including noise disturbance, landscape intrusion and verge damage. Various indirect effects, including those of the infrastructure associated with road transport are considered elsewhere. Where many visitors select the same destination location, the impacts of many vehicles can risk compromising the very attributes which attract those visitors, and which we are charged with protecting. These locations include some places which are both very sensitive to vehicular impacts, and which are difficult to access by public transport. Indeed, the attributes which can be considered environmentally sensitive, such as remoteness, scenic beauty, tranquillity, cultural heritage, recreational importance and ecological importance, are the very attributes which make such places attractive to visitors.

8.65 This issue refers specifically to those locations which are under particular pressures from large numbers of vehicle-borne visitors. This relates to, but is distinct from, Issue 3: the adverse impact of traffic on the National Park.

8.66 The Structure Plan (1994) takes the view that traffic management measures will be the first method to manage the demand for travel. It states that this will take the form of managing demand to match road space and parking facilities, and will also improve road safety, environmental conditions and reduce conflicts between road users.

8.67 Facilitating vehicular access to locations within the National Park can act in support of both our duty, under the Environment Act (1995), to foster the economic and social wellbeing of local communities, and our purpose of promoting opportunities for understanding

and enjoyment of the special qualities of the National Park by the public, under the National Parks and Access to the Countryside Act, 1949, as amended by the Environment Act, 1995. However, in pursuing these, there is potential for conflict with the Authority's other purpose: to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park. Where these purposes come into conflict and cannot be reconciled through good management, the Sandford Principle dictates that the conservation and enhancement of the National Park should take precedence.

8.68 The pressures of traffic on environmentally sensitive locations have led the NPA to work with partners to introduce Visitor Management Schemes at particular locations. There are currently four such schemes at the following locations, Goyt Valley, Roaches, Stanage and the Upper Derwent Valley.

Option T4.1

Take an approach of non-interference, allowing the disbenefits of congestion within particular areas to act as a restraint measure, on the assumption that if an area becomes too congested this will, over time, detract from the area's popularity

Impact of Evidence and Consultation

The experience at various sites throughout the National Park suggests that the number of vehicles necessary to deter visitors is greater than the carrying capacity of the environment, and thus this option is unrealistic. For example, on busy days at the Roaches, when the available parking becomes full, it is common to see visitors illegally parked on the roadside verge, i.e. not being deterred by the fact that the available parking capacity has been exceeded. Instead they engage in practices which are both environmentally damaging and also illegal. This indicates that it could be necessary for some degree of extra regulation in order not to give rise to conflict with national park purposes.

Sustainability Appraisal

This approach is also likely to have a negative impact on congestion and the environment, increasing air pollution with detrimental effects on human health. Self regulation is unlikely to work in a rural setting where other transport options are limited.

Option T4.2

Retain the current approach of continuing the existing Traffic Management Schemes within the Roaches, Stanage and the Goyt and Upper Derwent Valleys

Impact of Evidence and Consultation

This option has various merits. It offers targeted action to combat the damaging effects of high visitor traffic volumes. Additionally, this regime is already established and is therefore understood by authorities and visitors and requires only maintenance costs. Nevertheless, the example given as evidence to Option T4.1 dates from the period of the current traffic management regime. This indicates that there are still problems, including with parking enforcement and the provision of alternative means of access. Some evolution of a traffic management scheme will inevitably take place, and attempted remedy of these problems is to be expected. However, it may be argued that more fundamental changes are required.

Sustainability Appraisal

The exact nature of the effects will depend on the traffic management schemes implemented. Focusing traffic management in the existing four areas whilst helping these areas, may exacerbate traffic problems elsewhere.

Option T4.3

Review current Traffic Management Schemes and identify areas where additional Traffic Management Schemes could be put in place either by ourselves or in partnership with other Authorities and interested bodies

Impact of Evidence and Consultation

This option is the same as Option 4.2, but with the addition of a review of existing and potential traffic management schemes. Such a review may have merit as the degree to which existing schemes have evolved since their introduction, if at all, may not have been sufficient to ensure that they are still providing maximum benefits and existing schemes may not cover the most desirable locations. However, such a review would require both resources and the support of other Authorities and interested bodies.

This option was very much supported.

Sustainability Appraisal

Putting traffic management schemes in place in areas where traffic has adverse impacts upon communities, as well as the environment should have positive effects on economic and social objectives, human health and safety, as well the natural environment. Impacts are likely to be dependent on the nature of the traffic management measures.

Further Suggestions from Initial Consultation on Refined Options

8.69 There were no stakeholder comments on this Issue, only on individual options.

8.70 We welcome your comments on these options.

Issue T5

Issue T5

Balancing the need for car and coach parking facilities against their impact

8.71 The objective of this Issue and Options is to balance the needs of residents and visitors for parking provision, with the need to conserve and enhance the built and natural environments of the National Park. This is in line with the NPMP action to achieve this through the adoption of appropriate LDF policies. This issue is also related to the NPMP action to adopt a National Park Sustainable Transport Strategy, including an integrated approach to parking, public transport, walking and cycling within the National Park.

8.72 The PDNP is one of the most visited National Parks in the world, with the majority of which arrive by private car or van (85%). According to the NPA's 2005 Visitor Survey, the second most popular mode of transport for visitors was by coach (9%). The fact that 94% of visitors arrive by these two modes creates a demand for visitor parking for both cars/vans and coaches. However, the development of parking infrastructure involves land take and parking facilities can be visually intrusive. In addition, if parking facilities are not carefully located they may be underused, or potentially worsen traffic management within an area. Where parking facilities are not readily available, indiscriminate parking can damage soft verges, cause obstructions and also be visually intrusive. A lack of parking facilities can also lead to competition for available parking spaces between residents and visitors. This is a particular issue in those villages with narrow roads and little on-street parking available.

8.73 Car parking within the National Park serves multiple purposes. In both its on and off-street forms, parking provision may be used predominantly by residents, visitors, or a combination of the two. Similarly, parking may be associated with a single site or attraction, or be used for a number of purposes

8.74 Off-street parking within the National Park is provided by a number of different organisations. This diversity reflects the different uses that each car park is predominantly subject to.

8.75 There is substantial variability in the size and nature of car parks within the National Park. The significant influence of particular visitor destinations is particularly clear. For example, usage of car parks in the Upper Derwent Valley alone exceeds the combined patronage of all pay and display car parks that we own.

8.76 On-street and roadside parking is perhaps the single greatest parking resource within the National Park. This is provided by the various constituent highway authorities, with provision dependent on purpose. For example, metered on-street parking in Bakewell means that this is effectively an extension of the off-road parking resource, while some rural lay-bys effectively act as free car parks. The cost and any restrictions on length of stay are thus related to intended use.

8.77 In some instances where the impact of visitor parking upon residential areas has proved too problematic, Residents Parking Schemes have been implemented. Where such schemes exist, they are achieved through the auspices of the District or Borough Council, and incur a cost to the respective householders. Bakewell is the only settlement within the National Park, where such schemes exist. However where official schemes don't exist, it is not unknown for residents of some roads and housing estates to display signs stating that the parking is for residents only. These signs can themselves visually detract from the setting of such locations.

8.78 There are a number of locations within the National Park where the issue of parking has proved problematic, particularly where there is conflict between the interests of residents and visitors. This has led to a number of surveys being undertaken to ascertain the nature of parking and vehicle movements in particular settlements such as Bakewell and Bradwell. The two Bradwell surveys, undertaken in 2002 and 2003, suggest that the particular problems of that settlement are related to a lack of available on-street parking compared with the number of vehicles owned by residents. This situation can be exacerbated by inconsiderate parking of visitors. The problem is compounded by the relatively steep, narrow and twisting nature of many of the side-roads within the village. The Bakewell surveys were undertaken in 2005, and included both visitor and resident's surveys; the results are still to be finalised.

8.79 Coach parking has also proved problematic in some of the National Park's more popular visitor locations. A coach parking survey was undertaken in Bakewell in 2001, which highlighted some issues, including the need for a drop-off point within the town centre, and the high price of parking compared with other locations.

8.80 The East Midlands Regional Assembly commissioned the preparation of a car parking strategy for the East Midlands, which informed the car parking policy within the Draft East Midlands Spatial Strategy (2007). This dictates the preferred parking provision for new non-residential development, unless there are exceptional circumstances pertaining to access by public transport. This strategy is based upon the parking standards within PPG13: Transport (2001).

Option T5.1

Allow the demand for car parking to govern the number of car parking spaces provided, subject to the levels set within the new East Midlands Car Parking Strategy

Impact of Evidence and Consultation

This option is in contradiction of national park purposes, and has the potential to be most damaging to the National Park.

This option is offering something that is not within the gift of the National Park Authority even under its duty to local communities.

Sustainability Appraisal

This option is likely to have a negative impact on the natural environment and on traffic volumes. However, it might improve access to services and amenities, encourage people to visit the National Park and benefit the local economy.

Option T5.2

Retain the current approach of providing off-street parking where appropriate if coupled with a subsequent and equivalent reduction in on-street parking. Allow for parking facilities as set out within the East Midlands Car Parking Strategy for new non-food business developments

Impact of Evidence and Consultation

This option is in keeping with the current approach, as detailed within the Structure and Local Plans. The assumption is made that East Midlands Parking standards be adopted in place of the Derbyshire Standards. The East Midlands Parking Strategy takes the standards of PPG13 for the maximum number of parking spaces, except in exceptional circumstances.

Sustainability Appraisal

Allowing demand to govern the number of car parking spaces provided is likely to increase the use of cars within the National Park and travelling to the National Park. This may have a negative impact on the natural environment and traffic volumes. However, it might improve access to services and amenities, encourage visitors, and benefit the local economy.

Option T5.3

Retain the current approach to residential and visitor parking. With regard to parking facilities for new non-food business developments adhere to the East Midlands Car Parking Strategy Standards as a minimum, whilst reserving the right to impose more severe parking restrictions on a case by case basis dependent upon traffic impact and availability of alternatives

Impact of Evidence and Consultation

This option is in keeping with the current approach, except that it assumes that East Midlands Parking Standards replace Derbyshire Parking Standards within the Policies. This option would allow for more restrictive parking measures to be implemented in particular locations, where required.

Sustainability Appraisal

Reserving the right to impose more severe parking restrictions on a case by case basis depending upon traffic impact and availability of alternatives should have a positive impact on reducing traffic congestion and volumes of traffic. Other impacts will be dependent on what is specified in the East Midlands Car Parking Strategy.

Option T5.4

Retain the current approach of ensuring that the design and number of parking spaces associated with residential development, including any communal residential parking, must respect the valued characteristics of the area, particularly in Conservation Areas

Impact of Evidence and Consultation

This is the current approach as detailed within the Structure and Local Plans, and seeks to reduce conflict between parking uses, whilst minimising impact upon the valued characteristics of the National Park and particularly Conservation Areas.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Option T5.5

Retain the current approach of enhancing coach parking facilities at key visitor sites, where necessary. Developments that are likely to attract coach traffic will be required to make provision for the setting down and picking up of coach passengers and for coach parking

Impact of Evidence and Consultation

This approach seeks to mitigate the impact of the second most popular form of travel to the National Park, in ensuring that coaches have suitable facilities for loading / unloading and parking.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Further Suggestions from Initial Consultation on Refined Options

8.81 There were no stakeholder comments on this Issue, only on individual options.

8.82 We welcome your comments on these options.

Issue T6

Issue T6

The demand for new rail schemes, including light rail, to provide alternative means of transport to, from, within, and across the National Park

8.83 The objective of this Issue and Options is to provide alternative means of access to the car, for journeys to or across the National Park. This objective is in keeping with the NPMP actions to seek to reduce the carbon dioxide emissions caused by motorised transport, and to adopt a National Park Sustainable Transport Strategy, including an integrated approach to parking, public transport, walking and cycling within the National Park.

8.84 This Issue covers upgrading of existing lines, the safeguarding of no longer utilised lines for possible future rail use, the reinstatement of these lines, and new rail routes within the National Park. Existing Structure and Local Plan policy does the following.

- Safeguards the Woodhead Tunnels for Transport or rail use

- Safeguards the Woodhead Railway Route between Hadfield and Dunford Bridge, for its potential reinstatement as a railway
- Supports the reinstatement of the Buxton to Matlock Railway, and safeguards the section of the route within the National Park
- Safeguards the land for an additional loop to enhance track capacity on the Hope Valley Line.

8.85 The potential reopening of the Matlock to Buxton line was examined during the early part of this decade. Scott Wilson undertook a feasibility study into the reopening of the line, on behalf of a number of partners including ourselves, Derbyshire County Council, Government Office for the East Midlands, East Midlands Development Agency and the Strategic Rail Authority. Published in 2004, the final report concluded that financial costs of reinstating the line outweighed any potential benefits. However, the economic forecast for the railway improved from the year 2025 onwards. As a result of this study, plans for the potential reopening of the line were put on hold.

8.86 The Woodhead Tunnels run east-west under the Pennine hills, in the north of the PDNP. Until 1986 the route formed part of a rail link between Sheffield and Manchester. There are three tunnels, two built in 1846 and one larger tunnel constructed in 1953. National Grid owns all three tunnels and, since 1963, one of the older tunnels, the north tunnel, has housed 400kV power cables. These power cables reach the end of their operational life in 2009 and thus in 2007 the National Grid consulted on plans to switch power to 4.7km of new cables in the 1953 tunnel. Using the newer tunnel will allow the switch-over to be completed without a break in power transmission. Additionally, the 1953 tunnel is in a better condition than the other two tunnels, which are now becoming dilapidated. However, the newer tunnel has the greatest potential for re-use as a rail route, both because of the superior condition of the tunnel, and because of its size: the newer tunnel is of a gauge that would support large freight traffic. However, rail and cable use are not compatible in the same tunnel, as access to the cables will be required at all times, which will have adverse impacts on train operation. Although the NPA sought to resist this proposal we have not been successful, and the work is now programmed to go ahead in 2009/10.

8.87 The Yorkshire and Humber Route Utilisation Strategy was published for consultation in September 2008. Whilst the document refers primarily to potential developments to enhance capacity on the Hope Valley Line, there are also some references to the reinstatement of both the Woodhead and Matlock to Buxton railways.

8.88 The Hope Valley is referred to as a 'key capacity pinch-point' in relation to freight capability. Over the medium term 2014-2019, the Strategy suggests that there will be a requirement for, "*doubling of the Dore & Totley station curve and new loops in the Hope Valley.*" Over the long term, it is suggested that there is the possibility of increased passenger services but that this would entail, "*significant four-tracking of the existing route.*" The Report goes on to state that an alternative to this would be the reinstatement of the Buxton to Matlock route, which would remove eastbound aggregates traffic originating in the Peak District from the Hope Valley Line, thus freeing up capacity for passenger traffic. The Report emphasises that this option will be examined within the East Midlands Route Utilisation Strategy (Consultation Document scheduled for Spring 2009).

8.89 The Report refers to the Woodhead Route, as a long term alternative, to relieve pressure upon trans-Pennine routes, further stating however, that,

"The main benefits of this route would arise from dealing with congestion on the cross-Pennine road network rather than solving rail network issues."

Option T6.1

Permit the building of new rail schemes as and when deemed necessary and appropriate by Local Authorities and the Rail Industry, provided that proof is provided of adherence to Section 62 of the Environment Act (1995) and relevant National and Regional Policy and Guidance

Impact of Evidence and Consultation

This approach is contrary to the Department of the Environment Circular 12/96, PPS7, and Structure and Local Plan Policies.

Sustainability Appraisal

New rail schemes may improve accessibility to the National Park from surrounding areas, encouraging tourism and improving access for local residents. Modal shift from the car may bring positive impacts on the natural environment however unless schemes are sensitively designed they could produce negative impacts on landscape or townscape, including land take.

Option T6.2

Retain the current approach with the continued safeguarding of former railway routes within the National Park against their possible future reinstatement

Impact of Evidence and Consultation

This approach continues the status quo, maintaining the safeguarding of the Matlock to Buxton and Woodhead Railway Routes against potential future reinstatement. This approach could have future impacts for the trails that currently use the track-bed of these former railway lines, but offers the potential for modal shift on trans-Pennine journeys.

There should be a robust argument for safeguarding rail schemes. Another stakeholder was supportive of continuing to safeguard old rail routes, for example the Woodhead Tunnels and Matlock Buxton.

Sustainability Appraisal

Safeguarding of former railway routes preserves them as wildlife corridors, allowing adaptation to climate change, enabling their use as walking/cycling routes which may reduce traffic. However, preventing their future reinstatement as working railways may have a larger negative effect in terms of reducing volumes of traffic and greenhouse gas emissions. The use of new sites for railway lines is likely to have a much more significant adverse effect as creating routes for railways lines is highly energy intensive and disruptive to the landscape, soil and biodiversity.

Option T6.3

Resist all new rail schemes within the National Park, except in exceptional circumstances

Impact of Evidence and Consultation

This is based around the Department of Environment Circular 12/96 and PPS7, both of which oppose the building / upgrading of new railways in national parks except in exceptional circumstances. This approach could lead to the removal of safeguarding of land for the reinstatement of the Matlock-Buxton Railway, the Woodhead Railway, and the enhancement of the Hope Valley Line. This option may be in contradiction of measures to improve accessibility, and reduce carbon emissions.

