



Development Management Policies Part 2 of the Local Plan for the Peak District National Park

Submission Version
Duty to Co-operate Statement

February 2018

Peak District National Park Authority

Member of National Parks England

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PEAK DISTRICT NATIONAL PARK AUTHORITY

Duty to Co-operate Statement

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1.0 Introduction

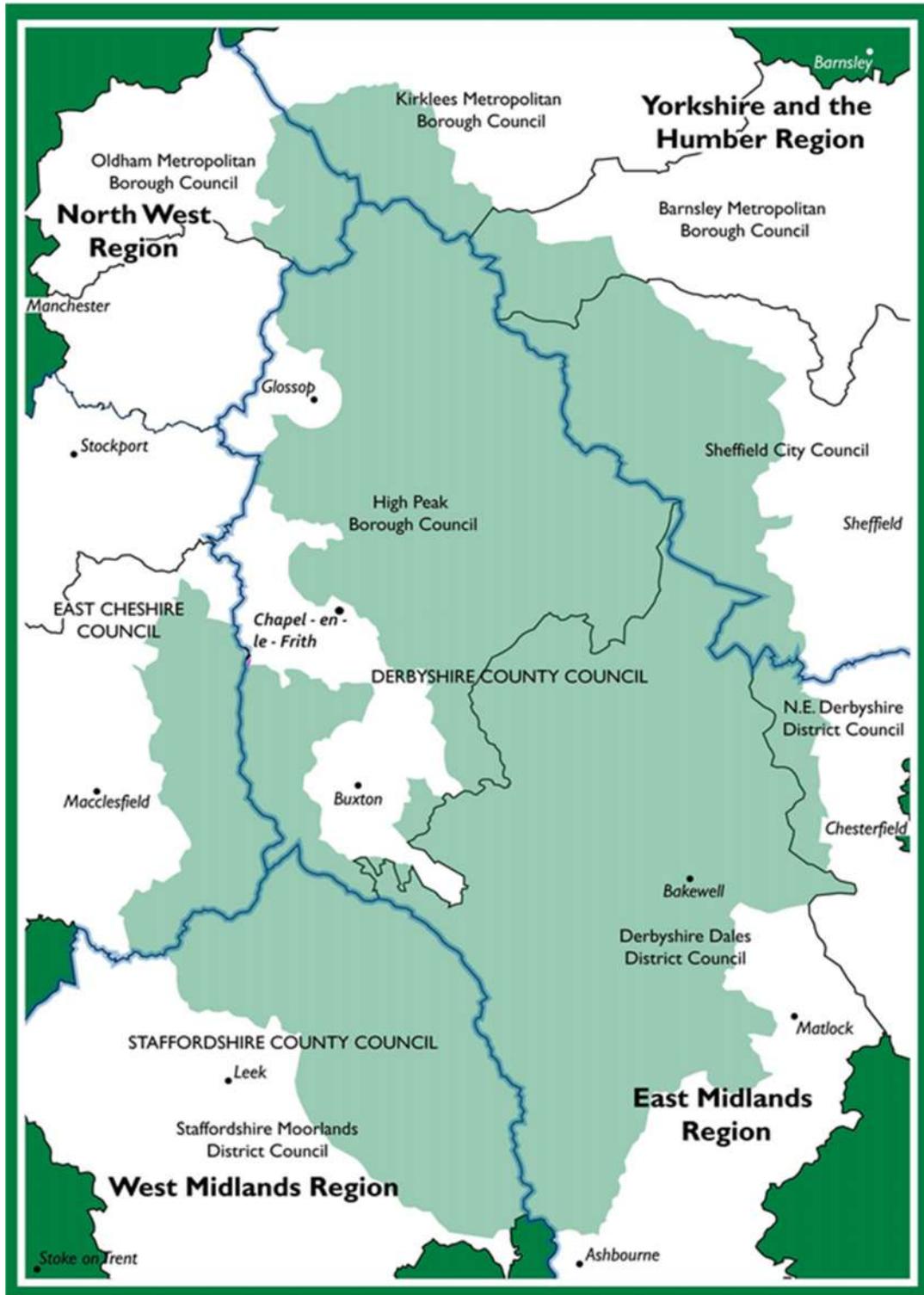
- 1.1 Section 110 of the Localism Act sets out the “Duty to Co-operate”, which applies to all local planning and national park authorities. The Duty requires these and other prescribed bodies to co-operate on strategic matters relating to “sustainable development or use of land that has or would have a significant impact on at least two planning areas”.
- 1.2 In addition, the National Planning Policy Framework sets out the strategic priorities that each local planning authority should consider in the preparation of its Local Plan at paragraph 156.
- 1.3 The Duty requires the Authority to work with neighbouring local planning authorities and County Councils in addition to the prescribed bodies named in regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.4 The Development Management Policies Document has been prepared on an on-going basis since 2012 with a continuous relationship with neighbouring local planning authorities, the County Councils and other prescribed bodies.
- 1.5 This document sets out how the National Park Authority has addressed the Duty in the preparation of the Development Management Policies Document. Additional information on the consultation and stakeholder engagement undertaken in preparation of the Development Management Policies Document can be found in the Authority’s Consultation Statement.

2.0 Cross-Boundary issues

- 2.1 The broad strategic priorities outlined in NPPF Paragraph 156 are primarily addressed via the Council’s Core Strategy, adopted in 2011 (See Appendix 2). The more detailed policies contained in the Development Management Policies document are designed to supplement these existing policies, providing more detail against which to determine individual development proposals.
- 2.2 **The Development Management Policies Document is not considered to raise any cross-boundary issues that could impact on any neighbouring local planning authorities.**
- 2.3 Any issues arising from the Local Plan are established through existing policies adopted in the Core Strategy. As such the nature of Duty to Co-operate discussions are primarily to monitor and assess the impact of the Core Strategy, using Development Management Policies to

refine and update aspects of policy in the light of evidence, to improve consistency with national policy and to address the local concerns of local communities, businesses, service providers and other stakeholders.

Local Administrative Context Showing Constituent and Neighbouring Authorities in relation to the Peak District National Park

