

Individual	Organisation	Comment	Topic
CIlr Peter O'Brien	DDDC	<p>The paper acknowledges that the population structure of the Park's communities has changed over the plan period, with a significant decrease in younger age groups, particularly of working age. Clearly many younger families have to move away in order to meet their aspirations of buying even a modest home. It also acknowledges that while statistically new housing provision is broadly in line with projections, a majority of this is holiday or second home accommodation.</p> <p>The need for affordable housing has nowhere near been met. The sustainability of many villages, as vibrant and thriving communities, is in question.</p> <p>The paper stops short of saying that the above is a consequence of the Plan's policies, but a number of us believe that the Authority's focus on meeting its statutory objectives is over-rigid and means that the needs of our communities and residents are not being met. This is perhaps epitomised by the continued view, as expressed in the topic paper, that any new development is by its very nature harmful to the Park - the reality is that Bakewell and the villages cannot be set in aspic, and become museum pieces, but should be allowed, encouraged in fact, to evolve in ways which add value to their distinctive character and characteristics.</p> <p>I would therefore hope that the Committee will strengthen the Council's response, by confirming that a fundamental reappraisal of the strategic objectives of the Plan should take place. This should include an appraisal of the implications of a commitment to reinvigorate local communities (villages and Bakewell) through appropriate development and investment in order to meet the needs of existing and future local residents. It would also imply that the Park moves to a "proactive" approach to planning, and away from the almost entirely reactive and desk-top policy approach that it has relied on to date.</p>	Spatial Strategy
CIlr Peter O'Brien	DDDC	<p>The current Plan does not allow for any new "ordinary" (market) housing to be developed, other than on brownfield sites, or by way of conversions/change of use. Affordable housing is allowed, but only on 'exception sites'. The Plan does not set out to meet housing needs, general or affordable, as it argues that this would be in conflict with its statutory objectives - this is often trotted out, but interestingly no evidence has ever been provided (as far as I am aware) as to precisely why sensitive development would compromise the Park's landscape or environmental character. As the current Plan has no housing target, it simply looks at trend average levels of development, which it says have been broadly consistent year on year. However the topic paper acknowledges that the majority of all new development is holiday accommodation, more than double the number of affordable dwellings built.</p> <p>Because of the severe limitations on the development of market housing, the consequence is that very few affordable homes are provided through the traditional S106 mechanism. Viability constraints further limit the provision on brownfield sites. Thus the vast majority of affordable units are provided by Registered Social Landlords, using Government funding. However the design standards imposed by the Park, and therefore higher construction costs, mean in practice that all schemes within the Dales area of the Park have required a significant financial top-up from DDDC. The paper acknowledges that this is unsustainable (it is also unfair!) - but offers no alternatives.</p> <p>The Park also have a different definition of affordable housing "need". It relates specifically to over-crowding or living in unsatisfactory accommodation. In my view, a more general definition is appropriate - based on the principle that a person/family with an "average" income should be able to buy a modest home; a person/family with a below "average" should have the opportunity to rent a home, at an affordable price. The issue in the Park is that no-one with an average income has any prospect of being able to buy a home - hence they move away.</p> <p>I would therefore suggest that our response to the Park reflects the above, asks that an appropriate and more broadly based housing needs assessment is undertaken (in collaboration with the constituent housing authorities, including DDDC), that consideration is given to the pro-active provision of a wider range of housing, including for example First Homes, and including on appropriate non-brownfield sites, that the implications of meeting such a housing need are assessed and evaluated, and that consideration is given to the Plan identifying sites for housing development. I also suggest that the entire set of mechanisms by which affordable housing is provided in the Park is collaboratively reviewed, with input from all the fella that housing and planning authorities and both social housing and market housing developers.</p> <p>Mike Hase also quite rightly draws attention to the current space standards adopted by the Park. One of the quirks of these are that if you want to have a garage as part of an affordable dwelling, the area of the garage is deducted from that of the permissible living accommodation. As well as being ridiculous, in my view this is also discriminatory - why is it always assumed that people living in an affordable home don't need or want a garage?! There is a general point too, the space standards are designed to try to make homes affordable, by being small, but they end up being hardly fit for purpose, certainly for a family.</p>	Housing
CIlr Steve Wain	DDDC	<p>What considerations have been given to the increase flows of water that travel down the Wye and Derwent from the PP and eventually enter the confluence of the Derwent at Rowsley? Surely a Local Plan is the ideal document to ensure such environmentally sound techniques are deployed to reduce such water flows. I'm aware that action is being taken on the moors to mitigate such flows, but significant surface water flows of water off the land and into the rivers could be mitigated further downstream, thereby reducing the impact of flooding on communities downstream. What considerations have been made in relation to this matter? I've searched his report and at no point does it mention the word flooding or effects of flooding. Can we as an affected area please raise this?</p>	Utilities
CIlr Steve Wain	DDDC	<p>Many communities that attract visitors have adopted overnight parking for motorhomes. These are known as Aires and I'm aware that a number of pitches have been allocated at the ABC for such use. I think if this is carefully coordinated this would boost the local economy in the PP and Eire further implementation should be encouraged in the DDDC.</p>	Recreation and Tourism

Clr Steve Wain	DDDC	<p>Item 4.2.11 on page 28.</p> <p>I believe there has a word missing at the beginning. The word is why, why should councils that share part of their area with a National Park accommodate more housing to make to take the pressure of the National Park to help protect it. The simple answer is to have effective differentiation. 58% of the land in DDDC is within the PP then the District should only have to accommodate 42% of any housing.</p> <p>I was fully supportive of the PP and it's beautiful landscapes, but I do feel that more must be done to absorb some of the burden being inflicted on the towns and larger villages in the south of the District.</p> <p>I personally don't think that this part of the report is strong enough to get our message over to the Peak Park, who appear only to pay lip service to most of what he said.</p>	Housing
Elizabeth Andrews	Northfield Farm Riding and Trekking Centre	<p>By way of introduction I am writing this as the owner and proprietor of Northfield Farm Riding and Trekking centre based in Flash, Buxton. My husband and I started the successful centre in 1976 along side our farming enterprise and in 1979 added our s/c accommodation.</p> <p>Much has changed over the last 45 years, not all for the best, and most especially the access to our countryside for horse riders.</p> <p>We used to have far more choice of routes in the 70's and 80's, then came Staffordshire CC's review of rights of way which effectively closed the majority of routes in this area (Quarnford & Staffs Moorlands) despite them having been pack horse trails for hundreds of years. Many of the old inhabitants were unaware of these changes and we never had a problem accessing the routes, however, as these farmers passed away and properties were sold to incoming families searches were done and gradually the downgraded paths were fenced off only being accessible to walkers. Most of these are now being reported and will, hopefully, one day will be reopened.</p> <p>Having looked through the local plan I see much is made of tourism and leisure frequently mentioning walking and cycling and their health benefits, with hardly a suggestion that there are other groups of leisure seekers in the Park.</p> <p>I would urge that more is made of the equestrian community and that the condition of some of the bridleways is looked at as a matter of urgency, pressure should be put on the Councils to speed up the process when problems occur with R of W and more concessionary routes should be allowed on land owned by PDNP, we are after all the epitome of 'green' tourism.</p> <p>It would also be a good idea if the PDNP could see that councils in areas such as ours, where we are close to three county boundaries, could perhaps work together to improve the network of bridleways.</p> <p>The use by motor bikes and 4x4's of some of the more sensitive tracks is certainly taking it's toll on the surfaces with heavy rain fall exacerbating the problem, motorised vehicles should stay on tarmac!</p>	Recreation and Tourism
Will Kemp	Chatsworth	<p>current policy is skewed towards the environment and away from the well-being/development of businesses & communities, thereby negating the opportunity to secure development that is genuinely 'sustainable'</p> <p>the PDNPA currently has no robust evidence on demographic forecasts and the socio-economic well-being of residents & businesses (by comparison, the Yorks Dales NPA has v robust evidence on the same which identifies disturbing trends (eg ageing population threatening viability of infrastructure, adverse impact of Brexit/ELMS on upland farming/unemployment/landscape) which the new LP must address)</p> <p>it is unclear if recent PDNPA budgetary cuts will allow such evidence to be funded (officer time, external consultants)</p> <p>the LP and PDNPA officers must recognise and acknowledge within decision-making that environmental benefits do not come at zero economic cost and that businesses need to be able to generate funds to deliver such benefits, i.e. policy must support the ability of businesses to make money in the first place (since 'money doesn't grow on trees')</p>	Supporting Economic Development
Will Kemp	Chatsworth	<p>the LP workshops suggest that in some aspects the LPA may be taking an over-simplistic and/or development management approach to the PDLP review (eg reliance on parish plans, "wish-list" surveys of residents and monitoring of policy performance in DM decisions). Survey results that identify 'number of applications approved contrary to policy' will fail to identify applications that have not been submitted as landowners/businesses etc would expect/fear a refusal and so be 'scared off' from submitting an application. Rather, a strategic, evidence-based approach to the LP review using sound planning judgement should be adopted</p> <p>the LPA has an extensive and we suggest excessive portfolio of SPG/Ds (eg 6 different SPDs for design alone); SPDs can be useful in expanding upon policy but care must be taken that their use is limited to that strictly necessary and any reader of the LP/applicant is not consequently overwhelmed by SPD; there is a clear opportunity for rationalisation of some aspects of SPD (removing out of date documents (eg Building Design Guide 1987));</p> <p>the Govt's Planning White Paper seeks to simplify and rationalise LPs; in view of the above (and possible need for additional guidance (Design Codes)), it is unclear to what extent such rationalisation will be possible across the LP and related documents; every should be made to maintain brevity</p> <p>environmental and/or single-issue groups can have significant influence over the PDNPA (policy, decision making) at the expense of business groups/interests (but the environment is not the only game in town; the NPA must take decisions having regard to all of its responsibilities).</p>	General comment on Local Plan Review
Will Kemp	Chatsworth	<p>the achievement of the Government's target of net zero carbon emissions by 2050 as required by the Climate Change Act 2008 (as amended) simply will not happen unless a major shift in policy occurs (including a relaxation of the effective prohibition of renewable energy on heritage assets).C18</p>	Climate Change and Sustainable Building

Will Kemp	Chatsworth	In particular, we are keen to see a policy supporting Whole Estate Plans (the benefits of which have been recognised by other NPLPs) to ensure landowners take a holistic approach to development/environment and the NPA takes a holistic approach to landowners, thus providing context/buy-in for development needs & applications to generate funds (to support investment in environmental benefits the NPA seeks/expects) as well as multiple benefits (eg identification of land for NBG, local traffic management solutions, etc). As such, I would be happy to seek to facilitate a webinar on the same to help inform you and colleagues (and other bodies with interests similar to ourselves)?	General comment on Local Plan Review
Andy Broadhurst	Derbyshire Swift Conservation Project	<p>We are responding to the questions posed in part 4 of this paper, i.e.</p> <p>4.2.1 Evidence overwhelmingly points to a crucial role for national parks in landscape-scale nature recovery and land-based solutions for net zero.</p> <p>Q1: Should the local plan focus more on outcomes related to biodiversity and net zero as well as landscape character?</p> <p>Q2: Should the spatially mapped nature recovery network that results from the nature recovery strategy (or strategies if not undertaken by the NPA) be incorporated into the local plan in accordance with para 174 of the NPPF.</p> <p>Q3: Should planning policies specify what types of development are allowed in accordance with the spatial plan for nature recovery (as well as other policies), and link this to the requirement for net gain?</p> <p>1. Our initial comments relate to biodiversity enhancement and how we think this concept can be strengthened</p> <ul style="list-style-type: none"> • NPPF 2019 requires: "providing net gains for biodiversity" (Clause 170 (d), page 149). https://www.gov.uk/government/publications/national-planning-policy-framework--2 • The Government's Building Better Building Beautiful Commission report "Living With Beauty" (30/01/20) recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110). https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission • We request that the biodiversity section makes provision for urban species dependent on buildings as follows, in accordance with NPPG 2019 Natural Environment which states that "Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments" (Paragraph: 023 Reference ID: 8-023-20190721 - https://www.gov.uk/guidance/natural-environment) • This request is supported by the National House Building Council Foundation, the standard-setting body for new homes: "Section 8.1 Nest sites for birds (page 42): "Provision of integral nest sites for swifts is through hollow chambers fitted into the fabric of a building while in construction. Although targeting swifts they will also be used by house sparrows, tits and starlings so are considered a 'universal brick" https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf 	Landscape, Biodiversity and Nature Recovery
Andy Broadhurst	Derbyshire Swift Conservation Project	<p>Wildlife depends not only on green spaces, but also on the artificial fabric of villages & towns. Buildings provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrow and starling, species that have seen large population declines and which are dependent on built areas for their survival. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should utilise opportunities to attract new species to a site through such measures. All wildlife habitats must be designed in accordance with the council's Biodiversity Action Plan (see below). Artificial nest bricks should be incorporated within developments (refurbishments, extensions and new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house sparrows and starlings.</p> <p>Integral (i.e. built-in, flush with the wall) bird nest bricks should be used rather than external boxes as they have a greater success and require no ongoing maintenance. As both swifts, sparrows and starlings use nest bricks designed for swifts, swift bricks are suitable for all 3 species. Accommodation for bats should be considered in addition to swift bricks and not as an alternative.</p> <p>The CIEEM provide guidance on nesting bricks ("In Practice" journal June 2019 - https://cieem.net/resource/the-swift-a-bird-you-need-to-help/) as follows:</p> <p>"As swifts and sparrows nest in groups, nest bricks should be clustered in suitable areas of the development, two to four bricks per dwelling, resulting in an equal number overall of nest sites and residential units. On larger commercial buildings, one swift brick per 6 m2 of wall, mounted near the roof, in clusters of three or more, is recommended. Avoid locating nest bricks above doors and windows. There is no upper limit for the height of a swift nest but bricks installed 5 m or more from the ground should lead to higher occupancy rates. Ensure a clear flyway of at least 5 m in front of the nest box avoiding obstructions such as trees, including any trees planted in new landscaping that may cause obstruction when mature"</p> <p>A number of planning authorities now include such wording in their Local Plans and an example of suggested text is given below:</p> <p>Suggested text (taken from the Hackney Local Plan): "All development schemes where the buildings have an eaves height of 4.5 metres and above shall provide integrated Swift nesting bricks which are used by swifts, house sparrows and starlings to help preserve endangered urban biodiversity. These integrated Swift bricks shall be installed at a rate of one per dwelling. Where this isn't practical e.g. due to wall tiles then an eaves box with a 65x32mm hole in the fascia can be created. Swift bricks should be set flush into the external wall to match adjacent brickwork wherever possible. Internal nest boxes are favoured by the Council."</p>	Landscape, Biodiversity and Nature Recovery

Andy Broadhurst	Derbyshire Swift Conservation Project	<p>2. Secondly, we would like to comment on the Nature Recovery Plan which we understand will replace the Biodiversity Action Plan referred to above: This needs to be updated to designate swift as a “priority” species to reflect its increasingly dire status (Swift will be designated a red listed species in 2022). Is it possible to reclassify this species within the scope of the Local Plan using the following wording? (adapted from the Oxford Biodiversity Action Plan 2015-2020) (https://www.oxford.gov.uk/downloads/download/618/biodiversity_action_plan):</p> <p>“Swifts and other urban species such as House Sparrow and Starling have seen huge declines in cities and towns across the UK over the past 20 years. Two of these species are already red-listed birds of conservation concern and Swifts will shortly be redesignated as such. All 3 of these species should be designated “priority species” in need of protection and enhancement. One of the main reasons for the decline of urban species of bird such as House Sparrow, Starling and Swift is the loss of the gaps and crevices used as nesting sites in buildings as they are renovated and repaired. These species tend to use the same nesting sites and so protecting existing nest sites or providing artificial nest sites for Swifts helps all 3 species. If nest sites are blocked off then these birds cannot breed, explaining the rapid decline in their populations. Therefore, it is critical to ensure that:</p> <ul style="list-style-type: none"> - nest sites used by these urban bird species are protected or replaced when repairing or renovating existing buildings - all new housing developments are designed to include integrated nest sites, ideally at a density of 1 nest site per dwelling A range of Swift bricks are available which makes it easy and cheap to accommodate Swifts (and hence House Sparrows and Starlings) into building design.” 	Landscape, Biodiversity and Nature Recovery
n/a	Sheffield and Rotherham Wildlife Trust	<p>Questions arising from performance of existing policy and new issues and evidence Response from Sheffield and Rotherham Wildlife Trust 25/11/2021</p> <p>4.2 Questions arising from performance of existing policy and new issues and evidence 4.2.1 Evidence overwhelmingly points to a crucial role for national parks in landscape-scale nature recovery and land-based solutions for net zero.</p> <p>Q1: Should the local plan focus more on outcomes related to biodiversity and net zero as well as landscape character? Yes! This is essential for many reasons and in line with the Environment Bill, the 25 Year Env Plan etc</p> <p>Q2: Should the spatially mapped nature recovery network that results from the nature recovery strategy (or strategies if not undertaken by the NPA) be incorporated into the local plan in accordance with para 174 of the NPPF. Yes! This is key for the PDNPA, developers and the public to see where the priorities are for nature conservation and recovery – including potential sites for biodiversity net gain etc</p> <p>Q3: Should planning policies specify what types of development are allowed in accordance with the spatial plan for nature recovery (as well as other policies), and link this to the requirement for net gain? Specifying types of development may be appropriate in some situations, but in others it may be the way a development is delivered. For example there are a wide range of different types of rural enterprise developments – more are more compatible with nature recovery than others. For example a glamping site in meadow setting is more compatible than a warehouse for rural supplies with no green infrastructure. Yes, link to BNG</p> <p>4.2.2 The link between DS1 C which lists ‘agriculture, forestry and other rural enterprises’ as development that is acceptable in principle in the countryside, and L1 that requires this development to ‘conserve and enhance valued landscape character’ could be re-examined.</p> <p>Q4: Are policies DS1C and L1 of the Core Strategy and DMC11 of the Development Management Policies sufficient to prevent development that harms landscape character and deliver biodiversity net gain? No – see Q3 so they should be re-examined</p> <p>4.2.3 DMC2 (i) permits within the natural zone ‘development that is essential for the management of the natural zone’.</p> <p>Q5: Should policy specify ‘management for the purposes of landscape scale nature recovery’ to prevent management associated with maintenance of a heather monoculture and grouse shooting? Yes – and have a caveats that</p> <ul style="list-style-type: none"> - development should only come after other options have been explored and deemed unreasonable with evidence supplied to the LPA - in some cases the development should be temporary for the period of restoration work <p>– see recent case (APP/M9496/C/18/3215789: Land at Mickleden Edge,) in relation to the above two points</p>	Landscape, Biodiversity and Nature Recovery
n/a	Social Housing Policy meeting with PDRHA on 25 th October 2019	<ol style="list-style-type: none"> 1. Compare the health of communities inside and outside the Park to see whether different planning policies are leading to different outcomes for communities e.g. school rolls. 2. We need to get into Eyam quickly and do site search work because the school is pushing for housing and despite the reluctance of the Parish Council to accept housing it is a key village service to try and sustain. (PDNPA) 3. We need to speed up response to planning enquiries where someone is interested in a site – there is a disconnection between work done to identify sites and the case officer response to an enquiry. They are unlikely to appreciate the urgency for the response. Is there way to sift them out for quicker response? (PDNPA) 4. CLTs - We can promote them and should. We can get money for a feasibility study into the benefits of big area CLT support mechanisms – The challenge would be funding it and its staff without adding costs to the build. (Chris Furness and Rob Cogings) 5. Village Statements - We could be bold in asking people what they want the village to look like and ask them to suggest sites for housing. We need them to point out any loss of services and facilities and the impact this is having on villages (David Frederickson) 6. For plan review issues/options work DDDC think a target would increase urgency in releasing and developing sites. (Simon Beynon) 7. For plan review issues/options work DDDC think we should prioritise resources into the bigger villages (the bigger ones such as Hathersage and Baslow) and possibly cluster the small ones. (Simon Beynon) The issue of where need is best provided for is politically sensitive as our member CF was clear that houses provided in Bradwell should be for Bradwell people. The idea of accepting people from next or subsequent parishes was not acceptable to Chris Furness but others are not so minded to restrict eligibility on localness grounds. However Housing Associations still come up against NIMBY Parish Councils which might make it harder to agree a looser connection requirement and get local support for housing. 	Housing