Sustainability Appraisal

This Option benefits the natural environment but may negatively impact on reducing the volume of traffic, the economy, access for all and responding to climate change. The latter may in turn produce negative impacts on the natural environment.

Option T6.4

Retain the current approach of safeguarding land for enhancements to the Hope Valley Railway Line

Impact of Evidence and Consultation

This option would maintain the current safeguarding of land for enhancement on the Hope Valley Railway Line, once such requirement is known. It would need to be emphasised, that the National Park Authority's support for any such scheme would be dependent upon the detail of the proposals.

Stakeholders were supportive of continuing to safeguard land for Hope Valley passing loops.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Option T6.5

Removal of safeguarding of land for reinstatement of former railway routes and enhancement of the Hope Valley Railway Line

Impact of Evidence and Consultation

This approach would be significant if Option T6.3 were seen as the appropriate way forward. Such an approach might allow for development upon either or both of the former railway routes. With regard to the Hope Valley Line, the exact alignments of any enhancements are not yet known, so the importance of safeguarding, is more one of potential support for enhancement.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Further Suggestions from Initial Consultation on Refined Options

8.90 With regard to freight, we need two options. One with a presumption against cross-Park routes and one being wary of new routes that serve the National Park. This latter option is because we want to encourage modal shift.

8.91 Regarding passenger rail, we need 3 options:

- New routes – only in exceptional circumstances, and no safeguarding of land for this
- Reinstatement – continued safeguarding
- Upgrading of existing lines, e.g. Hope Valley passing loops – continued safeguarding.

8.92 We welcome your comments on these options.

Issue T7

Issue T7

Accessibility

8.93 The objective of this Issue and the Options arising from it is to ensure that services and facilities are accessible to the community of the National Park and that the National Park itself is accessible to visitors, whilst seeking social inclusion and protection and enhancement of the National Park's environment. This objective supports the desire expressed within the Peak District NPMP to meet the needs of residents, visitors and surrounding areas, to reduce the adverse environmental impacts of travel on the special qualities of the National Park and to enable more sustainable travel patterns.

8.94 Accessibility can broadly be defined as the ease by which people can reach services and facilities. It focuses specifically on public transport, walking and cycling, as private motor vehicles are not available for use by all and are not a good option environmentally.

8.95 Each transport authority is charged by the Government with the development of an accessibility strategy as part of its Local Transport Plan. Accessibility strategies focus on tackling the problems experienced by those in disadvantaged groups and communities in accessing key services, and thereby promote social inclusion. Key services are defined in specific terms as the following, hospitals with outpatients' facilities, GPs' surgeries, areas of town centre activity, schools and colleges, supermarkets, libraries and access points, leisure centres and post offices.

8.96 Accessibility strategies are implemented by a variety of organisations working in partnership, including local planning authorities. We are one such authority and therefore must seek to pursue these strategies. However, we must also pursue our statutory purposes and duty and therefore cannot define accessibility only in the narrow terms set out for these documents. We must also seek to provide opportunities for the understanding and enjoyment of the National Park and thus for visitors to reach the National Park using environmentally sustainable forms of transport.

8.97 Accessibility can be improved in two ways, by moving people to services and facilities, for example through transport provision, and by moving services and facilities to people, for example by providing mobile services such as libraries. Where facilities are more fixed, the same two options exist. For example, a new library could be located close to a centre of population or a new housing development could be located close to an existing library. As accessibility strategies are implemented by a range of organisations, both of these aspects of service provision can be implemented. However, opportunities for promoting the understanding and enjoyment of the National Park are more limited as the National Park itself cannot be moved, and some focus on transport provision is therefore clearly necessary.

8.98 The National Park Authority is required only to ensure an adequate supply of housing, shops and services to meet the essential needs of local residents and businesses, whilst conserving and enhancing the valued characteristics of the National Park. Because of this, development within the National Park during the LDF period is likely to be minimal. As such, travel between existing housing, businesses and services is likely to be more critical than the appropriate siting of development. Nevertheless, the latter is still applicable and consideration of accessibility when examining proposals for development (and change of use) could have a significant influence on travel patterns within the National Park.

Option T7.1

Pursue transport policies aimed at protecting the National Park, regardless of the accessibility agenda

Impact of Evidence and Consultation

It could be argued that this option lacks regard for the purpose of national park authorities to promote opportunities for the understanding and enjoyment of the National Park. This option also ignores the potential for improved accessibility to support protection of the National Park environment, by providing alternatives to private motor transport.

Sustainability Appraisal

The pursuit of transport policies aimed at protecting the National Park should have benefits for the natural environment. However, disregarding the accessibility agenda will negatively impact on access for all and access to services. This may produce a negative impact on the local economy if visitors are discouraged.

Option T7.2

Pursue transport policies that balance the need to protect the National Park with promoting access to services by means other than the private car

Impact of Evidence and Consultation

This option takes both national park purposes into account.

Sustainability Appraisal

This option takes a balanced approach and should have positive impacts on most sustainability objectives.

Option T7.3

Pursue transport policies aimed at promoting access to services, regardless of their potential impact upon the National Park

Impact of Evidence and Consultation

This option conflicts with national park purposes and as such should not be considered viable.

Sustainability Appraisal

This option will have a positive impact on accessibility objectives. However, this option may also produce negative impacts on landscape, biodiversity and the National Park's historic and cultural environment which in turn, could have secondary impacts on the economy.

Option T7.4

Take a more pro-active approach in seeking to encourage any development for housing, retail, industry and recreation to be located in settlements with good provision of public transport or a good level of existing services

Impact of Evidence and Consultation

Such an approach would support national park purposes, duty and policies, and would also be in line with national planning and transport policy, particularly PPG13: Transport and the Draft East Midlands Spatial Strategy (2007).

Sustainability Appraisal

This option should have significant benefits for accessibility, with new development sustainably sited and focused in areas with access to services and alternative means of transport. However, there may be uncertain or potentially negative impacts on the natural environment if the most accessible locations are environmentally inappropriate.

Option T7.5

Encourage and support park and ride schemes to the main visitor areas in cooperation with the relevant transport authorities and companies. Park and Ride car parks would only be permitted if they could be accommodated without harm to the valued characteristics of the area

Impact of Evidence and Consultation

This would continue the approach taken in the 2001 Local Plan, permitting Park and Ride only where it might be beneficial to the National Park and act in pursuit of its purposes.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Further Suggestions from Initial Consultation on Refined Options

8.99 This issue is a cross cutting one, and should be an overarching issue rather than a separate one in the transport section.

8.100 We welcome your comments on these options.

Issue T8

Issue T8

The availability of safe walking, cycling and equestrian routes.

8.101 The objective of this Issue and its Options is to promote the use of non-motorised access to and within the National Park via segregated walking cycling and equestrian trails. This is in keeping with the NPMP action of, "*adopting a National Park Sustainable Transport Strategy which includes an integrated approach to parking, public transport, walking and cycling within the National Park.*" The Issue also encompasses the NPMP actions related to climate change and accessibility strategies.

8.102 This is an Issue that is linked to other Issues and Options, particularly with regard to the two long-distance trails along the former Matlock to Buxton and Woodhead Railways. The reinstatement of these railways would compromise the current routes of the trails. It is also linked to the question of accessibility, although this Issue is viewed from a wider perspective, looking at use of such routes for pleasure, and exercise, as well as to access jobs and services. However such routes can serve both purposes.

8.103 PPG13: Transport (2001) deals with the promotion of accessibility to services by walking and cycling. Similarly the Future of Transport White Paper (2004) suggests that, "*making walking and cycling a real alternative for local trips*" was an important element in achieving environmental objectives, whilst meeting the challenges of a growing economy and the need to travel.

8.104 PPS7: Sustainable Development in Rural Areas (2004) states that new developments in rural areas should be located in towns/service centres with good access to public transport. PPS7 further states that remaining developments in rural areas, "*should, where possible, give people the greatest opportunity to access them by public transport, walking and cycling.*"

8.105 Towards a Sustainable Transport System (2007) is the Department for Transport's policy and investment plan for the period 2013-14. It also proposes a new approach to longer term transport strategy building upon the recommendation of the Eddington Report (2006), whilst being mindful of the Stern Review (2006). Goal 3 of this strategy is to protect people's safety, security and health, and contains the following statement,

"We need to address the negative impacts of transport on people's health (for example, from air and water pollution), but also promote the health benefits of cycling and walking."

8.106 The Countryside and Rights of Way Act (2000) introduced a duty for Highway Authorities to prepare and publish a Rights Of Way Improvement Plan (RoWIP). These Plans are intended to identify ways in which Public Rights of Way, such as footpaths, cycle tracks, bridleways and restricted byways within each Highway Authority's area meet the present and likely future needs of the public. These needs include opportunities, *"for exercise and other forms of open-air recreation and the enjoyment of the authority's area and the accessibility of local rights of way to blind or partially sighted persons and others with mobility problems."* Six of the National Park's constituent highway authorities were tasked with the production of such a Plan, Kirklees were exempted owing to their Excellent Status as a Council. All six have produced a RoWIP. Kirklees Metropolitan Borough Council are voluntarily producing a RoWIP, but this has not yet been completed.

8.107 Derbyshire County Council have prepared a Greenway Strategy for West Derbyshire and the High Peak area, including that part of the Peak District within Derbyshire. The final Strategy document is not yet published, but proposes extensions to the current Greenway Network within the Greater Peak District area.

Option T8.1

Work with other local authorities to encourage the provision of new or improved walking, cycling and equestrian routes and infrastructure

Impact of Evidence and Consultation

This option takes the current approach adopted by the National Park Authority to encourage the provision of walking, cycling and equestrian routes through partnership with other authority's strategies and Plans, such as Local Transport Plans. Whilst this is a good approach, the availability of funding may restrict implementation.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Option T8.2

Take a proactive approach whereby new developments of appropriate scale and type within the National Park are actively encouraged, including via legal agreements to provide additional infrastructure for walking, cycling and horse riding or any other Smarter Choices appropriate to the location

Impact of Evidence and Consultation

This approach is supported by the Department for Transport Circular 02/07: Planning and the Strategic Road Network and its sister document 'Guide to Transport Appraisal'. Both of these documents endorse the use of Section 106, Section 278 or other agreements to provide Smarter Choice as a means of mitigating the transport impact of new developments.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Option T8.3

Ensure that where a development proposal affects a Public Right Of Way either the definitive line of the Right Of Way should be retained or, in exceptional circumstances where this is not possible, the developer will be required to provide an alternative route

Impact of Evidence and Consultation

This option seeks to protect all current Public Rights of Way from the impact of development. This option would maintain the status quo but would not, by itself, increase provision.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Option T8.4

Work in partnership with highway authorities to promote and encourage highway management that gives priority to sustainable modes of travel

Impact of Evidence and Consultation

This option is a proactive approach, aimed at prioritising sustainable use of parts of the highway network, over the private car. This could include the provision of bus priority measures, cycle lanes, quiet lanes or additional footpaths. This option could require additional land-take and signage or other transport infrastructure. The benefits of this option have to be weighed against the potential impacts. Each scheme would need to be judged accordingly.

Sustainability Appraisal

This option is new, and therefore has not yet been through the Sustainability Appraisal. The option will go through a Sustainability Appraisal in the future.

Further Suggestions from Initial Consultation on Refined Options

8.108 This is a new Issue directly arising from the September 2008 Stakeholder event. As this is a new Issue, it has not yet been through the sustainability appraisal, but it will as the LDF progresses. The comment made was, "*There are no walking & cycling options - for commuters not recreation. Need some options e.g. healthy living routes. Need to join up existing routes. Routes must be safeguarded in the LDF to draw in S106 funding.*"

8.109 We welcome your comments on these options.

Minerals

9 Minerals

Introduction

9.1 Mineral working continues to be one of the most contentious activities in the Peak District National Park (PDNP) as it potentially conflicts with national park purposes to conserve and enhance the nationally designated landscape, wildlife and cultural heritage interest and its enjoyment by the public, with the principles of sustainable development. The National Park Management Plan (NPMP) Outcome for 2011 is a reduced impact of mineral working on the National Park's special qualities and on its communities, with fewer quarries, all working to the highest modern environmental standards, established operating end-dates and restoration schemes and with an agreed definition of 'national need' for mineral working. Several of the proposed actions clearly point towards a reduction in mineral working in the National Park.

9.2 The range of matters within the minerals topic has been simplified to focus on four strategic issues:

- Issue 1 considers how to achieve a gradual reduction in the impact of minerals activity in the Peak District, looking at scale, alternatives and the national need for minerals. This issue has three options.
- Issue 2 is the safeguarding of mineral resources. This issue has three options.
- Issue 3 covers reviews of old mineral permissions, Environmental Impact Assessments and consolidation of permissions. This issue has one option.
- Issue 4 considers restoration and after-use. This issue has two options.

9.3 The list of issues may not be exhaustive and we welcome your comments to assist us in the formulation of effective policy.

Background

9.4 The 'Help Shape the Future' Preferred Options (2005) in respect of minerals were as follows:

- *Retain a presumption against new mineral sites, and resist development other than in exceptional circumstances, for example when development is essential in the national interest or enhances the National Park landscape.*
- *Tightly control mineral and waste management activity through permissions, conditions and monitoring, to reduce the adverse impact on the National Park landscape.*

- Continue to permit the small-scale extraction of building stone and stone roofing slate to secure supply for improvements to traditional buildings, providing the development is environmentally acceptable. This also minimises transport movements across the National Park and upholds the tradition of using local materials in the built environment.
- Retain current approaches to mineral extraction and restoration, but further explore sites both inside and outside the National Park for sources of local building materials.

9.5 There were only a handful of responses on minerals and only a few of these expressed a view on the actual options.

9.6 In the 2007 consultation, minerals issues and options were presented as follows:

9.7 Issue 1: Desire for a gradual reduction of minerals activity, including oil and gas operations, and its impact across the National Park.

- Option 1: Weaken control and reverse the National Park Authority's (NPA's) declared 'resolve'.
- Option 2: Maintain the current position.
- Option 3: Strengthen policy to achieve an increased reliance on winning minerals outside the National Park, remove policy reference to an aggregates landbank and remove Structure Plan safeguarding policy M6.

9.8 Issue 2: Clarifying the national need for fluorspar.

- Option 1: Keep policy and criteria that allow possible fluorspar working.
- Option 2: State in policy that there is no overriding national need for any mineral to be worked in the National Park.

9.9 Issue 3: The future of cement production in the Hope Valley

- Option 1: Continue with an approach relevant only to the plan period rather than to the longer term future.
- Option 2: Introduce debate on the longer term issue.

9.10 Issue 4: Sourcing 'conservation grade' building stone and roof slate in the least environmentally damaging way

- Option 1: Continue current policy.
- Option 2: Source suitable stone outside the National Park wherever possible.

9.11 Issue 5: Should we formally recognise (in policy) the Authority’s developing best practice in the review of old mineral permissions?

- Option 1: Continue to apply current and future legislation in order to review old mineral permissions on a site by site basis.
- Option 2: Further promote the consolidation and/or exchange of old mineral permissions.

9.12 Issue 6: Should we offer more certainty in policy for the preferred end use of mineral sites?

- Option 1: Do not prescribe end uses but seek best solution for each site through course of negotiation.
- Option 2: Establish a set of uses to ensure the end use of a quarry relates to matters that pursue the statutory purposes of the national park, such as conservation and enhancement of wildlife habitat or creation of leisure focused environments.

9.13 The options were considered in the context of national, regional, and local evidence. Since then, additional evidence has been gathered.

9.14 Some respondents to the 2007 Issues and Options Consultation supported the option to weaken control and reverse our declared resolve, although it should probably not have been put forward because it is not really a valid or realistic option since it is not in accordance with national policy.

9.15 The option for “*maintenance of the current position*” is perhaps obvious to some but was not explained fully, so this too may be flawed as a valid option. The following option, whilst offering realistic choices, is technically three options combined. A rewording of these second and third options along the following lines would therefore be appropriate in any future consultation:

- Maintain the current position to reduce the number of mineral sites within the National Park.*
- Maintain the current position to reduce the number of mineral sites within the National Park, and actively move towards increased reliance on minerals sourced outside the National Park.*

9.16 To consider the 2007 issues in the context of the new evidence, and to help clarify the steps undertaken in the review of minerals policies, we have regrouped them as follows:

- Issue 1: Achieving a gradual reduction in the impact of minerals activity by considering scale, alternatives and the national need for minerals.
- Issue 2 Safeguarding (drawn out as a distinct issue from the previous Issue 1).

- Issue 3: Review of old mineral permissions / Environmental Impact Assessments / consolidation of permissions (reformatted from previous Issue 5).
- Issue 4: Restoration / after-use (amended to reflect the strict after-uses set out in MPG7)

9.17 Matters of national need in previous Issues 2, 3 and 4 have been combined into an overarching Issue 1.

Issue M1

Issue M1

Achieving a gradual reduction in the impact of minerals activity

9.18 In general, a strengthening of approach to restraining mineral working in national parks has been supported by Government.