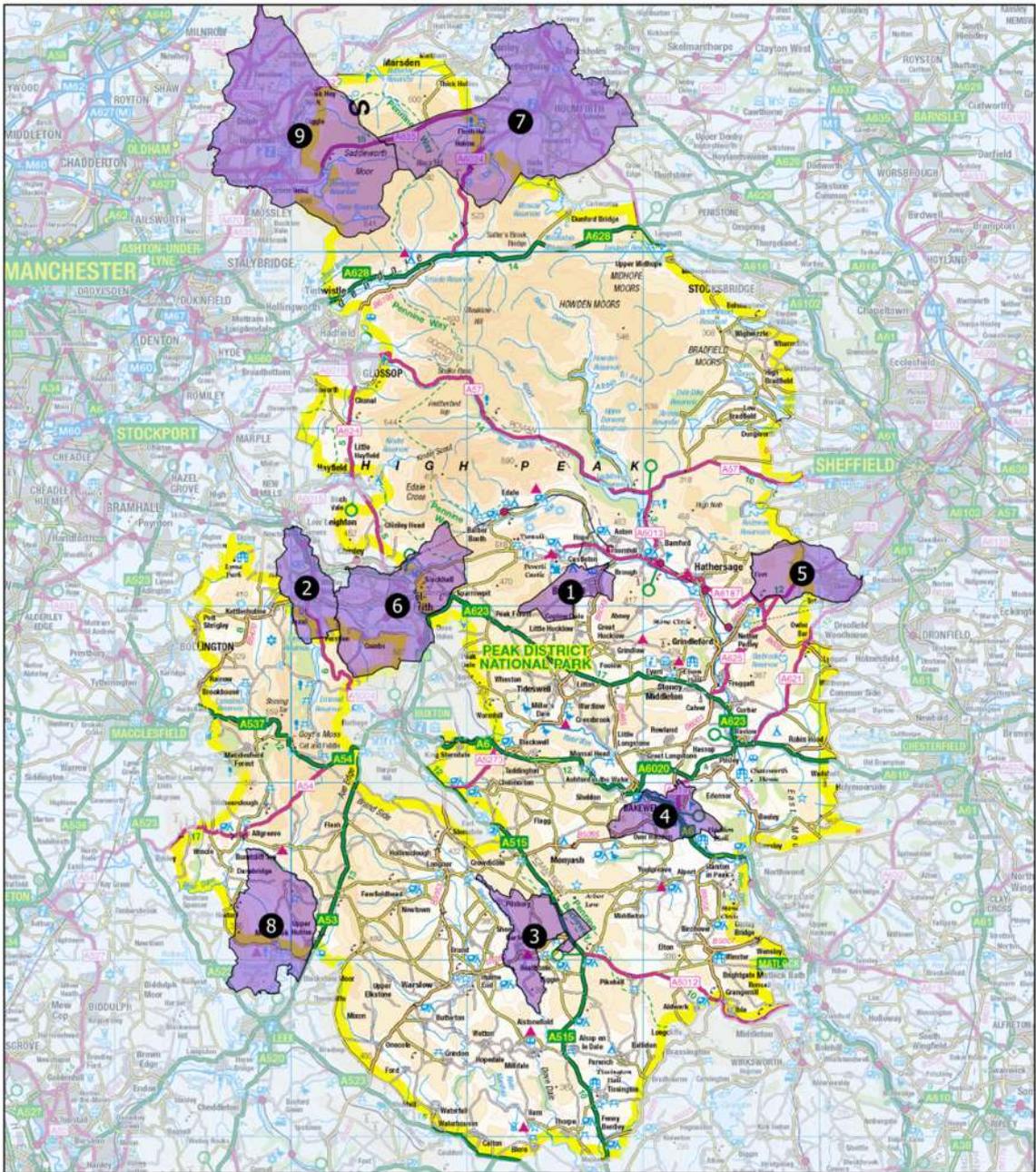


3.0 Approach to Neighbourhood Plans

3.1 The Localism Act encourages the preparation of neighbourhood plans or neighbourhood development orders. These can become part of the local development plan and set the context for planning decisions, but must be in line with the Authority's own planning policies, have regard to national policy, and be compatible with EU obligations. A Parish Council or community body can initiate and undertake neighbourhood planning. The Authority will provide technical or practical support to help produce the plan. At the time of writing the Authority is currently supporting 7 communities across the National Park in bringing forward their local aspirations to neighbourhood plan status. 2 plans have already been formally made (adopted) in Chapel en le Frith and Bradwell. The map below identifies the location of 9 communities which have formally designated an area for the purpose of producing a neighbourhood plan, including 3 wholly within the National Park at Bakewell, Bradwell and Hartington. The current list of designated areas is as follows:

- Holme Valley (Kirklees)
- Dore (Sheffield)
- Bradwell (Derbyshire Dales) – plan made
- Chapel-en-le-Frith (High Peak) – plan made
- Whaley Bridge (High Peak)
- Bakewell (Derbyshire Dales)
- Hartington (Derbyshire Dales)
- Leekfrith (Staffordshire Moorlands)
- Saddleworth (Oldham)

3.2 The Authority has restructured its Policy Planning Team to maintain long term support for community level work.



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Key	Name
1	Bradwell
2	Whaley Bridge
3	Hartington
4	Bakewell
5	Dore
6	Chapel-en-le-Frith
7	Holme Valley
8	Leekfrith
9	Saddleworth

DESIGNATED NEIGHBOURHOOD PLAN AREAS

SCALE: 1:300,000



4.0 Specific Co-operation in the production of the Development Management Policies document

4.1 There has been specific engagement with neighbouring authorities, the County Council and the other stakeholders in the preparation of the Development Management Policies Document. Full details of this can be found in the Authority's Consultation Statement. However, the table below summarises a timeline of events highlighting the key areas of engagement and co-operative working undertaken in the production of the Document.

4.2 The commitment to undertaking a Development Management Policies document was set out in the Local Development Scheme (third revision) (2010) submitted with the Core Strategy. This set out an intention to follow the adoption of the Core Strategy with a part 2 document. In effect this replicated the former hierarchy of Structure Plan (1994) and Local Plan (2001) but in the form of development plan documents in the LDF, as required by the Planning and Compulsory Purchase Act 2004.

4.3 The commitment to a part 2 document has remained in successive LDS reviews.

4.4 The Core Strategy was examined in April 2011 and key to some debates was the potential effectiveness of the plan and the need to be able to monitor and review aspects of Development Management policy in order to be responsive to the economic climate at that time. As such various references are made in the Core Strategy to the role of Development Management policies in delivering the objectives of the Core Strategy. This was accepted by the Inspector in her report.

4.5 In October 2011 the Core Strategy was adopted and attention turned immediately to the review of Development Management policies.

4.6 A decision on the rationale to continue this path was required following the introduction of the NPPF in March 2012. Annex 1 to the NPPF set out guidance on its implementation and the impact it was to have upon existing saved and adopted plans. Para 214 stated that "for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework". Para 215 went on to state, "In other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)."

4.7 On Friday 1 February 2013 a report was taken to the full Authority setting out a full conformity assessment of the Core Strategy against the NPPF with the conclusion that:

1. The Authority's planning policies are consistent with the provisions of the NPPF;
2. That, consequently no early review of the Core Strategy be required; and
3. That the process of producing Development Management Policies be used to consider any further ways in which the Authority's planning policies can be refined to further strengthen the consistency with national policy

- 4.8 The Authority has continued to monitor the performance of the plan through Annual Monitoring Reports and separate reports assessing performance on appeal. In both cases performance has been largely on target with observations of appeal decisions highlighting close conformity with the NPPF.
- 4.9 One appeal raised concerns over conformity with the core renewables policy. However the Authority determined that the principles of the policy remained correct but that supplementary planning guidance could be used to clarify and strengthen the policy approach laid out. This has now been completed and adopted.
- 4.10 The majority of cases raise issues of judgement as opposed to policy principle and as such the Authority has again judged this favourably and considers that the completion of Development Management policies along with other Supplementary Planning Documents will only serve to clarify the facilitate good development which serves to deliver the long term spatial objectives.
- 4.11 Early scoping and an Interim Sustainability report on the SA/SEA in 2012 indicated that the Development Management Policies would in effect sit within the policy principles of the adopted Core Strategy which had already recently been fully appraised for sustainability, strategic environmental assessment and under the Habitats regulations regarding the impact of policies on protected Natura 2000 sites. As such the scope to generate alternative options at this level of the development plan was limited.
- 4.12 From September 24th to 17th December a 12 week period of consultation took place with all consultation bodies on the issues and preferred approaches for the plan.
- 4.13 This document set out the reasonable alternatives as far as this was possible and in each case proposed a preferred approach.
- 4.14 The responses highlighted the need for further development of policy with affected stakeholders and as such a process of closer debate began (see timeline below).
- 4.15 Indeed following the adoption of the Core Strategy the Authority has sought to engage closely with a range of partners, making particularly close contact with parishes to debate the detailed development management issues impacting on matters of greatest concern in the locality, such as:
- using development as a means of driving conservation and enhancement of the National Park's valued characteristics;
 - the delivery of affordable houses;
 - the scope to reuse traditional buildings (heritage assets);
 - protecting local services and employment space;
 - responding to local parking needs;
 - managing the impact of quarrying;
 - business development on farms and the impact of new buildings;
 - farming succession; and
 - managing the impact of tourism

- 4.16 These and other issues have remained at the core of debates for the last 3 years as the plan has developed.
- 4.17 In 2015 a report was commissioned by the Planning Advisory Service (PAS) to consider the issues that may arise in terms of meeting the various soundness issues with a focus on a part 2 Development Management Policies Document, as opposed to a complete Local Plan review.
- 4.18 The final report was received in July 2015 and gave considerable reassurance to the approach taken, by comparing the experiences of other similar DPD's and looking at the consistency of the proposed policies (as drafted at that time) to try and predict potential issues.
- 4.19 In October 2015 a full draft of the Development Management Policies document was approved by the National Park Authority, with delegated Authority to work with a member Steering Group to enable final changes and sign off to be reached.
- 4.20 A detailed timeline of engagement with members and local stakeholders is set out below along with a record of the Duty to Cooperate dialogue that has taken place through this period.