n/a	Social Housing Policy meeting with PDRHA on 25 th October 2019	<p>8. For plan review issues/options work we should re look at the local connection requirement on affordable homes. It is very tough and does not relate to the wider needs of the area in terms of workers, families, service retention.</p> <p>9. We should ask the County for the money they receive on empty homes. They don't recycle it into housing delivery. (Rob Cogings)</p> <p>10. We should revert to traditional district wide housing needs and also use "Home-tracker" more to provide market intelligence. (Rob and Simon)</p> <p>11. We should use Home Options bidding information because it is updated to remove people who haven't bid for housing in the last three months. It is therefore a good indicator of need in an area at the time a property becomes available. (Simon Beynon)</p> <p>12. We need to consider how higher sustainability standards will impact on cost of affordable housing. At the moment the margins are tight so any increased burden on the developer may stop affordable housing delivery in its tracks. (Rob Cogings) we need to lobby politicians on this because it's important that we achieve affordable and sustainable homes (Pam Kenworthy)</p> <p>13. Review how PDRHA works. Is it effective enough? (Phil Sunderland)</p> <p>14. We need to use social media to get into communities because the parish Council isn't always the most receptive group to talk to (many examples given of NIMBYISM still being a problem in the Park (Chris Furness) but recognition that we shouldn't be forcing communities against their will (Andrew Mc. Cloy) the same goes for Neighbourhood Plans and CLTs: they will be the right vehicle for some villages but wrong for others. (There isn't a one size fits all solution)</p>	Housing
CIr Buttle	DDDC Local Plan Workshop with Members	<p>CIr Buttle</p> <p>Is population dropping mirroring what is happening everywhere else, but we are not filling in the gaps?</p> <p>IF – trend of ageing population ends up with many smaller households living in bigger houses. So we can add to the housing stock with smaller houses but cannot make people downsize etc</p> <p>CIr Buttle – can we develop more housing to make sure downsizing happens?</p> <p>IF – LPA has no authority over who the houses that are being vacated are sold to, so this doesn't always address the local need.</p>	Housing
CIr Radcliffe	DDDC Local Plan Workshop with Members	<p>CIr Ratcliffe</p> <p>Has been involved in a Neighbourhood Plan in DDDC during which they created a policy against second homes. Why does PDNP not have a similar policy?</p> <p>IF – to clarify, we do not permit houses as second homes, but we have no control over people buying them to use as a second home. Our early survey work has asked whether we should introduce a primary occupancy clause on the new open market houses we build. Our rates of second homes are not as high as some areas, although we appreciate this is largely irrelevant if you live in an area with this issue.</p> <p>BT – Holiday lets have a max 28 day use clause which people could apply to remove to give full time residency.</p> <p>CIr Ratcliffe – feels our approach jars with our local housing need approach.</p> <p>BT – Often holiday lets have been permitted for farm diversification which is also supporting local business. This is an important area for members to consider.</p>	Housing
CIr O'Brien	DDDC Local Plan Workshop with Members	<p>CIr O'Brien</p> <p>Feels that there are not enough homes being built to meet the needs of local people. He hears stories of local families having to move out of the area, and school admissions going down. He doesn't feel policies are genuinely supportive of affordable housing and the policy relies on external funding. Would PDNP be supportive on meeting affordable housing needs and not start with the presumption that any development is detrimental to the national park?</p> <p>BT – We are assessing our policy position and have explored what issues we are facing. We now need to set out policy options based on this evidence. We need to think about the capacity of the place and how we plan for it. We are not about numbers, as we do not have a housing target, and our objectives align with our purposes of conserving and enhancing and encouraging enjoyment. Any new delivery would still need to be appropriate to the PDNP. We do need to explore whether there are any other methods suitable to us eg starter homes.</p> <p>CIr McCloy – Members are willing to look at other options. Must not lose sight of our purposes but we do need to re-look at our policies. We need to look at how communities will sustain themselves and factor in succession planning. Members are keen to look at development. We have to be ambitious in delivering affordable housing and we need to look at the best mechanism to do this.</p> <p>MH – Through the review DDDC will come back to these sentiments.</p>	Housing
CIr Burfoot	DDDC Local Plan Workshop with Members	<p>CIr Burfoot</p> <p>There has been an increase in Air B&B, does PDNP have a policy on it?</p> <p>When the PDNP undertake their surveys, are they wide ranging with people outside the PDNP?</p> <p>AM – two surveys have been done, with the first Oct-Dec 2020, this had some 900 responses and 57% of responses were from people within the PDNP, so a high proportion were outside. We also undertook a streamlined version to improve our response rate from young people. This was targeted at schools and was sent out with a lesson plan</p> <p>BT – We do not have a policy on Air B&B. They might not always require planning permission but is down to individual circumstances and depends on the use involved eg lots of families/ large groups this would raise issues and permission would be needed.</p> <p>CIr Burfoot – any holiday use is a loss regardless of whether it has just one family in it</p> <p>BT – this use is seen as a normal dwelling use. This is a debate ongoing at a national level.</p>	Housing
CIr Slack	DDDC Local Plan Workshop with Members	<p>CIr Slack</p> <p>DDDC would like to see housing numbers in the PDNP increased. The number of affordable homes also needs to increase. Noted that climate change and renewable energy have not been referred to. PDNP have opposed wind turbines in the past. What is PDNP's current view on solar panels?</p> <p>BT – We have strategic Climate Change policies. Policy CC1 looks to reduce carbon in every development and this has been pushed harder through our validation list. Policy CC2 relates to renewables. We will encourage renewables, subject to assessing harm to the PDNP. We also have a Climate Change SPD in which solar panels are referenced. They are encouraged on farm shed roofs etc. They are encouraged on ground arrays and subsidiary structures where suitable. But we do want to push on with energy standards.</p>	Climate Change and Sustainable Building

CIr Purdy	DDDC Local Plan Workshop with Members	<p>CIr Purdy</p> <p>The area has the lowest wage index and the highest property prices. DDDC are building their own social housing. Would like to see a Think Tank with Derby Uni and the employment sector to get together on the issue of young people leaving the area due to the lack of jobs. DDDC are applying for the levelling up fund for the market town but is concerned with second homes and ageing population in the national park area. He has heard the PDNP referred to as the 'green graveyard'.</p> <p>CIr McCloy – would welcome the opportunity to take part in a Think Tank which the PDNP wouldn't lead on but would be involved in. We are always mindful of our statutory purposes and the influence that PDNP, as we are not the economic body etc, can have. We are a very small rural area and tourism is our main sector. Young people might be drawn out but how can we encourage them back in. The Think Tank could be useful to inform the Local Plan.</p> <p>CIr Purdy – We are also working on a new climate change SPD for the whole area</p> <p>BT – Had been involved in useful Think Tanks before COVID. There is also the role of transport, which is part of our wider sphere eg visitor management planning and looking at integrated transport hubs.</p>	Supporting Economic Development
CIr Hughes	DDDC Local Plan Workshop with Members	<p>CIr Hughes</p> <p>Affordable housing – the proportion of affordable housing that comes out of the housing figures is quite high.</p> <p>Thoughts on the possible removal to share housing requirements/numbers across LPA boundaries.</p> <p>Issues of putting carbon measures into place on heritage buildings and how PDNP deals with that.</p> <p>BT – the percentage of affordable housing is good, this is because we have a strong exception site policy, which says affordable housing or nothing. PDNP has looked at other methods in the past but the viability of affordable housing to open market just is not there. If we didn't have exception sites we would have increased housing figures but a lower percentage of affordable housing. It is possible to look at starter homes as an option, but hard to keep them affordable in perpetuity.</p>	Housing
CIr Burfoot	DDDC Local Plan Workshop with Members	<p>CIr Burfoot</p> <p>Would like to see more collaboration with DCC. Notes that the Glover report refers to declining funding for the 44 protected landscapes. How has this affected the PDNP?</p> <p>BT – big pressure on farm advice and the big landscape scale projects. Things have to be self-funded now. PDNP is leading on ELMS as a pilot scheme and has a focus on soil quality and low carbon measures. Trying to push for a good deal for farmers that can be rolled out nationally. PDNP and DCC have a duty to co-operate and have been speaking. We need a plan for the whole area, nature recovery areas along with policies for net-gain.</p>	Supporting Economic Development
CIr Gamble	DDDC Local Plan Workshop with Members	<p>CIr Gamble</p> <p>How do climate change policies link to PDNP design guide? Eg heard of issues with affordable houses not taking up low carbon options as the spend was already too high due to PDNP design requirements.</p> <p>Holiday lets – do we have knowledge of what percentage of housing are holiday lets?</p> <p>BT – the census would give the best indication of this.</p> <p>AM – advised that for each parish statement we noted the percentage of housing with 'no usual occupant' although this has not been collated for an overall park figure the individual figures can be found in each parish statement. AM can send out a link.</p> <p>BT – the Local Plan review will also kick-start a design review. Our design guide is 2006 and very traditional. Traditional design does need to sit alongside carbon measures. Do we need a new design – we could lead on a 'new vernacular'.</p>	Climate Change and Sustainable Building
CIr Lees	DDDC Local Plan Workshop with Members	<p>CIr Lees</p> <p>Do we favour any particular renewable?</p> <p>BT – each are considered on the individual planning merit. We encourage all forms of technology if they can integrate with the landscape. Open to new technology and there is more evidence we can collect about what is now possible.</p>	Climate Change and Sustainable Building
CIr Furness	DDDC Local Plan Workshop with Members	<p>CIr Furness</p> <p>General concern regarding the number of affordable houses. There is no limit as long as there is a local need eg Hathersage needs 40 houses but no sites coming forward. Should we have a target for affordable houses? Bradwell has used the Neighbourhood Plan process to identify sites. They have set up a CLT and now have 24 homes, 12 which they own outright. Could this model be copied elsewhere?</p> <p>BT – There are limits to the amount of affordable housing we build, there is a capacity that can be reached before it starts to impact on the PDNP. We do have an indicative figure but we are not tested against this as we do not have housing targets. The tools mentioned by CIr Furness can really help and Bradwell is a good model. There is scope in the plan to discuss the role CLT's can play. The new plan should have a view on how many affordable houses we would like to see in each area.</p> <p>There have been various meetings to try to identify sites in Hathersage, and there are some issues with land ownership and the sites not being released. It is not as attractive to landowners to release the land for affordable housing, open market would be more attractive but then we would lose the affordable housing numbers</p>	Housing
CIr O'Brien	DDDC Local Plan Workshop with Members	<p>CIr O'Brien</p> <p>DDDC are working with Hathersage PC to bring together all the stakeholders to try and solve the problem.</p> <p>PDNP will be involved in this also.</p>	Housing
CIr Wain	DDDC Local Plan Workshop with Members	<p>CIr Wain</p> <p>Has heard comments on Bakewell stagnating. The Bakewell infant school have had just 9 children enrol in this years intake.</p> <p>Regarding flooding and the recent floods in Matlock, what policies do we have to mitigate flows of water and the land management to assist with this problem?</p> <p>BT – due to the development rate in PDNP this is unlikely to be causing the flooding. We have wider land management projects to help with this. The moor project is our best option to help with this issue.</p> <p>CIr Chapman – The Derwent Catchment project is the largest European project to restore the moors and slow the flow. £5million has been spent this year and it is hoped this support will continue.</p>	Shops. Services and Community Development

ClIr FitzHerbert	DDDC Local Plan Workshop with Members	ClIr Fitz Herbert We need more family housing. Would like to see re-use of traditional barns, we need to be imaginative with these otherwise we will lose them	Housing
	CLA	4.2.1 Should we shift focus away from social affordable housing and permit a wider range of house types including smaller housing for an ageing and increasingly dependent population, as well as permitting housing for younger generations and those who want or need to work from home? Yes, planning policy should cater for the housing needs of all. Altering the emphasis, away from purely affordability, in order to provide a greater range of housing will increase the overall supply. An increase in supply of housing within the National Park will go a long way to redress the affordability issues. Housing cannot become more affordable without being more available.	Housing
	CLA	4.2.2 Should we change the local connection requirement attached to social housing to make it easier for those with less than 10 years connection to stay here? What do you think is fair? The impact of such a policy will vary on a case by case basis. Although it is encouraged, in principle, to remove restrictions on property.	Housing
	CLA	As well as supporting locals, the Authority should also give thought to encouraging migration into the area where appropriate in order to bring in skills, knowledge and money. In the Derbyshire County Council's Local Economic Assessment 2019, it was noted that within the County there will be an approximate increase of 60,000 people living within the area by 2041, this includes an overall decline of 4% of the working age population. It has been indicated that this pressure will be more heavily felt within the National Park.	Supporting Economic Development
	CLA	4.2.3 Should we refuse applications to convert buildings where the intention is that it would have sole use as holiday accommodation, and then put a primary occupancy clause on any new housing we permit so that it is lived in for most of the year? Planning applications (of a high quality, sympathetic design and sustainable and complying with policy) should not be refused based on the assumption of the intended use at some later date. While this market does act in competition with the permanent housing market that is not a sufficient reason to refuse what could otherwise be a positive planning decision. A decision that contributes to the community and provide a much needed additional source of income to many living within the National Park. If the Council increase the supply of such properties within the National Park then it will reduce the premium attracted by holiday lets. This may lead to permanent occupation being more financially attractive, in relation to holiday lets, and the increased supply will over time may increase the number of these properties being occupied all year round. In the case of a conversion, the change will improve the usefulness of assets that are otherwise being underutilised. In many cases agricultural buildings are now redundant for modern agricultural use. The conversion of them will stop them falling into disrepair and becoming an eyesore within the National Park. Support for conversions could make a significant and positive impact on rural areas. With these conversions being vital to certain individuals who may be between jobs/homes or for business who need workers for seasonal agricultural operations such as lambing or harvest.	Housing
	CLA	4.2.4 Should we give more certainty to developers by allocating sites for housing, or should we continue our approach of identifying a community's housing need and then working with communities and housing associations to identify suitable sites? As noted in the National Planning Policy Framework a more positive and pragmatic view should be taken by decision makers. It is acknowledged that the Authority faces competing goals and limited resources but a greater attempt should be made to place more weight on socio-economic factors when assessing local needs. Avoiding needs being assessed in a top-down manner, this being distinct from the nature of planning policy as being top-down. It must be noted that many CLA members provide rural housing at rates that can be well below open market values, and therefore play a vital social role. The National Park should look to support these responsible and reputable landlord's so that they can continue to provide this vital service in areas that the National Park view as 'unsustainable.' There should be some flexibility in making decisions based on community needs. As it is pointed out in 2.3.17 of the report noted that Hartington's affordable housing requirements went from 40 being required in 2007 to only needing 19 in 2014 without any such properties being built. This shows that there is a lack of robust information from which decisions are being based. The National Plan has lots of useful information, but unfortunately it can be missed as information is located in various places on the website and under differing terms. More certainty should be provided to applicants and developers who are required to invest significant funds and time in creating planning applications, for which the Council then need to make an assessment. More certainty should be given and training should be provided to decision makers so that changes aren't merely theoretical. It would be a positive move if the National Park could make necessary improvements to speed up the planning process.	Spatial Strategy

CLA		<p>4.2.6 Can the National Park accommodate more housing on green-field sites or is it already spoiling the beauty of the villages? Yes, low key sympathetic sustainable housing can organically grow around existing villages. Such growth will add to the viability of many villages that are in a downward decline within the National Park. Rural areas which make up most of the National Park are fragile and are in need for sympathetic development to ensure that large areas of the National Park remain viable.</p> <p>Quality homes can enhance the environment while having several socio-economic benefits, which is necessary to support the maintenance of the landscape. It has been felt that too much weight is placed on any new development and people have been trained to view development as intrusive. This is not necessarily the case and most small development will not have a significant adverse impact the landscape.</p>	Spatial Strategy
CLA		<p>4.2.7 Where should new housing go without it harming the beauty of the villages or the character of the wider landscape? Well-designed new housing can be added to all villages, to allow sympathetic incremental growth where needed. The current Settlement Hierarchy can be counterproductive as it prevents, predominately rural areas which make the National Park special from becoming sustainable. Especially with Covid-19 people are looking to move and work from home in the countryside.</p> <p>The CLA's Strong Foundations policy statement was specifically aimed at the challenges faced by rural communities to deliver organic incremental growth. It found that more than 2,000 villages across England are overlooked by the local planning process as they are judged to be "unsustainable" due to a lack of public services such as post offices or access to banks. These so called "unsustainable villages" are not allocated housing and have very limited development options to improve their sustainability, leaving them in a permanent cycle of decline.</p> <p>Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services. Access to post offices is assessed by 98% of local authorities, access to banks by 48%, but access to broadband by a mere 18% of local authorities. This flies in the face of Covid-19 experience, which has showed how much economic and social activity can still take place even as physical retail is limited.</p> <p>The needs of "unsustainable" villages for jobs, homes and modern services must be catered for, rather than ignored. It is only by delivering small quantities of new dwellings, of all types and tenures and including for elderly people, that sustainable development can be seen to be taking place for rural communities.</p>	Spatial Strategy
CLA		<p>4.2.8 Are the bigger villages that have the most services better places for new housing than small places with few shops and services? No, a balance should be sought with decisions being made based on the merits of each case.</p> <p>In small places with a few shops, if the National Park starves these areas of development and growth, there may be no shops in the future. This is particularly the case where Covid-19 has emphasised a change in consumer behaviour. The National Park should proactively encourage development in these areas. Allowing for investment, people and skills to enter these small places to create a sustainable area, especially in a post-Covid-19/Brexit world.</p> <p>The Derbyshire County Council Local Economic Assessment 2019 notes that in the last 5 years the Dales have economically declined by 5.9% while the rest of the country has grown by 10%. With 12.5% of employers highlight that there is a skills gap with the supply of jobs declining by 0.5% in the last 5 years, compared to England's growth of 10.3%.</p> <p>This comes with the expected decline in the number of working age people by 4% by 2041 (despite an overall population increase of 8%). These issues, which denote a trend, cannot be considered good to the long term prospect of the tourist sector, or the economy generally, within the National Park. The National Park must take balanced policy steps in favour of growth to rectify this very worrying trend. A trend of decline which can also be seen in a Derbyshire Dales economic assessment report from 2007.</p>	Spatial Strategy
CLA		<p>4.2.9 Should every village be allowed to have new housing so that the bigger villages don't need to grow to meet wider community needs? Yes. Housing should be permitted (assuming where policy is complied with and is of a quality design) where it is needed. This will support rural communities from falling into decline, it will reduce the need for large developments around the bigger towns in the region and reduce the need for certain commuting.</p>	Housing
CLA		<p>4.2.10 Should housing policy in a protected landscape respond to community aspirations or respond to objectively assessed need? Housing policy should respond to local objective needs. Community aspirations, can at times, be devoid of opinions from the most vulnerable or from groups who rarely engage.</p> <p>It is inevitable that not all of the community will be engaged when assessing need, and there is a danger if policy is heavily influenced by a minority that results in, or is perceived as, producing unbalanced or biased policy towards certain interests.</p>	Housing

CLA		<p>4.2.11 Should councils that share part of their area with the National Park accommodate more housing to take the pressure off the National Park and help us protect it? No. As this will only exacerbate internal inequality and accelerate the decline in certain rural communities, any only making local affordability issues much worse.</p> <p>The Council must cater to local socio-economic needs and not export the problems to outside of the National Park, in order to achieve a solution. This would not be a sustainable decision for the National Park, as it will be pushing money and skills out of the area, which are all needed for the maintenance of the National Park's special qualities.</p> <p>This is not the time for the National Park to burden neighbouring authorities with spill over from the National Park. One example is that Derby City Council have reported a (pre-Covid) 40% increase in the demand for the Council's own overstretched social housing.</p>	Housing
CLA		<p>4.2.12 Would visitors' enjoyment of the National Park and its villages be affected by more housing in and around the edge of some villages? Yes, but potentially in a positive way.</p> <p>If growth is permitted in rural areas then it will support local shops, restaurants/pubs and keep attractions open. If rural communities are pushed towards decline due to restrictive National Park policies and these facilities shut then it will greatly devalue visitors experience in the National Park.</p>	Spatial Strategy
CLA		<p>1. How do we plan for nature recovery? The National Park should look to work with applicants more. So that applications incorporate targets better and generally help to improve the standard of applications for the Council's benefit.</p> <p>Many land managers and farmers are undertaking a significant amount of nature work and the National Park should support these small business, and permit sustainable development which is needed to fund time consuming nature recovery work. Work that should be proportionate to the development.</p> <p>The CLA supports the increased emphasis on nature recovery and are involved with works in other areas of Government, such as the development of ELMS. One current obstacle is the current lack of detail surrounding BNG and ELMS which would help to plan for this area of work.</p>	Landscape, Biodiversity and Nature Recovery
CLA		<ul style="list-style-type: none"> • How can we ensure that 'net gain' plays a significant role in an area where there is very little development? The National Park can work with land managers and farmers to help incorporate net gain on the ground, and use these gains to help support sustainable development. Areas that are struggling must be permitted to develop otherwise there will be no local labour or needed money to be invested in the environment. • Landownership is key for nature recovery. Should we re-think how we work with big landowners (eg our big estates) so that planning and development there is more closely linked to nature recovery? The best way is to introduce yourself with relevant landowners and farmers, of all sizes, to share skills in order to meet the objectives. The Council should resist from entering discussions with a top-down approach as this may negatively affect progress. • Do you see a significant role for offsetting? Will neighbouring authorities be looking to deliver their net gain inside the National Park? There will be space for this offsetting. However the Council should not use this as an option to export much needed development. As noted within this response the National Park is in great need to local focused development throughout the whole National Park in order to reverse the trend of decline. It would be unrealistic to assume that offsetting from neighbouring authorities would be enough to sustain rural communities. The National Planning Policy Framework notes that you need social and economic strength in order to have a sustainable area. 	Landscape, Biodiversity and Nature Recovery
CLA		<p>2. How should our landscapes change? The landscape is an important but ever changing entity. Small changes relating to sustainable development should be acceptable provided that it keeps the National Park sustainable and protects the nature of the landscapes. The value of the landscape and the perspective of change/harm/improvement can of course be subjective and this must be balanced with the needs of local inhabitants. The National Park acknowledges this, as quoted on your website (with emphasis): 'The European Landscape Convention defines landscape as: an area, as perceived by people, whose character is the result of the action and interaction of natural and/ or human factors'</p>	Landscape, Biodiversity and Nature Recovery
CLA		<p>1) Do you agree that we are delivering National Park purposes to conserve and enhance the cultural heritage of the Peak District National Park? Yes, although improvements can be made so that the long term future of the National Park is secured. Nationally the CLA's 28,000 members manage and/or own at least a quarter of all heritage nationally, including a probably-similar proportion of listed buildings and structures covered by listing. The CLA is a significant stakeholder organisation of managers and owners of heritage, this includes having significant presence within the National Park. Our members believe strongly in heritage protection, but are concerned that it works effectively and proportionately, and safeguards heritage by allowing it to be changed in sympathetic ways to ensure that, as far as possible, it is financially viable and relevant in the future. This now has a new emphasis as we must now increase efforts relating to climate change mitigation and Net Zero targets.</p>	Heritage and the Built Environment