9.19 Minerals Planning Policy Statement 1: Planning and Minerals (MPS1), says that major mineral developments should not be permitted in national parks other than in exceptional circumstances. Because of the serious impact that major mineral developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications should be subject to the most rigorous examination. Major mineral development proposals should be demonstrated to be in the public interest before being allowed to proceed. Consideration of such applications should include an assessment of the need for the development, including national supply and the impact of permitting or refusing it on the local economy, cost and availability of alternative supply and any detrimental effect on the environment, landscape and recreational opportunities and the extent to which they could be moderated.

9.20 According to MPS1, proposals in designated areas which are not considered to be major developments should be carefully assessed, with great weight being given in decisions to the conservation of the natural beauty of the landscape and countryside, the conservation of wildlife and the cultural heritage, and the need to avoid adverse impacts on recreational opportunities.

9.21 MPS1 also says that planning authorities should ensure that development and restoration in designated areas should be carried out to high environmental standards, through the application of appropriate conditions, and be in character with the local landscape and its natural features.

9.22 Regional Spatial Strategy for the East Midlands (RSS8) underlines national policy by stating that national park designation confers the highest of protection as far as landscapes and scenic beauty are concerned. It also states that, "*major developments should not take place in the Peak District National Park save in exceptional circumstances and where it is demonstrated*

to be in the public interest and that it is not possible to meet that need in another way". RSS8 Draft Policy 36 advises that Local Development Frameworks (LDFs) should, "*make provision for a progressive reduction in the proportion and amounts of aggregates and other land-won minerals from the Peak District National Park..*". This policy is supported by the Secretary of State's Proposed Changes (2008).

9.23 Since 1994, we have promoted a policy of trying to reduce new major mineral development within the National Park. The Structure Plan established that land would not be allocated for minerals in the Local Plan, but nevertheless safeguarded known mineral resources and maintained the concept of a landbank for aggregates. The general approach to restrict new development was carried on in the Local Plan, although the intent of our resolve was weakened when the Secretary of State directed that policies on landbanks and aggregate provision should remain.

9.24 It must be recognised that previous consultation exercises have not revealed overwhelming public support for a reduction in minerals activity. The overall number of responses on minerals issues has been small, and the 2007 consultation was dominated by responses from the minerals industry. However, the 2004 survey did reveal some support for a reduction in mineral working, with 43% of respondents wanting it reduced against 48% who thought it should continue as now.

9.25 There is, unsurprisingly, little recognition in the industry response to consultation that working should be progressively reduced. Several operators and the British Aggregates Association (BAA) have also raised the issue of sustainability, as they assert that a reduction in mineral extraction from within the National Park would increase haulage distances through the National Park, particularly in routes from west to east.

9.26 There are also concerns from the industry about job losses if quarries close. Around 1.6% of National Park residents were employed in mining and quarrying in 2001. The industry has asserted that there will be fewer opportunities for those displaced from quarrying and its associated industries to find full time employment within the National Park. This may be the case, but similar jobs are likely to be available in adjoining areas.

9.27 Regarding the jobs argument it is worth recalling that, at the Examination in Public of the Structure Plan (1993), considerable discussion took place over the relationship between mineral extraction and employment because the minerals industry makes a contribution to the economy in terms of both direct and indirect employment. The outcome of the discussion was that the need for the mineral generates employment but the need for employment does not justify mineral extraction in the National Park.

9.28 Another concern raised through consultation is that reducing mineral working will cause a reduction in mineral royalties which have been used in the past to maintain buildings on private estates.

9.29 Questions regarding national need are best addressed by mineral type.

9.30 The Quarry Products Association(QPA) is a trade association for the aggregates and quarry products industry. Members are typically large corporate companies. The QPA introduced a Four Point Plan for Quarrying in National Parks in 1998, to demonstrate commitment to minimising environmental impact of the industry's activities in national parks. Under the plan QPA members will:

- Work with the Government and NPAs to identify dormant planning permissions in national parks which will not be reactivated and respond positively to initiatives by appropriate authorities to seek prohibition orders. This goes further than the present statutory position that they should not be reopened without the imposition of modern planning conditions.
- Work with NPAs to identify and clarify current permissions which are uncertain in scope or extent. Every effort will be made to resolve any areas of uncertainty without recourse to the courts.
- Not submit any planning application for new mineral workings in a national park unless there is a national need in terms of minerals supply or where the proposal has benefits for the national park in question.
- Only propose the extension of existing sites in national parks where there is a national need in terms of minerals supply; or the proposal has benefits for the environment, landscape and economic well-being of the national park in question.

9.31 However, the British Aggregates Association, which often represents small, independent aggregate companies, does not have such a policy.

9.32 In respect of fluorspar, the NPMP sets out our intent under Action Point 4, which basically states that there is no national need for the mineral. From the industry's perspective indigenous fluorspar is essential to the UK economy, unique and should not be treated the same as other quarrying such as aggregates. It is vital that a long term, well managed supply of fluorspar is maintained.

9.33 National and regional guidance and policy do not assist us if we is required to make a decision on the relative importance of need for fluorspar and need to conserve the National Park. We have asked for a Government view on this contentious matter but have not been given a coordinated response or conclusion on the competing agendas of trade and environment.

9.34 In terms of national need for cement there is current, if somewhat dated, national guidance on limestone provision for cement works. Although published in 1991, Minerals Planning Guidance 10 remains stated Government guidance in respect of cement manufacture. Paragraph 2 states that the cement industry is of major importance to the national economy and that it is necessary to have an adequate supply of raw material in order to maintain production. MPG 10 also advises that landbanks of at least 15 years permitted reserves should

be maintained for each plant (or 25 years in the case of further significant investment). The issue here, therefore, is not so much continuing supply in the short to medium term but the longer term situation, beyond the extent of the current planning permissions.

9.35 The NPMP has already set out our stance on building stone by applying a presumption against further permission for the supply of building stone and roof slate (Action point 3). However, MPSI advocates that minerals planning authorities should safeguard and/or make provision for building and roofing stone. National parks are not excluded from this general presumption.

9.36 In some cases, repair and conservation of local built character can require stone of a particular type, found within the National Park and perhaps inside areas of particular conservation value such as an internationally important wildlife designation. In such a case, two conservation needs come into conflict. There are substantial existing permitted reserves of building stone in the National Park. There are also many sites outside the National Park where similar, if not identical, stone can be found. In addition, we have carried out an audit of former sites where specialised, distinctive types of stone were quarried and are aware of the extent to which they might meet demand.

9.37 A reduction in the impact of minerals activity can only be achieved slowly. This is because for the most part, existing operations will not cease until either their planning permissions expire or the mineral in them is worked out. As a result, the principal means available to us for achieving a gradual reduction in impacts is by resisting (or by limiting the impact of) proposals which need fresh planning permissions.

9.38 The 2007 Issues and Options responses on this subject were influenced by the number of mineral industry responses, with a significant majority favouring continuation of current policy, although this was not actually defined. The option which advocated sourcing suitable stone from outside the National Park had only two supporters.

Option M 1.1

Maintain the current position, not allocating new sites and not permitting major development other than in exceptional circumstances or small scale development where there is no need or where the effects are unacceptable

Impact of Evidence and Consultation

MPSI supports strong protection of the heritage and countryside of national parks. National policy does not specify the boundary between 'major' and 'non-major' mineral developments, so this will need to be decided on a case-by-case basis. In practice, however, most proposals other than perhaps minor building stone proposals are likely to be classed as 'major'.

More evidence is needed from the minerals industry of the quality and quantity of fluorspar reserves, to ascertain whether there is a strategic longer term need to provide fluorspar from within the National Park.

This option was not offered for consultation in 2007.

Sustainability Appraisal

In the SA, this option scores positively on all landscape and sustainability objectives.

Option M I.2

As option I but with a stronger sequential approach to alternatives in the first instance, for example sourcing stone from outside the National Park

Impact of Evidence and Consultation

This option is in line with national and regional policy by resisting proposals for extracting minerals which can reasonably be obtained from outside the National Park, including aggregates, cement-making materials and limestone for industrial end uses. This option was not offered for consultation in 2007.

Sustainability Appraisal

The SA shows similar effects to option MI.1.

Further Suggestions from Initial Consultation on Refined Options

9.39 Stakeholders suggested that allocation was a possible option for fluorspar, especially if the Government resolves its view on national need. A separate issue with options on fluorspar working was included in the 2007 Issues and Options Consultation. Responses favoured continuing a policy and criteria allowing fluorspar working, although these were largely from within the industry. A small number of responses were in favour of stating in policy that there is no overriding national need for any mineral to be worked. There needs to be evidence from the minerals industry of the quantity and quality of fluorspar reserves to allow consideration of the environmental impacts of any sites which may be allocated for fluorspar extraction.

Option M I.3

Allocate sites for fluorspar extraction

9.40 Consultation also showed support for policy to allow replacement plant at existing sites where, as part of a gradual reduction of impact, it would result in environmental improvement.

9.41 We welcome your comments on these options.

Issue M2

Issue M 2

Safeguarding

9.42 Structure Plan Policy M6 safeguarded mineral resources, but it can be argued that it was directed at least as much to ensuring that high grade minerals are not used for low grade purposes and not simply to the generality of avoiding sterilisation by surface development.

9.43 MPSI establishes a national policy on mineral working for 'safeguarding' mineral resources in the ground. This is primarily for mineral planning authorities (including us) to, "*define Mineral Safeguarding Areas (MSAs) in Local Development Documents, in order that proven resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked*". On the face of it, this could be applicable in the Peak District, as the National Park contains extensive resources of workable mineral for a variety of end uses which could be sterilised by surface development. There is also the requirement to safeguard minerals in RSS8.

9.44 In October 2007 the British Geological Society published 'A Guide to Minerals Safeguarding in England'. This document was aimed at all mineral planning authorities and set out the methodology for safeguarding important mineral resources. However, the main philosophy in the document is that all mineral resources of economic value should be safeguarded from incompatible development, regardless of where they are located. For national parks there is no specific recommendation that the general safeguarding principles should be ignored or diluted in any way. The guide states that, "*mineral safeguarding should not be curtailed by other planning designations, such as urban areas and environmental designations without sound justification. Defining MSAs alongside environmental and cultural designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning considerations*".

9.45 In deciding whether a safeguarding policy is appropriate, there are two central issues for the LDF to consider, from what is land being safeguarded and for what is land being safeguarded? On the first point, surface development is so comprehensively restricted in the National Park, especially outside the confines of existing built-up areas, that there is very little development that is likely to sterilise any mineral. The fundamental reason for having a policy on safeguarding minerals therefore does not apply in the Peak District. For the exceptional occasions when surface development is proposed within the National Park outside the confines of existing development, we could require consideration of the impact of the development on potential future mineral working as part of the application assessment process, if necessary.

9.46 On the second point, most mineral working is contrary to the reasons for the establishment of the National Park, and mineral working will only be permitted in exceptional circumstances. A policy on safeguarding could give the misleading impression that swathes of land were being reserved for mineral working in future.

9.47 If safeguarding was considered appropriate, other issues would need to be resolved, such as: should it cover the whole geological resource, in which case how useful is it as a practical tool, or just part of it, in which case it looks as if the safeguarded area really is suitable for mineral working. Realistically, would the existence of mineral reserves beneath a site prevent development of a non-mineral nature which would sterilise those resources, when that development is otherwise contrary to policy and only acceptable as an exception? How much weight should be given to mineral resources beneath a site when their extent, quality and value is unknown?

Option M 2.1

Not to safeguard any minerals

Impact of Evidence and Consultation

This option is offered because of the huge existing quantity of permitted reserves already within the National Park and because of the competing and possibly overriding legislation in the Environment Act 1995 regarding the delivery of statutory national park purposes. Safeguarding is not necessary in the National Park for the purposes of protection of resources or enabling extraction. Options for this issue were not offered in the 2007 consultation.

Sustainability Appraisal

The Sustainability Appraisal shows neutral or no impact except on protection of historic and cultural environment.

Option M 2.2

Safeguard all mineral resources within the National Park

Impact of Evidence and Consultation

This approach may be difficult to apply in practice in the special circumstances in the National Park. Options for this issue were not offered in the 2007 consultation.

Sustainability Appraisal

The Sustainability Appraisal indicates no problems except negative impact on economy objectives.

Further Suggestions from Initial Consultation on Refined Options

9.48 Stakeholders suggested a third option was to safeguard particular minerals, but excluding limestone aggregate. Stakeholders and members thought that it might be worth exploring the possibility of safeguarding small scale sites for specialist minerals for local needs, for example building and roofing stone, which contribute through conserving and enhancing local built distinctiveness to the valued characteristics of the National Park.

Option M 2.3

Safeguard some minerals

9.49 We welcome your comments on these options.

Issue M3

Issue M 3

Review of old mineral permissions, Environmental Impact Assessments and consolidation of permissions

9.50 The Environment Act 1995 introduced requirements to review old mineral permissions issued between 1948 and 1982 (ROMPs). Previously, the 1991 Planning and Compensation Act dealt with Interim Development Order permissions issued between 1943 and 1948. The legislation requires mineral planning authorities to undertake reviews of old mineral permissions. Reviews can lead to a range of outcomes, from revocation of the original permission to bringing the environmental controls over operations up to modern standards. Reviews in national parks are a priority, so the review process has been started at all sites in the Peak District and completed at many. Policy M10 in the Structure Plan recognised the important benefit which the National Park could obtain from the review process.

9.51 Guidance accompanying the legislation recognises that the best solution on some sites may be to consolidate all existing permissions into a single modern one, as part of or separately from the formal review process. We have successfully consolidated or exchanged old mineral permissions as an alternative to applying the mineral review procedure site by site: an approach that has been supported by the courts. Examples include Ivonbrook and Hartshead quarries, and Hope limestone and shale workings. This 'policy' has helped to reduce the overall number of operational quarries and permitted reserves over the past ten years. There remain only three sites where, in our opinion, these types of consolidation will offer further benefits and negotiations have been taking place at all of them. These are

Topley Pike, Birchover and New Pilhough. With progress being made, there seems little merit in developing a planning policy to encourage this. Negotiations on consolidations remain a matter of good practice to which we give priority.

9.52 Some ROMPs have stalled. Due to a shortcoming in the legislation the Environmental Impact Assessments (EIAs), which are required at some sites before a Review can be finalised, have not been forthcoming. This is because, until legislation passed very recently, there was no time limit on companies to prepare and submit EIAs. This allowed those companies to continue working their sites under the pre-existing controls dating from many years beforehand. Companies could quite legally put off the updating of their operations to modern standards. This has now changed, with MPAs being given the power to suspend operations at sites which fail to submit EIAs within a reasonable period. As a result, we have now required all nine sites in the National Park with stalled EIAs to restart the review process. Just one of these, at Smalldale Head, has been further delayed by a series of judicial reviews. Action to pursue these reviews to the extent that the law allows is, like consolidations, a management issue more than a policy issue and again a matter of priority within the staff resources available.

9.53 In some cases, problems posed by old mineral permissions might best be resolved by revoking or modifying permissions or by challenging the operator's interpretation of their meaning. However, this course of action can be prohibitively expensive if compensation issues arise.

9.54 Consultation responses on these related issues were relatively brief and did not raise matters of principle. Government Office for the East Midlands advised that we should ensure that policies do not repeat national policy guidance. Several mineral operators thought that we should follow government guidelines on methodology for reviews by working with the industry.

9.55 Clear requirements from the Environment Act 1995 have shown that previous option I was legally required, so it has been discarded. Instead of including LDF policy on this issue, it could be a matter for consideration in our forthcoming Minerals Strategy to take forward the minerals aspects of the NPMP.

Option M 3.1

Formally recognise the National Park Authority's developing approach of promoting and negotiating the consolidation and/or exchange of old mineral permissions, where appropriate.

Impact of Evidence and Consultation

This may not be a necessary option, since appropriate action could be considered outside the LDF. Consultation responses preferred continuing site-by-site review of old mineral permissions.

Sustainability Appraisal

Sustainability Appraisal is favourable.

9.56 We welcome your comments on these options.

Issue M4

Issue M 4

Restoration and after-use

9.57 Minerals Planning Guidance 7 (para 12-21) defines the scope of after-uses, including agriculture, forestry, amenity including nature conservation, and landfilling of surface mineral workings.

9.58 The NPMP stipulates that policies should be adopted for the restoration or re-use of mineral sites to maximise opportunities for biodiversity and access and recreation.

9.59 The restoration of mineral workings is a significant opportunity for achieving national park objectives for enhancing landscape and biodiversity, providing recreational opportunities and promoting cultural heritage, all of them serving national park purposes. What can be achieved in practice varies, of course, from case to case. For example, the options available at sites which have been working for many years will be far different from the considerations when handling planning applications for new mineral development on fresh land. The nature of the land in question and the context of its surroundings are similarly critical in establishing restoration priorities. The principle of wishing to promote certain kinds of restoration and after-uses can therefore run into the practicalities of what is achievable and desirable in individual cases. We need the flexibility to respond accordingly, while at the same time we are well aware of the various strategic objectives we would like to pursue.

9.60 In the 2007 Issues and Options Consultation, the option advocating restoration on a case by case basis gained most support. However, there was also support for the alternative option which sought to establish a set of specific end-uses. Some mineral operators raised the point that it is important for the landowner of the site to be involved since future aftercare and maintenance of the restored land is likely to be their responsibility.