Detailed Timeline - Regulation 18 – Preparation of a Development Plan Document (subsequently updated to show progress up to Submission)

Date	Nature of Consultation	Who consulted
May 2012	Land Managers Forum Awareness of upcoming consultation	NFU CLA Land Owners Farmers Large Estates Utilities bodies
May 2012	Agents Forum – Awareness of upcoming consultation	Local planning Agents
May 2012	Discussion re policy issues	Derbyshire Fire and rescue
June 2012	Cross Authority meet up to learn about practical landscape delivery issues and impact on policy	Moors for the Future partnership
July 2012	Liaison meeting in advance of formal consultation	Peak Park Parishes Forum (PPPF)
Sep 2012	Annual Parishes Day launch of consultation and policy debates regarding: <ul style="list-style-type: none"> • Village capacity • Re-use of traditional buildings • Local needs and local connection for housing • Replacement dwellings • Employment sites (safeguarding and release) 	PPPF and wide range of parish councils

	• Parking	
Sep 2012	High Peak radio interview	Listeners in High Peak area of Derbyshire
Sep 2012	Duty to Co-operate meeting	Tameside Borough Council
	Housing Forum on preferred approaches	Peak District Rural Housing Association Other Housing Associations Derbyshire Dales District Council
	Scoping of SA	Statutory Environmental bodies
	Scoping of HRA	Statutory Environmental bodies
24 th Sep – 17 December 2012 12 week period	Issues and preferred approaches (Reg 18)	All specific and general consultation bodies
Oct 2012	Mid-point consultation discussion on DM policies	PPPF
25 th July 2013	Duty to Co-operate meeting	Derbyshire Dales District Council
8 th March 2013	Duty to Cooperate meeting	High Peak Borough Council and Staffordshire Moorlands District Council
July 2013	Report back on representations from consultation and planning ahead to parishes day	PPPF
	Authority workshop on DM policies	PDNPA Members
	Meeting/workshop on emerging evidence relating to historic farmsteads of the Peak District	Historic England
Oct 2013	Parishes Day – policy debates focussed on housing: • Affordable housing • Barn conversions • Replacement dwellings	PPPF and a wide range of parish councils
3 rd October 2013	Meeting/workshop on emerging evidence relating to historic farmsteads of the Peak District	Historic England
4 th September 2014	Duty to Co-operate Meeting with Barnsley	Barnsley Council
Sep 2014	Parishes Day – Debates under the theme Thriving and Vibrant communities	PPPF and a wide range of parish councils
17 th March 2015	National Trust Liaison meeting	National Trust
26 th March 2015	Duty to Co-operate meeting	Cheshire East Council

	with Cheshire East	
Sep 2015	Parishes Day – Debates under the theme Tourism and Visitor Management	PPPF and a wide range of parish councils
24 th September 2015	Duty to Co-operate meeting	Derbyshire Dales District Council
Oct 2015	Authority meeting – approval of draft Development Management Policies document	PDNPA Members
4 th December 2015	Derbyshire Dales – Housing Market Area workshop	DDDC and surrounding local planning authorities
Jan – May 2016	PDNPA member steering group to finalise draft plan for publication	Lead member representatives
15 th Feb 2016	Duty to Cooperate 2016	Kirklees Council
March 2016	Habitats Regulations Assessment undertaken	By DTA Ecology consultants
April 2016	Updated SA Scoping report	Statutory Environmental bodies
Sep 2016	Sign off of Publication Version under delegation by Chair of PC	PDNPA members
Sep 2016	Parishes consultation event pre-consultation	Parish Councils
8 th Sep 2016	Transport Design Guide Stakeholder event	Highways and Rail Authorities
24 th Sep 2016	Annual Parishes Day – debates on thriving communities	Parish Councils
6 th October 2016	DtC meeting with DCC Minerals Policy Team	Derbyshire County Council
7 th October 2016	Revised Local Development Scheme taken to full Authority	Authority members
28 th Oct 2016 – 27 th Jan 13 weeks (SCI says 8 weeks with extra provision given owing to Xmas period)	Publication State Consultation (Reg 19)	All specific and general consultation bodies
9 th November 2016	Bradfield Parish Council – discussion re DMP consultation	Parish Council
10 th November 2016	Meeting with DDDC Housing manager re policy development and delivery issues	DDDC Housing
6 th jan 2017	Local Conservative MP's to discuss National Park issues including DM Policy	MP's

	development	
12 th Jan 2017	Duty to Cooperate meeting with Sheffield	Sheffield City Council
17 th Jan 2017	Meeting with Natural England re strategic transport issues	Natural England
19 th Jan 2017	Waterhouses Parish council re DM Policies consultation	Parish Council
25 th Jan 2017	Stanton in Peak Parish Council re DM Policies consultation	Parish Council
14 th Feb 2017	Transport for the North – Wider Connectivity project Board	Transport for the North, Highways England, DfT, Highways Authorities
21 st March 2017	Duty to Cooperate meeting with Barnsley	Barnsley MBC
31 st March 2017	Annual Planning Liaison meeting with National Trust	The National Trust
4 th April 2017	Wider Connectivity Project Board	Transport for the North, Highways England, DfT, Highways Authorities
6 th April 2017	Duty to Cooperate meeting with Derbyshire County Council Policy team	Derbyshire County Council
27 th April 2017	National Parks Heads of Planning	The National Parks family
9-10 th May 2017	DDDC Local Plan examination hearings	Derbyshire Dales DC
11 th May 2017	Peak District Affordable Housing Working Group	Derbyshire Dales DC and High Peak BC housing and regeneration officers
24 th May 2017	Trans-Pennine Upgrade programme meeting Highways England and Statutory Environmental bodies	Highways England Natural England Historic England Environment Agency
13 th July 2017	Derbyshire Planning Policy Officers Group	All Derbyshire local planning authorities
29 th August 2017	Sheffield City Council Head of Planning	Sheffield City Council
25 th Sep 2017	Trans-Pennine Upgrade Programme – Statutory Environmental Bodies	Natural England Historic England Environment Agency
30 th September 2017	Annual Parishes Day – theme of National Park special qualities and managing impacts on them	Parish Councils
3 rd October 2017	National Park Management Plan consultation event	Wide range of partners
6 th October 2017	National Park Authority approval of proposed modifications to DM policies and Statement of Representations from	National Park Authority members

	Publication stage.	
6 th Nov 2017	Meeting with Peak Park Parishes Forum	Parish Councils
13 th November 2017 – 12 th Jan 2018 8 weeks consultation	Consultation into proposed modifications for DM policies	All specific and general consultation bodies
15 th November 2017	Duty to Cooperate meeting with Stockport MBC	Stockport MBC
15 th November 2017	Inception meeting for joint SHELAA process with High Peak BC	High Peak BC
22 nd November 2017	Presentation and discussion re development consent order for Trans-Pennine Upgrade Programme (Road Investment Strategy 1)	Arcadis (consultants) working with Highways England
30 th November 2017	Affordable housing working group	Derbyshire Dales DC and High Peak BC Housing and Regeneration officers.
11 th December 2017	Peak Park Parishes Forum discussion re DM Policies proposed modifications	Parish Councils
13 th December 2017	Meeting with Chatsworth Estate re DM Policies proposed modifications	Chatsworth Estate
23 rd Jan 2018	Trans-Pennine Tunnel Stakeholder Reference Group – presentation on strategic case	Transport for the North Highways England Range of other LPA's Highways Authorities and interest groups also in attendance.
6 th Feb 2018	Duty to Cooperate meeting with Derbyshire County Council	Derbyshire County Council

Summary of the main cross-boundary issues identified in the Core Strategy

Setting of the National Park

Policies and programmes in and around the Peak District National Park should help secure the conservation and enhancement of the designated area, respecting the statutory purposes of its designation. Care must be taken to ensure that all development respects and enhances the high quality environment of the area, including the setting of the National Park. Various areas of core policy add value to this context such as the inclusion in valued characteristics of flow of landscape character across and beyond the National Park boundary; providing a continuity of landscape and valued setting for the National Park.

Continuous dialogue takes place with constituent and adjoining authorities to ensure that consistent policies impacting on the fringe and setting of the National Park are established around the entire boundary (See Appendix 1)

Spatial strategy and relationship of settlements

The development strategy (DS1) for the Peak District National Park, and the spatial strategy overall, is strongly affected by the close proximity of this National Park to a large number of towns and cities offering an extensive range of jobs, services, retail and leisure opportunities. A key reason for not requiring a settlement hierarchy in the normal sense is borne out by the fact that National Park settlements exist at a level beneath most conventional hierarchies operating at the rural level within which allocations would not normally be made and offering scope only for exceptional development requiring a rural location, such as to meet local needs for affordable housing. The Authority considers its development strategy is consistent with the approach in neighbouring rural areas.