CLA		<p>The National Park has a disproportionate share of older properties, properties within Conservation Areas and properties in sparse locations which all adds to infrastructure costs. Money from sustainable growth is needed to improve energy efficiency and where appropriate replace buildings are needed to help solves these problems. It was noted that within an undisclosed period insulation was installed in 54% of properties, which is a big improvement but it does indicate that the starting baseline conditions of properties within the National Park is very low. Solutions to this potential problem cannot be realised without having local skills and people, and thus require suitable development.</p> <p>It is acknowledged that the National Park faces competing demands, and this falls within the context of stretched resources. That being said, the National Park is a living environment and attention must be given to ensure that it remains sustainable. Currently there is little room to emphasise the need for important socio-economic development which is essential for the maintenance of heritage assets within the National Park.</p> <p>In a mobile world the National Park must respond with sustainable and sympathetic development in order to resolve current problems. The National Planning Policy Framework should be used as a guide in establishing and interpreting policy clearly. It notes that the definition of sustainability includes socio-economic factors, and requires decision makers to be positive and creative. This should not be viewed as being in conflict with maintaining/enhancing the cultural environment (as per the Environment Act 1995 or the Planning (Listed Buildings and Conservation Areas) Act 1990). Rather the National Park should view socio-economic development as a necessary foundation on which heritage/landscape improvements and maintenance rests.</p> <p>Further to some of the points made in the National Park's workshop on the matter 'energy efficiency,' is only part of decarbonising buildings. Crude retrofitting based only on 'energy efficiency' can have perverse consequences. The use of materials in construction, of at times short-life interventions can undermine the fuel-use savings, and causing physical damage to buildings and impact the occupier.</p>	Heritage and the Built Environment
CLA		<p>2) Could we still achieve National Park purposes if our detailed policies for new development (where permitted) were more flexible and allowed applicants to be more creative in terms of design, materials and methods of construction? Yes.</p> <p>(2a) What might be the risks to a more flexible approach? There is a risk but this must be balanced with the overall trend of decline. This trend of decline will be of greater harm to the National Park than the impact of a few localized developments which are of a more creative design. There are a number of small businesses and individuals that feel the overriding Statutory goal of the National Park has, at times, been over zealously applied, against otherwise well designed proposals. The risk must be balanced against the continuation of the trend in the decline of important socio-economic factors that are essential for the health of communities. Notwithstanding the associated investment of time, material and money into the maintenance of the National Park's landscape. There is the risk that flexibility within the planning system creates uncertainty. This leads to additional costs in time and resources for both the applicant and the Council. With too much flexibility providing the decision makers ample space to justify refusal what may otherwise be sympathetic much needed sustainable development.</p>	Heritage and the Built Environment
CLA		<p>(1) The economic life of the Peak District is being affected by huge changes (eg leaving the EU, Covid) and there is more to come (eg ELMS). We know we have more work to do to understand this. What do you see as the new opportunities for business?</p> <p>Opportunities will continue to be limited if planning policy fails to redress the imbalance in addressing the three pillars of sustainability. Decision makers must not overlook the value of socio-economic factors when assessing proposals.</p> <p>There may be opportunities in increased staycation, but this may only be in the short term while foreign travel is restricted, and will probably be of insufficient magnitude to reverse the overall trend of a decline. The current position where business is being faced with both Brexit and Covid, has for the National Park, had the impact of amplifying and accelerating trends within the National Park.</p> <p>These are issues connected to having an ageing population, an over reliance on unreliable seasonal sectors such as tourism (which Covid-19 has highlighted) and having geographical difficulties. The only way to improve the position and opportunities is to take a more positive and pragmatic view of development.</p>	Supporting Economic Development

	CLA	<p>(2) Thinking specifically about farm diversification, our policies already support small scale business development, preferably by re-use of existing buildings of vernacular merit. The new business must support the existing agricultural business and the 'primary business' must retain ownership and control.</p> <p>(a) Does this give farmers and land managers sufficient scope to make the most of new opportunities?</p> <p>The Council supports only a limited spectrum of potential diversification projects. Most of which tend to be seasonal and are not highly paid jobs. This lack of secure employment does not help associated issues such as affordable housing or the ageing population. The focus on a limited selection of options undermines the sustainability and attractiveness of the National Park.</p> <p>It is unsustainable and unreasonable to expect seasonal tourism to create a resilient and profitable economy. At a time of Covid and huge changes to the rural sector following Brexit, without development suitable to meet the future challenges the protected qualities of the National Park's along with rural business will suffer.</p> <p>The Council should reconsider their position relating to the ownership and control of a business, and instead focus on the economic value of the diversification. It is important to measure employment, expertise, skills, wage creation and diversity of occupations. These are more important than looking at ownership/control of the business. If individuals are expected to run several projects, some of which they may not have the appropriate expertise, and the 'primary business' then it is likely that they will be overstretched. However, if the Council was to support each project, potentially let out to experts, it could create a positive, productive, attractive and exciting sustainable hub making use of what may otherwise be redundant unattractive farm buildings.</p> <p>The National Park's special qualities needs support from local profitable rural business. The National Park should look to extend the scope of types of diversification projects that it will support in order to build up resilient businesses.</p> <p>In one of the scoping meetings it was mentioned that new Government agricultural schemes may assist rural business. It is recommended that the National Park doesn't place too much hope on Environmental Land Management Schemes (ELMS), which is still in its design phase, as a replacement for sustainable development.</p>	Supporting Economic Development
	CLA	<p>(b) What are the risks to the National Park's special qualities of 'relaxing' this approach? (ie small scale business development, preferably by re-use of existing buildings of vernacular merit. The new business must support the existing agricultural business and the 'primary business' must retain ownership and control.)</p> <p>It depends on the nature of the 'relaxing.' The risks must be considered in relation to the continued decline which is damaging to the National Park's ability to maintain and enhance its special qualities. There may be risks associated with additional built volume within the National Park, but this must be balanced with the benefits of the proposed development. It should be noted that well designed development can enhance the landscape, and it shouldn't be assumed that all development will be detrimental.</p> <p>The risk must be balanced against the findings in a 2019 Derbyshire County Council Local Economic Assessment. The report builds on other reports and supports findings going back to the 2007 Derbyshire Dales Economic Assessment report. The 2019 report highlights that:</p> <ul style="list-style-type: none"> • In the last 5 years the economy in the Dales has shrunk by 5.9%, while it has grown by 10% in the rest of the nation. That is a 15.9% difference in performance and is harming sustainability. • In the last 5 years the local job supply has decreased by 0.5%, while in the rest of the nation local job supply has grown by 10.3%. • 12.5% of business reports that there is a skills gap. • 21.5% of people work from home in the National Park and they should have appropriate facilities, this can help reduce commuting and support the local economy. • The Dales has the least affordable housing in the whole of the Midlands, with a price to wages ratio of 9:1. • There is to be a decline in the working age population by 4% by 2041, despite an overall increase in the population. • Derbyshire is lagging behind the rest of the nation in creating a low carbon county. <p>If decision makers are permitted to reduce every decision by only looking at its subjective detraction from the landscape then the National Park will only continue in its trend of decline and any planning changes would only be theoretical. It was noted in a workshop and a Council document that it has made planning decisions that favour the socio-economic benefits of a development over the landscape impact, such as in the case of wind turbines (application no. 2012/12 NP/DDD/0412/0434). A balanced approach in consistent decision making would be supported.</p>	Supporting Economic Development
	CLA	<p>(3) Planning policy can't on its own provide and retain community facilities. What can we do to support thriving and sustainable communities?</p> <p>While planning policy cannot support community facilities directly on its own, it can support ancillary development that allows people to live and work in the area. It is these people who will help form a community and support all of the local facilities and Council services. The planning decision makers and policy should support sustainable development of housing and various business spaces. This will lead to indirect support of community facilities through increased demand.</p>	Shops, Services and Community Development

	CLA	<p>1. Our objective for recreation is for a network of high quality sustainable sites and facilities that have promoted understanding and enjoyment by everyone, including residents. Have we achieved this?</p> <p>The National Park should help promote responsible use of networks.</p>	Transport
	CLA	<p>2. How do we achieve the right balance for visitor parking? Our current approach is restrictive – we won't permit new or enlarged facilities unless there is a demonstrable need and consideration of environmental capacity. Is this still the right approach? If it's going wrong, where and how is it going wrong?</p> <p>Covid 19 showed that there is a lack of parking, with many visitors parking in unsuitable locations such as on road verges and in front of gates/entrances. Having policy to support development and ancillary parking will help reduce the negative pressures on areas and can help channel people to local business/footpaths. This would help improve the local economy and visitors experience simultaneously whilst protecting the National Park.</p> <p>Parking can be incorporated with rural diversification projects, including rest facilities and access to bins. This is something that planning policy can look favourably on. As such development will allow areas for safe responsible parking as opposed to creating highway risks and potential damage to the immediate environment (soil compaction, soil erosion by protecting sensitive areas and flora damage plus associated litter).</p>	Transport
	CLA	<p>3. The routes of the Monsal and Trans Pennine trails are currently safeguarded against development for future rail use. Given their popularity as multi-user trails, should they be safeguarded for this use instead?</p> <p>More details would be required about the proposal, including any other public routes that are to be safeguarded and/or linked up. If the National Park seeks to meet some of the highlighted future challenges it needs to allow suitably located sustainable development which is necessary to fund the maintenance of local routes, while enhancing the experience for users.</p>	Transport
	CLA	<p>4. How useful have our policies been in delivering our aspirations for sustainable travel? If they have not been useful – what can we do differently?</p> <p>While it is worth acknowledging geographical constraints in connecting the National Park the current transport policies are not the best ways to improve transport infrastructure within the National Park.</p> <p>Supporting rural diversification all of types of appropriate development, not just limited to seasonal tourism, will help fund the maintenance of rights of way, provide much needed parking, bins and welfare facilities. This proposed development needs to be allowed in areas away from the main hubs, as bus routes should respond to local needs and not the other way about. This is necessary in order to provide/maintain infrastructure where it is needed, to reduce inequality within the National Park and create vibrant areas which are currently in decline.</p> <p>As covered in other areas following the National Park's shareholder workshop permitting development help get areas into a positive cycle, which will lead to beneficial knock-on benefits to delivering sustainable travel. New sustainable development will increase the amount of local money, Council Tax/Business Rates takings and use of local public transport by increasing local critical masses.</p>	Transport
	Youlgrave Community Land Trust	<p>1. Climate Change and Sustainable Buildings</p> <p>a. Retrofitting</p> <p>i. Allow energy saving if character of building is kept. Thus, new double glazing with multi panes, insulation, for example.</p> <p>ii. Take a pro-active approach to insulation, addition of renewable energy generation (solar panels, heat pumps)</p> <p>b. Promote schemes to generate Renewable Energy on any reasonable scale.</p> <p>c. Anaerobic Digestion on farms to reduce run-off of pollutants and generate energy for use on the farm. Encourage joint schemes between farmers and other local sources.</p>	Climate Change and Sustainable Building
	Youlgrave Community Land Trust	<p>2. Health and Well-being</p> <p>Whilst acknowledging the aim of the maintenance and creation of 'healthy inclusive and safe places to live.' Current transport arrangements to visit local medical facilities, e.g., Darley Dale, Winster, Newholme, Calow etc. are inadequate if access to a private vehicle is unavailable. In addition to the inconvenience caused, unnecessary car journeys are generated thereby impacting negatively on 'clean air' aspirations.</p> <p>The 'healthy, inclusive' needs of an aging population are such that consideration should be given to the possibility of co-operative housing projects for older people. Such arrangements have demonstrated real benefit in maintaining mobility, cognitive ability and "neighbourliness", reducing the need for social care.</p>	Health and Wellbeing

	Youlgrave Community Land Trust	<p>4. Housing</p> <p>The Park's affordable housing needs are not being adequately met.</p> <p>The design of new affordable housing developments should have a positive effect on local cultural heritage and landscape character as well as driving low carbon and other environmental objectives, to which end the current planning guidelines need to be improved.</p> <ul style="list-style-type: none"> a. Insulation standards b. Windows – size to include quality of lighting in the building, solar heat gain in south facing walls not just the traditional aesthetic aspects. Traditional windows are often larger than those shown in the planning standard. c. Solar panels, tiles, heat pumps etc. to be encouraged. d. Grey water – using rainwater for toilets and all non-hygienic uses. e. Biodiversity and conservation e.g. bat boxes, wildlife corridors. f. Minimise hard non absorbent surfaces g. Provision of charging points for electric vehicles, particularly for terraced properties and those without easy access for provision of charging. h. Add space for home working by which we mean an area for an office, crafts, homework, music practice etc. Is the Maximum Gross Floor Areas in DMH1 adequate? i. Allocation of Affordable Housing <p>The Parks objective is to have strong, thriving communities. However, the policy of 'new build for local need only' undermines this highly desirable objective. It creates a museum of rural life and perpetuates a false stereotype of rural life that has repercussions for existing housing, forcing up prices. The popping of this bubble may go some way to addressing the 'we are not currently permitting the numbers of houses of all types to have a positive impact on the population profile' issue. The introduction of 'housing for primary residency only' requirements would help to address these issues as would broadening their definition of key workers (essential workers) to add to the Affordable Housing allocation criteria. Providing housing for key workers could reduce the expectations to travel long distances to work and could have a positive impact on redressing the ethnic imbalance.</p> <ul style="list-style-type: none"> i. Continue to support people with strong local connections. ii. Add people who have jobs in the area, & essential or key workers who support the area and want to establish a family home. iii. How can diversity of population be encouraged? iv. Change the allocation rules for Affordable Housing, reduce to 5 years and broaden the qualification criteria. 	Housing
	Youlgrave Community Land Trust	<p>5. Landscape, Biodiversity and Nature Recovery</p> <ul style="list-style-type: none"> a. Promote wildlife habitats on hills and in valleys. b. Lead a Nature Recovery Strategy. c. Engage with farmers & local communities. d. The bio-diversity gains need to be listed with each new development – there being a minimum expectation. 	Landscape, Biodiversity and Nature Recovery
	Youlgrave Community Land Trust	<p>6. Recreation and Tourism</p> <p>The different types of tourist and their transport needs should be identified. Small groups venturing out from Manchester/Sheffield for example, want to glimpse the scenery, the sites and taste something worth returning to, and explore in greater detail. Their needs are different to the Sheffield walkers that visit almost weekly and are clear in where they wish to be 'dropped off.'</p> <ul style="list-style-type: none"> a. What is the saturation point for visitors? b. Maintenance and strengthening of the Ranger Service. c. Provision for mobile holiday homes needs extending as they bring money to the area and if air travel does not recover there may be increased road traffic from the continent. Waste disposal, water etc. overnight parking, should be developed at the 'gateways'. d. Encourage longer stays – activity centres, holiday homes, mobile homes, caravan and camping facilities. <p>In these areas' education is needed more than penalties</p> <ul style="list-style-type: none"> e. Litter, BBQ's, and Fires. i. How do you stop visitors damaging the valleys and habitats? ii. How to persuade all to take litter home or put it into waste bins provided? The sheer volume of waste has at time exceeded the ability to stop litter bins overflowing at busy weekends and bank holidays. Similarly, the amount of litter that is thrown out of vehicle windows. McDonalds and Costa Coffee are well represented. f. Keeping dogs under control. There have been instances in our valleys of dogs killing wild birds, harassing, and killing sheep and the general issue of dogs disturbing nesting sites and thus stopping birds breeding. g. Litter picking is very much lead by local volunteers. 	Recreation and Tourism
	Youlgrave Community Land Trust	<p>7. Shops and Community Facilities</p> <p>Broadband connectivity still needs to be improved if people are to work effectively from home.</p>	Shops, Services and Community Development
	Youlgrave Community Land Trust	<p>8. Spatial Strategy</p> <p>Biodiversity considerations need moving to the top of the list for planning decisions. Current split of the Park into three areas is possibly not the best strategy for the connectivity of biodiversity and Climate Change considerations e.g. nature recovery networks.</p>	Spatial Strategy

	Youlgrave Community Land Trust	<p>9. Supporting Economic Development</p> <p>With Climate Change & learning from the Covid 19 Pandemic the emphasis on growth of production and GDP must stop, as growth can be the unnecessary use of raw materials and increased waste. While adequate sites need to be available for business; the growth needs to be with encouraging services and the arts as employers. Musicians; galleries/exhibitions; schemes like 'Live and Local' need supporting and expanding. Small service businesses need access to flexible premises (dual use) and storage (for electricians, builders, plumbers, painters /decorators etc.).</p> <p>Sports facilities should be supported as providers of leisure and health facilities but also treated as major employers.</p>	Supporting Economic Development
	Youlgrave Community Land Trust	<p>10. Sustainable Transport and Infrastructure</p> <p>Aspirations need to be big.</p> <p>a. When considering the maintenance and growth of thriving communities, transport must be considered as a major factor.</p> <p>b. Promote an integrated public transport system for the Park across all local government agencies and providers.</p> <p>c. Improving trans-Pennine connectivity by road and public transport (and the Edale/Manchester rail link?) is imperative as part of the 'levelling up' process. To lose the Monsal Trail would, however, be too much of a loss – its flatness and length make it an ideal resource for families and older/less mobile users.</p> <p>i. Buses – good provision for residents and an attractive alternative for visitors to use instead of cars.</p> <p>d. 20 mph speed limit in all rural settlements.</p> <p>e. Car Parks</p> <p>i. needs a rethink considering Climate Change as people feel they need to use cars to reach leisure destinations. Gateways and transport hubs should provide adequate parking.</p> <p>ii. Allow provision of seasonal car parks.</p> <p>f. MaaS – Mobility as a Service – support an expansion of the schemes.</p> <p>g. Restricting use of minor roads to access only for motorised vehicles.</p> <p>h. Cycling and walking to be safer and easier for visitors and locals.</p> <p>i. Green Lanes to be Bridleways.</p> <p>ii. New cycleways alongside A roads or as alternative routes.</p> <p>i. During the pandemic quite drastic moves have been made in London – closing off roads, cycle only lanes on dual carriageways, making walking and cycling much safer and easier. Consideration of a similarly drastic plan in the Park is worth pursuing.</p> <p>j. The use of drones should be discouraged. Medical/emergency use could be exempt, surveillance/images of houses for sale, blocked guttering etc. could be given guidelines or licences.</p>	Transport
	Youlgrave Community Land Trust	<p>11. Utilities</p> <p>a. Community Energy Schemes to be encouraged.</p>	Utilities
DDDC Officers		<p>1. Spatial Strategy</p> <p>The topic paper sets out the potential change to the organisation of the National Park from the current Local Plan approach of using three landscape character areas to Local Authority constituent boundaries. In addition it questions; should areas of biodiversity enhancement and protection be identified on a revised policy map, should visitor hot spots be identified, and should the distribution of development be identified by identified villages or ad hoc?</p> <p>Officer Comments</p> <p>The suggested change from three plan areas reflecting landscape and character to one that reflects neighbouring authority boundaries will potentially help alignment with the Derbyshire Dales Local Plan, it could improve monitoring and implementation of cross boundary issues therefore this approach should be supported.</p> <p>The identification of biodiversity enhancement and protection areas is in advance of the Environment Act and not considered to have significant cross boundary implications for DDDC.</p> <p>The identification of visitor hot spots and the development of supporting policy should be cautiously welcomed. Support for such approach would be dependent upon what the policy is intended to achieve and if there is any benefit to the Derbyshire Dales local economy. It is considered that further discussion as to how the hot spots are identified and whether the policies applied are to be of constraint or managed growth would be welcomed</p> <p>The continued identification of villages where development is considered acceptable as this policy position enables a managed approach to development and a more considered approach to its impacts on existing communities including an assessment of any potential benefits. Ad hoc development provides less certainty for the public and the development industry.</p> <p>However, it is considered imperative that the first stage of Local Plan review should entail the identification of the scale of housing needed for the future of the National Park, then consideration of what is the best policy approach to delivering the future housing requirements. Whatever approach is taken the Local Plan must be able to show that it has identified the requirement and set out clearly how it is going to deliver the requirement. Either, for example, by identifying sites or having wider boundaries which would in essence provides additional capacity. This needs to be documented as to how the requirement will be met.</p> <p>Perhaps the approach being suggested in the topic paper should go further and allow for increased development to meet local needs and the wider needs of the community</p>	Spatial Strategy