Option M 4.1

Do not prescribe specific preferences for after-use, but seek best solution through negotiation on a site by site basis

Impact of Evidence and Consultation

Possible after-uses can vary depending on the site, nature of the land and its surroundings. Consultation responses preferred this option.

Sustainability Appraisal

The Sustainability Appraisal shows several uncertainties depending on the characteristics of individual sites.

Option M 4.2

Establish preference for after uses, in accordance with Biodiversity Action Plan and emerging Landscape Strategy which reflect the statutory purposes of the National Park

Impact of Evidence and Consultation

Local priorities for the landscape and biodiversity will be clearer in the light of the revised Peak District Biodiversity Action Plan and emerging Landscape Strategy. Fewer consultation responses supported this option.

Sustainability Appraisal

The SA indicates generally positive impact on landscape objectives.

9.61 We welcome your comments on these options.

Abbreviations

10 Abbreviations

AA	Accessibility Agenda
AF	Affordable Housing
AHR	Annual Housing Report
AMR	Annual Monitoring Report
AS	Accessibility Strategy
BAA	British Aggregates Association
CA	Conservation Area
CFMP	Catchment Flood Management Plan
CHS	Cultural Heritage Strategy
CLT	Community Land Trust
CRC	Commission for Rural Communities
CRoW	Countryside & Rights of Way Act
CS	Community Strategy
DC	Development Control
DDEP	Derby & Derbyshire Economic Partnership
DPDs	Development Plan Documents
EIA	Environmental Impact Assessment
EIP	Examination in Public
EL	Environmental Levy
ELC	European Landscape Convention
ELR	Employment Land Review
EMCPS	East Midlands Car Parking Strategy
ENPA	English National Park Authorities Association
ES	Enhancement Site
RFRA	Regional Flood Risk Appraisal
GOEM	Government Office for the East Midlands
GPD	Greater Peak District
HA	Highway Authority
HGV	Heavy Goods Vehicle
HMA _s	Housing Market Areas
HNS	Housing Need Survey
LBAP	Local Biodiversity Action Plan
LCA	Landscape Character Assessment
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LGV	Large Goods Vehicle
LH	Lifetime Home
LP	Local Plan
LPA	Local Planning Authority
LS	Landscape Strategy
LTP	Local Transport Plan
MPG	Minerals Planning Guidance
MPS	Minerals Planning Statement
MSA	Mineral Safeguarding Area

NPA	National Park Authority
NPD	National Park Duty
NPMP	National Park Management Plan
NPP	National Park Purposes
NZ	Natural Zone
P&R	Park and Ride
PAS	Planning Advisory Service
PATF	Peak Area Transport Forum
PD	Permitted Development
PDNP	Peak District National Park
PDNPA	Peak District National Park Authority
PDRAZ	Peak District Rural Action Zone
PDRHA	Peak District Rural Housing Association
PI	Public Inquiry
PNS	Parish Need Surveys
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
PPTF	Peak Park Transport Forum
PTA	Passenger Transport Authority
PTEs	Passenger Transport Executives
QL	Quiet Lane
QPA	Quarry Products Association
RES	Regional Economic Strategy
ROMPs	Review of Old Minerals Permissions
RoWIP	Rights of Way Improvement Plan
RS	Recreation Strategy
RSL	Registered Social Landlord
RSPB	Royal Society for the Protection of Birds
RSS8	Regional Spatial Strategy for the East Midlands
RZ	Recreation Zone
SA	Sustainability Appraisal
SAC	Special Area of Conservation
Sat-Nav	Satellite Navigation
SC	Smarter Choices
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHA	Serviced Holiday Accommodation
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SHP	Social Housing Provider
SoPR	State of the Park Report
SP	Structure Plan
SPA	Special Protection Area
SPG	Supplementary Planning Guidance
SPITS	South Pennines Integrated Transport Strategy

SS	Spatial Strategy
SSSI	Site of Special Scientific Interest
STM	Sustainable Transport Mode
SUD	Sustainable Drainage System
SI06	Section 106 Agreement
S278	Section 278 Agreement
TA	Transport Authority
TM	Traffic Management
TNW	The Northern Way
TP	Travel Plan
TRO	Traffic Regulation Order
UCO	Use Class Order
VAS	Vehicle Activated Sign
WAFU	Water Available For Use
WPCS	Working with People and Communities Strategy
WS	Wildlife Severance

Glossary

11 Glossary

11.1 The following summarised terms as used in this document have the meanings shown

A57/A628 Mottram – Tintwistle Bypass	A possible new road proposed by the Highways Agency to bypass the villages of Mottram, Hollingworth and Tintwistle. If built, this scheme would be accompanied by Route Restraint Measures on the A628/A616
Accessibility	The ability of people to reach jobs, services and recreational opportunities, either by travelling to those services or by having those services brought to them
Accessibility Agenda	A term used to describe a national policy theme aimed at pursuing increases in accessibility
Accessibility Strategy	A document produced by every transport authority as part of its Local Transport Plan. It sets out the authority’s priorities and the actions proposed to achieve increase accessibility
Affordable Housing	This type of housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market at a cost low enough for them to afford, determined with regard to local incomes and local house prices and remaining so for the future. It is regarded as outside the main housing market and excludes low cost market housing
Annual Housing Report	This updates information on housing development, land availability and contributions towards local housing needs in the Peak District National Park
Annual Monitoring Report	This monitors the implementation of the Local Development Scheme and the extent to which policies in the Local Development Documents are being achieved
Buy-back / Buying-back	This is a term used to describe the act of buying existing open market dwellings when they become available to bring them into the affordable and/or social provision sector
Community Land Trust	This is a property trust which aims to benefit the surrounding community by ensuring the long-term availability of affordable housing
Community Strategy	A strategy produced by each local authority to show how the social, environmental and economic well being of the area will be improved. Government Office for the East Midlands has agreed that the National Park Management Plan is the equivalent for this National Park
Conservation Area	A designation applied to areas of special architectural or historic interest, in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990, with the intent of preserving or enhancing their character or appearance

Countryside and Rights of Way Act	The Act that provided the right to roam for the general public on specific areas of land in 2000
Core Strategy	This is a Development Plan Document that sets out the long-term spatial vision for the local planning authority area together with the spatial objectives and strategic policies to deliver that vision
Cultural Heritage Strategy	A strategy produced by the National Park Authority and stakeholders to guide the future management of the cultural heritage of the National Park
Demography	This is the study of population statistics such as births, deaths, diseases
Derby & Derbyshire Economic Partnership	This is one of seven Sub-regional Strategic Partnerships set up by the East Midlands Development Agency in 2003
Development Control	This is the department within the Planning Authority which processes planning applications. This department was renamed as 'Planning Services' in the Peak District National Park Authority in 2007
Development Plan Documents	These are the suite of spatial planning documents that, together with the relevant Regional Spatial Strategy, will form the development plan for a local authority area., They can include a Core Strategy, Development Control Policies, and Site-Specific allocations and are subject to independent examination
Diversification	This is the development of additional business, usually to support farm enterprises, often by adding value to farm produce
Dwelling	This is an accommodation unit where all rooms are behind a door that is inaccessible to others. A dwelling where two households share a kitchen or toilet within the same building would therefore be classed as one dwelling with two household spaces
East Midlands Car Parking Strategy	Regional guidance on car parking established as part of the emerging East Midlands Regional Plan
Employment Land Review	This is a review of employment land in a planning authority area or a wider strategic area. A necessary piece of evidence in advance of identifying employment land requirements and allocating sites on plan
English National Park Authorities Association	This is a body that exists to promote and further the needs of the nine English National Park Authorities

Enhancement Site	A site where housing helps to conserve and enhance the National Park for example, by restoring a valued building or a site that detracts from the surrounding area, particularly where this cannot be done without new development
Environmental Impact Assessment	This is a procedure for drawing together in a systematic way an assessment of the likely significant environmental effects of a development project, as required under the European Directive 97/11/EC. The Directive is enacted in England through The Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999
Environmental Impact Assessment relating to mineral review procedures	The Town and Country Planning (Environmental Impact Assessment) (Mineral Permission and Amendment) (England) Regulations 2008 were introduced to deal with stalled reviews of old mineral permissions and to provide for additional sanctions for all reviews of mineral permissions. The regulations enable Mineral Planning Authorities to assess whether the remaining development is EIA development and require submission of outstanding environmental and other information to enable stalled mineral review submissions to be determined within certain timescales
Environmental Levy	A monetary charge that could be used to discourage traffic from using a particular route or area in order to protect the local environment
European Landscape Convention	The convention is devoted exclusively to the protection, management and planning of all landscapes in Europe. The Convention became binding on the UK from 1 March 2007
Examination	This refers to the examination of a local development document by an independent inspector appointed by the Secretary of State
Examination in Public	An examination of a statutory document by an independent panel appointed by the Secretary of State
Glossop Spur	This is a possible new road proposed by Tameside Metropolitan Borough Council to link the proposed A57/A628 Mottram-Tintwistle Bypass with Glossop. This road is dependent on that bypass and is being considered at the same adjourned public inquiry
Government Office for the East Midlands	This is the hub of central government in the East Midlands, including town and country planning work on behalf of the Secretary of State for Communities and Local Government
Greater Peak District	This refer to the Peak District National Park and its surrounding urban settlements
Greenways	These are off-road routes designed for shared use by people of all abilities on foot, bike or horseback

Heavy Goods Vehicle	Vehicles over 3.5 tonnes in weight, now succeeded by the term Large Goods Vehicle (LGV)
Highways Agency	The government agency responsible for maintenance of motorways and trunk roads (roads of national and regional importance). There is one trunk road within the Peak District National Park, which is the A628
Highway Authority	The organisation responsible for the maintenance of public roads. In the Peak District National Park, this responsibility is shared between seven local authorities. The National Park Authority is not a highway authority
Holiday Homes	The definition of a holiday home used by the Peak District National Park Authority is, “a development with planning permission for a maximum occupation of 28 days per year by any one person”. The definition of a holiday home used in the 2001 Census was, “any dwelling rented out for the purposes of holiday provision”
Household	This is a single person or group of people who live together at the same address with common housekeeping
Household Space	This is accommodation available for an individual household
Housing Authority	A local authority with responsibilities under the Housing Act 2004, usually the district or city council
Housing Market Areas	These are geographical areas that are defined by household demand and preferences for housing. They reflect the key functional linkages between places where people live and work
Housing Needs Survey	A survey, usually carried out by the housing authority, to assess housing needs that are not currently being met by the market or by social housing providers
<i>Inter alia</i>	Lating, meaning "among
Intermediate Affordable Housing	This is housing that is at prices and rents above those of social rent, but below market price or rents, and which meet the criteria for affordable housing. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent
Key Worker	A person employed by the public sector, either in a frontline role delivering an essential public service in the areas of health, education and community safety or who has been identified by the Regional Housing Board as requiring assistance, who is eligible for the Housing Corporation funded Key Worker Living programme

Landbank	An aggregate landbank is defined by Minerals Planning Supplement I 2006 (para4.1), as an indicator of when new planning permissions for aggregate extraction are likely to be needed. The landbank indicators are at least 7 years for sand and gravel and at least 10 years for crushed rock
Landscape Character Assessment	An assessment of the character of the landscapes of the National Park produced by the National Park Authority and stakeholders in advance of a landscape strategy
Landscape Strategy	A strategy produced by the National Park Authority and stakeholders to guide future management of the landscapes of the National Park
Large Goods Vehicle	Vehicles over 3.5 tonnes in weight, this term succeeds Heavy Goods Vehicle
Lifetime Home	A home designed to accommodate changing needs as occupants become older, for example with room for a stair lift or use of a wheel chair
Local Biodiversity Action Plan	This sets out priorities for wildlife Conservation in the area
Local Development Document	The collective term for Development Plan Documents, Supplementary Planning Documents and the Statement of Community Involvement
Local Development Framework	This is the portfolio of Local Development Documents which consists of Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement, the Local Development Scheme and Annual Monitoring Reports. Together these documents provide the framework for delivering the spatial planning strategy for a local authority area
Local Development Scheme	This sets out the authority's programme for preparing Local Development Documents
Local Plan	The present set of policies that guide development within the Park and provide the finer detail underneath the over arching policies within the Structure Plan
Local Planning Authority	The Authority responsible for Land Use Planning in the area
Local Transport Plan	A document produced by every transport authority which sets out its five-yearly priorities for transport and the actions it will take to pursue these. The plan is a suite of documents including a Bus Strategy, an Accessibility Strategy and a Rights of Way Improvement Plan. Current LTPs run from 2006-2011

Minerals Forum	Two meetings were held one with the industry and one with local communities (parishes and environmental / action groups) in 2007 and 2008 respectively to inform the LDF process
Minerals Planning Guidance	These documents and their replacements, the Minerals Policy Statements, set out the government's policy on minerals and planning issues and provide advice and guidance to local authorities and the minerals industry on policies and the operation of the planning system with regard to minerals
Minerals Planning Statements	These set out the government's policy on minerals and planning issues, providing advice and guidance to local authorities and the minerals industry on policies and the operation of the planning system with regard to minerals
Mineral Safeguarding Area	These are areas defined in Local Development Documents in order that proven mineral resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined will be worked. They also alert prospective applicants for non-minerals development to the existence of valuable mineral resources
National Park Authority	The authority responsible for Land Use planning and management within a National Park
National Park Duty	The Environment Act 1995 provides that, in pursuing National Park Purposes, each National Park Authority shall seek to foster the economic and social well being of local communities
National Park Management Plan	The Plan seeks to guide the management of the National Park in a way which will help to achieve its statutory purposes and duty, improving the quality of life for those who live or work in the Park, or are visitors to it
National Park Purposes	The two primary purposes of English and Welsh National Park Authorities, as defined by the Environment Act 1995, are to (1) Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park and (2) Promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public
Natural Zone	These are areas of the National Park defined by the National Park Authority as particularly important to conserve
Parish Need Surveys	These are surveys of housing need completed at a Parish level by Parish Councils and Local Authorities, often with the support of Housing Enablers who work between the local authority and the community

Park and Ride	A system for accessing popular and/or congested locations featuring a remote car park linked to the destination by a regular bus, train or tram service
Passenger Transport Authority	A local government body that is responsible for public transport within large urban areas
Passenger Transport Executives	The transport authority of a metropolitan area, covering a number of metropolitan districts and boroughs. The Peak District National Park area includes three PTEs: Greater Manchester, South Yorkshire and the Metro (the West Yorkshire PTE). Each overseen by a Passenger Transport Authority
Planning Advisory Service	The Service is a part of the Improvement and Development Agency for local government. Its aim is to provide advice to local authorities on tackling local planning issues
Peak Area Transport Forum	See <i>Peak Park</i> Transport Forum below
Peak District National Park	An area of land designated as a National Park under the National Parks and Access to the Countryside Act (1949)
Peak District National Park Authority	This is the authority responsible for the management of the Peak District National Park
Peak District Rural Action Zone	An organisation established to stimulate economic development and regeneration activity, covering parts of Derbyshire Dales, High Peak and Staffordshire Moorlands both within and outside the National Park
Peak District Rural Housing Association	The Association promotes the provision of social rented and intermediate affordable homes for people within the Peak District and its surroundings
Peak Park Transport Forum	A partnership of transport interests from the Peak District and its surrounding areas who meet to discuss cross-boundary transport issues, now renamed the Peak Area Transport Forum
Peak Sub-area	This refers to an area covered by the East Midlands Regional Spatial Strategy that consists of the whole of the Peak District National Park together with the remaining areas of High Peak Borough and Derbyshire Dales District that lie outside the National Park
Permitted Development	This refers to certain forms of development which can be carried out without the need to make an application to a local planning authority under the Town and Country Planning (General Permitted Development) Order 1995. Each highway authority is granted permitted development rights within the highway boundary

Public Inquiry	This is an official review ordered by the government to scrutinise transport proposals, the conclusions of which are presented to the government for a decision
Planning Policy Guidance	These have been superseded by Planning Policy Statements
Planning Policy Statement	Statutory guidance issued under the Planning and Compulsory Purchase Act 2004. They are prepared by the Government after public consultation to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. They also explain the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals
Quarry Products Association Four Point Plan	Produced by the Quarry Products Association, an association of the major aggregate mineral producers, in 1998, this plan was established to help resolve uncertainties over the extent of quarrying in National Parks, to build upon the existing planning rules, including an rigorous test for planning applications; a review of dormant planning permissions and the offer by a number of companies to give up quarrying right in National Parks
Quiet Lane	A designation given to roads with light traffic and low speeds to show they are suitable for shared use by walkers, cyclists, horse riders and motorised users
Recreation Strategy	A strategy produced by the National Park Authority to guide future management of recreational visitors to the National Park
Recreation Zone	This is a designation which indicates the ability of those areas to accept specified types of recreational development
Regional Economic Strategy	Each regional development agency sets out its main economic policies in a strategy for the region
Regional Spatial Strategy	This sets out the region's policies in relation to the development and use of land and forms part of the Development Plan for local planning authorities. The whole of the National Park is included in the RSS for the East Midlands, RSS8. When approved, the current update will be called the East Midlands Regional Plan
Registered Social Landlord	These are independent housing organisations registered with the Housing Corporation under the Housing Act 1996