Recreation and tourism

The preamble to RT1 in the Core Strategy explains that developments which provide opportunities for understanding and enjoying the National Park will be welcomed in locations close to its boundary or with easy access by sustainable means, taking into account the landscape character and setting of the National Park. In the context of the highest status of protection for the National Park, policy 10 in the former East Midlands Regional Plan required authorities and others to encourage and promote tourism opportunities outside the National Park that could ease pressures on the National Park itself. Holiday park style development including static caravans, chalets and lodges can be better accommodated outside the National Park subject to landscape considerations affecting the setting of the area.

Renewable energy

The preamble to CC2 in this plan covering low carbon and renewable energy development describes the potential impact that such developments can have on the setting of the National Park. Text explains that the Authority will

advocate consideration of less damaging alternatives to protect the National Park and its setting, particularly from larger schemes such as wind farms.

Housing

The context on housing policy provided by the East Midlands Regional Plan clarified that delivery of dwellings in the National Park counts towards the housing targets set out for local authorities within the Peak, Dales and Park Housing Market Area. Partnership working consolidated through the LDF process by collaboration on evidence gathering and on joint preparation of a Local Investment Plan, is aiding delivery prospects.

Minerals

The proximity of vast levels of mineral resources on the edge of the National Park is a key reason in supporting the objective to seek a gradual reduction in the flow of minerals from the Park itself. Close on-going dialogue will be necessary between the Authority and Derbyshire County Council to consider and agree the best long term strategy for minerals in the context of these large shared resources.

Transport and communications

A range of transport related cross-boundary issues exist including:

- the high levels of motorised traffic in general in comparison with more sustainable modes of transport;
- the high levels of cross-park traffic;
- high demands for freight transport to, from and across the National Park;
- the demand for improved rail connections to surrounding urban areas, and the use of former railway routes;
- the provision of routes for more sustainable modes of transport including walking, cycling, horse riding and by inland waterway.

These issues are considered within core policies and the Authority feels these address cross-boundary accessibility, travel and traffic issues, so far as is possible within the scope of this document.

Summary Map

Peak District National Park Duty to Co-operate

The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

NB - No's correspond to background notes

<p>1. Oldham MBC</p> <p>Response to Greater Manchester Spatial Framework in January 2017, with implications for fringe landscape.</p> <p>Joint discussion re Saddleworth Neighbourhood Plan and specific discussions regarding Fletcher's Mill site on National Park boundary at Dovestone.</p>	<p>2. Derbyshire County Council</p> <p>Contribution to County wide studies e.g. employment projections and Gypsy and Traveller Accommodation Assessment.</p> <p>Contribution to CDP SMART monitoring system</p> <p>Discussions on possible County-wide spatial statement to assist the DtC and in the context of the emerging Combined Authority.</p> <p>Local Aggregates Assessment agreed in 2013 with 2017 update agreed in draft.</p> <p>Part of Planning and Health group</p> <p>Lead role in cycling strategy with promotion of green infrastructure links from gateway towns.</p> <p>DtC meeting 6th Feb 2018 to discuss consultation arrangements</p>	<p>3. Kirklees</p> <p>Response to Kirklees Draft Local Plan during 2013</p> <p>Joint discussion re Holme Valley Neighbourhood plan during 2014/15</p> <p>Duty to Cooperate meeting on 5th February 2016</p>	<p>4. Barnsley MBC</p> <p>DtC meeting in Barnsley on 4th September 2014</p> <p>SCR Green Belt Review meetings held in Barnsley</p> <p>Barnsley Local Plan – response sent 11th Jan 2015 seeking improved policies for National Park fringe</p> <p>DtC meeting 21st March 2017 to discuss any issues with emerging Barnsley Local Plan</p>
<p>14. High Peak</p> <p>Response to draft Local Plan including suggestion for improved policy for National Park fringe and early concern expressed over allocations close to National Park boundary</p> <p>Memo of understanding signed by Chairs of both Authorities assisting policy development to manage growth on the edges of the Borough in ways which are more sympathetic to the wild and open landscapes of the Peak District National Park</p> <p>Housing contribution agreed at 110</p> <p>Cross boundary involvement in 2 Neighbourhood Plans at Chapel-en-le-Frith and Whaley Bridge.</p> <p>Service Level Agreement for NPA to assist HPBC in undertaking housing enabling within High Peak Borough</p> <p>Shared approach to SHELAA evidence informing brownfield land register</p>		<p>5. Sheffield CC</p> <p>Sheffield City Region Green Belt review. Contribution to agreed methodology.</p> <p>Cross boundary involvement in the Dore Neighbourhood Plan</p> <p>Response to Sheffield's growth options Jan 2015</p> <p>DtC meeting 12th Jan 2017 to discuss housing allocations near NP boundary, plus approach to Fracking.</p>	<p>6. North East Derbyshire</p> <p>Response to Draft Plan made in March 2015. Request made for improved policy reference for the National Park fringe.</p> <p>25th Jan 2018. Response to NED Local Plan, declining request to take up NED housing growth on basis of wrong spatial logic.</p>
<p>13. Cheshire East</p> <p>DtC meeting on 26th March 2015</p> <p>Response to CE Draft Plan with improvements to policy regarding the National Park fringe – 6th July 2015</p>		<p>8. National Park Management Plan Partnership</p> <p>Advisory group and annual conferences aimed at partnership support for achieving NPMP objectives and ensuring duty to have regard to statutory National Park purposes.</p> <p>Significant projects include Moors for the Future, South West Peak Partnership, Eastern Moors Partnership and Pedal Peak.</p> <p>Responses from several authorities in 2017 on the current review of the NPMP regarding the focus for future strategy.</p> <p>New delivery focussed sub-group established for housing during 2017 with attendance by DDDC and HPBC.</p>	
<p>12. Staffordshire Moorlands</p> <p>DtC meeting on cross boundary issues 8th December 2014.</p> <p>Considered specific implications of development at Waterhouses. Proposal for a small allocation for housing and business use.</p> <p>Explored whether a trend figure for anticipated housing delivery could be provided to the council similar to that offered DDDC and HPBC. Housing contribution agreed at 100</p> <p>Cross boundary discussion on 1 neighbourhood area at leekfrith and expression of interest by community at Onecote and Bradnop</p> <p>11th May 2016 meeting to discuss landscape assessment of housing sites for SMDC Local plan, dealing with impacts on National Park fringe.</p>		<p>11. Staffordshire County Council</p> <p>Contribution to Cycling projects</p> <p>Comments on Development Plan re spatial strategy and landscape character approach</p>	<p>10. East Staffs</p> <p>Scanning of and consultation on plans but no significant cross boundary issues arising</p>

Meeting Notes, letters and memorandum of understanding where produced and corresponding to Map in Appendix 2

1. Oldham

Response to the Greater Manchester Spatial Framework

Covering email

Dear GMCA team

Please find attached the response of the Peak District National Park Authority (PDNPA) to the current consultation on the Greater Manchester Spatial Framework.

Our response focuses heavily on the Robert Fletcher's Mill site and surrounding land in the Dovestones area of Saddleworth (Oldham) however we endorse, and would like it be recorded as such, the response made by Friends of the Peak District on the two sites OA 26 Mottram M67 and OA21 High Lane (Stockport) other than in respect of the comment made about tunnelling the A628, which is an engineering option for which this Authority retains an open mind, meaning we neither support nor reject the concept at this stage.

The National Park Authority welcomed the opportunity on the 10th January to meet the team and hear the views of the team and constituent authority officers, and would urge ongoing dialogue with the PDNPA as the plan progresses.

It is welcomed that my colleague Tim Nicholson is now invited to an upcoming meeting of the SEMMS refresh.

To be clear, whilst the Authority always prefers to work towards the avoidance of objections, at this stage we are objecting to the development of the three sites for the reasons outlined in our response.

However the Authority encourages GMCA team to work with us on areas where impact of development on wider landscape (both direct and indirect) is clearly predictable in order that we can work with you towards a spatial framework that benefits both Greater Manchester and the National Park.

Yours sincerely

Ian Fullilove
Policy Planner Ba (Hons) MRTPI

Dear GMCA

The Peak District National Park Authority (PDNPA) makes the following comments on the draft Greater Manchester Spatial Framework

Greater Manchester Spatial Framework DRAFT PDNPA response

The PDNPA recognises the advantages of planning areas on a larger than local authority area basis, and benefits from a similar joint planning principle in its management across the various constituent councils covering the Peak District National Park. Our members already represent every constituent council including Oldham.