	DDDC Officers	<p>2. Climate Change and Sustainable Buildings</p> <p>The key questions posed in the topic paper are: do policies strike the right balance between the statutory purposes of the National Park and enabling low carbon/renewable installations? What new technologies will emerge?</p> <p>Officer Comments</p> <p>The focus of the topic paper is on the technological response to climate change impacts. It is considered that the new Local Plan presents an opportunity for the National Park to integrate climate change mitigation and adaptation measures into all policies. The National Park have existing relevant SPDs and Design guides that can be drawn on to inform this more integrated approach, although it is recognised that is not an easy task to achieve. The District Council's Climate Change Officer will liaise with the relevant Officer at the National Park to agree an integrated approach.</p> <p>Overall the District Council should be supportive of policies that seek to mitigate the impact of development on climate change and also policies that encourage adaptation to the impacts of climate change, for example through retrofitting energy efficiency measures into existing built environment</p>	Climate Change and Sustainable Building
	DDDC Officers	<p>3. Health and Well-being</p> <p>The National Park Authority works in partnership with constituent authorities and healthcare professionals to ensure that residents' health and well-being is considered in all aspects of the Authority's work. There are currently no specific health and well-being planning policies contained within the National Parks planning policies. It is recognised that health and well-being is a cross-cutting theme in the new local plan and as such a Health Impact Assessment (HIA) should be undertaken. No specific questions are in the topic paper.</p> <p>Officer Comments</p> <p>The cross cutting theme approach to health and well-being is supported, however it should be recognised that health and well-being only forms part of the infrastructure required to sustain vibrant communities. The role of broader infrastructure should be recognised.</p>	Health and Wellbeing
	DDDC Officers	<p>4. Heritage and Built Conservation</p> <p>The Peak District National Park's (PDNP) cultural heritage is hugely significant in its scale and quality, however only 5% of PDNP's cultural heritage assets are designated. A new Supplementary Planning Document 'Conversion of Historic Buildings' will provide further guidance to ensure heritage assets are converted sensitively and that the 'significance' of any historic asset is considered 'up-front' in the planning process through a heritage statement. It is recognised that new planning policy needs to take into account; a building's carbon life-cycle; the retrofitting of heritage assets sensitively and sustainably in response to climate change and the UK's 2050 zero net carbon target, the process for determining the curtilage of a heritage asset, and a more sustainable approach to modern farming whilst protecting heritage assets. No specific questions are in the topic paper.</p> <p>Officer Comments</p> <p>Further explanation in a revised Conversion of Historic Buildings SPD is welcomed however, it should be noted that new policy cannot be introduced via a SPD. The District Council's Conservation Officer has no comments at this point in time but will welcome the further opportunity to comment on policy as it evolves.</p>	Heritage and the Built Environment
	DDDC Officers	<p>5. Housing</p> <p>The topic paper states that the strategic evidence of housing need for the National Park as a whole needs refreshing. Current policy permits new houses in the National Park for very specific reasons related to local need, and open-market dwellings where it is a good way to enhance a brownfield site or conserve a valued building, ancillary and essential worker dwellings are permitted. The topic paper states "the delivery of affordable housing at the level seen in this plan period is entirely due to Derbyshire Dales District Council part funding schemes when other grants have reduced. This situation is not sustainable in the medium to long term but there is currently no sustainable alternative." There are twelve questions raised concerning the introduction of more flexibility into housing policy, how to achieve a balance with the needs of communities and the character and purposes of the National Park both being met.</p>	Housing
	DDDC Officers	<p>Officer Comments</p> <p>The acknowledgement that the strategic evidence base is in need of review is welcomed. The current review of the Derbyshire Dales Local Plan has entailed renewed studies to update the evidence base. The outcomes of these studies have been shared with the Peak District National Park Authority. The revised policy approach in the National Park Local Plan must flow from the evidence in order to be found "sound" by the Planning Inspectorate.</p> <p>The principle of permitting a wider range of house types including smaller housing for an ageing and increasingly dependent population, as well as permitting housing for younger generations and those who want or need to work from home seems reasonable, but this should not be at the expense of less affordable housing. Nor must the possibility of greater latitude in market housing be allowed to inflate hope values so as to inadvertently reduce the scope for the development of affordable housing. The Peak District National Park Authority will need to address the overall level of requirements of the PDNP, including other forms of housing, which may be identified by the evidence base.</p>	Housing

	DDDC Officers	<p>A relaxation of the 10 year local connection policy would be welcomed: 10 years is unduly restrictive and is a disincentive to the provision of additional affordable housing. A maximum of 5 years is considered fairer, and should help to improve supply without undermining the intent of the policy. It is also considered that the policy requiring a connection of 10 years in the past 20 years for those returning to the National Park is unduly restrictive, and has an impact upon the delivery of affordable homes. It is suggested that this requirements should also be relaxed to require a connection of 5 years in the past 10 years.</p> <p>With regard to the conversion of properties to holiday accommodation, consideration of the existing density of holiday homes within the locality should be undertaken. Where these are relatively scarce, it would be unnecessary to have a blanket refusal. Consequently, a threshold beyond which no new holiday accommodation is allowed may be appropriate.</p> <p>Whilst accepting statutory purposes the District Council considers that one of the key requirements for the National Park is to ensure that its housing needs are met.</p> <p>The allocation of sites needs to be done after an updated SHELAA is carried out. This should include an assessment of the size and capacity of villages to accommodate additional development.</p>	Housing
	DDDC Officers	<p>Small developments even on green field sites may not necessarily have an adverse impact upon the character and appearance of the National Park. Housing developments can be accommodated within the park context and can enhance beauty not reduce it. This has been demonstrated over 20 years or more in locations such as Winster and Taddington, where the new affordable housing units are exceptional and complement the village rather than detract from it.</p> <p>The cost of providing new affordable homes has been increasing for many years. There is a danger that slavishly following the design guide, whilst also meeting environmental standards, will mean we reach a point where it is no longer financially viable to provide new affordable homes within the Peak District National Park. Grant funding from Homes England, supplemented by grant from local councils and financing from housing associations, cannot keep pace with the relentless increase in build costs.</p> <p>Finally there is concern that the floor space standards currently adopted by the National Park Authority do not reflect current National Prescribed Standards. As such it is considered that the National Park Authority should be encouraged to adopt these as the basis for new residential development, and in particular bungalows should as a minimum meet Building Control Standard M4(2).</p> <p>In summary, greater flexibility within the housing policies is to be welcomed as this would enable the housing needs of communities to be fully met within the National Park and future thriving sustainable settlements achieved.</p>	Housing
	DDDC Officers	<p>6. Landscape, Biodiversity and Nature Recovery</p> <p>The topic paper sets out how the planning policies to conserve landscape have been effective to date. Overall, planning policies have had a neutral to negative effect on biodiversity, development itself is not leading to the loss of important sites and where necessary policies support land management for landscape-scale projects. In terms of nature recovery the topic paper notes the development of the National Planning Policy Framework and The Environment Bill which both describe an enhanced role for the planning system in nature recovery, via nature recovery strategies, spatially mapped nature recovery areas and biodiversity net gain.</p> <p>Officer Comments</p> <p>Whereas most of the issues in this topic paper are specific to the National Park there are potentially cross boundary implications should the new Local Plan identify a nature recovery strategy which in turn identifies networks. There is the possibility that by increasing scope and range of protection of the landscape this in turn may impede development opportunities in the future.</p>	Landscape, Biodiversity and Nature Recovery

	DDDC Officers	<p>7. Recreation and Tourism The topic paper notes that planning permission has been granted and work commenced on a hotel in Bakewell. Outside Bakewell, hotel development has been restricted. The development of static caravans and lodges has also been restricted, except in relation to the enhancement of a static caravan site by replacement of caravans by lodges. Day and overnight visits continue to increase.</p> <p>The Covid-19 pandemic has highlighted the vital role of the National Park to its visitors. There was a decline in the number of permissions granted for recreation, environmental education and interpretation over the life of the Core Strategy. The availability of alternative means of access to many popular recreational sites has declined, particularly in relation to access by public transport. Problems such as dangerous or obstructive parking, dangerous or antisocial driving, fly camping, littering and other anti-social behaviours were reported during the easing of the Covid-19 lockdown.</p> <p>The questions in the topic paper relate to the linkages between development at recreation sites and more sustainable or environmentally-friendly means of access, the use of car parks for camper van over-night stays, the role and identification of "Gateway" sites on the fringes of the National Park, possible hotel development, development of new static caravans/lodges/chalets sites, the location of camping pods and shepherd huts and questions surrounding the policies on occupancy conditions for self catered accommodation.</p> <p>Officer Comments The evidence base does not take into account the impacts of COVID and Brexit, this is recognised but is critical to developing the most appropriate policy going forward. The identification of 'Gateway' sites may have an impact on the communities of Derbyshire Dales, in terms of impact on transport, infrastructure and services. The concept of "Gateway" and the specific locations needs to be fully explained. Further dialogue will be needed with the National Park Authority as this concept is developed in order to assess the impact of this policy approach and ensure that it doesn't have an overall negative impact on the Dales communities.</p> <p>The National Park is lagging behind other destinations in the provision of hotels, whether they be chain, boutique or gastropub/hotel. Additional hotels would further diversify the visitor offer to the benefit of the local economy. Without such increased offer visitors may choose to spend their holidays elsewhere</p>	Recreation and Tourism
	DDDC Officers	<p>8. Shops, Services and Community Facilities The aim of Peak District National Park policies has been to improve access to services and retain and provide community services and facilities. The topic paper considered shops and services including access and use of online shopping, the spread and demand for school places, a shortfall of allotment spaces and the need for additional information regarding recreations space. It is acknowledged that the impact of COVID is as yet unknown and that the changes to the Use Class Order that facilitate the conversion of shops to residential accommodation will need to be understood.</p> <p>Officer Comments The evidence base does not consider the impact of COVID or Brexit. This is recognised as a gap in evidence but is crucial to making informed comment. How the PDNPA responds to changes to the Use Class order (Cat E) and the impact this has on town centres is also going to be key, in addition to understanding the impact of COVID on the office market and shopping habits.</p>	Shops, Services and Community Development
	DDDC Officers	<p>9. Supporting Economic Development The landscape is seen as a National Park core asset and vital for agriculture and tourism. Almost two-thirds (65%) of Peak District businesses surveyed stated that they depend on the quality of the landscape and environment (State of Business and the Rural Economy Report, 2020). Current planning policy supports new businesses in or on the edge of Bakewell and other 'named settlements' and safeguards existing business land or buildings. In the open countryside farm diversification is supported when it is sensitive to the park's special qualities. The topic paper raises questions about supporting non agriculture and tourism business, farm diversification, access to broadband and climate change mitigation and adaptation measures.</p> <p>Officer Comments The evidence base does not consider the impact of COVID or Brexit. This is recognised as a gap in evidence but is crucial to making informed comment. How the PDNPA responds to changes to the Use Class order (Cat E) is also going to be key to avoid the loss of B1c (light industrial) space, as well as understanding the impact of COVID on the office market and shopping habits.</p> <p>Some of the evidence is out of date e.g. latest AMR data is 2016/17. There is brief reference to District Council plans but not the identified priorities of the DDDC Economic Plan or the Covid Recovery Plan that were published in 2020. The Derbyshire Economic Partnership has also published a Recovery Plan which has been informed by the districts and should be taken into account along with the D2N2 Recovery and Growth Strategy. The PDNPA evidence base is weak in this regard. The evidence base is also weak in mistaking agriculture and tourism as the 'main' industries in the National Park, when in terms of employment they are relatively minor. The review of the National Park planning policies is an opportunity to include policies that are more flexible and therefore supportive of DDDC economic ambitions.</p> <p>In terms of climate change adaptation and mitigation measures, there is a danger of over-emphasis on the environment thereby stifling economic recovery. Clearly contributing to the low carbon agenda is important and should be encouraged through plan making but the extent to which new development is required to contribute to mitigating climate change needs to be balanced with the stated objectives of a sustainable rural economy / rural communities and considered on a case by case basis. The National Park needs to be a living and working environment. Whole Local Plan viability needs to be taken into consideration and if policy requirements have a negative effect on viability their inclusion needs to be carefully assessed.</p>	Supporting Economic Development

	DDDC Officers	<p>10. Sustainable Transport and Infrastructure</p> <p>The topic paper states that the Peak District is home to 38,000 residents and receives up to 26 million visits every year, meaning that there is a high demand for travel to, from and within the National Park. Between 2012-2017 there was an increase of car transport by 13% and even though leisure cycling has increased the majority of visitors arrive by car. Residents are concerned about parking provision in settlements and wider traffic and visitor management issues. The topic paper sets out existing policy approach and questions in detail if this is the correct approach to take forward into the next Local Plan. The topic paper also notes the potential policy conflict between existing Core Strategy Policy T5A safeguards land tunnels and bridges for the potential reinstatement of the former Woodhead and Matlock to Buxton Railways, and Policy T5B which seeks to ensure the continuation of the Monsal and Trans Pennine Trails in the event of reinstatement.</p>	Transport
	DDDC Officers	<p>Officer Comments</p> <p>The dominance of car travel for National Park visitors means that many journeys are taken through the Derbyshire Dales and terminate at car parks in Bakewell and villages. In addition traffic management or changes to parking regimes in settlements within the Derbyshire Dales will have direct implications for residents. Consideration will need to be given to the climate change implications of continued support for road transport and encouragement of sustainable transport infrastructure should be supported. The Local Plan will include policies that are used in the determination of a planning application; not all traffic management schemes are subject to these policies as they will be largely operational in nature.</p> <p>The reinstatement of the train line between Matlock and Buxton was debated on the 18th March 2021 Council Agenda item 17 the proposals by the Peaks and Dales Railway – Manchester and East Midlands Rail Action Partnership. It is recorded in the minutes 1803021 that the views of Derbyshire County Council and the Peak District National Park Authority be noted and endorsed.</p> <p>The Peak District National Park Authority does not support the current Peak and Dales Railway proposals. Whilst it is totally committed to a low-carbon and sustainable future for the National Park, it does not accept that the reinstatement of the railway on the route of the Monsal Trail is part of the solution. Other than Bakewell, the former line does not directly serve any communities in the National Park. The National Park Authority is unconvinced that it is possible to retain the Monsal Trail or an equally convenient alternative route if the railway reinstatement takes place. It does not consider that “re-provisioning” would provide an acceptable alternative.</p> <p>Similar concerns are set out by Derbyshire County Council. It emphasises the importance of the Monsal Trail and the prominence, within its forward plans, of extending this and completing the White Peak Loop (of which the Monsal Trail is a vital component). Given the nature of the line, the County Council can see no way in which a Trail, open to all users, can co-exist with any form of rail operation along the whole of this route, particularly through its tunnels or over its viaducts and bridges. It does not believe that there is any alternative to the use of these tunnels and bridges, given the geography and terrain. Derbyshire County Council is strongly opposed to the current Peak and Dales Railway proposals.</p>	Transport
	DDDC Officers	<p>11. Utilities Topic Paper</p> <p>There are a range of networks offering utility provision to residents of and visitors to the National Park, including water and waste, gas, electricity and digital connectivity. The National Park also acts as a catchment area for water, supplying neighbouring urban communities. The topic paper sets out questions regarding; the provision of new reservoirs, greywater systems, the current control of the location of communication masts and whether the park should focus on design and mast sharing, the location of larger scale renewable energy schemes and infrastructure for electric vehicles.</p> <p>Officer Comments</p> <p>Whereas a new reservoir may be considered necessary in the future to meet demand and act in advance of future extreme weather events, the location and scale of any new reservoir needs to be considered in a regional context and should not necessarily be resisted if it has a wider benefit. Measures to support mitigation and adaptation to climate change should be supported.</p> <p>The inclusion of policies that enable better communication infrastructure in the National Park should be supported as it will facilitate increased economic and social benefit for communities in the Derbyshire Dales.</p> <p>The District Council would welcome discussion regarding the location of larger scale renewable energy schemes, in particular with regard to landscape impact.</p>	Utilities
Will Kemp	Chatsworth	<p>Q.1.2. What broad areas could we use to help determine the levels of development that might be acceptable? The LPA/LP should determine levels of development by establishing/considering robust evidence on demographic, supply and demand factors (eg population growth forecasts, landscape capacity & employment location respectively) in relation to sustainability appraisal objectives. It is a concern that such evidence does not seem to be in place, nor is there a published timetable of exactly what evidence will be collated, when and how. All evidence must be objectively assessed. If NPA officer resources are limited, external, independent experts may need to be employed, as with the Yorkshire Dales NPLP.</p>	Spatial Strategy
Will Kemp	Chatsworth	<p>Q.1.2. Should we allow any community, no matter what its size, to respond to the community's need for development, or focus on Bakewell & the bigger villages (currently 62 villages)? The distribution of development should generally accord with a settlement hierarchy so as to help: ensure a critical mass of viable infrastructure/services; prevent a free-for-all pattern of development where that could run counter to sustainability objectives; protect the character of the smallest settlements. As such, the L Plan should (continue to) focus development on Bakewell and the larger villages, but provide some flexibility for development elsewhere if needed. It will not be possible at the point of adoption of the LP to identify all and every 'development need', so some flexibility is required so as to retain the ability to respond to future identified needs and positively-framed development initiatives.</p>	Spatial Strategy

Will Kemp	Chatsworth	Q.1.3. Should we shift our focus away from social affordable housing and permit a wider range of house types including smaller housing for an ageing & increasingly dependent population? It is clear from existing evidence that the totality of the existing housing stock must change if it is to meet the needs of the resident population. New build development will make a small but important contribution towards meeting these changing needs. Decisions on housing type should therefore: be led by analysis of relevant demographic, supply & demand factors; avoid a myopic focus on social affordable housing; explore more dynamic forms & models of housing that could contribute to help meeting 'need' (since the national housing crisis is not just concerned with housing numbers but the lack of diversity of housing stock). As such, the LPA should seek to address these issues accordingly. There are opportunities to support providers of 'in-kind' 'affordable housing' to help meet local needs. The Devonshire Group, for example, provides below-market cost housing for rent both for estate employees and others without drawing upon public subsidy but is not a registered social landlord. The Group's property portfolio across a number of settlements where there is demonstrable need for additional housing (to ensure community sustainability etc) could allow this role to be increased, if LP evidence recognised this 'RSL-type' function and was sufficiently flexible to support related opportunities.	Housing
Will Kemp	Chatsworth	Q.1.4. Should we give more certainty to developers by allocating sites for housing, or...continue our approach of identifying a community's housing need and then working with communities & housing associations to identify suitable sites? Yes, more certainty (and trust) should be given to developers by way of allocated sites, provided those sites are capable of delivery. That said, given the low level of new housing development across the NP and small size of many sites, it is unlikely to be feasible or necessary to identify <u>all</u> housing sites for allocation at the time of adoption of the LP, i.e. the process of identifying suitable sites (esp. within the smallest settlements) will come about through community-led processes. It should not be assumed that it will only be 'local communities and housing associations' that will have the capacity to identify or suggest suitable sites. Reliance on potentially over-prescriptive model/processes to identify sites (such as that included in the 2 nd part of the Q) should be avoided	Housing
Will Kemp	Chatsworth	Q.2.1. How do we plan for nature recovery? A. How can we ensure that 'net gain' plays a significant role in an area where there is very little development? The LPA/LP needs to: provide a policy framework that facilitates NBG and recognises/'rewards' its delivery (noting that much BNG can/will be achieved by means outside of planning control/not linked to 'development', i.e. land management practices – see below); support "high value" development (i.e. to provide more £ contributions/other re NBG). The NPA may be able to support/facilitate the identification of areas with scope for BNG.	Landscape, Biodiversity and Nature Recovery
Will Kemp	Chatsworth	B. Landownership is key for nature recovery. Should we re-think how we work with big landowners (e.g. our big estates) so that planning and development there is more closely linked to nature recovery? Yes. Notwithstanding that the real issue is land management (not ownership per se), the LP/LPA should acknowledge the significant contribution that 'estates' make in delivering nature-related benefits (through existing land management) and related opportunities for 'nature recovery'. 'Big landowners' include not only landed estates but public sector and utilities, e.g. County Council, Yorkshire Water. The LP/LPA must at the same time recognise that such benefits do not come at zero costs and that estates are businesses, ie they need to make money before they can fund any environmental management and/or provide ecological benefits. As such, the LP needs a policy on Whole Estate Plans (as per supported by LPs at the S Downs/Yorks Moors/Lake District NPs) to help support estates to continue to take a holistic approach to environmental management & that the NPA takes a holistic approach to estates.	Landscape, Biodiversity and Nature Recovery
Will Kemp	Chatsworth	C. Do you see a significant role for offsetting? Will neighbouring authorities be looking to deliver their net gain inside the National Park? No, at least in the short term. Neighbouring LPAs (taking financial contributions from developers in lieu of "on-site" BNG) will prioritise spending within their own boundaries so as to demonstrate 'local benefits' from development. The scope/scale of such BNG contributions is unlikely to be so great as to generate any capacity-driven 'need' to 'export' BNG proposals to the NP. That said, developers will have some freedom to choose where to deliver "off-site" BNG so there may be a 'market opportunity' for the NP (or more specifically landowners within the NP) to seek to attract such contributions/BNG schemes, but it is unclear as yet what geographical/other limitations (if any) LPAs can/will impose on off-site BNG.	Landscape, Biodiversity and Nature Recovery
Will Kemp	Chatsworth	Q.2.2. How should our landscapes change? Landscapes are constructs of human activity and their 'value' is subjective according to the priorities or specific interests of the viewer, ie the product of thousands of years of land management, and evolve according to the demands placed on them. The LP must recognise that 'the landscape' will continue to evolve, in a way that is evidence-based & economically sustainable, having regard to key issues in related locations (eg biodiversity, flood risk/management, climate change etc) as appropriate.	Landscape, Biodiversity and Nature Recovery
Will Kemp	Chatsworth	Q.3.1. Do you agree that we are delivering National Park purposes to conserve and enhance the cultural heritage of the Peak District National Park? In part. The LP must recognise that 'cultural heritage' is not static and thereby the NP (in all its facets) is dynamic and will continue to 'evolve'. 'Enhancement' of 'heritage' includes, in part, responding positively to current-day opportunities/needs (which in turn will form part of 'heritage' in the future). It is acknowledged that a high standard of "protection" of existing heritage assets is required to help ensure their survival, but an overly-restrictive approach can also hinder the ability of landowners/businesses to generate the necessary funds that are required to pay for the conservation and repair of the same (heritage assets do not 'look after themselves' nor are they generally funded by the public purse). An underlying problem is that NP policy is (by wording and interpretation/application) static rather than dynamic, and the approach of development management officers too often negative rather than positive. LP policy needs to recognise that heritage assets were not built to last forever (and require often substantial investment to maintain in good order), and that cultural heritage, and the related landscape, is a living one that has always (had to) and must continue to be allowed to evolve; it should not be 'preserved in aspic'.	Heritage and the Built Environment