Review of Old Minerals Permissions	The Environment Act 1995 required that old mineral permissions issued between 1948 and 1982 be review and new working conditions imposed. Schedule 13 covers the initial review of such permissions; Schedule 14 covers subsequent periodic review undertaken every 15 years
Rights of Way Improvement Plan	A plan that Highways Authorities are required to prepare under the Countryside and Rights of Way Act 2000. It contains an assessment of the adequacy of the current rights of way network together with opportunities for its improvement
Rural Exception Site	This is a small site that would not normally be used for housing, to be used specifically for affordable housing (in perpetuity) in a small rural community. The permitted housing should seek to address local needs
Safeguarding	This is protection of a site from development for a possible specific future use. For example, identifying land where minerals exist below the surface to prevent other development taking place on the surface of the land which could inhibit access to the minerals and prevent future generations from exploiting them. Some disused railways have also been safeguarded to allow their possible future re-use as railways lines.
Sandford Principle	This established that, where the two primary purposes of National Parks come into conflict and cannot be reconciled by good management, the first purpose, conservation and enhancement of the environment, should take precedence
Satellite Navigation	This is a technology-based system used in transport that can accurately direct a vehicle around an unfamiliar network of roads
Saved Policies or Plans	These are existing adopted development plans that have been saved for 3 years from the date of commencement of the Planning and Compulsory Purchase Act in September 2004 and by further agreement from GOEM, until replaced by the Local Development Framework
Section 106 Agreement	These are legal agreements, named after Section 106 of the Town and Country Planning Act 1990, between planning authorities and developers without which planning permission would not be given. They address matters that cannot be dealt with adequately through conditions in the planning permission
Section 278 Agreement	These are agreements, named after Section 278 of the Highways Act 1980, drawn up between developers and the Highway Authority when a new development necessitates highway works, such as junction improvements or a new cycle way, in order to specify that, for example, the highway authority will complete the works at the developer's expense

Serviced Holiday Accommodation	This is a term that covers hotel, guest house and bed & breakfast accommodation
Settlement	This is a definition used to describe a group of buildings where people live, such as towns, villages and hamlets
Site of Special Scientific Interest	This is a conservation designation for the country's very best wildlife and geological sites. The designation was first established in the National Parks and Access to the Countryside Act 1949. The current legal framework is provided by the Wildlife and Countryside Act 1981, amended in 1985 and further substantially amended by the Countryside and Rights of Way Act 2000
Smarter Choices	This is a term coined by the Department for Transport to describe a range of techniques for influencing people's travel behaviour towards more sustainable options which include travel planning, promotion of public transport, car sharing, teleworking and travel awareness campaigns
Social Housing Provider	Local authorities and registered social landlords are the main providers of social housing
Social Rented Housing	This is rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant
South Pennines Integrated Transport Strategy	This is an officer-level delivery body, formed by the Peak Park Transport Forum and charged with pursuit of the SPITS Business Plan. Membership includes a range of transport interests from the Peak District and its surrounding areas
Spatial Planning	This goes beyond traditional land use planning to bring together policies for the development and use of land with other policies and programmes which influence the nature of places and how they function
Spatial Strategy	The strategy responds to the distinctive characteristics and challenges facing an area. It sets out where the best locations for particular types of development are and how they will be implemented. For the National Park it focuses on conserving and enhancing the distinctive and valued characteristics of the area
Special Area of Conservation	This is a habitat and wildlife protection designation under the European Community Habitats Directive (92/43/EEC)
Special Protection Area	This is a wild bird protection designation under the European Community Birds Directive (79/409/EEC)

Statement of Community Involvement	This sets out the standards which authorities will achieve with regard to involving local communities in the preparation of Local Development Documents and in development control decisions. It is not a Development Plan Document but is subject to independent examination
Strategic Environmental Assessment	This is a generic term used to describe formal environmental assessment of policies, plans and programmes, as required by the European Strategic Environmental Assessment Directive (2001/42/EC)
Strategic Flood Risk Assessment	This is prepared by local planning authorities to support the application of the Sequential Test by the planning authority and to provide information and advice in relation to land allocations and development control
Strategic Housing Land Availability Assessment	This is an assessment of the potential capacity of an area to accept new build housing over the next 15 years. It is a necessary part of the evidence base in advance of choosing whether to allocate sites on the plan; it does not commit the National Park Authority in advance of either full plan preparation or development control assessment
Strategic Housing Market Assessment	This is an assessment of the way in which the housing market works and interacts with other social and economic factors. It is carried out by planning and housing authorities for a wide area that is defined in the Regional Spatial Strategy and known as a Housing Market Area
State of the Park Report	A report produced by the National Park Authority as an assessment of the state of the National Park as a result of actions and policies put in place to conserve and enhance it
Structure Plan	This is the present set of over arching policies that guide development within the National Park
Supplementary Planning Guidance	This provides supplementary information in respect of the policies in Development Plan Documents. It does not form part of the Development Plan and is not therefore subject to independent examination
Supported Housing	This is housing where an individual can live independently in a home of their own whilst receiving regular visits from a Support Worker who will help with matters they find challenging
Sustainability Appraisal	This is a tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). The Planning and Compulsory Purchase Act 2004 requires sustainability appraisals are undertaken for all Local Development Documents

Sustainable Transport Mode	These are forms of transport that have a lower environmental impact than cars, vans and lorries, usually considered to be walking, cycling and public transport
Tenure	A form of right or title under which property is held, for example ownership or rent
The Northern Way	A partnership of three Regional Development Agencies which aims to promote economic growth in the north of England
Traffic Management	Influencing or controlling vehicular movements and parking, particularly through traffic regulation orders or alterations in road layout or parking arrangements
Traffic Regulation Order	A legal order which allows the highway authority to regulate the speed, movement and parking of vehicles and regulate the movement of pedestrians
Transport Authority	These are authorities charged with subsidising socially necessary transport services and with producing a range of transport plans and strategies, including Local Transport Plans, Bus Strategies and Accessibility Strategies. The National Park is covered by six transport authorities, including three County Councils and three Passenger Transport Executives
Travel Plan	A set of actions drawn up by an organisation or individual, aimed at reducing single-occupancy car use and thus saving money, promoting road safety, and making a positive contribution to the community and the environment
Use Class	Classes of use are set out in the Town and Country Planning (Use Classes) Order 1987. B1 Business (includes offices, research & development, light industry appropriate in a residential area); B2 General Industrial
Use Class Order	An order that classifies the use of land, as defined by the Town and Country Planning (Uses Classes) Order 1987 and amended by the Town and Country Planning (Use Classes) (Amendment) (England) Order 2005
Valued Characteristics	The characteristics for which the National Park is valued. These include opportunities for quiet enjoyment, wildness and remoteness, landscape and wildlife, geology and geomorphology, clean earth, air and water; the cultural heritage of history, archaeology, buildings, customs and literary associations and any other features which make up the National Park's special qualities
Vehicle Activated Sign	An electronic sign that displays an illuminated message when a vehicle approaches

<p>Village / Parish / Community Plans</p>	<p>These are plans produced by groups within the community that identify priorities for action to improve the environment/economy or social fabric of a village or parish</p>
<p>Wildlife Severance</p>	<p>A term used to describe situations where transport infrastructure, particularly roads, obstructs patterns of wildlife behaviour e.g. dividing a community, or separating the homes or feeding grounds of animals</p>
<p>Working with People and Communities Strategy</p>	<p>A strategy produced by the Peak District National Park Authority and stakeholders to encourage under represented visitor groups from target populations around the National Park, local residents and businesses to visit the National Park and/or to increase their understanding of it</p>

Appendix A Theme Evidence List

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If you would like further information about this study, details can be obtained from Brian Taylor, Policy Planning Manager, Tel.: 01629 816303

Appendix B Strategic Context

Legal and Policy Background

The Planning and Compulsory Purchase Act 2004 requires planning authorities to review their land use plans and policies and produce a new style of land use plan called a Local Development Framework.

The NPA is therefore in the process of replacing its 1994 Structure Plan and 2001 Local Plan.

The context for land use planning in a National Park is different to that outside the Park. This is because the legal basis for National Parks gives the planning authority different fundamental objectives in managing the Park to those given to other planning authorities.

The legislative context for land use planning is the 1995 Environment Act. The Act includes objectives for National Park management. They are expressed as the purposes and duty. The purposes are as follows.

"conserving and enhancing the natural beauty, wildlife and cultural heritage of the area...; and

"promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public".

In pursuing these purposes the NPA has a duty to:

"seek to foster the economic and social well-being of local communities within the National Park,..., and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park".

Section 66 of the Environment Act (1995) requires the NPA to prepare a Management Plan for the Park. The current Plan was published in February 2007. It is co-ordinated and integrated with other plans, strategies and actions in the National Park within the statutory purposes and duty upon the NPA and its partners. It indicates how the purposes and duty will be delivered through sustainable development. As such it is a vital component of the LDF.

(This is different to other local planning authorities who are required to produce Sustainable Community Strategies. The NPA doesn't produce a Sustainable Community Strategy but it does try and reflect the priorities in these strategies.)

Following the enactment of the Planning & Compulsory Purchase Act 2004 RPG became part of the statutory development plan and has been re-named as a Regional Spatial Strategy (RSS). RPG8 therefore becomes RSS8 and this replaces the RPG8 published in January 2002.

The National Park covers parts of four regions: East Midlands, Yorkshire and Humber; North West and West Midlands. However for land use planning purposes the whole National Park is considered to be part of the East Midlands. As a result of this decision, the PDNPA must ensure its land use plans are in accordance with RSS8 for the East Midlands.

The region is split into sub areas. The National Park is part of the Peak sub area along with Derbyshire Dales and High Peak (see picture 2.2 in introduction).

The NPMP is the single most important document for the National Park. It is the overarching strategic document and central to the future of the National Park. It shows co-ordination and integration with other plans, strategies and actions in the National Park where they affect the National Park purposes and duty.

It indicates how the National Park purposes and associated duty will be delivered through sustainable development. It sets the framework for all activity pursued in the National Park by stakeholders.

The current plan is for the period 2006 to 2011 and its vision and desired outcomes are key guidance for the LDF policies.

Community Strategies are produced by local authorities as a requirement of the Local Government Act 2000. They reflect the priorities of people in each local authority area and they are the basis for development of land use policies for each area.

The National Park covers part of 12 local authority areas so there are many strategies to take into account when making land management decisions for the National Park. However the NPA is not required to produce a community strategy. The nearest equivalent is the NPMP. The NPA reflected all community strategies' priorities in this document and has updated the picture for this consultation. The following map illustrates this picture.

The PDNP is impacted upon by the plans and strategies of many other organisations. Although some of these are produced by the NPA they will be implemented by a wide range of organisations so close working is required in plan production and implementation.

There is a duty on all organisations operating in the area to have regard to National Park purposes and duty. (Section 62(2) of the Environment Act) There is also a responsibility on the NPA to have regard to the needs of other organisations. The following list is indicative but by no means an exhaustive list of key strategies and plans.

- Peak District Local Biodiversity Action Plan Review 2007
- Peak District Cultural Heritage Strategy 2006
- Peak District Landscape Character Assessment 2008
- Derbyshire Local Transport Plan LTP2 2006
- Staffordshire Local Transport Plan LTP2 2006
- Cheshire Local Transport Plan 2006
- Derbyshire Dales and High Peak Housing Strategy 2005 - 2009
- Derbyshire Primary Care Trust Strategy 2007 - 2009
- Peak District Sustainable Tourism Strategy 2000
- Rural Action Zone Action Plan 2008 - 2011
- Village/ Parish Plans (around 35 covering the National Park dating from 1999 - 2008)
- PDNPA Working with People and Communities Strategy and Action Plans (Adopted by PDNPA December 2008)
- Derbyshire Dales Local Plan 2005

- High Peak Local Plan 2005
- Staffordshire Moorlands Local Plan 1998
- Macclesfield Borough Local Plan 2004
- Sheffield City Unitary Development Plan 1998
- Oldham MBC Unitary Development Plan 2006
- Kirkless MC Unitary Development Plan 1999
- North East Derbyshire Local Plan 1995

There are other strategies currently in production which will inform LDF Policies. A short list of key strategies and plans includes:

- Derbyshire Dales and High Peak Joint Core Strategy for the Local Development Framework 2011
- Staffordshire Moorlands Core Strategy for the Local Development Framework 2009.
- PDNPA Landscape Strategy (due for adoption by PDNPA May 2009)
- PDNPA Recreation Strategy (due for adoption by PDNPA June 2009)

Spatial Portrait

The PDNP was designated in 1951. Its purposes of conserving, enhancing its special qualities and of promoting understanding and enjoyment of them (called valued characteristics) are set out in the NPMP as:

- outstanding natural beauty and character of the landscape
- significant geological features
- sense of wildness and remoteness
- clean earth, air and water
- importance of wildlife and the area's unique biodiversity
- thousands of years of human influence which can be traced through the landscape
- distinctive character of villages and settlements
- wealth of historic buildings, gardens and parks
- opportunities for quiet enjoyment
- opportunities for outdoor recreation and adventure
- easy accessibility for visitors from surrounding urban areas
- vibrancy and sense of community
- customs, legends, traditions and arts
- environmentally friendly methods of farming and working the land
- craft and cottage industries
- special value attached to the National Park by surrounding urban communities

Located at the southern tip of the Pennines, the National Park extends over 1438 sq km of gritstone moorland and edges, limestone upland and dales, and attractive villages. It is nationally and internationally important with much of the National Park being covered by other designations, providing extra protection for geological, biological and historical features and sites.

The Core Strategy is being developed concurrently with work on Landscape Character for the PDNP. This has begun to add greater definition to the well established landscape areas known as the Dark Peak, White Peak and South West Peak. The Authority is proposing to use new landscape character area definitions to form a more locally distinctive basis for developing spatial planning policy. When overlain by the sustainable community strategy priorities of constituent authorities, a clearer description can be formulated of the challenges and opportunities that face this living landscape.

The complexity of the Dark Peak has been recognised by the distinguishing 3 main component Landscape Character Areas (northern moorlands of the Dark Peak, Eastern Moors and Derwent valley) and 3 less extensive moorland fringe Character areas. The Dark Peak and Eastern Moors strongly characterised by the wild and open expanses of moorland and the famous gritstone edges which provide long ranging views and sense of remoteness which leaves the area particularly sensitive to change. The peatland environment is of international importance and the important Moors for the Future programme is focussed on moorland restoration and understanding future impact arising from visitor pressure, climate change and water resource management. These areas have come under significant pressure from the impact of large scale wind farm proposals and the increase of cross park traffic which contribute to an erosion of tranquillity, landscape division and immediate impact on biodiversity. These areas are important for the role they provide for the large urban populations in terms of recreation and healthy living. The two areas contrast principally in their scale and the extent of influence of nearby urban areas.

The identification of 3 moorland fringe areas adjoining Sheffield (Dark Peak Yorkshire Fringe), the North West conurbations (Dark Peak Western Fringe) and Chesterfield (Derbyshire Peak Fringe) recognises the transitional nature of these rural areas between the open moorland landscapes of the Dark Peak and Eastern Moors and the surrounding urban areas. Whilst all predominantly pastoral, each differs in their topography and extent of influence from adjacent urban centres.

The White Peak has been given extra definition with the separation of the Derwent Valley character area. These two areas embody a strong sense of community being overlain by the numerous communities of the Derbyshire Dales and High Peak. Bakewell sits as the only market town inside the National Park and continues to serve as an agricultural centre having been bolstered over recent years by a new agricultural business centre, retail presence and community facilities serving a wide rural hinterland. The role of Bakewell and the nearby villages continue to serve as important visitor destinations backing up what is still a strong agricultural community. The joint Dales and High Peak Community Strategy demonstrate a strong sense of community support urging for more affordable housing and access to services. This will be a particularly challenging area for the Core Strategy to find ways of achieving key objectives for sustainable communities whilst pursuing the primary purposes of national Park designation, particularly in terms of landscape protection and conservation of historic village character.

The South West Peak is an area of upland and associated foothills in the south west part of the Peak District National Park. It is bounded by the distinctly different limestone landscapes of the White Peak to the east and the extensive lowlands of the Cheshire and Staffordshire Plain to the west and the Churnet Valley to the south. To the north is the more industrial

landscape of the Dark Peak Western fringe. The area possesses a number of small villages where issues of affordable housing and access to services are issues of concern. Close relationships exist between these communities and nearby market towns such as Leek and Macclesfield.

More than 10 million leisure visits were made to the PDNP by people aged over 16 living in England in 2005 (England Leisure Visits Survey, 2005).

However, the National Park is not just a place for conservation where understanding and enjoyment are promoted, it is also a place where people live and work. The population of the PDNP in 2006 was about 38,366. It has remained at around 38,000 since 1991 whereas the East Midlands and England have seen increases. Population projections indicate that there is likely to be a decline in the Parks population between 2001 and 2026 although this partly depends on the number of new houses built.