National Park status confers the highest level of protection for landscape, wildlife, and cultural heritage and charges the Authority with enabling opportunities for the enjoyment and understanding of its special qualities by the public at large (i.e. the nation) As such, any response this Authority makes to a plan consultation is in the context that development with potential to impact on the special qualities, or the public's ability to enjoy these, should be designed to have a positive impact or, in the event that this Authority believes this cannot be achieved, should be avoided altogether. (The Sandford Principle)

Development considered to harm the National Park landscape, or people's ability to enjoy it is inherently unsustainable because it places economic considerations above social considerations (such as people's need and ability to access leisure resources, either by foot, cycle or public transport); and environmental considerations, (such as the wider landscape setting of the National Park).

The Authority is also concerned that whilst development on the fringes of the National Park will generate economic activity benefitting Greater Manchester's economy, the associated impacts on road routes across the National Park will present a significant additional threat to the experience of the National Park for users in these areas irrespective of whether new infrastructure becomes a reality. It is not considered to be a sustainable strategic spatial approach if development requires harm to a nationally protected landscape in order to achieve benefits to the Greater Manchester economy.

The Authority would urge GMCA to recognise the potential of the National Park to attract visitors to the wider GM area, rather than enabling the development of one or two sites where the social benefits are limited to the occupants, the economic benefits are limited to the site owners, but the irreversible harm is borne in perpetuity by the environment and the many people at home and visitors from abroad who may otherwise be attracted to the GMCA area and the National Park.

The PDNPA's specific comments are shown below in bold text and in response to response to the sections of the plan stated (in italics)

1.1.3 The protection and enhancement of our blue and green infrastructure is a central theme of our strategy.

This statement is at odds with the proposals to develop land on the edge of the National Park and to the detriment of the setting of the National Park.

1.4.4 We have sought to minimise the release of Green Belt sites by exploiting the opportunities to increase development densities in well connected urban locations and will continue to explore this over the next 12 months.

The green field sites around Fletcher's Mill are not well connected to the rest of Greater Manchester and is an unnecessary release of green belt

1.5.3 It is concluded that we have to consider Green Belt release to meet this need and that exceptional circumstances exist to amend the existing Green Belt boundaries, as set out in the background evidence papers that support the GMSF.

The draft plan does not appear to amend the green belt boundary at Fletchers Mill so it is not clear to see why land at Fletchers Mill is included for housing development. Furthermore we would strongly disagree that the parcels of land surrounding Fletchers Mill represent sustainable sites warranting release from the greenbelt, owing to their value as open greenspace, and also because of the lack of sustainable transport linkage to essential services.

Policy SL7 The Eastern Gateway represents a significant growth area for the east of the

conurbation focused on existing employment land at Ashton Moss, new land to the north and west of Ashton Moss, a new Garden Village at Godley Green and expansion of the Bredbury Park Industrial Estate in Stockport. In the short term, land at Ashton Moss has been identified as the outstanding opportunity site for a potential Manchester EXPO 2025. The site offers a strategic opportunity for direct access to the M60, Metrolink at Ashton Moss and a proposed new railway station which would provide heavy rail access to Manchester. The expansion of Bredbury Park Industrial Estate will further improve the industrial and warehousing provision in this part of Greater Manchester, and the protection of existing employment sites within the Tame Valley will ensure an excellent range of floorspace. Significant improvements to public transport access to Stockport Town Centre and Manchester Airport will be sought, together with the planned completion of the Mottram-Tintwistle bypass helping to link the area more effectively to other key growth locations.

This is a misrepresentation of the schemes that are on the table as Tintwistle has not been put on the table. Only Mottram has been proposed.

Policy GM1

It will not be possible to accommodate all development needs within the existing urban areas, and some development of green field sites outside them will be required, but this must take place in such a way as to complement regeneration rather than drawing investment away from existing urban areas.

It is not considered that housing on this site complements regeneration of Fletchers Mill in any sense other than financial, which is not a sufficient justification to outweigh the harm to both local greenspace and the setting of the National Park.

4.0.3 This plan is very clear that the infrastructure needed to deliver the sites that it allocates should be funded wholly by the developments on those sites, and public subsidy should not be necessary except in the most exceptional circumstances.

This point is understood but makes the packaging of land such as Fletchers Mills and surrounding fields inevitable where a regeneration of the Mill complex itself and removal of associated industrial infrastructure could (without developing out adjacent green field sites) be highly beneficial to the area of Uppermill and Greenfield in the short term through employment creation associated with the re-development; and highly beneficial long term in making this valley and the Dovestones Reservoir an even more attractive place from which local people can enjoy both the grandeur of the Peak District National Park and the local greenspace forming the setting to this nationally important area. The National Park Authority's view is that the significance and value attached to the Peak District National Park could constitute an exceptional circumstance justifying the use of public subsidy in order to enable redevelopment of this complex site in an area of high landscape value.

Policy GM4 Greater Manchester will continue to enhance its wide range of retail, leisure and tourism opportunities, helping to ensure that it is a hugely attractive and enjoyable place to live, work and visit.

Tourism and leisure activity will be encouraged across Greater Manchester, but the following locations will be especially important:

The countryside—improving access to Greater Manchester's distinctive landscapes such as the Pennines and lowland wetlands, with the Dovestone on the eastern edge of the area acting as a gateway to the Peak District National Park;

The area already serves as a gateway to the National Park. Allocating significant parcels of land for residential development on sites adjoining Fletchers Mill site will adversely change the character of this valued local greenspace and its role in enhancing the setting of the National Park. Access can be improved to this destination without building a new housing estate, and would need to be improved in any case to capitalise on the recreational opportunities that Dovestones could offer.

7.0.4 The Robert Fletchers site is allocated for tourism/leisure in the allocation policies.

It is clearly also allocated for housing which neither enhances neither tourism nor leisure opportunities in the area.

In implementing this (GM7 Green Infrastructure) and related policies, regard will be had to the Natural Character Area profiles published by Natural England and other evidence on green infrastructure.

Due regard to the statutory purposes of National Park designation should also be an integral part of a green infrastructure approach because all public authorities have a duty of care under Section 62(2) of the Environment Act 1995 to do this. It should be clear and evident what regard has been had to the National Park and, presently, the Plan does not make this clear.

Policy GM10 The distinctive upland landscape, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and gritstone settlements contained in narrow valleys, will be protected and enhanced as part of the wider Pennine area extending to the north and east of Greater Manchester. The achievement of the following priorities will be particularly important:

1. Significantly extend the area of active blanket bog, both through the protection of existing sites and the restoration of degraded areas, thereby helping to retain and capture carbon, support priority species and habitats, improve water quality, retain water, manage run-off and reduce soil erosion;
2. Enhance the full range of moorland habitats as part of an ecologically connected network, including improving upland meadows, to support increased wildlife populations and enable them to adapt to climate change;
3. Maintain the sense of remoteness, protect historic landscape features, and enhance views of and from the area, as key aspects of local distinctiveness, tranquillity and identity;
4. Enhance public access and promote the enjoyment of the landscape, in a manner compatible with conserving the environmental and historic qualities, thereby supporting a high quality of life, healthy lifestyles and the attractiveness of Greater Manchester for visitors.

The introduction of a housing estate to this site will not:

- **enhance the characteristics of the upland landscape as highlighted in the opening lines of GM10;**
- **enhance the sense of remoteness or enhance views of the area, though sensitive re-development of the mill and surrounding industrial buildings could achieve this;**
or
- **enhance public access and promote the enjoyment of the landscape, in a manner compatible with conserving the environmental and historic qualities and will not increase the attractiveness of Greater Manchester to visitors; but will**
- **lead to the loss of valued upland landscape features.**

The Peak District Landscape Strategy for the area describes settlement as follows

- Dispersed settlement with isolated farmsteads and small clusters of dwellings
- Stone built terraced housing associated with historic mills

The development of blocks A B and C would contradict this characteristic of the area and jar with the existing valued patter of development

Valley Pastures with industry:

A high priority in this area is to manage the historic pattern of settlement

It is also a priority to protect and maintain features associated with the historic industrial character which would not be achieved by the addition of a housing estate to the edge of the Mill complex.

13.0.2 The backdrop of the Pennines is a central component of Greater Manchester's sense of place, but this landscape also provides a vital range of environmental and cultural services. The continued strengthening of the landscape character of the uplands is therefore an important part of the overall strategy for Greater Manchester.

If this statement is to mean anything, sites such as the fields adjacent to Robert Fletchers Mill should remain undeveloped

13.0.4 The uplands provide a sense of inspiration and escapism. This is complemented by the extensive industrial architecture and archaeology, including mill ponds, narrow winding lanes and dry stone walls, as well as buildings. Enabling more people to enjoy this distinctive character could help to increase the attractiveness of Greater Manchester as a place to live and visit, but this will need to be balanced with the pressures that increased access brings.