Will Kemp	Chatsworth	Q.3.2. Could we still achieve National Park purposes if our detailed policies for new development (where permitted) were more flexible and allowed applicants to be more creative in terms of design, materials and methods of construction? Yes. Policies can remain 'strong' and effective even if 'flexible'. The cultural heritage resource and built environment more generally has the capacity to accommodate changes (such change being a characteristic of the NP) without significant adverse impacts. Innovation and creativity needs to be fostered and encouraged rather than stifled. Indeed, policy needs to change (drastically) to provide for net zero carbon development by 2050 as required by the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Again, an underlying problem is that NP policy is static rather than dynamic (see answer to Q.3.1 above). Amongst other things, a policy supporting development in line with Whole Estate Plans would encourage and facilitate a more informed and dynamic approach by key stakeholders who have the ability to effect positive change.	Heritage and the Built Environment
Will Kemp	Chatsworth	Q.3.2a. What might be the risks to a more flexible approach? The risk of a more flexible approach would be the potential for a perceived diminution (by some observers) of character, but this would be manageable. Moreover, the risk of a non-flexible approach would include: a deterioration of the cultural and heritage resource; non-compliance with the Climate Change Act for reasons outlined in the answers to Q.3.1 and Q.3.2 respectively; suppression of opportunities for creativity and innovation; failure to meet current and future needs of residents and visitors to the NP.	Heritage and the Built Environment
Will Kemp	Chatsworth	Q.4.1. The economic life of the Peak District is being affected by huge changes (eg leaving the European Union, Covid) and there is more to come (eg ELMS). We know we have more work to do to understand this. What do you see as the new opportunities for business? New opportunities include: staycation; extension of tourist season due to climate change (warmer shoulder-season); renewable energy generation arising from net zero carbon emissions by 2050 as required by the Climate Change Act 2008 (as amended); more working from home; continued trend in increased number of businesses that do not need an urban location. The Q of what are the key threats must also be asked (eg Brexit, Covid, climate change), and the Local Plan needs to address these too (as has been the case with the YDLP evidence base).	Supporting Economic Development
Will Kemp	Chatsworth	Q.4.2. Thinking specifically about farm diversification, our policies already support small scale business development, preferably by re-use of existing buildings of vernacular merit. The new business must support the existing agricultural business and the "primary business" must retain ownership and control. This premise to the Qs is misguided in two respects: firstly, PDLP policy creates major barriers for economic growth so does not "support" small-scale business development; secondly, there is no need to distinguish between new and primary business, and ownership/control is irrelevant since what matters is that the business(es) are sustainable (economically, environmentally) and operate within acceptable parameters (traffic, noise, landscape, building design etc). The Q presupposes that the 'agricultural business' (i.e. the use of 'the land') is and will remain the predominant generator of 'value'. This may be incorrect. The largest proportion of a business asset (by area or value) may be 'the land' but the use of 'the buildings' could generate much greater value. Activities carried out in 'the buildings' may or may not be linked to 'the agricultural business'. The ownership structure of the land and buildings is irrelevant. Some link between multiple activities within a single land holding may be advantageous (supporting holistic management and cross subsidy) but this is not and must not be a prerequisite for policy support. A policy framework that sought to restrict ownership/control in this way would stifle innovation and ultimately be detrimental to the economic fabric of the NP, with negative consequences on social and environmental issues. (a). Does this give farmers and land managers sufficient scope to make the most of new opportunities? No, for the reasons set out above. (b). What are the risks to the National Park's special qualities of "relaxing" this approach? There is no risk as such since the PDLP policies re design are so strong and will require any new build to fit with its surrounds etc. 'Environmental impacts' can be given due consideration through the development management process and appropriate controls imposed through scheme design and/or by conditions.	Supporting Economic Development
Will Kemp	Chatsworth	Q.4.3. Planning policy can't on its own provide and retain community facilities. What can we do to support thriving and sustainable communities? The PDLP should: continue with thrust of existing settlement hierarchy (provides development in areas with critical mass and need for related quantum of development); take a more holistic approach (ie so that decisions are not skewed towards the environment alone); provide affordable housing policy for younger families (to reverse ageing population issue); encourage the preparation of Whole Estate Plans (ie to support estates in identifying/assessing their own needs (facilities, accommodation) and opportunities for helping to meet wider community needs, inc provision & delivery of affordable housing); be underpinned by robust evidence (ie update facilities audit 2010 and identify/assess (hiring external experts if NPA officers resources are insufficient) : what current facilities are where; how are they faring (ie viable or not); what new facilities are needed where; how best to deliver facilities. The evidence of the 'use' of current facilities should include an understanding of their catchment. This is particularly important for schools (and should be readily available through pupil data), with schools being central to and a useful indicator of 'sustainable communities' (a primary school that draws its pupils from outside or far away from its host settlement could be an indicator of lack of (affordable) family housing within the settlement and imbalanced demographics).	Shops. Services and Community Development
Will Kemp	Chatsworth	Q.5.1. Our objective for recreation is for a network of high quality sustainable sites and facilities that have promoted understanding and enjoyment by everyone, including residents. Have we achieved this? Yes, progress seems to be heading towards the objective; policy therefore seems to be sufficiently flexible and working, so should not be changed too much. At development management-level, policy needs to (continue to) be interpreted with flexibility, recognising the need where it exists for supporting infrastructure and/or commercial opportunities in relation to the 'sustainable site and facilities'.	Recreation and Tourism

Will Kemp	Chatsworth	<p>Q.5.2. How do we achieve the right balance for visitor parking? It depends which issue you seek to address: parking that causes climate change, parking that causes road congestion/safety issues, or parking that causes harm to the landscape? Each merits a different policy response, the efficacy of which will vary from site to site. Our current approach is restrictive – we won't permit new or enlarged facilities unless there is a demonstrable need and consideration of environmental capacity. Is this still the right approach? The approach must be restrictive at a strategic level, since parking should not clog up the strategic/local highway network, but some flexibility is needed at site-level to address specific issues. If it's going wrong, where and how is it going wrong? We have recent experience of the LPA approving an application for more parking at Chatsworth House to meet need/demand/improve facilities/better meet visitor expectations (good), but then imposing a condition to suppress the current overflow parking facility W of the House without any reasonable consideration of where future overflow parking should take place (bad); in this instance, the approach of the LPA is wrong re the latter since its thinking is (commercially) unrealistic, inflexible and non-holistic. But the L Plan issue at stake is simply the need for policy to allow for overflow parking during periods of peak demand since such parking will by its nature be exceptional and time-limited – and the alternative comprises ad hoc parking in locations (eg road-sides) which will clog up the local highway network and prevent the passage of emergency vehicles etc and/or turning away visitors, causing loss of income (very bad, since visitor income is critical to sustain investment in heritage assets, which does not receive public subsidy). Again, the LP/LPA needs to be dynamic, not static, in its approach.</p>	Transport
Will Kemp	Chatsworth	<p>Q.5.3. The routes of the Monsal and Trans Pennine trails are currently safeguarded against development for future rail use. Given their popularity as multi-user trails, should they be safeguarded for this use instead? This not an issue that directly affects our interests, though we gain indirectly from tourism within the NP as a whole (and vice-versa) and would be concerned if this (non-starter) issue is given further consideration during the LP review process at the expense of other more pressing issues. Although in principle enhanced opportunity for rail travel (through restoration of previously closed lines) may be desirable, any such aspiration is entirely unrealistic and undeliverable. The potential demand would fall significantly short of any threshold required to ensure financial viability and the opportunity for public subsidy is limited (and will become more constrained (rising national debt, falling GDP (Covid, Brexit)). Conversely, the economic benefits of continued (and extended) recreational use of 'rail trails' are significant. Protecting the lines for recreational use could encourage further investment in related facilities, generating additional economic benefits (alongside sustainable tourism and social/health benefits).</p>	Transport
Will Kemp	Chatsworth	<p>Q.5.4. How useful have our policies been in delivering our aspirations for sustainable travel? Uncertain: the State of Tourism report indicates 20% of visits are by non-car modes (good), but also indicates only 3.5% of leisure-related visits are by public transport (bad); this suggests the majority of non-car visits are made by bicycle, especially since cycling accounts for 27% of visitors (good). If they have not been useful, what can we do differently? Suitable alternatives include: a policy supporting tourism-led and other development in line with approved Whole Estate Plans (so landowners must resolve long term traffic-related issues with external stakeholders such as the LHA); a policy that encourages the development of visitor accommodation/infrastructure so that visitors stay longer (ie leads to fewer day-trippers – the 'tidal flow' of day visitors contributes significantly to congestion/emissions problems); change the perception (within the NPA/through policy) that "all cars are bad" since cars will now increasingly be hybrids/electric and generate less emissions etc; the demand for car-based travel is unlikely to diminish significantly and will remain high in the NP given the lack of genuinely available alternatives, and the need/preference to transport multiple people, all family/holiday paraphernalia (pets, food, pushchairs, bikes, tents, etc). Any policy that supports 'days-to-stays' will assist in reducing the demand for car-based transport and use of alternatives upon arrival (e.g. hub and spoke holiday – arrive by car, use bikes to travel around, walk).</p>	Transport
Will Kemp	Chatsworth	<p>the LP workshops suggest that in some aspects the LPA may be taking an over-simplistic and/or development management approach to the PDLP review (eg reliance on parish plans, "wish-list" surveys of residents and monitoring of policy performance in DM decisions). Survey results that identify 'number of applications approved contrary to policy' will fail to identify applications that have not been submitted as landowners/businesses etc would expect/fear a refusal and so be 'scared off' from submitting an application. Rather, a strategic, evidence-based approach to the LP review using sound planning judgement should be adopted</p> <ul style="list-style-type: none"> - we are concerned that there remains an (apparent) significant gap in the evidence base that will be required to support/underpin decision making within the LP review process, and that there is no published programme for such works; it is unclear if the LPA has the necessary resources (officer time) or funds (hire external experts) to gather the objective evidence needed to inform the PDLP - the LPA has an extensive and we suggest excessive portfolio of SPG/Ds (eg 6 different SPDs for design alone); SPDs can be useful in expanding upon policy but care must be taken that their use is limited to that strictly necessary and any reader of the LP/applicant is not consequently overwhelmed by SPD; there is a clear opportunity for rationalisation of some aspects of SPD (removing out of date documents (eg Building Design Guide 1987)); - the Govt's Planning White Paper seeks to simplify and rationalise LPs; in view of the above (and possible need for additional guidance (Design Codes)), it is unclear to what extent such rationalisation will be possible across the LP and related documents; every should be made to maintain brevity - scope for new PDLP policy to apply/recognise the principle of/need for enabling development (ie development that would normally be contrary to policy and refused); examples could include the retro-fitting of heritage asset buildings with energy efficiency/renewable energy generation measures - need for policy that encourages the development of visitor accommodation/infrastructure so that visitors stay longer (converting 'days to stays') (ie leads to fewer day-trippers – the 'tidal flow' of day visitors contributes significantly to congestion/emissions problems) - the LP and LPA officers must recognise and acknowledge within decision making that environmental benefits do not come at zero economic cost and that businesses need to be able to generate funds to deliver such benefits, i.e. policy must support the ability of businesses to make money in the first place (money 'doesn't grow on trees') - environmental and/or single-issue groups can have significant influence over the PDNPA (policy, decision making) at the expense of business groups/interests (but the environment is not the only game in town; the NPA must take decisions having regard to all of its responsibilities). 	General comment on Local Plan Review

Will Kemp	Chatsworth	The main considerations and concerns arising from the workshops are that the LPA/LP should/needs to: - consider the need (and allocate necessary funds if required) to hire independent experts to produce/assess robust evidence on demographic forecasts, socio-economic trends and landscape capacity (& related SA objectives) as per the emerging Yorks Dales NPLP - produce/publish a timetable of what evidence will be done when (& how)	General comment on Local Plan Review
Will Kemp	Chatsworth	focus development on Bakewell and the bigger villages (in the White Peak area), but provide some flexibility for development elsewhere if needed, allowing for community-driven C104 needs to be identified/addressed C106	Spatial Strategy
Will Kemp	Chatsworth	avoid a myopic focus on social affordable housing; explore more dynamic forms & models of housing and delivery (eg landed estates/delivery of non-RSL 'affordable housing') - allocate sites for (housing) development that are capable of delivery where scale of development and need for certainty allows	Housing
Will Kemp	Chatsworth	provide a policy that supports/facilitates NBG & support "high value" development (to provide more related financial/other contributions re NBG); support identification of areas with scope for NBG, work more closely with large estates, recognising they are businesses that need to generate funds to allow continued investment in environmental management and/or provision of ecological benefits (therefore) provide a policy on Whole Estate Plans – ie to ensure estates take a holistic approach to env management, and to ensure the NPA takes an holistic approach to estates	Supporting Economic Development
Will Kemp	Chatsworth	recognise heritage assets were not built to last forever, the heritage landscape is a living one, and landscapes have evolved over thousands of years so should continue to evolve in a way that is economically sustainable and addresses key issues (eg biodiversity, flood risk, climate change) and not be preserved in aspic	Heritage and the Built Environment
Will Kemp	Chatsworth	recognise that a high standard of "protection" of heritage assets actually hinders the ability of landowners/businesses to generate funds to invest in conservation and repair of the same	Heritage and the Built Environment
Will Kemp	Chatsworth	recognise the heritage resource has the capacity to accommodate changes without significant adverse impacts, and indeed needs to change (drastically) to provide for net zero carbon development by 2050 as required by the Climate Change Act 2008 (as amended)	Climate Change and Sustainable Building
Will Kemp	Chatsworth	address new development opportunities (eg staycation; extension of tourist season due to climate change; renewable energy generation arising from net zero carbon emissions by 2050; more working from home) and threats (eg Brexit, Covid, climate change)	Supporting Economic Development
Will Kemp	Chatsworth	recognise new development will not harm landscape quality since PDLP policies re design are so strong and will require any new build to fit with its surrounds etc	Spatial Strategy
Will Kemp	Chatsworth	support thriving and sustainable communities by: continuing with thrust of settlement hierarchy (provides development in areas with critical mass and need for related quantum of development); taking a more holistic approach (ie so decisions are not skewed towards the environment alone); providing affordable housing policy for younger families (to reverse ageing population issue); encouraging the preparation of Whole Estate Plans (ie to support estates identify/assess their own needs (facilities, housing) and support meeting wider community needs; establishing robust evidence (ie update facilities audit 2010 and (if necessary) hire external expert to identify/assess: what current facilities are where; how are they faring (ie viable or not); what new facilities are needed where; how best to deliver facilities)	Shops, Services and Community Development
Will Kemp	Chatsworth	allow overflow parking during periods of peak demand, especially since the alternative comprises ad hoc parking at road-sides which clogs up the highway network and prevents the passage of emergency vehicles and could lead to visitors being turned away/not arriving resulting in loss of income required to support investment in heritage, environment etc	Transport
Will Kemp	Chatsworth	restrict parking at a strategic level but provide some flexibility at a site-level to address specific issues	Transport
Will Kemp	Chatsworth	support tourism-led and other development in line with approved Whole Estate Plans (so landowners must resolve traffic issues with external stakeholders); encourage visitor accommodation/infrastructure so visitors stay longer (days to stays) (& reduces day-trippers who cause congestion/emissions); change perception that "all cars are bad" since cars will now increasingly be hybrids/electric and generate less emissions etc.	Recreation and Tourism

Will Kemp	Chatsworth	<p>the LP workshops suggest that in some aspects the LPA may be taking an over-simplistic and/or development management approach to the PDL review (eg reliance on parish plans, "wish-list" surveys of residents and monitoring of policy performance in DM decisions). Survey results that identify 'number of applications approved contrary to policy' will fail to identify applications that have not been submitted as landowners/businesses etc would expect/fear a refusal and so be 'scared off' from submitting an application. Rather, a strategic, evidence-based approach to the LP review using sound planning judgement should be adopted</p> <p>there remains an (apparent) significant gap in the evidence base that will be required to support/underpin decision making within the LP review process, and that there is no published programme for such works; it is unclear if the LPA has the necessary resources (officer time) or funds (hire external experts) to gather the objective evidence needed to inform the PDL</p> <p>the LPA has an extensive and we suggest excessive portfolio of SPG/Ds (eg 6 different SPDs for design alone); SPDs can be useful in expanding upon policy but care must be taken that their use is limited to that strictly necessary and any reader of the LP/applicant is not consequently overwhelmed by SPD; there is a clear opportunity for rationalisation of some aspects of SPD (removing out of date documents (eg Building Design Guide 1987)); new PDL policy needs to apply/recognise the principle of/need for enabling development (ie development that would normally be contrary to policy and refused); examples could include the retro-fitting of heritage asset buildings with energy efficiency/renewable energy generation measures</p> <p>the LP/LPA officers must recognise and acknowledge within decision-making that environmental benefits do not come at zero economic cost and that businesses need to be able to generate funds to deliver such benefits, i.e. policy must support the ability of businesses to make money in the first place (i.e. 'money doesn't grow on trees') environmental and/or single-issue groups can have significant influence over the PDNPA (policy, decision making) at the expense of business groups/interests (but the environment is not the only game in town; the NPA must take decisions having regard to all of its responsibilities).</p>	General comment on Local Plan Review
Steve Platt	Hope Valley Climate Action	We ask that the founding principle underpinning Local Plan policies is the need to address the climate and ecological emergencies.	Climate Change and Sustainable Building
Steve Platt	Hope Valley Climate Action	The need to bring CO2 emission levels down to as near zero as possible and to enable biodiversity to recover must be fundamental to the new Local Plan.	Landscape, Biodiversity and Nature Recovery
Steve Platt	Hope Valley Climate Action	<p>We ask that the PDNPA work with transport authorities to deliver sustainable transport alternatives.</p> <ol style="list-style-type: none"> 1. Make cycling and walking to local services safer and more attractive. 2. Campaign for a single transport authority that sets timetables, fares and ticketing. 3. Improve the management of visitor traffic. 4. Ensure that permission for new development is conditional on access being possible without needing to use a car. 	Transport
Steve Platt	Hope Valley Climate Action	It is important that the Local Plan takes account of the Nature Recovery Strategy (soon to be a requirement on all local authorities).	Landscape, Biodiversity and Nature Recovery
Steve Platt	Hope Valley Climate Action	<p>We ask that the PDNPA produce Supplementary Planning Guidance on biodiversity enhancement to guide and inform developers.</p> <ol style="list-style-type: none"> 1. Identify and target areas and engage with landowners and communities to enhance biodiversity. 2. Make carbon sequestration an explicit objective of land management policies. 3. Protect the relatively wild areas of moorland and semi-natural vegetation. Phase out moorland burning. 4. Make genuine biodiversity gain a condition of any planning application approval. 	Landscape, Biodiversity and Nature Recovery
Steve Platt	Hope Valley Climate Action	<p>Sustainable buildings</p> <p>We need to reduce energy demand to a level where it can be met completely from renewable resources.</p>	Climate Change and Sustainable Building
Steve Platt	Hope Valley Climate Action	<p>We ask that the PDNPA produce a revised Design Guide to be a key driver in helping people to make changes that are sensitive to the National Park landscape.</p> <ol style="list-style-type: none"> 1. Clarify planning policy in relation to retrofit. 2. Permit rendered buildings to be insulated on the outside. 3. Encourage the creation of a "One-Stop Shop" retrofit service. 4. Help develop local Retrofit Co-coordinators and installers. 	Climate Change and Sustainable Building
Steve Platt	Hope Valley Climate Action	<p>Renewable energy</p> <p>Consultation with stakeholders and residents and visitors should layout clearly the options in the light of the demands imposed by the climate emergency. HVCA is currently embarking on a renewables feasibility study that will estimate the demand for electricity by 2030, describe the options for generation and engage with stakeholders and the general public.</p> <p>We ask that the PDNPA consider the options for installing large-scale renewables in the Park taking into consideration the importance of landscape sensitivity.</p> <ol style="list-style-type: none"> 1. The Local Plan should reconsider the options for large-scale renewables in areas like Hope Valley. 2. Examine all aspects of good design to minimise the impact on the landscape. 3. Give clear guidance on all aspects of renewables including solar tiles, solar panels, heat pumps and smaller wind turbines on farms. 	Climate Change and Sustainable Building