Socio/economic/environmental profile

The profile of the population can be summarised as follow:

- Population density in the Park is far lower than the average for the East Midlands or England.
- In 2001 the average age of people living within the Park was 43 years (Census of Population 2001), 4.5 years higher than in England due to proportionally fewer children and young adults but more people aged 60 and over.
- Population projections indicate that the average age of the Park population will increase as there is likely to be a decline in the working age population and a significant increase in people aged 60 and over because change within the existing 17,000 homes by far outweighs the influence that varying rates of new building might have.
- The proportion of National Park residents with a limiting long-term illness was slightly lower than that of the region and England.
- There is a relatively low proportion of residents who are non-white British living in the National Park compared to the country as a whole.
- Economic activity rates in the Peak District are higher than the national average and unemployment is lower.
- Due to the rural nature of the area, cars are an essential requirement for residents. As a result, proportionally far fewer households in the Park do not have access to a car compared with England.

The profile for dwellings and households can be summarised as follows:

- In 2007/08 there were an estimated 17,000 dwellings and over 800 holiday homes.
- The 2001 Census of Population showed that there was a total of 17,196 household spaces within the Park of which 3.2% were vacant (the same as the average for England as a whole) and 4% were second residences or holiday homes (significantly higher than the average of 0.6% for all England).
- In 2001 there were 15,949 households in the Peak District National Park. The average number of rooms per household increased from 5.6 in 1991 to 6.1 in 2001. It remained higher than the national average (5.3 rooms per household in 2001).

- In 2001 there was an average of 2.34 people per household in the Park, similar to England. Even though the number of rooms per household has increased since 1991, the number of people per household has decreased.
- In 2001 the proportion of pensioner households living in the National Park was higher than in England; the proportion of households consisting of couples with children was about the same; and the proportion of lone parent families was far lower.
- The proportion of people living in the National Park who owned their homes outright in 2001 was much higher than in England as a whole.

The National Park economy can be summarised as follows:

- It is closely related to the surrounding areas.
- The 2001 Census indicated that around half of the working population of the Park travelled to jobs outside the Park and 4 out of 10 jobs in the Park were filled by workers who lived outside.
- The majority of jobs within the National Park are within the service sector. Tourism plays an important role with 19% of businesses being hotels and restaurants. This reflects the attractiveness of the Park to people and its geographical position with 16 million people in 2001 living within 1 hours drive time of the Park (2001 Census of Population).
- Agriculture also accounts for 19% of businesses within the Park. Businesses in the Park tend have fewer employees than regionally or nationally and wages tend to be lower.

Findings from the Annual Monitoring Report

All local planning authorities must prepare an annual monitoring report (AMR) to consider performance of planning policy against a set of indicators required by the Government. Also authorities must report on the progress made in preparing development plan documents.

Throughout the previous AMR's the NPA has sought to report specifically on cases which have raised particular tensions on policy or identified potential gaps where new policy is considered necessary. This provides useful additional evidence in the review of policy as it is a direct reflection on the recent experiences of implementing policy and the Authority's performance in meeting its key strategic objectives.

Area Descriptions, Values and Challenges

The National Park is a myriad of different broad landscape character areas and more detailed landscape character types. The broad areas are known as Dark Peak, White Peak and South West Peak.

Although the whole National Park has the highest landscape designation in the UK, land use planning needs to respond to the different land management challenges in each area. This plan will do this because it will draw on the knowledge and information gathered for each area. This includes Landscape Character Work (describing each area and outlining desired management outcomes for each area); knowledge of constituent authorities community priorities (community strategy priorities); and values placed on the National Park by the

people who live and work in and around it and who visit the area. The plan also draws on knowledge of particular development pressures in each area and examines the relationship of parts of the park to its more urban hinterland.

For the purposes of this document we consider the Dark Peak to include the Moorland Fringe areas. In broad terms this means areas north of the Hope Valley and areas east of the Derwent Valley. In broad terms the White Peak includes the Derwent Valley and extends to the Park boundary in the south and to the Staffordshire Derbyshire boundary to the west. The South West Peak covers the remaining areas of the Park. The exact boundaries can be seen on the Landscape Character Assessment maps which can be found on the National Park Authority website.

The descriptions below are based on a wide variety of sources including comments received from the stakeholder and community workshops held during September and October 2008. A summary map and table of this can be viewed below.



Picture B.1 Values & Challenges for the Areas of the Peak District National Park

Dark Peak & Moorland Fringe Area	
VALUES	CHALLENGES
<p>Safety from major changes</p> <p>Tranquillity, peace, solitude and quality dark skies</p> <p>Pride in quality landscapes in ‘our back yard’</p> <p>Carbon capture potential</p> <p>World famous climbing ‘edges’</p> <p>Excellent walking and mountain biking</p> <p>Conserved historic landscape pattern</p> <p>Conserved quality of buildings in villages</p> <p>Obvious contrast with landscapes around the National Park</p> <p>Good rail access from Manchester to Edale for walking up onto the Kinder Plateau</p> <p>Strong mixed communities from a range of background with a wide variety of skills.</p> <p>Good access for fringe communities to get into the open countryside</p> <p>Good access for National Park communities to wider range of services in towns and cities nearby</p>	<p>Potential large road infrastructure in open landscapes</p> <p>Potential large electricity infrastructure across open landscapes</p> <p>Pressure for large scale wind turbines on the edge of the area</p> <p>Traffic levels and parking are a nuisance for small communities on the fringes of the National Park</p> <p>Insensitive use of landscape by some motorised vehicle users can spoil many others’ enjoyment as well as damage the landscape.</p> <p>Public transport use by visitors is low</p> <p>There is under representation of groups from nearby surrounding urban areas (in our visitor profile)</p> <p>Landscape potential for carbon capture and water capture requires careful integration with Biodiversity Action Plan and other strategy aims.</p> <p>Many towns around the National Park are priorities for housing delivery so most investment will go there; however, there is a need to keep Park communities vibrant too.</p>

White Peak & Derwent Valley Area	
VALUES	CHALLENGES
<p>Peace, quiet and solitude can still be found. Communities are generally strong and enjoy a fair range of services.</p> <p>The character and charm of Bakewell and most villages remains intact</p> <p>There is excellent access from the south into areas like Dovedale and a good range of trails (e.g Manifold, Tissington and High Peak)</p> <p>Some HopeValley communities have a relatively good bus service</p> <p>Some Hope Valley communities have a reasonable rail service</p>	<p>Village services and bus services are under threat in small communities.</p> <p>There are few good housing sites and many villages are nearing capacity.</p> <p>There are few obvious ‘windfall opportunities’ left</p> <p>There is a small but significant unmet need for affordable homes</p> <p>Some wards have relatively high levels of holiday and second homes.</p> <p>The population is ‘older’ than areas around and 16 – 30 year olds are leaving the area. High house prices and low wages combine to make houses less affordable to local people.</p> <p>Increased out-commuting of local people for higher paid jobs;</p> <p>Increased in-commuting for jobs that local people don’t fill;</p> <p>High levels of out-commuting for well paid jobs by higher skilled people.</p> <p>Pressure to widen views on what acceptable diversification is in the Park. (from farming and other businesses)</p> <p>Pressure to grant further permissions to extract stone and mineral (strengthening the position of quarry companies and quarry operations in the Park landscape)</p> <p>Some employment sites under occupied and pressure to release them for housing</p> <p>Traffic and parking pressure still affects many villages badly. (both visitor traffic and quarry lorry movements)</p> <p>Small land ownerships and multi layers of strategy make it harder to achieve biodiversity cultural heritage and landscape goals.</p>

South West Peak Area	
VALUES	CHALLENGES
Rugged gob-smacking landscapes Wide variety of landscape types in one small area Industrial heritage is conserved Historic character is conserved Tranquillity can still be enjoyed Good recreational offer at the Goyt Valley Communities are strong Communities in the north, west and south have good access to towns around (Buxton, Macclesfield and Leek) There are good links in from Cheshire for recreation.	Fragmentation of Biodiversity Action Plan habitats is more likely as climate change takes effect Patchy demand for employment sites Villages on the Staffs Derbyshire border area have relatively poor access to services. There is a relatively high level of holiday homes in some wards Public transport take up by visitors is poor despite efforts to subsidise some services The areas roads are popular with motorbikes to the extent that their use has led to high accident rates and pressure from road safety professionals for new signage and speed cameras.

Dark Peak and Moorland Fringe

The Dark Peak includes the Dark Peak; Dark Peak Western Fringe; Dark Peak Yorkshire Fringe; Eastern Moors; Derbyshire Peak fringe. It includes large parts of High Peak borough and fringe parts of Kirklees, Sheffield and Barnsley, North East Derbyshire and Oldham administrative areas.

The Dark Peak is a relatively unsettled landscape with vast tracts of open moorland, several reservoir systems and world famous climbing edges on the edges of the grit-stone plateau. The area is crossed by long distance recreational routes (the Pennine Way and the Pennine Bridleway). The attractive landscape was a factor in the 1930s movement for mass access to the Moorlands from heavily populated industrial areas around the edge. Access was widened by the Countryside and Rights of Way Act 2000

Land ownership is still predominantly in large land holdings with extensive areas owned by the National Trust, water companies and estates. This has been beneficial in enabling joint working on moorland restoration (Moors for the Future) and joint work to manage heavy visitor numbers (at the Upper Derwent)

Much of the area has additional wildlife designations that sit alongside the National Park designation. This offers multi layers of protection for large areas of the dark peak and recognises their international biodiversity value as well their landscape value.

The moorlands have potential to capture carbon and capture water both of which contribute to the objective of sustainably managing natural resources. The reservoir network is vital for water storage and supply to this and surrounding areas.

The reservoirs (Upper Derwent area) are especially popular for recreation because the road network offers people easy access to the reservoirs and the moorlands.

The Edale valley is popular because it is the gateway to the Kinder plateau and is easy to get to by road and rail from Sheffield and Manchester.

Settlements are around the park edges and culturally close to cities and towns nearby. The exception is the Edale Valley settlements which are relatively remote from urban areas. The mill town industrial heritage of the area leaves a strong legacy which is most evident in the design of the housing and the mills.

The larger settlements of Hayfield, Buxton, Glossop, Meltham, Marsden, Stocksbridge, and Penistone sit around the national park between the Park and the conurbations of Manchester, Sheffield, Huddersfield, and Oldham.

The area is crossed by major inter city road links (the A628 and the A57) and is also crossed by major electricity lines from Tintwistle to the Woodhead Tunnel. The Snake Pass has absorbed telecommunications masts to enable better mobile phone coverage in the area.

Values

The public and other stakeholders in these areas particularly recognise and value the contrast with adjacent urban areas. The Park was described as 'their back yard' by stakeholders from around the Park and the quality of landscape and the built environment is particularly important as is the qualities of tranquility, peace and solitude and dark skies. They also value the historic landscape and the fact that uniformity of buildings emphasise the history of the area. The landscape strategy will add more knowledge to this picture.

The public value the diversity in the communities and the mix of people and skills in the area. The strength of community spirit is valued highly everywhere, as is the relatively crime free environment.

Large urban populations and the Local Authorities around the Park value good access to the Park and the recreation opportunities such as excellent climbing areas and excellent walking. There is pride in the area's role in the Mass Trespass and the subsequent designation of the area as a National Park.

People in the places like Bradfield, Holme, Hayfield, Edale value the fact that their environment is relatively safe from new development but they also value good access to facilities and services in larger towns and cities.

Challenges

The policy of constituent authorities is to focus new housing and business development in places like Holmfirth, Penistone and Stocksbridge as well as the large border urban areas of Sheffield and Glossop. There is also a presumption in favour of development in Buxton, Hayfield, Birch Vale, Thornsett, New Mills, Furness Vale, Buxworth, Chinley, Chapel Milton

Whaley Bridge Tunstead Milton, Chapel en le Frith, Combes, and Dove Holes. The challenge is to retain the viability of Park settlements when they are not priorities for development in either regional or constituent local authority terms.

Peoples perception of the number of local people who need affordable homes far exceeds the facts. The number of homes needed is very small for the Dark Peak communities as a whole by comparison with the white peak communities' needs. In addition, sub regional policy is to concentrate development in larger places outside the Park. The gap between perception and reality is likely to mean that communities will remain unsatisfied with the level of delivery of new homes in the Park. This is a communications challenge rather than a land use one.

The area is subject to proposals for large scale wind turbines in large open landscape. It is also subject to proposals for large scale road infrastructure and for electricity lines. The challenge is to ensure that any development conserves and enhances the landscapes and habitats of this area of the park.

The area is good for sports such as climbing and mountain biking but also attracts off road bikes and 4x4 users. The challenge is to manage legitimate use of the Park and accommodate facilities that will help us to deliver the recreation strategy.

The area is highly accessible (in theory) to millions of people living in the Sheffield Kirklees, Oldham, and Barnsley areas. Many of these people belong to areas or cultures that are under represented in our visitor profile. The Authority has a set of target groups from target areas. Work with these people and local authorities is beginning to identify particular gateway sites or areas to which it is felt these people would come. The challenge will be to find ways of enabling development that draws these people in whilst conserving and enhancing the landscape. Existing examples include the Moorland Discovery Centre at Longshaw which is a gateway for under represented Sheffield communities.

There is a need to conserve the areas ability to provide for those seeking tranquil places
There is a need to conserve the quality of dark skies and the contrast this provides with surrounding urban areas.

There is a challenge to continue re-instating degraded habitats.

There is a challenge to maximise the areas potential to capture water for supply to fringe regions.

There is a need to maximise the areas potential to capture carbon within the moors.

There may be potential to encourage sustainable bio-fuel production (e.g. sustainable woodlands)

There is a challenge to promote sustainable design and conserve and enhance historic character.

There is a challenge to maximise recreation opportunities sensitively by driving up the quality of the tourism product in ways that conserve and enhance the National Park

Whilst areas like the Upper Derwent are visitor hubs, most visitors continue to come in car despite many years of attempts to subsidise/provide bus services.

White Peak and Derwent Valley

The white peak is dominated by limestone grasslands and a large network of small settlements ranging from Bakewell with about 400 people to small villages of a few hundred people or less.

Bakewell is by far the largest settlement within the National Park, and acts as a service centre for a wide rural area with a population of about 20,000 people. The new livestock market is very successful and has secured its role serving the region's farmers. Bakewell is also a very popular tourist centre and a focus of public transport services linking surrounding villages with major towns and cities. Future strategy must understand this wider role - accessibility, both into Bakewell from surrounding villages and the rural area, and out to the next tier service centres beyond the Park, is essential to enable choice and to cater for the needs of all sectors of the community.

The National Park Authority values Bakewell's role and status within the NP. It is a thriving and vibrant town centre with an historic market town character. It provides housing and employment opportunities that are appropriate to local needs, and its services and facilities are in easily accessible central locations, both for the residents of Bakewell and its hinterland. It has adequate public transport provision and parking for residents and visitors.

Many more communities are relatively remote from larger town and cities by comparison with the villages in the Dark Peak fringe. Most villages retain a relatively healthy range of services and facilities for their size. In most villages the shops and facilities are not dominated by tourism services in products.

The area is almost totally within the Derbyshire Dales District Council area. They have areas that are priority for development around the southern edge of the National Park. These are Ashbourne, Matlock, Wirksworth, Matlock Bath, Cromford, Darley Dale, and Middleton by Wirksworth. Although High Peak Borough Council area mainly falls outside the White Peak they prioritise development in some places that are close to the White Peak (Buxton and Chapel en le Frith) These surrounding places are housing and employment centres and provide many of the jobs and services that National Park residents rely upon. The vibrancy of these places is essential to small communities in the National Park.

Some villages are founded on farming and retain their agricultural character. Ownership of this farmed landscape is more fragmented than in the Dark Peak with many small farm holdings. Large holding do remain for example at Tissington and at Chatsworth Estates.

Other villages have an industrial character founded on long gone industries such as lead mining; whilst converted mills tell another story of the areas bygone industry. In all places the buildings and settlements patterns give a strong clue to each settlements origins.

One of main features of the area is the large quarrying operations to extract limestone and mineral. This is part of the industrial heritage of the area going back many centuries. The older forms were lead and copper mining. The modern forms are limestone, sandstone and fluorspar working producing cement, building stone aggregate and minerals for the chemical industry.

The area is famous for Dovedale in the south but other attractions include Chatsworth, Bakewell, Nine Ladies and Arbor Low.

The area generally offers gentler opportunities for visitors, and many people simply enjoy gentle walks and bike rides (for example on the trails that run alongside the areas disused railway lines (Tissington and High Peak trails.). Others are happy to spend time in the picturesque villages rather than pursuing more extreme active sports.

The area is not subject to major cross park traffic movements by comparison with the A57 and the A628 across the Dark Peak. It is subject to localised heavy traffic in settlements on main routes and in settlements close to major quarrying operations. Other problems are localised and intermittent congestion in tourism hot spots.

Other infrastructure such as telecommunications masts and electricity pylons are evident but are generally of smaller scale than in the Dark Peak.

Values

People in the Bakewell and Hathersage areas highlighted the beauty and variety of the landscapes created by farming. They also highly value the townscape and traditional village street scene and the fact that places like Bakewell still have an agricultural feel in keeping with its surrounding area.