Inspiration and escapism will not be aided by the introduction of a housing development onto green field land next to the Mill. The development of the area for tourism and leisure will increase pressure, but this would be exacerbated, unnecessarily by the introduction of high levels of newly introduced residential traffic.

The value and accessibility of local greenspace should not be underestimated for neighbouring urban areas to utilise for pastimes such as dog walking, cycling and jogging. The natural bowl created by the steep, rugged hillsides, are then complemented by the natural valley floor which retains traditional sheep grazing. Allied with the water borne opportunities for leisure these rural characteristics create a real sense of escape and contact with nature.

Policy GM13

A Green Belt within Greater Manchester will be retained.

This Green Belt will be afforded strong protection in accordance with the National Planning Policy Framework. In achieving this fundamental aim the Green Belt will serve the five purposes set out in national policy:

to check the unrestricted sprawl of large built-up areas;

to prevent neighbouring towns merging into one another;

to assist in safeguarding the countryside from encroachment;

to preserve the setting and special character of historic towns;

and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Positive and beneficial use of the Green Belt will be supported where this can be achieved without harm to its openness, permanence or ability to serve its five purposes. In particular, the enhancement of its green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for the residents of Greater Manchester and providing the high quality green spaces that will support economic growth.

Policy GM20

Greater Manchester will be a dynamic, forward-looking city region anchored by a deep respect for its heritage, particularly its leading role in the industrial revolution, social advancements and subsequent innovations. The quality of Greater Manchester's heritage will be maximised by:

1. Preserving and enhancing heritage assets and their settings;
2. Ensuring that the design of new development fully responds to the historic context, reinforcing local character and identity;
3. Securing the sympathetic long-term reuse of heritage assets, helping to reduce the amount of heritage at risk;
4. Increasing the understanding and interpretation of the historic environment, including through archaeological works as part of new development and carefully recording lost heritage assets;
5. Maximising the positive contribution of Greater Manchester's industrial heritage, such as its canals and mills;
6. Protecting and restoring the area's natural heritage, such as ancient woodlands and peatlands.

This allocation does not safeguard the countryside from encroachment because it extends redevelopment of a Mill complex onto greenfield land creating an abrupt and insensitive built relationship immediately adjacent to the National Park boundary.

The development of a housing estate:

- **does not constitute ‘positive and beneficial use of the Green Belt without harm to its openness, permanence or ability to serve its five purposes’;**
and
- **will not preserve and enhance heritage assets and their settings; or fully respond to the historic context, or reinforce local character and identity;**
and
- **will diminish the positive contribution of Greater Manchester’s industrial heritage, such as mills;**

28 Allocations

Policy GM25

1. Development must be in accordance with a masterplan or Supplementary Planning Document (SPD) that has been adopted by the relevant local planning authority (or authorities), with no development taking place prior to the adoption of the first masterplan for the site;
2. Development must make provision for, and be phased with, supporting infrastructure, facilities, environmental mitigation and, in the case of housing developments, affordable housing in accordance with district policies;
3. Development must take place at a speed that ensures that economic and housing needs are met, and where this does not happen then compulsory purchase powers may be used to progress development more quickly and in a more coordinated manner;
4. Development must be designed to minimise any adverse impacts on the remaining green belt, including the use of landscaping and carefully designed buffer zones which will manage the transition, and create strong defensible boundaries between the edge of strategic allocations and the new Green Belt boundary;
5. Development must respect and take account of all designated and non designated heritage assets and their settings, as well as respecting wider features and qualities that create a sense of place or local character;
6. Development must mitigate flood risk and, where appropriate, provide for surface water drainage through soft, sustainable drainage methods;
7. Development must ensure the extraction of any viable brickclay, sand and gravel, sandstone and/or surface coal resources in advance of construction, in

accordance with the relevant policies of the Greater Manchester Joint Minerals Plan. In the case of sites that involve the provision of housing, development must also accord with the following requirements:

A. Maximise the delivery of affordable housing where required by district policies;

B. Make full provision for the additional school places generated by the development, with the presumption that this will be on-site unless there are preferable opportunities off-site .

The introduction of a housing estate next to Fletchers Mill site will have a hugely detrimental impact on the green belt which cannot be ameliorated by the use of clever design landscaping and buffer zones. It is the wrong type of development in the wrong place and such a fundamental problem cannot be overcome by mitigation.

28.8.12 OA12 Robert Fletchers (Oldham) The redundant Robert Fletchers Paper Mill, associated buildings and surrounding land sits on the outskirts of Greenfield (Saddleworth), in close proximity to Dovestone Reservoir and on the edge of the Peak District National Park. Together they form a major developed site in the Green Belt. The development of the site will see around 100 Holiday Lodges and 120 new homes delivered, maximising the tourism potential of this unique location in a sensitive and appropriate way.

The blocks of land identified do not collectively represent a developed site because some of the blocks have never been developed and are green field land. The introduction of 120 new homes does nothing to maximise tourism potential because they will detract from the area's (including the National Park's) attractiveness to visitors from Greater Manchester and beyond. It is an insensitive solution to achieving the objective of enhancing the attractiveness of the area for tourists and local people because the housing will provide benefits only to those who purchase the houses, which is an insignificant number by comparison with the population of the catchment area for Dovestones and beyond, and the numbers of people who will benefit from the conservation of this upland and fringe National Park environment for the nation.

The development of the site will need to:

1. Provide a range of leisure and tourism uses which maximise and take full advantage of the site's unique location, landscape and setting on the edge of the Peak District National Park and adjacent to Dovestone Reservoir;

Leisure and tourism uses and opportunities can be enhanced without adding 120 new homes to an upland landscape tight on the boundary of a national park. The principle of such sites ought not to focus on taking full

advantage, but to seek ways of sensitively managing development in ways which conserve and enhance the qualities of the National Park. In such close proximity to the National Park, the focus of development should therefore be that which promotes the understanding and enjoyment of the area, not its exploitation for general development.

2. Incorporate holiday lodge buildings that will be compatible with the leisure and tourism uses;

3. Provide large residential properties to diversify the type of accommodation within the area and across the Borough where this would help to facilitate and support the leisure and tourism uses;

Any scheme will need to accord with relevant policies within the Oldham Local Plan as considered necessary and appropriate. Any proposals for the redevelopment should consider the site as a whole.

This proposal brings about a direct conflict both to the conservation purpose of the National Park and the internal dynamic between purposes. The Sandford principle explains that, where there is a conflict between the drive for recreation and leisure development and the conservation of the National Park, conservation must have priority.

Reasoned Justification

The site is a mix of brownfield and greenfield land that falls within the Green Belt on the edge of Greenfield. It is a gateway into the Peak District National Park and presents a strategic and unique opportunity for Oldham and Greater Manchester for tourism and leisure uses and to enhance visitor attractions and destinations within the sub-region. The development of the site for leisure and tourism uses will also capture the increasing leisure spend in the local economy due to its close proximity to the RSPB reserve, Dovestone reservoir and the Saddleworth villages. The site has come forward through the Greater Manchester Call for Sites exercise and comprises of several parcels of land under a single ownership. It therefore provides a deliverable development opportunity unconstrained by fragmented land interests. The site provides the potential to provide a range of high quality housing in an attractive and desirable rural location. It also provides an opportunity to enhance Oldham's housing offer and contribute to meeting Oldham's housing need. Due to the scenic location of the site, it should be an attractive location for larger and bespoke housing, providing a distinctive offer to the borough's housing market. Any development will be required to provide, as appropriate, the necessary supporting highway and social infrastructure, such as road junctions, public transport, walking and cycling facilities, education, health, retail and community provision. If all the strategic

allocations came forward at the same time then further infrastructure may be required to facilitate development. Any development will need to respect and take account of the natural and historic environment within, and surrounding, the site. This includes Hey Top Conservation Area, New Barn and Greenfield House at Greenfield Mill listed buildings, and other buildings of local heritage significance.

The reasoned justification definition of this allocation directly contradicts the earlier claim that collectively these blocks of land are a major developed site.

It is a strategic and unique opportunity for Oldham and Greater Manchester for tourism and leisure uses and to enhance visitor attractions and destinations, but this will not be achieved by building 120 houses next to the Mill.