Steve Platt	Hope Valley Climate Action	<p>We need a mix of uses and although settlements usually form the basis of policy there are opportunities for reusing buildings elsewhere in the Park, so long as quality/character is maintained.</p> <p>We ask that the Local Plan encourages diversification of farming and businesses. We particularly welcome enterprises that give visitors a deeper appreciation of the special qualities of the National Park. We would like to see these business located where they can be accessed by sustainable travel.</p> <ol style="list-style-type: none"> 1. Develop policies both to protect existing business and to encourage new. 2. Take a flexible approach to the reuse of the existing built area within the Park. 3. Encourage visitors to stay longer and be actively involved in cherishing the Park. 	Supporting Economic Development
	RSPB	<p>4.2.1 This report has identified several ways in which the planning system can impact on people's health and well-being. These are:</p> <ul style="list-style-type: none"> • safeguarding community facilities, open space and recreation/sports facilities • protecting and enhancing public rights of way • tackling air pollution • delivering high quality, well-designed homes that can meet the needs of an ageing population • enabling development that can lead to social interaction, via public spaces, easy walking and cycling, diverse land uses, greater residential densities and provision of local amenities <p>It should be established whether there are any other ways planning can influence health and well-being.</p> <p>As identified in the topic paper, there is a growing body of evidence that time spent outdoors can improve health and well-being, so we welcome the bullet point items listed above and see them as essential considerations for the local plan to deliver those health benefits in line with the recommendations in paragraphs 92 (c) and 98-103 of the National Planning Policy Framework (NPPF).</p>	Health and Wellbeing
	RSPB	<p>A further way in which the planning system can positively influence health and well-being is through the provision of greater biodiversity and bio-abundance in all developments. Recent studies are beginning to suggest that mental health is improved even further, not just by being outside, but by being outside in places of greater biodiversity where our senses are stimulated by the sights, sounds, and smells of nature (Myers, 2020). Ensuring that open spaces within developments support an abundance of wildlife and encouraging new homes to be well-designed to support life (such as in our partnership with Barratt Homes at Kingsbrook: https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing/) will enhance their health and well-being benefits.</p> <p>Providing nature rich spaces within communities will also have benefits above and beyond improving people's health and well-being. Studies now suggest that people who have a greater connection to nature are also more likely to behave more positively towards the environment, wildlife and habitats (RSPB, 2021). Providing nature-rich green space for people to enjoy will thereby promote greater nature connections which will potentially be followed by further positive action for nature, creating a positive feedback loop whereby both people and nature benefit and both statutory purposes of the National Park are fulfilled.</p>	Health and Wellbeing
	RSPB	<p>4.2.1 Evidence overwhelmingly points to a crucial role for national parks in landscape-scale nature recovery and land-based solutions for net zero.</p> <p>Q1: Should the local plan focus more on outcomes related to biodiversity and net zero as well as landscape character?</p> <p>Absolutely. The nature and climate emergency we are now facing is the most pressing issue of our time and threatens to fundamentally alter the natural world that our civilisation relies upon. The local plan should place great emphasis on both biodiversity and reduction of greenhouse gas emissions.</p> <p>In September 2020, when the Prime Minister announced plans to ensure 30% of land in Britain was protected by 2030, protected landscapes, including National Parks, were included in the area of land already considered to be protected for nature. However, National Parks in the UK are not protected solely for their biodiversity value as equal weight is given to the conservation and enhancement of natural beauty, wildlife and cultural heritage.</p> <p>For National Parks to meaningfully contribute to '30 by 30' it is vital that biodiversity is given the highest priority and the local plan review presents an opportunity to elevate the value of biodiversity outcomes in planning decisions. The 2019 Landscapes Review led by Julian Glover proposed that "National landscapes should have a renewed mission to recover and enhance nature..." and that they "should form the backbone of Nature Recovery Networks...". For this to be achieved National Parks, including the Peak District, need to ensure that biodiversity gains become a key consideration in all aspects of planning, ensuring no existing sites are put at risk. The key findings of Sir John Lawton's 2010 Making Space for Nature report, calling for more nature sites that are bigger, better and more joined up should also be integrated into the local plan, ensuring that any developments within the National Park actively benefit nature and contribute to a bigger and more connected ecological network.</p> <p>The Government's commitment to reach 'net zero' by 2050 also elevates the need for climate mitigation to be a core component of the local plan. Paragraph 153 of the NPPF states that "Plans should take a proactive approach to mitigating and adapting to climate change..." and this could be delivered through land-based solutions such as peatland restoration and the encouragement of more trees in the landscape.</p> <p>Any efforts aimed at contributing to the goal of net zero must acknowledge biodiversity as to avoid actions that actively hinder nature's recovery.</p>	Landscape, Biodiversity and Nature Recovery

	RSPB	<p>Q2: Should the spatially mapped nature recovery network that results from the nature recovery strategy (or strategies if not undertaken by the NPA) be incorporated into the local plan in accordance with para 174 of the NPPF.</p> <p>Yes. We encourage you to plan for biodiversity at a landscape scale across local authority boundaries. This should be achieved by identifying and mapping components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping-stones that connect them and areas identified by local partnerships for habitat restoration and recreation. You should also plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure and promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. The Nature Recovery Plan in development (and which will feature a significant mapping exercise) should be fully integrated with the local plan.</p>	Landscape, Biodiversity and Nature Recovery
	RSPB	<p>4.2.2 The link between DS1C which lists 'agriculture, forestry and other rural enterprises' as development that is acceptable in principle in the countryside, and L1 that requires this development to 'conserve and enhance valued landscape character' could be re-examined.</p> <p>Q4: Are policies DS1C and L1 of the Core Strategy and DMC11 of the Development Management Policies sufficient to prevent development that harms landscape character and deliver biodiversity net gain?</p> <p>Currently we do not consider the policies DS1C, L1 and DMC11 to be robust enough to deliver net gains in biodiversity. To add the required weight to these policies, policy L1 should explicitly mention enhancing biodiversity and/or delivering nature recovery. Additionally, policy DMC11 currently states "Proposals should aim to achieve net gains to biodiversity". Net gains of biodiversity should be mandatory, not just an aim.</p>	Landscape, Biodiversity and Nature Recovery
	RSPB	<p>4.2.3 DMC2 (i) permits within the natural zone 'development that is essential for the management of the natural zone'.</p> <p>Q5: Should policy specify 'management for the purposes of landscape scale nature recovery' to prevent management associated with maintenance of a heather monoculture and grouse shooting?</p> <p>We welcome a change to the wording of DMC2. Developments associated with driven grouse shooting – such as tracks and other associated infrastructure – have occurred in the natural zone. Although developers have claimed this infrastructure is for the purpose of managing habitats, these developments play no role in the 'essential management' of the natural zone and instead of assisting nature recovery, actively prevent it. While these developments have on occasion been successfully challenged by PDNPA enforcement, the proposed policy wording, being more explicit, would weaken arguments in favour of these development types therefore avoiding damage to landscape value and the natural zone's internationally important, protected habitats. The proposed wording above is a definite improvement upon the existing policy wording but the overarching requirement is that the final version must be very clearly defined and robust enough to prevent any loopholes that allow harmful development that is not actively delivering nature recovery.</p>	Landscape, Biodiversity and Nature Recovery
	RSPB	<p>Spatial Strategy</p> <p>4.2.2. Should we identify areas of opportunity for nature recovery and biodiversity net gain on a map so that any planning gain can be targeted at enhancing biodiversity, and development steered away from areas where it would be harmful?</p> <p>Yes (please refer to answer for Q2 under 'Landscape, Biodiversity and Nature Recovery' above).</p>	Spatial Strategy
	RSPB	<p>Supporting Economic Development</p> <p>4.2.1 Should new economic development also contribute to other plan aims, for example, adapting to and mitigating climate change?</p> <p>Yes. Paragraph 153 of the NPPF states that "Plans should take a proactive approach to mitigating and adapting to climate change..." and this requirement should stretch to new economic developments as well as any other developments.</p>	Supporting Economic Development
	RSPB	<p>4.2.2 Should new economic development conserve traditional character and foster net gains in wildlife in order to conserve and enhance the National Park landscape?</p> <p>Yes. Paragraph 174 of the NPPF is clear that plans have a responsibility to protect valued landscapes and provide net gains for biodiversity.</p>	Supporting Economic Development
	RSPB	<p>4.2.3 Should we support non-agriculture and tourism businesses if they conserve and enhance the special qualities of the National Park and provide more varied job opportunities?</p> <p>Where businesses can contribute to the special qualities of the National Park, in line with the park's purposes, they should be supported, but stringent tests should be applied to ensure that the positive outcomes suggested will be realised. Rural areas such as those in the National Park need new forms of employment to ensure strong communities are maintained and if the nature and climate emergency is adequately addressed in the Peak District then opportunities for businesses will arise, such as through nature tourism. As an example of the kind of business that could be supported, nature tourism firstly would rely upon some of the park's special qualities for its own existence, so is unlikely to cause harm as that would be self-defeating. Nature tourism would actively rely upon the first purpose of the National Park and would fulfil the second purpose, as it would promote understanding and enjoyment of the wildlife and natural beauty of the landscape. As discussed in the response above under 'Health and Well-being', nature connection (as could be promoted through new nature tourism businesses) can also instigate positive behaviour from more people as they develop a deeper understanding and appreciation of nature, encouraging more environmentally friendly actions which then continue to fulfil the park's purposes. Placing nature's recovery at the heart of the local plan and supporting new businesses that want to support and celebrate nature's recovery could provide real, tangible benefits to the local economy and local communities. A recent study conducted by Rewilding Britain (Rewilding Britain, 2021) concluded that thousands of new rural jobs could be created if nature was put at the heart of a green economic recovery and the Peak District National Park should integrate this thinking into the development of its local plan to ensure that any such opportunities can be realised.</p>	Supporting Economic Development

	Lichfields on behalf of Litton Properties	<p>Spatial Strategy</p> <p>The Spatial Strategy Topic Paper acknowledges at 2.2.8 that the nature of business use is changing and as such a variety of businesses are now at RBP. Litton is encouraged that the PDNPA recognises the importance of the RBP for accommodating a range of business uses. However, we consider it is important that any policy provides appropriate restrictions to safeguard much of the site for employment purposes whilst promoting a flexibility of uses to ensure versatility in changing economic climates. The PDNPA has demonstrated some flexibility to support the long-term success and sustainability of RBP with by granting planning permission for both a hotel and prior to that a gym. In accordance with Paragraph 82 of the Framework regard should be given to the need for policy to be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. Policy should be positively prepared. It should not be written in a way that has the potential to prevent future development activity. This matter is explored further the relevant sections below.</p> <p>Paragraph 2.4.1 also recognises that the current settlement strategy has helped to steer most new development to villages in sustainable locations and prevent harmful development in the wider countryside. RBP is in a highly sustainable location. There are frequent bus routes along Buxton Road and the site itself is short and pleasant walk to Bakewell town centre. We consider that the RBP presents an opportunity for further development opportunities particularly once the new road bridge into the site is completed. This is expected to be in September 2022. This includes the objective to allow for increased employment floorspace at the site and some new housing development including the repurposing of heritage assets for residential use. This is discussed further within in the relevant sections below.</p>	Spatial Strategy
	Lichfields on behalf of Litton Properties	<p>Paragraph 2.4.2 of the Supporting Economic Development Topic Paper sets out that there have been significant increases to the stock of employment generating land with important approvals at the RBP in Bakewell. My client supports the recognition by the PDNPA of the role the RBP plays in the ongoing improvements and retention of quality employment space at the park. In this regard, we would emphasise our previous comments regarding the need to ensure that any site-specific policies are suitable and flexible enough to ensure versatility in changing economic climates. The nature of tenants is moving away from traditional employment uses and the way businesses have and are diversifying and changing needs to reflected in policies for economic development. This includes the expansion of uses supported on traditional employment sites and recognition that all employment generating uses, not just the traditional office, industry, storage and manufacturing have a key role in economic development of the Peak Park.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties	<p>Shops Services & Community Facilities</p> <p>The Shops, Services and Community Facilities Topic Paper concludes that shops and community facilities have been in decline which reflects the changing market influenced by an increase of people shopping online. It also recognises the need to further assess and consider the update Use Class Order to understand what uses need to be safeguarded in policy and whether future change of use within Use Class E will need future monitoring. It also highlights the importance of understanding how social interactions can continue to happen in light of this new use class system. Litton agrees that social interaction is a critical part for the healthy functioning of the NPA, particularly in towns such as Bakewell and areas within walking distance to the town centre such as the RBP. It is therefore important that policies are flexible enough to allow for changes in market conditions and allow for sites and units to be adaptable to meet the changing needs of the community.</p> <p>In the case for RBP, we consider that there is an opportunity to allow for flexibility in policy to promote more customer-facing uses on the site which complement and enhance the employment offering as its principle use. We would consider it inappropriate to implement any blanket policies restricting flexibility particularly with the new provisions of Use Class E published in response to a recognised need for elasticity in planning and in accordance with paragraph 82 of the Framework.</p>	Shops. Services and Community Development
	Lichfields on behalf of Litton Properties	<p>When planning for housing needs, we consider that the NPA should allow for a degree of flexibility to respond to changing market conditions. Any specific prescribed requirement in policy (particularly for affordable housing, starter homes etc.) should be robustly justified and evidenced through a Strategic Housing Market Assessment which takes into account local requirements and, for example, new demand for larger homes adaptable for home working.</p>	Shops. Services and Community Development
	Lichfields on behalf of Litton Properties	<p>The Topic Paper suggests that the existing housing stock is not sufficient to meet the needs of the local resident population. We therefore consider that the delivery of market housing to meet needs of the local resident population should be addressed in the NPA. It is also important for the PDNPA to also recognise that market housing may be appropriate on brownfield land where viability is considered to be constraint to development. This being said, Litton understands the PDNPA's duty to balance the protection of the landscape, heritage and other assets of the PDNPA with meeting development needs. Indeed, environmental benefits such as biodiversity net gain or other landscape improvement initiatives could be established and / or funded through new development. It is therefore important that the PDNPA recognise that future policy should not provide major barriers to developmental growth within the NPA. There is also a requirement for the PDNPA to recognise that the delivery of open market housing plays a valuable role in acting as a catalyst to fund affordable housing in line with new Government reforms to the planning system. This is a particular challenge for the NPA as paragraph 2.4.6 of the Topic Paper acknowledges that there has been a reduction in available grant funding for affordable housing and there is another sustainable mechanism.</p>	Shops. Services and Community Development
	Lichfields on behalf of Litton Properties	<p>We consider that the PDNPA should be planning for the right development in the right places either through allocations or site-specific policies which recognise sustainable development locations and/or by identifying settlement hierarchies. Planning proactively for locations for sustainable development will also allow for viability to be taken into account at plan making stage to avoid inflation of land values.</p>	Shops. Services and Community Development

	Lichfields on behalf of Litton Properties	The withdrawn BNP provided a development boundary for Bakewell for accommodating future growth. This included the RBP. We consider that a similar approach for the Local Plan would be a proactive way to support sustainable development in the PDNPA. In the case for RBP, this comprises a highly sustainable location in relation to access to existing services and amenities. The site is brownfield and well screened from the wider surrounding landscape. The site already benefits from a number of planning permissions for employment-led mixed-use development. However, there are pockets of the site which are available to meet future needs for housing. Paragraph 1.3.10 acknowledges that existing policy allows for new build market housing where it is a good way to enhance a brownfield site and conserve a valued building. Litton is supportive of this direction of policy and considers that this should be taken forward with the new Local Plan and further emphasis placed on the role of open market housing to conserve heritage assets. Litton considers that current policy is skewed towards the protection of the environment by applying blanket policies restricting any development growth that do not take into account site specific considerations. We consider that this is preventing opportunities for the PDNPA to meet identified needs through development that is actually sustainable and minimises impact on the landscape. This will also assist in taking pressure of neighbouring planning authorities that are struggling to meet the needs for the NPA as well as their own.	Shops, Services and Community Development
	Lichfields on behalf of Litton Properties	Recreation and Tourism The Recreation and Tourism Topic Paper acknowledges that planning permission was granted for a new hotel in Bakewell. This hotel is approved at the RBP and we consider that this is an important asset of the National Park as it is considered that it will assist in taking pressure off existing housing stock in Bakewell which may be used for conversion to holiday lets. Particularly as 'stay-cations' appear to be much more prevalent in the country as a result of the pandemic and the inability to travel abroad as freely. As such its delivery should be supported where possible by the PDNPA and therefore a proactive approach should be taken to policy to allow this site to come forward. On this basis and as set out above, policy should allow for some degree of flexibility to be able to adapt to changing market conditions which may threaten the delivery of the site as a whole.	Recreation and Tourism
	Lichfields on behalf of Litton Properties	The RBP is partially located within the Bakewell Conservation Area and lies in close proximity to: 1 Lumford Mill C19 Water Management System (Scheduled Monument); 2 Bridge over the River Wye (C18) (Grade II Listed); 3 Lumford Mill Workshop Building (C18) (Grade II Listed); and 4 Facing to Bridge Over Mill Stream (C18) (Grade II Listed). There are no locally listed buildings within the site or surroundings, but several non-designated heritage assets have previously been identified. These include the Mule Spinning Shed (C19, now largely demolished), the Retort House and its associated chimney (C19) and a Brick Chimney (C20). Lichfields submitted representations to the Conversion of Historic Buildings Supplementary Planning Document consultation in September 2021. These representations remain relevant to the Heritage and Built Conservation Topic Paper. In this regard, Litton endorses the support for conversion of historic buildings, particularly to residential use as there are opportunities at the RBP to repurpose historic buildings for housing such as Lumford Mill. Development Plan policies should not apply a blanket approach to all development. A degree of flexibility is important in order to respond to a site's context and unique circumstances. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Substantial harm may be permissible under circumstances including (for example) if the harm is outweighed by the benefit of bringing the site back into use. This is a practical, pragmatic and proportionate approach that takes account of the need for flexibility. Paragraph 3.1.5 of the Topic Paper highlights a recognition for climate change benefits for refurbishing and adapting existing buildings for repurposing. This proposed direction is supported. Policies should allow for a degree of flexibility to enable designated heritage assets to be refurbished and altered to accommodate new uses and great weight should be afforded to repurposing old buildings. This is also in line with the new Government target of net zero carbon emissions by 2050 as required by the Climate Change Act 2008 (as amended). This will not happen unless a shift in policy is achieved. It will also allow for their long-term preservation. Policy should also allow for flexibility to accommodate renewable energy sources such as solar panels on and within the setting of historical assets.	Heritage and the Built Environment
	Lichfields on behalf of Litton Properties	Overall, we consider that the existing policies within the Development Plan need to be brought up to date and further consideration needs to be given to allowing for enough flexibility to support the delivery of RBP as an employment-led mixed-use development	Supporting Economic Development
	Lichfields on behalf of Litton Properties	Further consideration should also be placed on the ability for the NPA to meeting housing need within sustainable brownfield locations such as the RBP with little impact on the wider landscape, as well as the wider benefits that developmental growth can bring to the NPA	Housing
	Lichfields on behalf of Litton Properties	Further consideration should also be given to ensuring opportunities to enhance historical assets are pursued to promote their long-term preservation and to meet climate change objectives.	Heritage and the Built Environment
	Lichfields on behalf of Litton Properties	We trust that this consultation response will be taken into account and contribute to the development of the Local Plan Review. My client would welcome the opportunity to discuss any development opportunities at the RBP with the PDNPA and to ensure that any site-specific policies are suitable and flexible enough to ensure versatility in changing economic climates.	General comment on Local Plan Review

	Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Policy DB1 (Development Boundary)</p> <p>Lichfields supports the inclusion of the Riverside Business Park [RBP] within the Development Boundary (Part A of this policy). As the development boundary is the area in which development will be supported which aligns with Litton's ambitions for the RBP. Notwithstanding this, the Riverside Business Park Site Assessment for Boundary Extension sets out that the site is located 853m to the nearest bus stop and is ranked 15th out of 18 sites (1 being the most accessible and 18 being the least). This is not endorsed. The source and methodology for this assessment is not provided. However, there are in fact two bus stops (one located on either side of Buxton Road) immediately adjacent to the site boundary. These serve routes to Buxton Castleton, Dove Holes, Tideswell and Derby. The nearest bus stop is approximately 150m from the centroid of the Business Park. The site is also walking distance to Bakewell Town Centre where there is a wealth of shop and services.</p> <p>We consider that the assessment has been based on inaccurate and/or out-of-date information. This information has then been presented as an evidence base document that informs the draft BNP policy.</p> <p>Fundamentally it down plays the accessibility of the Riverside Business Park and should be revisited to present both accurate data and make clear the methodology and sources used.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Riverside Business Park is the single largest predominantly employment site in Bakewell. It covers a site of approximately 5Ha. However, as we have emphasised in previous representations on the draft BNP, Riverside Business Park has experienced a significant period of under-occupation. This has been due to the condition and layout of the buildings which are, in many cases, no longer of a sufficient quality, size or format to serve the needs of modern business. The site has a range of complex physical and environmental constraints including historical assets, flood risk, and ecology, each of which imposes significant limitations on development.</p> <p>There have been a number of proposals to bring the site forward for development which seek to maximise its economic contribution, both to Bakewell and the wider National Park area, and which have included all appropriate mitigation measures. Litton is committed to securing the long-term viability of the site and this vision is being realised by a string of planning permissions over the last decade. These are acknowledged in both the draft BNP and the supporting document 'Summary of Employment Land in the Peak District National Park' [ELPDNP] prepared by the Peak District National Park Authority. Development Management Policy DME3 (Safeguarding employment site) stipulates that if evidence of strategic need justifies mixed use development, the predominant use of employment sites should remain in B1, B2 or B8 Use Classes. We consider that this policy provides appropriate restrictions to safeguard the site for employment purposes whilst promoting a flexibility of uses to ensure versatility in changing economic climates. In accordance with Paragraph 81 of the Framework regard should be given to the need for policy to be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. Policy should be positively prepared. It should not be written in a way that has the potential to prevent future development activity as Policy E2 currently has the potential to.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Further, in the GL Hearn Study¹ Bakewell was found to have a need for 1.3Ha of additional employment land across the plan period. The GL Hearn Study found there to be in fact 2.3Ha of additional employment land; a surplus of 1.Ha. RBP was identified as having up to 1Ha of additional employment land. Part B of the policy states: Where a mix of uses sought and deemed necessary to aid development, it will only be granted if it is not likely to put at risk the viability, vitality and character of the Central Shopping Area.</p> <p>We consider that this is unsound as it provides an unreasonable additional restriction on alternative uses on employment sites over and above what is prescribed by National policy. Neighbourhood plans should not seek to reiterate these policies. Indeed, part B of the policy does not accord with paragraphs 89 and 90 of the Framework which requires an impact assessment for retail and leisure applications over 2,500 m² outside town centres. Applications should be refused where they fail to satisfy the sequential test or are likely to have a significant adverse impact on centres. Part B of the policy is unsound as it provides an unreasonable additional restriction on alternative uses on employment sites which is not supported by sound evidence or justification.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Secondly, the policy has no regard to the recently published Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 [the revised Use Class Order]. This introduced Use Class E (Commercial, Business and Service) which provides support for a flexibility of uses between the former Use Classes A1, A2, A3, B1, D1 and D2 without the need for planning permission.</p> <p>For both reasons set out, we recommend that part B of the policy is deleted.</p> <p>Part C of the policy states:</p> <p>A Class uses will only be permitted as on-site sales from a B Class unit, and must be ancillary to the unit's primary B Class use. The requirement for retail development associated with an industrial or business unit to be mainly restricted to the sale of goods produced in the unit is achieved by Part A of DMP Policy DMS 3 (Retail development outside Core Strategy Policy DS1 settlements). However, we consider that this is unsound as the policy provides an added restriction which does not comply with part (d) of paragraph 81 of the Framework which requires that planning policies should be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changes in economic circumstances. It also does not accord with the revised Use Class Order, namely Use Class E, as detailed above. Part C of the policy is also not accompanied by any sound evidence to justify its inclusion. We therefore recommend that this part of the policy is deleted.</p>	Supporting Economic Development

Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Part C of the policy states: A Class uses will only be permitted as on-site sales from a B Class unit, and must be ancillary to the unit's primary B Class use. The requirement for retail development associated with an industrial or business unit to be mainly restricted to the sale of goods produced in the unit is achieved by Part A of DMP Policy DMS 3 (Retail development outside Core Strategy Policy DS1 settlements). However, we consider that this is unsound as the policy provides an added restriction which does not comply with part (d) of paragraph 81 of the Framework which requires that planning policies should be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changes in economic circumstances. It also does not accord with the revised Use Class Order, namely Use Class E, as detailed above. Part C of the policy is also not accompanied by any sound evidence to justify its inclusion. We therefore recommend that this part of the policy is deleted.</p>	Supporting Economic Development
Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Part D of the policy states: Any development permitted at sites 1 and 4 must maintain and where possible enhance the continuity and integrity of the river corridor, including associated watercourses. Any new development should not be within a 10m buffer zone from the river bank. We consider that this is unsound. Whilst Litton accept that the river corridor should be afforded protection, to have a 10m buffer for development may not be appropriate in all circumstances. For example, the policy conflicts with approved planning permission NP/DDD/0307/0192 for the the creation of an access road and bridge over the river. Instead, each application should be assessed on its own merits in accordance with policies set out in the development plan and the Framework. The requirement for a 10m buffershould be deleted from the policy. The supporting text for Policy E2 (paragraph 6. 19) sets out a figure for additional available employment land in Bakewell. Using the employment land summary the draft BNP seeks to reduce the figure quoted as additional available employment in the GL Hearn study. Whilst we appreciate any figure should take into account any physical and environmental constraints for each site the resulting 0.3HA of additional available employment land at Riverside as it is presented in the draft BNP over simplifies the available land at RBP. The reason for this is as set out above; whilst the site is in fact significant the current condition of much of the buildings mean the site needs to be redeveloped to bring it up to modern day standards. In addition, there has been found to be a surplus of employment floorspace in Bakewell and this should be made clear in the supporting text. Fundamentally the policy should be positively written. It should recognise the constraints brought about by the condition of existing buildings at RBP and the need for greater flexibility.</p>	Supporting Economic Development
Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Housing Policies Paragraph 4.11 of the draft BNP states that whilst the document does not allocate sites for housing, it amends the development boundary to make it possible to accommodate future growth (Policy DB1 and Map 2). As set out in our comments for Policy DB1, the inclusion of the Riverside Business Park including Lumford Mill within the development boundary is supported as it aligns with our client's ambitions for the delivery of some housing in this location. Part B of Policy H2 (Market Homes and Starter Homes on Previously Developed Sites) states: Starter Homes must comprise at least 50% of the total dwellings units permitted, with market housing or other enabling development being accepted only to the level necessary, as verified by an independent viability assessment undertaken by a Chartered surveyor, if necessary commissioned by the NPA but in all cases at the applicant's expense, which must include land purchase at values reflecting the policy constraint on re-development. The policy requires at least 50% of the total dwellings to comprise Starter Homes with no sound justification or evidence to support this. Housing need in its broadest sense should be established through a Strategic Housing Market Assessment, and this might include/be supplemented by a specific needs assessment that considers older people living within a Housing Market Area. This appears to be overly restrictive above and beyond National policy and the Development Plan. The policy relates to housing on previously developed sites where viability is often a constraint to development. The policy has no regard to this factor. We recommend that this requirement is deleted.</p>	Housing
Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>The policy also references Government guidance which has been withdrawn (Starter Homes Guidance withdrawn on 7 February 2020). This should be updated. Part F of the policy removes permitted development rights for starter homes with no justification or supporting evidence. This is a detail that can be controlled by condition of planning permission. We recommend that this is deleted. On behalf of our client we endorse the inclusion of the RBP in the development boundary at Policy DB.1 and would welcome a more positively worded policy in the draft NP for redevelopment of brownfield sites for housing. We suggest the following policy is added in the interests of supporting brownfield sites for housing and providing scope for due consideration of constraints to development: Policy H4 Housing Development on Previously Developed Land The development of previously developed land for residential use within the development boundary defined by Policy DB1 of the Neighbourhood Plan will be supported in line with Local Plan policy DMH6 where it does not conflict with other relevant development and neighbourhood plan policies. Affordable Housing or Starter Homes should be provided in line with requirements of the development plan and neighbourhood plan unless this is evidenced to be unviable.</p>	
Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Policy H3 (Specialist Housing) Part A of the policy states: New residential schemes (whether new build or conversion, greenfield or brownfield, open market or social/affordable) that are proposed on reasonably flat locations with relatively easy access to the town centre, must contribute to meeting specialist needs and the needs of the town's ageing population. The revised draft NP does not provide any clarity over what threshold confirms a site has 'easy access to the town centre' and is not supported by evidence or reasoned justification. There is also no clarity over what is meant by meeting the housing needs of the town's ageing population. Given the loose nature of the terminology within the policy text there is little prospect of it being effective.</p>	Housing
Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	<p>Policy ENV3 Protection of Non-designated Heritage Assets has been amended to refer to the local list having regard to DMP Policy DMC5 (Assessing the impact of development on designated and non-designated heritage assets and their settings). This is supported.</p>	Heritage and the Built Environment

Lichfields on behalf of Litton Properties (From Reg 15 Bakewell Neighbourhood Plan consultation)	With regards to Policy ENV 4 (Local Green Spaces), we note that the boundary of the local green space on Map 7 has been updated to accord with the planning permission NP/DDD/0719/0798 at the Riverside Business Park. This is supported.	Shops. Services and Community Development
Lichfields on behalf of Litton Properties (from Reg 14 Bakewell Neighbourhood Plan Consultation)	<p>Policy E2 (Employment Sites)</p> <p>Whilst Policy E3 (Riverside) has been deleted, Lichfields notes that Policy E2 (Employment sites) has been extended to include site specific policies for the Riverside Business Park.</p> <p>Part B of the policy states: B. "Where flexibility is sought and deemed necessary to aid development, it will only be granted if it is not likely to put at risk the viability, vitality and character of the Central Shopping Area." We consider that this is unsound. Appropriate protection of the viability and vitality of centres is achieved by the policies set out within the Framework. Neighbourhood plans should not seek to reiterate these policies. Indeed, part B of the policy does not accord with paragraphs 89 and 90 of the Framework which requires an impact assessment for retail and leisure applications over 2,500 m² outside town centres. Applications should be refused where they fail to satisfy the sequential test or are likely to have a significant adverse impact on centres. Part B of the policy is unsound as it provides an unreasonable additional restriction on alternative uses on employment sites which is not supported by sound evidence or justification.</p> <p>Part C of the policy states that: C. "A Class uses will only be permitted as on-site sales from a B Class unit, and must be ancillary to the unit's primary B Class use." The requirement for retail development associated with an industrial or business unit to be mainly restricted to the sale of goods produced on the unit is achieved by Part A of DMP Policy DMS 3 (Retail development outside Core Strategy Policy DS1 settlements). Neighbourhood plans should not seek to reiterate these policies. Indeed, we consider that this is unsound as the policy provides an added restriction which does not comply with part (d) of paragraph 81 of the Framework which requires that planning policies should be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changes in economic circumstances. Part C of the policy is also not accompanied by any sound evidence to justify its inclusion.</p>	Supporting Economic Development
Lichfields on behalf of Litton Properties (from Reg 14 Bakewell Neighbourhood Plan Consultation)	<p>Part D of the policy states: D. "Any development permitted at the 'Riverside' and 'former Cintride' sites must maintain and where possible enhance the continuity and integrity of the river corridor, including associated watercourses. Any new development should not be within a 10m buffer zone from the river bank." We consider that this is unsound. Whilst Litton accept that the river corridor should be afforded protection, to have a 10m buffer for development may not be appropriate in all circumstances. Therefore, each application should be assessed on its own merits in accordance with policies set out in the development plan and the Framework.</p> <p>Part F of the policy states: F. "Any development in an area of flood risk will need to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk." Part F repeats part (b) of paragraph 160 of the Framework. Neighbourhood plans should not seek to repeat these policies. We therefore recommend that part F of Policy E2 should be deleted.</p> <p>The supporting text for Policy E2 (paragraph 6. 19) sets out a figure for additional available employment land in Bakewell which includes 0.3 hectares on Riverside Business Park. However, we consider that this figure does not take into account that the site has a range of complex physical and environmental constraints including historical assets, flood risk and ecology, each of which imposes significant limitations on development.</p>	Supporting Economic Development
Lichfields on behalf of Litton Properties (from Reg 14 Bakewell Neighbourhood Plan Consultation)	<p>Policy ENV 3 (Protection of Non-designated Heritage Assets)</p> <p>Proposed policy ENV 3 states that: "Planning applications for development affecting non-designated heritage assets, including those listed in para 3.23, must clearly demonstrate how these will be conserved and where possible, enhanced." We consider that proposed Policy ENV3 is unsound as it is not consistent with national policy concerning non-designated heritage assets (paragraph 197). The proposed policy does not reference the need to consider the impact on the significance of the asset nor does it take into account that need for a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. The policy requirement is disproportionate to the level of significance of non-designated heritage assets undermining the requirements of national policy.</p>	Heritage and the Built Environment
Lichfields on behalf of Litton Properties (from Reg 14 Bakewell Neighbourhood Plan Consultation)	<p>Policy ENV 4 (Local Green Spaces)</p> <p>Proposed Policy ENV 4 designates land as Local Green Space and includes the access road for the Riverside Business Park (Site 1). However, Paragraph 99 of the Framework requires that the designation of land as Local green Space be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. It is noted that part of this designation is subject to extant planning permission NP/DDD/1017/1068 and makes up an area of land to be developed for car parking to serve the approved development. Therefore, designating this area as Local Green Space is unsound as it conflicts with the Framework and the approved planning permission.</p>	Shops. Services and Community Development

	Lichfields on behalf of Litton Properties (from Revised NP consultation) 2018	<p>Policies E2 and E3 are fundamentally unchanged from the 2016 draft NP. Lichfields notes the inclusion of the term “not likely to put at risk” replacing “does not put at risk” in Policy E2 at Criterion B. This does not, in any way, overcome the fundamental conflict with the NPPF. As currently worded Policy E2 does not accord with the NPPF which sets out at paragraph 26 what a local planning authority should require when considering proposals for retail, leisure and office development proposed outside of town centres that are not in accordance with an up-to-date development plan. Similarly Paragraph 22 of the NPPF is clear that proposals for the alternative use of employment land/buildings in B Class use should be treated on their merits having regard to market signals and the relative need for different land uses. There is no requirement for neighbourhood plan policy to repeat the provisions of the NPPF and moreover, Policy E2 is inconsistent with the provisions of the NPPF. Supporting text to Policy E3 refers to a survey of residents that was undertaken in November 2015. The 2016 revised draft NP states that 74% of respondents felt that the construction of a new access bridge across the River Wye should precede any development at the site. Whilst Litton acknowledges the importance of community consultation in policy development, the findings of the exercise referenced are no basis for development of planning policy. Two separate Inspectors appointed by the Secretary of State have considered the issue of a new access to Riverside Business Park and both concluded that such an access is not a pre-requisite to new development coming forward. The development management function of the Peak District National Park Authority is the appropriate arbiter of whether the provision of a new access is a material consideration, and this is on a case-by-case basis. There is no justification or requirement for Policy E3, which is not sound. For the avoidance of doubt the Litton position is maintained that Policies E2 and E3 should be deleted.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties (from Revised NP consultation) 2018	<p>Policy H2: Age and disability related considerations Criterion A of Policy H2 states: “New homes proposed for previously undeveloped reasonably flat, level locations with easy access to commercial and social facilities within the town, must meet the housing needs of the town’s ageing population” The revised draft NP does not provide any clarity over what threshold confirms a site has ‘easy access to commercial and social facilities’ or indeed what is meant by ‘commercial and social facilities’. There is no clarity over what is meant by meeting the housing needs of the town’s ageing population. The policy is not supported by any evidence or reasoned justification. The same concerns apply to Criterion B, which refers to ‘this specific need’ but without providing any evidence of what that need is. Criterion C seeks to define ‘residential needs’ but does not provide any evidence of this need, or any justification as to how commercial developers are expected to meet a need if any such need exists. Paragraph 50 of the NPPF is clear that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities local planning authorities should: plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); identify the size, type, tenure and range of housing that is required; and where they have identified that affordable housing is needed, set policies for meeting this need. Housing need in its broadest sense should be established through a Strategic Housing Market Assessment, and this might include/be supplemented by a specific needs assessment that considers older people living within a Housing Market Area. Policy H2 is not sound and is without evidential justification. Moreover, putting this to one side for a moment, given the loose nature of the terminology within the policy text there is little prospect of it ever being effective.</p>	Housing
	Lichfields on behalf of Litton Properties (from Revised NP consultation)	<p>Policy H3: Open Market Housing Whilst it is positive that Policy H3 is supportive of open market housing development on brownfield sites and other sites where development would enhance the built environment, there is no sound justification for seeking to draw an undefined distinction between sites that do/do not meet a requirement of level access to the town centre. The final part of the sentence in Criterion A would have to be deleted ‘...where sites do not meet the requirements of Policy H2 f or level access to the town centre’ to be considered sound. Criterion B refers specifically to Policy DMH2 of the Development Management Policies: Part 2 of the Local Plan for the Peak District National Park (Publication Version for Consultation October 2016). This document is not adopted and is to be tested at examination. It is yet to be confirmed whether this is positively prepared, justified, effective and consistent with national policy. Even at the point where the Part 2 Local Plan is adopted, there is no justification for Criterion B as it simply repeats a higher tier of development plan policy and there is no requirement or justification for this within a neighbourhood plan. Policies H2 and H3 are not sound, are without justification and should be deleted.</p>	Housing
	Lichfields on behalf of Litton Properties (from Revised NP consultation) 2018	<p>Policy ENV3: Heritage Assets Policy ENV3 states: “ This Neighbourhood Plan urges that the authorities draw owners’ attention to heritage assets, including those which are not statutorily protected, and that positive action to conserve them be taken if the need arises.” This statement amounts to a request and is inappropriately defined as a policy. Moreover it is not justified, is not supported by evidence and does not have a clear purpose. The preservation of heritage assets is covered in Section 12 of the NPPF, the Planning(Listed Buildings and Conservation Areas) Act 1990 as amended and planning policy within the local Development Plan including saved policies LC6 and LC8 of the Peak District Local Plan and Policy L3 of the Peak District National Park Core Strategy (2011). There is no need or cause for the neighbourhood plan to repeat existing planning policy and guidance. Aside from this the policy is not worded in a coherent way and reads as a broad vision with unclear phrasing such as “positive action” which makes the overall policy imprecise with no clear purpose. Policy ENV3 is not sound and should be deleted.</p>	Heritage and the Built Environment

	Lichfields on behalf of Litton Properties (from Revised NP consultation) 2018	<p>Supporting Text</p> <p>Part 4 of paragraph 6.3.3 provides a summary of Riverside Business Park. It states: "The Riverside Business Park is the largest area of employment land in the Peak District National Park, some 4.9ha. However, access and egress to main roads are difficult. Access is via a small private bridge and a private estate road along Lumford, and then along Holme Lane to Baslow Road. This road also serves a number of residential properties. There is consent for a new bridged access directly from the A6, but this requires significant funding to deliver. Currently the site incorporates a mix of uses. There are a number of older structures in a mixed state of repair but substantially still in use. Approximately 2ha of the site is occupied by buildings which require modernization. Permissions exist for the development of a hotel on the site replacing existing structures and floorspace, and a further permission has been secured for the redevelopment of some 3000+ m2 of existing ageing B-Class industrial units used by Pinelag Ltd. One building is Grade II Listed and a Scheduled Ancient Monument is present on the site. The derelict part of the site could provide a maximum of 1 ha of industrial land, although given the complexities of developing the site, this is likely to be lower (HR\$9.32)."</p> <p>As with policies within the revised draft NP there are a number of terms that are not defined and/or supported by evidence. Access and egress is described as "difficult", without any explanation. There is also no reference to the recently approved employment development (ref. NP/DDD/1017/1119). Whilst it is noted this was approved following publication of the revised draft NP, any factual account of planning permissions secured should include reference to this latest approval. In summary the revised draft NP continues to contain very serious flaws in the above respect which directly affect our client's interest. We trust that all our submitted representations on behalf of Litton will be given full consideration and look forward to receiving confirmation of receipt.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties from Bakewell NP Pre Submission 2016	<p>Policy E2: Employment Sites</p> <p>Policy E2 (Criterion A) proposes the safeguarding of existing employment sites. This repeats the content of draft Policy DME3 of the NPA Development Management Policies DPD (October 2016) and will not be needed if DME3 becomes adopted development plan policy. Criterion B advises that flexibility away from B class uses will only be granted where it would not put at risk the viability, vitality and character of the central shopping area. This is not consistent with NPPF policy on town centre uses (Paragraphs 23 to 27) and is not needed given the intended inclusion in the draft Development Management Policies DPD of a policy aimed at protecting the health of centres. Criterion C advises that A Class use will not be permitted unless it forms part of on-site sales from an existing factory unit and be ancillary to the existing B Use Class. All of the employment sites referenced within the supporting text are located outside of the defined central shopping area. Again, this is not consistent with NPPF policy on town centre uses. Policy E2 in part repeats existing policy and is inconsistent with current Government policy. Policy E2 is considered to be not sound. Recommended Change Policy E2 should be deleted.</p>	Supporting Economic Development
	Lichfields on behalf of Litton Properties from Bakewell NP Pre Submission 2017	<p>Policy E3: Riverside</p> <p>Policy E3 provides specific guidance on future development of the Riverside Business Park. Riverside Business Park is the largest existing employment site within the National Park. It is appropriate for the use and development of key strategic sites like Riverside to be the subject of policies prepared (by the NPA) that pay due regard to the needs of the wider authority area and subjected to detailed examination by an independent Inspector. Policy E3 is considered to be not sound. Criterion (a) refers to a new access bridge being an integral part of any development where there is an increase in floorspace or an intensification of use. This is without justification and the second part of this directly conflicts with the site-specific policy in the existing local plan. Moreover the need or otherwise for highways infrastructure is a matter for development management decision making informed by traffic impact assessment modelling. Similarly the point at which any new access bridge is provided (Criterion (b)) should reference a new bridge only being required where the need for such improvement to the highway exists, having regard to traffic modelling. Reference to delivery of a new bridge should not be in the context of an arbitrary reference to it coming forward as early as possible within any development, without any evidential basis for such a statement. Criterion (c) is seeking to dictate the approach of the NPA to development management and is inappropriate. Riverside Business Park has experienced a significant period of under-occupation due to the condition and layout of the buildings which are, in many cases, no longer of a sufficient quality, size or format to serve the needs of modern business. The site has a range of complex physical and environmental constraints including historical assets, flood risk, and ecology, each of which imposes significant limitations on development. There have been a number of proposals to bring the site forward for development which seek to maximise its economic contribution, both to Bakewell and the wider National Park area, and which have included all appropriate mitigation measures. In accordance with Paragraph 21 of the Framework regard should be given to the difficulties these barriers present to investment and policy should not result in additional burdens which would be likely to prevent future development activity. Development proposals that come forward for Riverside Business Park are rightly considered on merit, having regard to the prevailing development plan and material considerations including national planning policy and the wider context of the economic and environmental needs of Bakewell and the National Park. Recommended Change Policy E3 should be deleted.</p>	Supporting Economic Development
	Hope Valley Climate Action	<p>We ask that the founding principle underpinning Local Plan policies is the need to address the climate and ecological emergencies.</p> <p>Introduction</p> <p>The need to bring CO2 emission levels down to as near zero as possible and to enable biodiversity to recover must be fundamental to the new Local Plan. This submission has been coordinated by Hope Valley Climate Action (HVCA), but includes the views of a wider range of people from different parts of the National Park. Stephen Platt of HVCA compiled the submission.</p>	Climate Change and Sustainable Building