People value the excellent access to the countryside and the opportunities to experience solitude, peace and quiet.

People also recognise and value strong village and town communities with a good community spirit and a good range of services and support networks. They value the relatively good bus services and (in the Hope Valley) the train service. They also value schools GPs post offices, convenience shops and village halls as essential parts of the village or town scene.

Workshop results showed less emphasis on access to the countryside which perhaps reflects the fact that people in these areas live in the countryside rather than being between town and cities and open landscapes (as they tend to be in the Dark Peak communities)

Challenges

There is a challenge to be clearer about what we mean by natural beauty in the area and use the Landscape Character Assessment to explain this more clearly. This needs to be backed up with clear design guidance.

There is a challenge to integrate the requirements of biodiversity action plans and the cultural heritage strategy, and the climate change strategy with the landscape strategy. This then needs to be linked to the LDF so that planners know what needs to be achieved in each area. This is particularly pertinent in this area where the land ownership is more fragmented, the landscape is overlain with many different communities with different priorities.

There is a need to challenge the misconception that an 'attractive' landscape is always a 'healthy' one. For example attractive bright green fields are often poor and degraded in terms of wildlife and cultural landscape.

There is the challenge to identify acceptable landscape change where that is needed to for purposes of providing habitat for biodiversity. This may become harder to implement if there is pressure for food production as transport/import costs soar.

There is a challenge to enable renewable energy infrastructure to meet the needs of communities and business but the perception is that this justifies change in the landscape. There is no policy at national or regional level that suggests the national park should accommodate renewable energy infrastructure if it degrades the landscape. There is no consensus that local people or visitors want renewable energy infrastructure that results in major landscape change. There is some support to maximise the use of water for energy generation which would be a lower impact way of producing renewable energy.

The perception is that communities are unsustainable with too many old people and not enough young people and too many holiday homes. Whilst there is some truth in this statement no villages have suffered loss of schools and few have suffered loss of shops and post offices. At all the Autumn 2008 community events people valued the strength of community in the area which suggest that whilst villages are changing they are not becoming less sustainable. The percentage of holiday homes is high in some wards but numbers are certainly lower than in other National Parks and other popular rural areas.

It is proving hard to find sites for new affordable homes in many settlements and this is increasing the pressure to look for sites in smaller settlements. However there is no agreement as to whether it is better to continue the policy of allowing new build in larger settlement only or whether to adopt a new policy that spreads new development more widely across all size settlements.

There is pressure to meet the challenge of providing affordable homes for local people by conversion of existing buildings. Whilst policy allows this to happen, it rarely does happen because people have the option to convert to holiday homes. A commonly held view is that we should close off the option to convert building to holiday homes particularly in villages. The loss of buildings to holiday homes is felt most acutely in the white peak because this is where most local plan settlements lie. However the conversion of a building to a holiday home will provide someone with extra income and this will be a local family in many cases. There is a choice between meeting a social need or an economic need.

There is a challenge to ensure that all communities either have a good range of services, or have good access to those services elsewhere. The perception is that new housing will help sustain services and facilities but there is no evidence that this is the case. Some places that have not grown at all in the last 15 years still retain the same services they had back then. On the other hand, some places have grown and still lost services. There is no positive direct correlation therefore between extra houses and level of services.

There is a responsibility to assist constituent housing authorities in their job of delivering homes in the larger towns around the Park. It may be damaging for us bow to pressure to allow new development in less sustainable locations because it may divert scarce investment away from these large housing and employment centres.

There is pressure to be more flexible about re-use of redundant farm building for either family members to remain on the farm or for businesses to operate from the countryside (and supplement the farm income) The challenge is to find a way to enable essential workers to remain in the area but to not allow new open market houses to be built which ,experience proves, can quickly end up meeting the demand for a house in the countryside and not the essential needs of the business. The challenge is also to enable farmers to get income from other than farming without introducing an industry that is very likely to result in an adverse impact on the farm itself and the landscape within which it sits. The perception is that if a building exists it must be used for something irrespective of its location in the landscape whereas the conservation of the landscape may well be best served by removal of the building once its usefulness to the farming business has expired.

The employment sites that exist are not fully occupied and there is consistent under demand on some sites. The challenge is to modify employment sites and facilities to meet the different needs of business today or stimulate demand for the sites as they are now. However there is pressure to consider change of use to housing and in some areas the lack of good housing sites combined with the lack of demand for employment sites may intensify this pressure.

There is a view that the economy is subsidy dependant. An economy that is less subsidy dependant might be possible but it might mean enabling non conservation related business more flexibility to operate in this area. However this needs to be done in ways that don't undermine the landscape of the area and its inherent value to the local economy (e.g through visitor investment). There is also a danger of undermining potential investment in more sustainable locations around the Park i.e those towns sandwiched between magnets for business investment (the cities) and nationally valued landscapes (the National Park).

South West Peak

The south west peak is more mixed landscape with areas of upland pasture contrasting with areas of moorland. The pattern of landownership shows large moorland ownerships but also small land holdings.

There are far fewer villages than the other two areas and a relatively dispersed pattern of very small villages and hamlets. Most of these are farming villages but some date from times of earlier industry including coal mining.

The areas to the west are relatively well connected to the surrounding urban areas of Macclesfield and Leek but the villages to the east are quite remote. The settlements retain a good level of services for their size but some areas such as the Hamps Valley and Manifold wards now have relatively high levels of second homes.

The surrounding planning authorities in Staffordshire Moorlands, Macclesfield, and High Peak prioritise Leek, Waterhouses, Macclesfield Town, Chapel en le Frith, Buxton, New Mills and Whaley Bridge as places for new development.

The area is not as visited as the white or dark peaks but the Roaches is popular with climbers, certain 'A' roads are popular for both motor cyclists and pedal cyclists, and the Goyt Valley and Macclesfield Forest areas are popular visitor destinations. The Dove Dale area is popular with visitors from the Stoke on Trent area of the Staffordshire proving its value to relatively local urban populations.

The area is relatively unspoilt by roads, pylons or telecommunications infrastructure and it doesn't have the quarries and associated infrastructure or traffic that the white peak has.

Values

People in the Warslow area value the continuity of landscape and the fact that this provides a visible connection to the past. They value a 'rugged gobsmacking' landscape of great diversity and the excellent access to great recreational opportunities. They also value the simple quality of tranquillity.

It is valued as a great place to live and work with strong communities and good links between businesses. The potential for renewable energy both wind generated and water driven is seen as a valuable asset.

In the Kettleshulme area people value the landscape and the industrial heritage but notably the many variations within landscapes in a small area.

People value the great recreational possibilities available, notably the Goyt Valley and the touring network in from the wider Cheshire area.

The safe, quiet, relatively crime free environment is valued and there is a strong sense of community in attractive village environments. This is supported by a good range of services and supportive schemes for small business such as the Environmental Quality Mark scheme.

Challenges

The variety of landscape types and the unusual settlement pattern means great care is needed to permit development of appropriate design and location.

The fragmentation of priority biodiversity habitats is a big issue in the face of climate change. The key habitat sensitivity of moorland/peatlands to climate change challenges us to consider radical adaptation or habitat change but the purposes of the National Park is to conserve and enhance landscape but not fundamentally change it.

The "health" of micro-enterprise is vital to the wealth of the rural economy of the area and the challenge is to adopt policies that recognise this and enable small-scale enterprise.

There is a view that the economy is subsidy dependant. An economy that is less subsidy dependant might be possible but it might mean enabling non conservation related business more flexibility to operate in this area. However this needs to be done in ways that don't undermine the landscape of the area and its inherent value to the local economy (e.g through visitor investment). There is also a danger of undermining potential investment in more sustainable locations around the Park i.e those towns sandwiched between magnets for business investment (the cities) and nationally valued landscapes (the National Park)

Whilst areas like the Goyt are visitor hubs, most visitors continue to come in car despite many years of attempts to subsidise/provide bus services.

The specific access priorities within this area from the ROWIP need to be taken into account.

Public transport around the Park is as important as public transport in and out of the Park but the challenge is to retain the level of bus services for residents when the trend is to take services away. The size of the communities means demand is unlikely to rise and places such as Flash have poorer public transport than it had 5 years ago.

The size of communities means services are marginal. The co-location of shop, post office and village hall has protected services in one village but this requires considerable community effort, and support from other agencies. Not every community has the capacity to avert service loss. The south west are is particularly susceptible because the communities are so small and relatively remote from large towns and support networks.

Appendix C Developing Spatial Objectives

Developing Spatial Objectives

In Spring 2007 the National Park Authority consulted on Issues and Options for the Core Strategy. As part of this stage representations were also invited on a set of proposed Spatial Objectives. The responses to that consultation along with the results of the interim sustainability appraisal are set out below. Please tell us what you feel about the Spatial Objectives reflecting on the comments made so far.

After this period of consultation the Authority will refine the Spatial Objectives also to show how these help to define the spatial expression of the NPMP. In the interim this refined options consultation draws on the Management Plan Vision and the Strategic Outcomes as set out below.

NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 climate change is being addressed and the natural resources of the National Park are being managed sustainably so that we:</p> <ul style="list-style-type: none"> • reduce our adverse impact on climate change, and future generations are better able to manage, mitigate and adjust to the changes that are starting to take place: • are better placed to hand on a diverse, healthy and resilient natural 	<p>Policies and decisions on development recognise the role the National Park plays in global terms by conserving and enhancing a high quality landscape, including wildlife and cultural heritage by locating and designing new development in ways which reduce the carbon footprint and ensuring that the most beautiful and lasting impression is left by the distinctive rural character of the area.</p>	<p>The spatial objective on climate change should be more focused on the specific issue to which it relates. The key part of the objective refers to aiming to reduce carbon footprint of development through location and design. The references to landscape, wildlife, cultural heritage and distinctive rural character are implicitly covered under other objectives. Therefore, the spatial objective should be more</p>	<p>We are keen to see inclusion of water saving features both within and without developments coupled with sustainable drainage methods as an integral part of development. (EA) You need to expand coverage to take account of policies dealing with adaptation to climate change as well as policies dealing with mitigation. Scope for more policy influence on climate change, CO2 reduction or low carbon policies in various parts of CS, yet is little mention of these issues. See recent consultation draft PPSI supplement.(AA) Document does not link between climate change & transport - link needs to be made forcefully. (FPD) Use of term 'carbon footprint' is less than clear as it does not clarify whether this is global, park-wide, local or individual footprint. Would make more</p>

<p>environment to future generations</p> <ul style="list-style-type: none"> • retain and improve the National Park's natural resources as the basis for our survival, well-being and prosperity. 		<p>focused around the main issue in question.</p> <p>In addition, the objective should include reference to meeting targets for renewable energy provision, energy efficiency and considering the management of future flood impacts arising as a result of climate change without compromising the special purposes and duty of the Park.</p> <p>Prudent use of resources is a key objective in addressing climate change, and the spatial objective should include reference to efficient use of resources and recovery, reuse and recycling of construction and waste materials.</p>	<p>sense to simply seek reduction in greenhouse gas emissions eg "designing new development in ways which reduce greenhouse gas emissions and ensure that the.." The objective would be strengthened by replacing 'impression' with 'imprint'.(NT)</p> <p>LPA's including NPs should take action to identify areas for new habitat creation to make semi-natural habitats more sustainable in the face of climate change. Action should focus on reducing negative edge effects from surrounding intensive land use and buffering, and extending valuable habitats such as ancient woodland. See Woodland Trust 'Space for Nature'. (WT)</p> <p>We are disappointed to see no reference to need to ensure that species and habitats within NP are able to adapt to impact of climate change which is already occurring at an accelerating rate.(WT)</p> <p>The use of word 'beautiful' on its own is inappropriate in this instance because it is purely subjective.(CLA)</p> <p>With farming under pressure, new woodland creation provides a valuable opportunity for farmers to diversify their businesses & contribute to the environment. New woodland is best targetted to areas where is already a high concentration of ancient woodland, where it should be designed to buffer and extend those habitats so they can survive climate change and other pressures. Core Strategy should address this potential. (WT)</p>
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			<p>Detail is essential to understand likely spatial consequences. NPMP aim to reduce adverse impact would benefit from explicit targets. Should be noted that encouraging tourism will inevitably exacerbate greenhouse gas emission. Would be helpful to explain how plan will enable future generations to 'manage' etc climate change. Must define NP's 'natural resources'. (WT)</p> <p>We would like to see spatial objectives set out why a switch to landscape scale management of the countryside is necessary to enable habitats and species to adapt and survive in the face of the threat of climate change. The NP is ideally placed to be a key driver in delivering a shift to landscape scale planning and management. Contribution planning can make is set out in ODPM 'Planning Response to Climate Change: Advice on Best Practice'. (WT)</p> <p>I do not think it is in your gift to reduce the extent of climate change, but you might reasonably promote policies which are sustainable and do not contribute to global warming.(BMC)</p> <p>UU and RSPB have worked together supported by NPA officers to implement Sustainable Catchment Management Programme. This will conserve & improve environment in water catchment grounds in PD, provide a purer raw water source and thereby reduce greenhouse gas emissions.</p>
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NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 the natural beauty of landscapes means:</p> <ul style="list-style-type: none"> • they are still attractive places to live in and visit and are assets to communities and the economy • there is a clear characterisation of the whole of the landscape and it is conserved and enhanced in accordance with that characterisation. 	<p>Development will be sited and designed so to never compromise the natural beauty of the Peak District landscape and that all development should seek to contribute to the gradual enhancement of that landscape.</p>	<p>The spatial objective to natural beauty is in accordance with sustainability objectives relating to landscape.</p>	<p>There is danger with 'Natural beauty' heading and text that it is assumed that landscape qualities of the NP are solely the product of natural processes and that no management is needed to maintain them. The beauty as currently perceived relates to combination of natural processes & man's influence. It is the overall character of the landscape that is important and needs to be understood & enhanced. If development is permitted in one of the few significantly degraded landscapes, it is reasonable to expect very significant improvements in landscape quality; 'gradual' should be deleted, although might be replaced by 'continued'. This would better complement NPMP & more closely accord with approach in PPS7.(NT) In objective for natural beauty, "...so as to never compromise the natural beauty.." is overly restrictive and conflicts with the overall strategic aim of a modern PDNP. A more flexible objective should be set out that reflects the desire for a modern NP.(DDDC) When issues of 'protection' are raised it is necessary to consider importance of what is threatened before considering what degree of protection to give it. (CLA)</p>
NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 dynamic partnerships have achieved</p>	<p>Ecological assets of the Peak District will</p>	<p>The biodiversity spatial objective is considered to be</p>	<p>Lose the word gradual (NT)</p>

<p>outcomes for biodiversity and begun to tackle the challenge of climate change having especially:</p> <ul style="list-style-type: none"> • reached the Public Services Agreement target of 95% of Sites of Special Scientific Interest in target condition by 2010 • increased the quality and quantity of Biodiversity Action Plan priority habitats and species, especially moorland restoration and condition status • increased distinctive White Peak wetland and farmland habitats, and key Local Biodiversity Action Plan species • identified ways of reducing the extent of climate change and reducing its adverse impact on biodiversity. 	<p>always be conserved when making decisions on new development in the National Park and all development should seek to contribute to the gradual enhancement of biodiversity in line with the objectives of the Biodiversity Action Plan.</p>	<p>adequate for the protection of biodiversity. However, it is recommended that the objective is widened to include the protection of all the Peak District's natural assets and their role in providing vital ecosystem services (e.g. providing clean water, reducing run-off and preserving soil function) in order to link conservation and a healthy environment in an integrated way. Sites of geological interest should also be considered alongside biodiversity.</p>	<p>Does not explain what 'ecological assets' of NP are – an explanation is necessary for overall clarity of document. On NPMP, unclear why moorland restoration & condition status singled out in second bullet point, as PSA target of 95% of SSSIs in target condition largely deals with moorland sites. (RSPB)</p>
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NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 people, communities and organisations have worked together to:</p> <ul style="list-style-type: none"> • deliver outcomes of the Cultural Heritage Strategy • conserve and enhance distinctive characteristics of landscape and settlements, especially in the White Peak. 	<p>The cultural heritage of the Peak District will always be conserved when making decisions on new development in the National Park and all development should seek to contribute to the gradual enhancement of the area's cultural assets in line with the objectives of the Cultural Heritage Strategy.</p>	<p>'Cultural heritage' should be defined as it is unclear what aspects of cultural heritage this relates to.</p> <p>The spatial objective for cultural heritage is considered to be compatible with sustainability objective, assuming a broad definition of the term, which includes architecture, local character, historic buildings and landscapes, archaeology, parks and gardens, monuments, battlefields and other assets.</p>	<p>Cultural heritage objective agreed, but with correction to read "will always be conserved" and suggest that use of 'gradual' is again superfluous - reuse and renovation of derelict buildings of historic/architectural merit should be encouraged and would result in a significant enhancement of cultural assets, even in a park-wide context.(NT)</p>
NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 the impact of mineral working on the special qualities of the National Park and on communities has been reduced because:</p> <ul style="list-style-type: none"> • there are fewer quarries 	<p>Opportunities will be taken through the application of strategic planning policies and wider influence of the Authority to gradually reduce</p>	<p>This objective adequately addresses the visual impacts of minerals extraction, but neglects other aspects of sustainable development of</p>	<p>We object to use of the phrase 'natural beauty' even with reference to the wider NP, in the context of the visual impact of mineral workings. Recommend replace by 'landscape character'.(BMC) The policy should simply state "there are no new quarries", and then retain the 2nd and 3rd</p>