The deliverability of the site does not make market housing any more acceptable in terms of the impact on the setting of the National Park or the views of the area from the boundary of the National Park.

The purpose of national parks is to conserve their special qualities (including the flow of landscape character beyond their boundaries) for the nation to enjoy, and not to provide desirable locations to build housing from which to look out at the National Park. The GMSF needs to demonstrate an approach that understands and respects National Park purposes, which means removing areas whose development will palpably work against conservation and enhancement of the area and the nation's ability to enjoy the National Park and the setting of the National Park

The desirability of the setting would also in this case lend itself to expensive homes of a type that could not be considered modest or in keeping with the housing in the surrounding area even if it was a good site for housing (which it isn't) The scope for harmful development is therefore exacerbated by the inference that this sort of site would provide executive style housing.

Oldham Local Plan 2013 'Options Report' Sustainability Appraisal Report for Saddleworth south shows the site as a mixed use redevelopment opportunity in the green belt. Site 89, page 45.

The Authority would not dispute the potential to enhance the Mill site through mixed use development but this is wholly different to the GMSF proposal to package sites around the Mill for extensive residential development on green belt land

OA26 Mottram M67 which is B1/B2 to north of A57T and housing to south of A57T.

The Authority is concerned that the developments at Mottram, both sides of the A57 (mixed use including 70,000m² of B1/B2 business use and 174 houses), will put severe

additional pressure on the A57/A628/A616 corridor, both with or without any planned improvements. The Strategy is not seen as sustainable therefore because of the knock on impacts of development on the surrounding road network and particularly the network that crosses the National Park, where the aim should be to relieve traffic pressure and improve air quality and reduce carbon emissions.

OA21 High Lane Stockport is proposed beside the A6.

4,000 houses will load pressure onto the A6, and a revisit of SEMMS may well bring pressure for the A6 bypass of the original SEMMS, which the Authority has already opposed because of the increase in cross-Park traffic that it believes would inevitably result. Whilst the GMSF makes the right noises regarding sustainable transport, the fact is that most people accessing these sites will travel by private car, which will not make transport more sustainable. The development of 4000 homes and the inevitable and predictable adverse impact on the surrounding road network and areas such as the National Park does not therefore represent sustainable development

3. Kirklees

Duty to Cooperate meeting between Kirklees Borough Council and Peak District National Park Authority - 5th Feb 2016

In attendance

Richard Hollinson – Policy Group Leader KBC

John Buddle – Principal Planning Officer KBC

Brian Taylor – Policy Planning Manager PDNPA

Discussion

Update on plan making

18 months ago in 2014 KBC submitted Core Strategy for examination however concerns were raised regarding DtC so the plan was withdrawn.

Now being refreshed as a consolidated Local Plan with updated evidence base.

Consultation just completed. Generated around 10,000 comments principally on sites.

Noted objection lodged by PDNPA on 1 site at Meltham (H52)

SA/HRA work being done by LUC. BJT to send link to previous SA and HRA reports undertaken by LUC for PDNPA on their Core Strategy.

Noted previous contact by KBC to neighbouring Authorities through letters, formal consultation and DtC table.

Approach to growth and spatial strategy

The Leeds city region drives much of the growth.

Strategic allocations are directed to the north of the Borough, ie north of Huddersfield, and Dewsbury, leaving the southern edge (adjacent to the National Park) largely untouched except for a few smaller allocations such as H52.

M62 corridor is a focus for duty to cooperate discussions with other authorities such as Calderdale.

Valley corridors also have an industrial legacy where continued growth would be supported up to the point of landscape harm. Green belt review highlights places like Marsden and Holmfirth as characterised by steep sided valleys where existing settlements are hemmed in which little scope for change. 70% of the area is greenbelt. The Local Plan represents a change in direction in the approach to spatial planning in Kirklees as a conventional settlement strategy is no longer proposed, taking a broader approach to directing growth as described above. i.e. settlements not ranked in conventional way.

In addition work is progressing on landscape character alongside the HRA and consideration of the NP setting.

Therefore the area is very constrained.

Cross Park traffic

There is a small degree of cross park traffic arising from Kirklees towards Oldham but this tends to be very local traffic and not considered a strategic problem.

The role of peripheral town

RH explained that owing to the overall growth being in the north of the Borough, this leaves towns such as Meltham, Marsden and Holmfirth somewhat quiet in the way they are represented in the Local Plan. There is strategic landscape character work underway to help understand the role of settlements such as these on the edge of the National Park.

Suggestion made to introduce a new row in the Kirklees DtC table to pick up these issues then re-consult the PDNPA officers.

In a recent meeting with Sarah Fowler (PDNP CEO) a similar question had emerged, namely what role do these/could these areas play, particularly with regard to tourism business and access to the National Park? How strategically important are towns on the periphery to the National Park?

There is a desire to move on from the recent tourism brand of “Last of the Summer Wine” country, possibly more towards active recreation.

Recreation Hubs

BT explained the emerging work on recreation hub sites in the National Park and explained the intention to progress this as an Area Action Plan style DPD.

This is potentially an area of good cross boundary linkage and as such there is interest on both sides in engaging early on the development of this policy.

Neighbourhood planning

There is already a commitment to joint working on the Holme Valley Neighbourhood Plan with the village of Holme at the southern edge of the area inside the National Park.

Position on housing allocations

NPA officers have made an objection to site H52 at Meltham for 33 houses as this lies right on the boundary of the National Park.

BT explained approach being taken by NPA is to not object whole but be selective to those sites that have the biggest impact and working closely with neighbouring and constituent authorities to improve policies for development the fringe and setting of the National Park where this can bring about more appropriate design, character and development density to reflect the deeper rural character of the area.

RH explained site H52 arose out of SHLAA work and was speculative in nature.

As such RH and JB had suggested the site could be rejected.

Approach to wind energy

No intention to bring about a buffer zone, but similarly KBC are not interested in formal search areas. Therefore with a strong element of protection for the southern fringe of the Borough including the policy regarding the setting of the National Park there is agreement that development is likely to be appropriate. BT guided RH and JB on work done by the NPA on Climate Change and Sustainable Building (including renewable energy projects).

Reinterpretation of National Park boundary

BT explained that as part of work to revise the development management policies, officers at PDNP are also updating the policies map. This includes a complete re-digitisation of the NP boundary to snap more accurately and consistently to features on the ground.

RH asked that when this is ready could a GIS data file be sent through to colleagues at KBC.

4. Barnsley

(note by Alan Hart BMBC 15th May 2017)

Barnsley Local Plan (BLP)

Post Submission Duty to Co-operate engagement – Peak District National Park Authority (PDNPA)/ High Peak

21st March 2017 – BMBC Westgate Plaza offices

Summary Note of Meeting (appended to this note is the agenda for the meeting which included references to BLP website and documentation)

1. Attendees – Brian Taylor PDNPA (BT) – BMBC Paula Tweed (PT) and Alan Hart (AH).
2. PT summarised the BLP Examination position – BLP submitted 23rd December 2016 - Inspector Mrs Sarah Housden appointed- first stage of examination 16th-25th May 2017 – see <https://www.barnsley.gov.uk/media/5640/id004-barnsley-lp-examination-stage-1-draft-hearing-timetable.pdf> - and Inspectors Main Issues and Questions for Stage 1 received - see <https://www.barnsley.gov.uk/media/5642/id003-barnsley-local-plan-examination-stage-1-matters-issues-and-questions.pdf>
3. The substantive issues raised by the Inspector were –
 - a. **clarification of Objectively Assessed Housing Need (OAHN)** – see submitted addendum to SHMA <https://www.barnsley.gov.uk/media/5488/barnsley-2017-shma-addendum-report-1703-final-a.pdf> and updated Housing Background Paper <https://www.barnsley.gov.uk/media/5487/local-plan-housing-background-paper-version-2-march-2017final.pdf> and
 - b. **BLP implications arising from the recently published Housing White Paper (HWP)** - issues being reviewed but some of the HWP proposals not accommodated in the BLP eg specific provision for small sites
4. BT summarised PDNPA engagement in Highways England route studies including long term possibility of a road tunnel crossing the National Park. It was noted that the various options for the route had implications for Barnsley if and when confirmed.
5. BT updated on the approach of the PDNPA to identifying potential areas of impact on the National Park from land being considered for housing and employment development as part of liaison between PDNPA and High Peak authorities. The approach uses a Memorandum of Understanding to aid the agreement of sites and ensure effective consultation on sites of potential impact.
6. PT confirmed the approach of the BLP to wind turbine proposals was to identify areas of search based on landscape classification by way of its ability to absorb wind turbines of different specification eg height etc. The BLP approach was informed by BMBC being a participant along with neighbouring authorities in the 'South Pennines Wind Energy Landscape Study'. BNP agreed to share the wording and extent of the wind turbine search areas with BT to check.
7. BT confirmed there were no issues of concern regarding the BLP requiring attendance of PDNPA at the BLP examination hearings.
8. The meeting closed confirming the intent to maintain positive Local Plan dialogue both on a 1-1 basis and also through the various BMBC/Sheffield city Region mechanisms.