	Hope Valley Climate Action	<p>We ask that the PDNPA work with transport authorities to deliver sustainable transport alternatives.</p> <ol style="list-style-type: none"> 1. Make cycling and walking to local services safer and more attractive. 2. Campaign for a single transport authority that sets timetables, fares and ticketing. 3. Improve the management of visitor traffic. 4. Ensure that permission for new development is conditional on access being possible without needing to use a car. 	Transport
	Hope Valley Climate Action	<p>Nature and land management It is important that the Local Plan takes account of the Nature Recovery Strategy (soon to be a requirement on all local authorities).</p> <p>We ask that the PDNPA produce Supplementary Planning Guidance on biodiversity enhancement to guide and inform developers.</p> <ol style="list-style-type: none"> 1. Identify and target areas and engage with landowners and communities to enhance biodiversity. 2. Make carbon sequestration an explicit objective of land management policies. 3. Protect the relatively wild areas of moorland and semi-natural vegetation. Phase out moorland burning. 4. Make genuine biodiversity gain a condition of any planning application approval. 	Landscape, Biodiversity and Nature Recovery
	Hope Valley Climate Action	<p>Sustainable buildings We need to reduce energy demand to a level where it can be met completely from renewable resources.</p> <p>We ask that the PDNPA produce a revised Design Guide to be a key driver in helping people to make changes that are sensitive to the National Park landscape.</p> <ol style="list-style-type: none"> 1. Clarify planning policy in relation to retrofit. 2. Permit rendered buildings to be insulated on the outside. 3. Encourage the creation of a "One-Stop Shop" retrofit service. 4. Help develop local Retrofit Co-coordinators and installers 	Climate Change and Sustainable Building
	Hope Valley Climate Action	<p>Renewable energy Consultation with stakeholders and residents and visitors should layout clearly the options in the light of the demands imposed by the climate emergency. HVCA is currently embarking on a renewables feasibility study that will estimate the demand for electricity by 2030, describe the options for generation and engage with stakeholders and the general public.</p> <p>We ask that the PDNPA consider the options for installing large-scale renewables in the Park taking into consideration the importance of landscape sensitivity.</p> <ol style="list-style-type: none"> 1. The Local Plan should reconsider the options for large-scale renewables in areas like Hope Valley. 2. Examine all aspects of good design to minimise the impact on the landscape. 3. Give clear guidance on all aspects of renewables including solar tiles, solar panels, heat pumps and smaller wind turbines on farms. 	Climate Change and Sustainable Building
	Hope Valley Climate Action	<p>Tourism and local business We need a mix of uses and although settlements usually form the basis of policy there are opportunities for reusing buildings elsewhere in the Park, so long as quality/character is maintained.</p> <p>We ask that the Local Plan encourages diversification of farming and businesses. We particularly welcome enterprises that give visitors a deeper appreciation of the special qualities of the National Park. We would like to see these business located where they can be accessed by sustainable travel.</p> <ol style="list-style-type: none"> 1. Develop policies both to protect existing business and to encourage new. 2. Take a flexible approach to the reuse of the existing built area within the Park. 3. Encourage visitors to stay longer and be actively involved in cherishing the Park. 	Supporting Economic Development
	Hope Valley Climate Action	<p>The urgent need to bring CO2 emissions levels down to as near zero as possible and to enable biodiversity to recover must be fundamental to the new Local Plan. We are therefore acutely aware of the Government's intention to reduce emissions by 68% of 1990 level by 2030, which coincides roughly with the lifespan of the new Local Plan.</p>	Climate Change and Sustainable Building
	Hope Valley Climate Action	<p>Years of focusing on protected sites and rare species have failed to halt the decline in biodiversity. It's time for a different approach. We need a Nature Recovery Strategy for the Park that will galvanise landowners, businesses, communities and local Councils to play their part to make things better.</p> <p>Reducing emissions, reversing biodiversity decline and nature recovery that supports carbon sequestration will require the Park not only to develop policies but also to show real leadership and commitment and to undertake high profile public campaigns, individually and with other bodies.</p>	Landscape, Biodiversity and Nature Recovery
	Hope Valley Climate Action	<p>National Park Purpose The Environment Act 1995 defines the purposes of designation as a national park to:</p> <ul style="list-style-type: none"> • Conserve and enhance the natural beauty, wildlife and cultural heritage; and • Promote opportunities for the understanding and enjoyment of the special qualities of the area by the public. <p>There is a tension between these two purposes that has profound implications for policy and the development of a Local Plan. For example better visitor management might suggest directing people away from the most over-crowded places and spreading them more thinly by encouraging them to visit less popular areas. This might reduce traffic congestion but would impact nature recovery. To encourage biodiversity and protect wildlife it might be better to promote well-managed honeypots and protect quiet undisturbed less accessible places. The growth of visitors reaching into parts of the Park that were previously little visited is also an issue for farmers and livestock management as well as for nature.</p> <p>The Local Plan will be in place for some years whereas attitudes and technology are changing fast and it may be difficult to update policies to keep pace. The PDNPA needs to be agile and the Local Plan needs to be flexible to adapt as more urgent action becomes necessary.</p>	General comment on Local Plan Review

	Hope Valley Climate Action	<p>The areas in which the PDNPA could influence travel and transport are planning and development, sustainable transport infrastructure and visitor management. Given that the amount of CO2 produced by transport in the Peak Park is estimated to be second only to the Cement Works, it is obviously vital to reduce this. At the moment most travel by locals and visitors is by fossil fuel vehicles.</p> <p>Suggestions</p> <ol style="list-style-type: none"> 1. Active travel. We need to make cycling and walking to shops, schools and local services safer and more appealing. This might mean lowering speed limits, especially through villages, for both locals and visitors alike and creating new cycle ways away from main roads. The PP has a role in encouraging this vision. 2. Public transport. To combat the convenience of private vehicles public transport needs to be frequent, reliable and comprehensive in coverage. Bus services, vital to those in rural areas without a car, were in decline and needed subsidy before Covid. Hit badly by Covid social distancing they may fail to recover unless re-envisioned. Demand Responsive Transport, supported by DCC, would provide similar journey times to cars without the need for parking provision. 3. Experience from Europe suggests that a successful integrated public transport system needs to be coordinated by a single transport authority that sets timetables, fares and ticketing. The PDNPA has a role in encouraging this level of coordination. The Authority also needs to be aware of and encourage the expansion of on-demand transport into the Peak if and when it becomes more ubiquitous in surrounding conurbations. 4. Transport hubs. Develop transport hubs, for example at Hope Rail Station, to connect electric minibuses and cycle hire with main line train and bus services. 5. Visitor management. Improve management of visitor traffic and parking by promoting alternative modes of transport. 6. More sophisticated parking management. This strategy might include real-time parking information for car parks that encourage visitors away from honey pots, regulations that prohibit verge-side parking and stricter enforcement while at the same time encouraging the provision of convenient alternatives. This approach might begin with a simple map showing the capacity of car-parks throughout the Peak together with an indication of whether they are likely to be full at popular times. This might be a smart-phone app, showing traffic congestion, parking availability, bus links and cycle hire. It might also show en-route and less frequented attractions. 7. New development. Ensuring that permission for new development is conditional on access by public transport or active travel. 8. Road building. Resist pressure for new major trans-Pennine road links and carriageway upgrades that would increase traffic through the park via the Snake Pass. 9. Electrification. Encourage electrification of the Sheffield-Manchester rail line. Encourage switch to electric vehicles through the installation of charging points in all accessible car parks near housing without off-street parking. 	Transport
	Hope Valley Climate Action	<p>The focus of the Peak Park has been on landscape. Whilst this includes nature as well as the cultural landscape, a stronger focus on wildlife and biodiversity is now needed. It is necessary to continue to prohibit development in open areas but the term "natural zone" may not be an accurate description and "open countryside" may be better.</p> <p>Working with Local Authorities, Wildlife Trusts etc., the PDNPA will be responsible for taking the lead on the Local Nature Recovery Strategy if the Environment Bill passes into law. It is important therefore that the Local Plan takes account of the Nature Recovery Strategy proposals. As well as focusing on important sites, habitats and species, the Local Plan should highlight the need for measures to protect, enhance and restore landscape features in ways that will deliver significant biodiversity improvements. For example, the Plan could identify and target areas where there are remnant hedgerows in need of restoration, scrub and woodland, pastures and river corridors with poor buffer zones, areas damaged by intensive grazing or areas where field trees are not regenerating or where Ash is predominant.</p> <p>Engaging landowners and communities in initiatives to deliver local enhancements could deliver quick and significant biodiversity gain. Engagement could be through farm advice for those eligible for agri-environment grants via effective public campaigns in target areas. However, whilst the new schemes may facilitate landscape-scale initiatives to restore habitats and re-wild, in the Park such schemes are highly likely to be in areas that already have a level of protection (e.g. SSSI) and/or where owners already have an interest in nature. Elsewhere the new schemes may deliver little more than stopping things from getting worse e.g. Tier 1 may resemble the old cross-compliance rules for Basic Payments. Currently, many smaller scale landowners are not interested in or are unable to engage with PDNPA. Proactively engaging with them and communities at Parish scale could turn this around. There may also be potential to train more volunteers to provide advice and support to landowners.</p>	Landscape, Biodiversity and Nature Recovery
	Hope Valley Climate Action	<p>Policies must avoid leading to a concentration of intensive farming in the valley bottoms. Ring-fenced nature rich uplands and valley bottom wildlife deserts will not reverse biodiversity decline; the two habitats are connected and species move between them. The current biodiversity value of valley pastures could and should be far greater.</p> <p>Many areas of wet grassland have been drained for grazing leading to the loss of nationally declining flora (e.g. Ragged robin). Ageing and diseased field trees are not regenerating and hedgerows are in a poor state in many areas.</p> <p>There is a huge opportunity to improve biodiversity through the management of green spaces in villages (churchyards, verges and recreation areas). The Local Plan should protect these spaces from development and promote wildlife-friendly features (bat boxes, swift bricks, hedgehog holes) in all new development and renovation. Such planning conditions should apply to all developments, large and small through Supplementary Planning Guidance on improving biodiversity. There needs to be a mechanism for a parish to register sites (trees, hedgerows, boggy areas and ponds) that are important to a community and should be protected.</p>	Landscape, Biodiversity and Nature Recovery

	Hope Valley Climate Action	<p>Suggestions</p> <ol style="list-style-type: none"> 1. The Local Plan needs to develop policies that protect enhance and restore nature at landscape scale across the whole of the National Park and plans that identify and target areas for action, engaging landowners and communities in ambitious initiatives to restore nature and reverse biodiversity decline. 2. Making carbon sequestration an explicit objective of land management policies. Encourage sensitive large-scale native tree planting, whilst recognising that well-managed pasture and moorland also sequester carbon and that the varied habitats are valuable. Encourage the preservation and restoration of peatland. 3. Protecting open countryside: the relatively wild areas of moorland and semi-natural vegetation and allowing them to evolve, for example by 'scrubbing up' of hillsides and allowing rewilding to take place. Phase out moorland burning. 4. Make genuine biodiversity gain a condition of any planning application approval. Recognise the nature value of verges and other 'everyday' spaces. Promote community gardens and allotments. 5. There is a need for specific targets and monitoring over time, using measurable parameters such as the condition of soil or the presence of species, and a need to provide support and advice to farmers and other landowners who are key to delivery of a nature recovery strategy. 	Landscape, Biodiversity and Nature Recovery
	Hope Valley Climate Action	<p>The Peak Park needs to be seen in the national context and the need to reduce energy demand to a level where it can be met completely from renewable resources. Because there is very little new build in the Peak Park it is likely that most of the housing stock in 2050 has already been built. At present 85% of homes are heated by gas. If these homes are to be heated by electricity their energy efficiency will need to dramatically improve. It is therefore necessary to reduce the energy demand of these houses by improving energy efficiency, move to electricity by phasing out gas and oil, and reduce the peaks and troughs in demand.</p> <p>Most of the dwellings in the Peak Park have a poor energy rating and so there is considerable scope for reducing demand through improving energy efficiency of both residential and non-residential existing buildings. This fabric first approach should include both better insulation and air-tightness. Many property owners fail to undertake retrofit, because they do not know what to do or how to do it, or they are unsure how to access finance. The Peak Park could help to make it easier to retrofit, by setting up "One-Stop Shop" retrofit services.</p>	Climate Change and Sustainable Building
	Hope Valley Climate Action	<p>The National Park obviously poses a particular challenge given the age of the housing stock and the need to preserve the character and aesthetics of the built environment. External insulation is unlikely to be acceptable on stone buildings and it will be necessary to work within the constraints imposed by the Park to help homeowners to make the right decisions. However, a large proportion of buildings in the Park are rendered and there may be scope to apply external wall insulation, which is more efficient and less disruptive than internal insulation.</p> <p>Retrofit can be incremental if carefully planned. Attention to detail is paramount to avoid problems such as cold bridging and interstitial condensation. There is, however, a huge lack of people with the relevant skills. Opportunities need to be provided for the training of architects, surveyors and builders that will be needed to meet the requirements of British Standard PAS 2035:2019 on retrofitting dwellings for improved energy efficiency.</p> <p>The national strategy for rolling-out retrofitting will be delivered via five regional hubs allied with Local Enterprise Partnerships. In this region it is the Midlands Hub, working through Local Enterprise Partnership D2N2, based at Nottingham City, Council, that covers Derbyshire and Nottinghamshire. PDNPA needs to be aware of this and be part of the rollout.</p>	Climate Change and Sustainable Building
	Hope Valley Climate Action	<p>Suggestions</p> <ol style="list-style-type: none"> 1. A revised Design Guide that would be a key driver in helping people to make changes that is sensitive to the National Park landscape. 2. Planning guidance about retrofit should include a more pro-active approach to insulation standards and permit rendered buildings to be insulated on the outside. It should also clarify planning guidance on air-source heat pumps. 3. The PDNPA should encourage the creation of a "One-Stop Shop" retrofit service, promoting retrofitting and providing all the necessary information about funding, getting a survey, contractors, etc. 4. There need to be many more local Retrofit Co-coordinators to oversee the process, including planning, monitoring progress and signing off work. This service will be charged for, both to ensure that private firms offering the same service were not disadvantaged, and to recoup costs. 5. The PDNPA might consider joining the Accelerator Cities project, set up in 2019 as a network to support planning authorities in encouraging retrofit. The project provides an evolving handbook, workshops, a newsletter, and online resources, including models for providing funding where owners are unable to fund it themselves. 	Climate Change and Sustainable Building
	Hope Valley Climate Action	<p>In the light of the Government's commitment to a 68% reduction in greenhouse gases by 2030 against a 1990 baseline the Peak Park needs to consider permitting the installation of a number of sensitively sited renewable energy installations. We recognise that large-scale renewable projects are currently discouraged or prohibited in all national parks. However, we believe it is timely that careful consultation with stakeholders and residents and visitors should layout clearly the options in the light of the demands imposed by the climate emergency. HVCA conducted an energy study of residents in the Valley in October 2020. 214 people responded. We asked people their opinion about 6 large-scale renewable options, including continuing with the current policy of prohibiting their use in the Peak Park. (Fig 2) We found that there is considerable support for large-scale renewables. Only 24% are opposed to them in the national park and only 9% want to retain current planning policy. A large solar array was the most liked option followed by small scale solar and hydro. Two-thirds of respondents, however, like wind-power, either a single turbine or a small wind farm of 5 turbines. However, this was a small sample and respondents were self-selected, so may have been 'greener' than the general population. Sustainable Hayfield conducted a similar survey of residents' attitudes to a community owned solar farm. Just 10-20% of residents objected and 78% would think about investing. There is also a case for investing in electricity storage facilities, either using batteries or gravity, to help match supply and demand. 90% of respondents see the key benefit of renewables as being the reduction in carbon emissions. 52% are strongly in favour of community ownership and 58% think there would be less need to expand the national grid. A local use restriction and community ownership might make them more acceptable. Analysing people's detailed comment shows that nearly half (48%) of respondents are strongly in favour of large-scale renewables in the Hope Valley and 28% are cautiously supportive. HVCA are currently embarking on a renewables feasibility study that will estimate the demand for electricity by 2030, describe the options for generation and engage with stakeholders and the general public. The study has the support of Parish Councils, the PDNPA and the District and Borough Councils.</p>	Utilities

	Hope Valley Climate Action	<p>Suggestions</p> <ol style="list-style-type: none"> 1. Taking into account the importance of landscape sensitivity, the Local Plan should reconsider the options for large-scale renewables in areas like Hope Valley. 2. Provision of power storage will be as important as power generation. Batteries in electric vehicles will be provide substantial storage capacity but further capacity will be needed. 3. Those proposing large-scale renewables need to work closely with planners to examine all aspects of good design to minimise the impact on the landscape. 4. Planning policy needs to give clear guidance on all aspects of renewables including solar tiles, solar panels, heat pumps and smaller wind turbines on farms. 	Utilities
	Hope Valley Climate Action	<p>Inevitably, in terms of land area, some sectors (e.g. agriculture) dominate in the National Park but we need a mix of uses and there are already policies in place to protect other types of business. B1 and B2 uses represent "industrial" and "office", and B2, in particular, is significant within the Park. Most farmers accepted that farming practices are going to change. Government policy has been to encourage diversification, including producing renewable power, but planning use categories and planning policies don't necessarily encourage these changes. Planning policy and planning culture need to be open to alternative businesses if farming is to be sustainable. The Peak Park needs to provide advice, encouragement and leadership; for example, the Authority might run come and meet sessions at Bakewell Market.</p> <p>Farmers have diversified for example into bunkhouses and holiday lets. But the provision of holiday accommodation doesn't provide much local employment. Post-Covid there may well be a demand for office space, and for small storage units to enable residents without spare space to run businesses from home. Although business people know that they need to react to climate change, their immediate priority is to recover from Covid and survive. Settlements were usually used as the basis of policies for development but it is important to recognise opportunities for reusing buildings elsewhere in the Park, so long as quality/character is maintained. When opportunities for reuse occur the PDNPA needs to consider both housing for residents and holiday accommodation. Many local businesses, especially pubs, restaurants etc., survive because of visitors as well as locals.</p> <p>The ending of the Covid lock-down has seen a dramatic increase in the number of day visitors, a minority of whom behave in an anti-social manner leaving litter, lighting BBQ's and fires and allowing their dogs off the lead to disturb or kill nesting birds and harass live-stock.</p> <p>As well as people coming for the day from surrounding conurbations, many visitors are beginning to want slower, more immersive experiences. Visitors should be persuaded to stay for more than a day for courses, activities, crafts, adventure and festivals. It is important, therefore, to anticipate the sort of accommodation needed for this type of study centre or outdoor entertainment venue.</p> <p>In the immediate term, the majority of visits will continue to be day trips by car, so we have to think about the options for managing the traffic and parking problems. This ties back into Sustainable transport and the idea of promoting transport hubs and connecting them with electric minibuses, electric bike hire and other forms of shared transport. Given the complexity of transport and the many authorities involved the PDNPA needs to provide an overview and facilitate the cooperation of the various authorities in an overall strategy.</p>	Recreation and Tourism
	Hope Valley Climate Action	<p>Suggestions</p> <ol style="list-style-type: none"> 1. The PDNPA needs to think about what kinds of spaces are needed and develop policies both to protect existing business and to encourage new. 2. We need to emphasise the benefits of tackling climate change and the accessibility of a well-connected location such as the Hope Valley. 3. The PDNPA should take a flexible approach to the reuse of the existing built footprint within the Park. It needs to consider the nature of each settlement and decide whether it is more appropriate to designate a site for housing or for business use – to be flexible whilst always trying to retain quality and character. 4. The PDNPA should encourage visitors to stay for longer and be actively involved. 5. PDNPA ought to be pushing hard for integrated transport now, rather than "pacing" a gradual change from car use. 	Recreation and Tourism
	Hope Valley Climate Action	<p>There are tensions between some of the suggestions in the different topic areas, for example between encouraging biodiversity and managing visitors or between large-scale renewable energy generation and landscape sensitivity. Nevertheless key Local Plan policies would reduce carbon emissions and enhance biodiversity. We therefore ask that the PDNPA:</p> <ol style="list-style-type: none"> 1. Work with transport authorities to deliver sustainable transport alternatives. 2. Produce Supplementary Planning Guidance on biodiversity enhancement to guide and inform developers. 3. Produce a revised Design Guide to help people to make changes to their homes that are sensitive to the National Park landscape. 4. Consider the options for installing large-scale renewables in the Park taking into consideration the importance of landscape sensitivity. 5. Considers broadening tourism and local business policies to allow some development, perhaps linked to enhancing biodiversity and people's enjoyment of the special qualities of the area, in areas away from settlements. Above all We would like to see the Local Plan state that the need to address the climate and ecological emergencies is the founding principle underpinning all Local Plan Policies. 	Climate Change and Sustainable Building