<ul style="list-style-type: none"> • those quarries that remain are worked to the highest modern environmental standards with established operating end-dates and restoration schemes • there is an agreed definition of 'national need' for mineral working. 	<p>the visual impact of mineral working in accordance with the overall aim of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Peak District.</p>	<p>the Park's mineral resources. It is recommended that this objective is broadened to include protecting mineral resources, their prudent and efficient use, reducing transport impacts, protecting communities from amenity impacts and historic assets and wildlife from disturbance as a result of mineral working. While it is accepted that minerals extraction is a key issue within the National Park. It is also recommended that this objective should be covered within a wider prudent use of resources objective, which included the efficient use of water and land, and the conservation of soil resources. It should be recognised that whilst mineral extraction can have an adverse effect on the historic environment, the opening of small</p>	<p>indents. The understanding then would be that where there was need for vein mineral workings these met the conditions of your 2nd indent.(BMC) Welcome NPA recognition that mineral extraction must continue in PD (CLA)</p>
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		quarries for the supply of building and roofing stone can contribute to the conservation of local character.	
NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 highways, transport infrastructure and services have been improved because they:</p> <ul style="list-style-type: none"> • meet the needs of residents, visitors and surrounding areas • increase the proportion of visitors using methods of travel other than private cars • reduce the adverse environmental impacts of travel on the special qualities of the National Park • enable more sustainable travel patterns that lead to a reduction in the levels of carbon dioxide emitted into the 	<p>Opportunities will be taken to gradually reduce the impact of traffic across the National Park. Greater encouragement will be sought for more sustainable means of travel, acknowledging the reasonable use of the car in rural areas. Greater understanding of the access needs of all residents and users will be sought, including the implications for the location of homes, services and job opportunities. Transport needs will be commensurate to the scale of need and capacity of the area and the</p>	<p>The traffic, travel and accessibility spatial objective does not contradict any SA objectives. No further recommendations have been made from the appraisal.</p>	<p>4th statement of objective should say 'transport provision' not 'needs'. Suggest remainder would be improved if amended to "will be commensurate with the scale of need, the capacity of the area and the relationship of NP communities." Even with these revisions it will be important in detailed policy work to establish how 'capacity of the area' will be defined & measured. (NT)</p> <p>First statement in objective generally agreed, delete 'gradually'; but approach should be based on related policies & decisions eg "Policies & decisions on development will secure a reduction". First part of 2nd statement strongly supported, but 2nd part is open to interpretation that all car use in rural areas is reasonable; suggest "acknowledging that some car use in rural areas, such as that of residents in isolated locations, will be more difficult to provide alternatives for at least in the short to medium term." Agree 3rd point (NT)</p> <p>The encouraging and enabling aspect of this objective should be emphasised, and actions likely to limit or deter desired access by vehicle should be acknowledged as being economically dangerous and erosive</p>

<p>atmosphere, especially by supporting public transport.</p>	<p>relationship of National Park communities to major conurbations outside the Park boundary.</p>		<p>Seek clarification of whether "reduce the impact of traffic" excludes scope for direct traffic reduction. In light of statement that highways, transport infrastructure & services will have been improved, worth noting that NP has just objected to transport infrastructure improvements. (RSPB) Slower speeds are first step to reducing traffic impacts and would be in line with DfT Circular 01/2006 on setting local speed limits. Transport objectives should be amended to read: "The impact of traffic on the NP & its carbon footprint will be reduced."; "More sustainable means of travel"</p>
<p>NPMP Outcome</p>	<p>LDF Plan Spatial Objectives</p>	<p>SA Recommendations</p>	<p>Previous consultation response 2007.</p>
<p>By 2011 all people, especially those from disadvantaged communities, children and young people, and the elderly should: • feel welcome in the National Park • have the opportunity to participate in diverse recreational activities that enhance the quality of their lives.</p>	<p>The ability to access and enjoy the National Park will be improved in ways which contribute to the sustainable management of the area by seeking to increase the scope for active recreation in ways which do not compromise the valued characteristics of the area.</p>	<p>The recreation and tourism spatial objective addresses the majority of SA Objectives. However, in promoting recreation (and tourism) the National Park should also be striving to increase the quality of the tourist product in line with target markets, maximise employment opportunities and ensure that touristic assets are well presented and informed.</p>	<p>Object to linking general intention to promote sustainable management with specific commitment to increasing one particular form of recreation/tourism ie active recreation. Increasing scope for active recreation will not necessarily contribute to sustainable management, and it is certainly not the only way of contributing. Request split statement to "The ability to access & enjoy the NP will be improved in ways which contribute to the sustainable management of the area" and "Opportunities will be sought to increase the scope for active recreation in ways that do not compromise the valued characteristics of the area." Should also consider introducing</p>

			additional statements on passive recreation & tourism, or delete statement relating to active recreation altogether.(NT)
<p>By 2011 the number of people staying overnight in the Peak District, and the sustainability of tourism experiences, is increased especially resulting from:</p> <ul style="list-style-type: none"> • increased quality of tourism services • a wider range of tourism products based on, and compatible with, the special qualities of the National Park. 	<p>No separate spatial objective for tourism</p>	<p>The National Park should also be striving to increase the quality of the tourist product in line with target markets, maximise employment opportunities and ensure that touristic assets are well presented and informed.</p>	<p>Cross-refer to 1.10, re 'increased quality of tourism services' and wider range of tourism products': Recognise the broad thrust of general objectives, but the target of purely increasing the number of people staying overnight should be rendered specific, measurable and attainable, in subsequent documents if not in this one. Such an undemanding objective of merely an increase will not receive the public funding which is vital to this sector.(CCT)</p> <p>Recreation and Tourism objective should include the content of the NPMP strategic outcomes dealing with overnight stays and increased quality of tourism products. (Wilbrahims)</p> <p>Some areas of N & E PD are at extremities of water supply network, some properties there are fed by concessionary water supplies eg small local springs serving single or small clusters of properties which can support domestic water only. They could not support extra tourist facilities & accommodation. If developers supported by NPA requested extension of water distribution network for these uses, we would request NPA support in works to lay mains & provide necessary pumping stations subject to detail on landscape or built environment.</p> <p>The greater number of visitors to the NP are domestic day visitors. They represent the core market of most</p>

			<p>non-accommodation tourism businesses, and according to English Tourism Council 2001, nationally are the main tourism spenders. They are crucial to the PD economy. The need for continued encouragement of these major beneficiaries deserves a special mention in the objective.(CCT)</p> <p>You have to include the health agenda, and mention specifically both informal and competitive recreation. Particularly the informal, unstructured recreation the ordinary person enjoys at a level which suits them. Be proud of that opportunity, especially in this day & age when funding goes to Olympic Games only a tiny percentage of population enjoy or participate in. The balancing opportunity NPs can provide must be championed. (Henry Folkard)</p>
NPMP Outcome	LDF Plan Spatial Objectives	SA Recommendations	Previous consultation response 2007.
<p>By 2011 there is increased understanding of the special qualities of the Peak District National Park amongst target groups so that they:</p> <ul style="list-style-type: none"> • feel welcome in and know that they are in the National Park • understand why it is a special place 	<p>More and better opportunities will be sought to improve the understanding of the National Park.</p>	<p>The spatial objective of promoting a better understanding of the National Park is considered to</p>	<p>A logic for better understanding is that it can enhance enjoyment and directly sustain core values. Promoting better understanding objective needs to be linked back to Development Plan activities eg "Through planning policies and</p>

<ul style="list-style-type: none"> • have the opportunity to influence decisions that affect them and respect each other’s needs • have the opportunity to make a personal contribution to sustainable management of the National Park. 		<p>be too rudimentary. Consider including more detail as to the ways in which this objective could be addressed, such as increasing opportunities for education and information provision.</p>	<p>decisions on development proposals opportunities will be sought."(NT)</p>
<p>NPMP Outcome</p>	<p>LDF Plan Spatial Objectives</p>	<p>SA Recommendations</p>	<p>Previous consultation response 2007.</p>
<p>By 2011 communities around the National Park are more cohesive with:</p> <ul style="list-style-type: none"> • more opportunities for children and young people, and the elderly • reduced inequality and communities within the National Park have: • better access to services • more affordable homes for those who need them. <p>By 2011 communities are better able to</p>	<p>That in pursuing the primary aims of the National Park a sustainable approach to fostering the well being of the Park’s communities will be secured which facilitate the provision and safeguarding of</p>	<p>The ‘fostering sustainable communities’ spatial objective does not contradict any SA objectives. No further recommendations have been made from the appraisal.</p>	<p>Sustainable approach includes need to keep build costs down for developers (DDDC) Fostering Sustainable Communities objective should include the content of the NPMP strategic outcomes dealing with affordable housing provision and community activity particularly in respect of parish plan activity and the weight afforded to Parish Plan action plans. (Wilbrahims) Have significant difficulty with final bold type entry at 1.9 under People and Communities, and think it should be deleted. It says to me "we want others to do our job for us because we can't afford it, or prefer to spend what we have on our own priorities." It is a statement which as it stands is too condensed for its own good, and since it cannot be unpacked in situ it should be deleted. (Henry Folkard)</p>

<p>shape their own futures with more objectives for the National Park and its communities being met by the voluntary sector, volunteering and community activity and enterprise.</p>	<p>accommodation, services, community sport leisure and transport needs of local people at the most appropriate scale and distribution and in the most resource efficient means possible.</p>		<p>Needs to be mention of employment in this section (and in I.10) as employment is crucial to building sustainable communities. (Henry Folkard) Objective as written is quite confusing and potentially open to varying interpretations. Introducing 'community support' into a list of physical needs is unhelpful and should be dealt with in a separate statement. Suggest objective is redrafted with aim of improving clarity. Also recommend it should refer to statutory purposes rather than aims of NP. (Wording proposed) (NT)</p>
<p>NPMP Outcome</p>	<p>LDF Plan Spatial Objectives</p>	<p>SA Recommendations</p>	<p>Previous consultation response 2007.</p>
<p>By 2011 prosperity has been improved by businesses, social enterprise and the public sector: <ul style="list-style-type: none"> • working together • raising productivity • capitalising on their location in a special and distinctive Environment • developing a sustainable economy. </p>	<p>That in pursuing the primary aims of the National Park a sustainable approach to fostering the well being of the local economy will be secured which facilitates the provision and safeguarding of new and existing employment opportunities, which seek to build on and benefit from the strong rural character of the area by ensuring</p>	<p>The 'fostering a sustainable rural economy' spatial objective does not contradict any SA objectives. No further recommendations have been made from the appraisal.</p>	<p>Objective is relevant only to one segment of the PD economy ie activities which have links to rural character and environment. There needs to be reference to wider economy including all small businesses and services. (DDDC) Propose "In pursuing the primary purposes of the NP a sustainable approach to fostering the wellbeing of the local economy will be secured. This will be based upon facilitating the provision .. By producing high quality goods and services in ways which.." This policy refers to provision of new opportunities and safeguarding existing opportunity. Should go further and encourage existing businesses to expand and encourage new business to start up. This is only way local employment will grow that will</p>

	high quality products in ways which understand and respond to the environmental sensitivities of the area.		enable, especially the mobile young, workforce to remain in PD. (CLA)
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Appendix D Core Strategy Delivery Plan

Core Strategy Delivery Plan

The Government has reasserted its commitment that Core Strategy documents should be underpinned by two key principles; **justification** and **effectiveness**. Firstly they should be justified, i.e. that issues have been evidenced and the plan represents a means to responding to these agreed spatial priorities. The issues and policy options in the main body of this document represent the current position of the National Park Authority in justifying the basis for the eventual Core Strategy. The second point relates to the effectiveness of the plan in responding to these issues and Government requires that an implementation (or delivery) plan is set up alongside the spatial policies to clearly set out how the plan will be implemented. An example of the kind of monitoring table the Authority intends to use is shown below. This indicates that the driver for the Core Strategy, as with other Action Plans prepared by the Authority is the National Park Management Plan, and the Strategic Outcomes agreed in 2006. From there we can then see how spatial objectives are derived and how these help to shape Core Policies. Importantly, the Core Policies can then be seen in the context of the other actions that are necessary to help deliver the plan. These could either be other National Park Authority Action Plans or plans developed by a local Council or other agency which similarly help to deliver the wider Spatial Objective, for instance the role that District Council housing authorities might play in developing and managing the social housing stock.

This table will be completed as core policies are developed further next year.

NPMP Outcomes	Spatial Objectives & Indicators	Core Policies & Indicators from AMR	Other Strategic Actions contributing to Spatial Objective	Lead bodies	Resources	Timescale
<p>Biodiversity</p> <p>By 2011 dynamic partnerships have achieved outcomes for biodiversity & begun to tackle the challenge of climate change, having especially:</p> <p>reached the public services agreement target of 95% of SSSI in target condition by 2010;</p> <ul style="list-style-type: none"> increased the quality & quantity of BAP priority habitats & 						

<p>species, especially moorland restoration & condition status;</p> <ul style="list-style-type: none"> increased distinctive WhitePeak wetland & farmland habitats, & key Local BAP species; <p>identified ways of reducing the extent of climate change & reducing its adverse impact on biodiversity.</p>						
<p><u>Cultural heritage</u></p> <p>By 2011 people, communities & organisations have worked together to:</p> <p>deliver outcomes of the Cultural Heritage Strategy;</p> <ul style="list-style-type: none"> conserve & enhance distinctive characteristics of landscape & settlements, especially in the WhitePeak. 						
<p><u>Natural beauty</u></p> <p>By 2011 the natural beauty of the landscape means:</p> <p>they are still attractive places to live in & visit and are assets to communities & the economy;</p> <ul style="list-style-type: none"> there is a clear characterisation of the whole of the landscape & it is conserved & enhanced in accordance with that characterisation. 						

<p><u>Climate change & natural resources</u></p> <p>By 2011 climate change is being addressed & the natural resources of the National Park are being managed sustainably so that we:</p> <p>reduce our adverse impact on climate change, and future generations are better able to manage, mitigate & adjust to the changes that are starting to take place;</p> <ul style="list-style-type: none"> • are better placed to hand on a diverse, healthy & resilient natural environment to future generations; • retain & improve the National Park's natural resources as the basis for our survival, well-being & prosperity. 						
<p><u>Mineral extraction</u></p> <p>By 2011 the impact of mineral working on the special qualities of the National Park & on communities has been reduced because:</p> <p>there are fewer quarries;</p> <ul style="list-style-type: none"> • those quarries that remain are worked to the highest modern environmental standards with established operating 						

<p>end-dates & restoration schemes;</p> <ul style="list-style-type: none"> • there is an agreed definition of ‘national need’ for mineral working. 						
<p><u>Traffic, travel & accessibility</u></p> <p>By 2011 highways, transport infrastructure & services have been improved because they:</p> <p>meet the needs of residents, visitors & surrounding areas;</p> <ul style="list-style-type: none"> • increase the proportion of visitors using methods of travel other than private cars; • reduce the adverse environmental impacts of travel on the special qualities of the National Park; <p>enable more sustainable travel patterns that lead to a reduction in the levels of carbon dioxide emitted into the atmosphere, especially by supporting public transport.</p>						
<p><u>Recreation & tourism</u></p> <p>By 2011 all people, especially those from disadvantaged communities, children & young people, & the elderly should:</p> <p>feel welcome in the National Park;</p>						

<ul style="list-style-type: none"> • have the opportunity to participate in diverse recreational activities that enhance the quality of their lives. <p>By 2011 the number of people saying overnight in the Peak District, & the sustainability of tourism experiences, is increased especially resulting from:</p> <p>increased quality of tourism services;</p> <ul style="list-style-type: none"> • a wider range of tourism products based on, & compatible with, the special qualities of the National Park. 						
<p><u>Understanding the National Park</u></p> <p>By 2011 there is increased understanding of the special qualities of the National Park amongst target groups so that they:</p> <p>feel welcome in & know that they are in the National Park;</p> <ul style="list-style-type: none"> • understand why it is a special place; • have the opportunity to influence decisions that affect them & respect each others' needs; <p>have the opportunity to make a personal contribution to sustainable management of the National Park.</p>						

<p><u>People & communities</u></p> <p>By 2011 communities around the National Park are more cohesive with:</p> <p>more opportunities for children & young people, & the elderly;</p> <ul style="list-style-type: none"> • reduced inequality; <p>And communities within the National Park have:</p> <p>better access to services;</p> <ul style="list-style-type: none"> • more affordable homes for those who need them. <p>By 2011 communities are better able to shape their own futures with more objectives for the National Park & its communities being met by the voluntary sector, volunteering & community activity & enterprise.</p>						
<p><u>Economy</u></p> <p>By 2011 prosperity has been improved by businesses, social enterprise & the public sector:</p> <p>working together;</p> <ul style="list-style-type: none"> • raising productivity; • capitalising on their location in a special & distinctive environment; <p>developing a sustainable economy.</p>						