Alan Hart 15th May 2017

Barnsley Local Plan

Post Submission Duty to Co-operate engagement – Peak Park/High Peak

Tuesday 21st March 2017 – BMBC offices 11.00am L3R1

AGENDA

9. Welcome and introductions
10. Local Plan position
 - a. Barnsley Local Plan - submission - examination programme - timetable
 - b. Peak Park / High Peak Local Plan position update
11. Policy
 - a. Barnsley Local Plan – shown in Publication version together with submitted modifications informed by consultation comments
 - b. Peak Park / High Peak comments on Barnsley Local Plan policies of cross boundary interest
 - c. Peak Park / High Peak Local Plan – any emerging policy issues / policies of cross boundary interest
12. Sites
 - a. Barnsley Local Plan Site Policies –
 - b. Peak Park / High Peak comments on Barnsley Local Plan site policies of cross boundary interest
 - c. Peak Park / High Peak Local Plan – any site policies of cross boundary interest
13. Any other business

Please see the Barnsley Local Plan Examination website <https://www.barnsley.gov.uk/services/planning-and-buildings/local-planning-and-development/our-new-local-plan/local-plan-examination-library/> and in particular the Library which includes:

- SD2 Publication Draft
- SD8 Statement of Consultation – structure is as the Local Plan Chapters
- SD30 Local Plan Minor Modifications – again in chapter order
- SD15 Duty to Cooperate Statement – gives a summary review of consultation with prescribed bodies prior to submission
- BP1 Strategy Background Paper
- BP2 Green Belt and Safeguarded Land Background Paper –
- BP3 Housing Background Paper
- BP4 Housing Trajectory (Appendix to Housing Background Paper)
- BP5 Gypsies, Travellers and Travelling Showpeople
- BP6 Employment Background Paper
- BP7 Transport Background Paper

There is also evidence material shown in papers EB1-EB 118 (local), EB119-EB 141 (city region) and EB 142-EB171 (national).

5. Sheffield

Peak District National Park Authority
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E-mail: customer.service@peakdistrict.gov.uk
Web: www.peakdistrict.gov.uk
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Aldern House . Baslow Road . Bakewell . Derbyshire . DE45 1AE



Your ref:

Our ref:

Date: 12/01/16

Letter sent via e-mail

The Sheffield Plan Citywide options for growth to 2034

A consultation response by the Peak District National Park Authority (PDNPA)

January 2015

Q1. –

Q2.

a) Have we identified the right challenges for Sheffield between now and 2034?

Please see part b)

b) If not, what other challenges does the Sheffield Plan need to address?

Other challenges include ensuring development is environmentally sustainable including reducing the use of energy and water and including flood-resilience measures in waste-water systems.

Q3.

a) Have we identified the right opportunities for Sheffield between now and 2034?

Please see part b

b) If not, what other opportunities could the Sheffield Plan support?

The city is recognised as one of the 'greenest' in the UK, with over 2 million trees and a range of high quality open spaces, providing opportunities to develop active lifestyles. It should also be mentioned that Sheffield benefits from the spectacular landscapes of the Peak District National Park, both within and adjacent to its boundary, providing great opportunities for outdoor adventure. Opportunities include partnership working to further develop connectivity from the City to rural cycling within the Peak District National Park (see [PDNPA cycling strategy](#), <http://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/cycle-strategy>)

One such example is the Peak Park Anniversary Cycle Route, developed by Sheffield City Council and the Peak Park Planning Authority to mark the 50th Anniversary of the Peak District National Park. It goes through the centre of Sheffield, then along the linear Porter Valley parkland and up to Ringinglow, before crossing Burbage Moor and descending to Hathersage. There is plenty of climbing and fabulous views en route.

http://www.cycle-route.com/routes/Peak_Park_Anniversary_Route-Cycle-Route-2218.html#19c07rlj1CA2BWLs.99

Q4. Do you support the Sheffield Plan Vision, Aims and Objectives?

Please see question 5.

Q5. Do you think anything is missing, and if so, what?

Biodiversity safeguarded and enhanced and connectivity of habitats improved.

Reference should be made to the National Park landscapes, for example, “the landscape and character of the villages and the countryside including the urban/rural fringe and the landscapes of the National Park, both within the City boundary and outside, should be protected and enhanced.” This is as required under Section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended).

Reference could be made to the PDNPA’s [Landscape Strategy and Action Plan](#)

(<http://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/landscape-strategy>) and to [National Character Area Profiles](https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-yorkshire-and-the-humber) (<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-yorkshire-and-the-humber>).

Q6-11 -

Q12. Should the Plan identify only the City Centre, the Upper Don Valley, the Lower Don Valley and the Outer South East as the main locations for new offices and manufacturing, distribution and warehousing?

Map 2 and paragraph 1 of 4.1 should make clear that parts of the area lie within the Peak District National Park where policies 14 and 115 of the NPPF apply. Guidance is found in the National Parks Vision and Circular (see ref. 25 NPPF)

Q13-32 -

Q33. Subject to fitting in with the local character and site conditions, should developments on greenfield or Green Belt sites generally be required to a higher density such as above 40 homes per hectare?

Building on greenfield and Green Belt sites should be avoided as the open countryside and rural fringe of Sheffield and the Peak District National Park are defining characteristics that provide a sense of place. The Green Belt helps to avoid the spread of more urban type development, and maintains openness. Impacts on the National Park Area should be taken into consideration since the impacts of development in the Green Belt may be inconsistent with the statutory purposes of the National Park.

The Habitats Regulations Assessment of citywide options for Growth to 2034 (Nov 2015) states that “the majority of Sheffield’s Green Belt is too environmentally sensitive to be suitable for development.”

This is particularly the case in areas adjoining the National Park where the Green Belt provides an important transitional area between the designated area and the urban area. This allows for habitat connectivity and avoidance of negative impacts on internationally designated sites as well as assisting in conserving and enhancing the National Park.

Q34. -

Q35.

a) Do you support the option of significant urban remodelling at Neepsend/Shalesmoor?

Yes, urban remodelling would be preferable to development of greenfield and Green Belt land which are important to Sheffield as a city promoting active lifestyles.

Q36.

a) Do you support the option of significant urban remodelling at Attercliffe?

Yes, urban remodelling would be preferable to development of greenfield and Green Belt land which are important to Sheffield as a city promoting active lifestyles.

Q37. -

Q38. -

a) Do you support the option of focusing major growth at Stocksbridge and in the Upper Don Valley (including land in Barnsley Borough)?

Major growth at Stocksbridge may impact negatively on the National Park. The Green Belt should remain underdeveloped in areas bordering the National Park in order to conserve and enhance the National Park as required by primary legislation. This is the approach followed by Bath and North East Somerset as set out in the Sheffield Green Belt Review (Aug 2014).

Paragraph 79 of the NPPF states:

'the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

Paragraph 80 explains that the 'Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

and that

'once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.' (Para 81)

The openness of the Green Belt land which forms the setting of the National Park should be retained and enhanced to continue to assist in safeguarding the countryside from encroachment. Whilst the Proposed Sheffield City Region Combined Green Belt Review recognises, in the common list of constraints, Internationally important nature conservation sites (RAMSAR sites, Special Areas for Conservation, Special Protection Areas), Sites of Special Scientific Interest and National Nature Reserves, Local Nature Reserves Ancient Woodland and Regionally Important Geological Sites it should also include the setting of the National Park, as in example criteria for Bath and North East Somerset¹. This approach is in line with Section 11A(2) of the National Parks and Access to the Countryside Act 1949 (as amended).

National Character Area profiles, for the Dark Peak (51) and the Nottinghamshire, Derbyshire and Yorkshire Coalfield (38), illustrate the importance of the Green Belt for Sheffield City, The National Park area and the international designations within it (see Appendix for examples).

The Proposed Sheffield City Region Combined Green Belt Review – A Common Approach – August 2014 states that beneficial/appropriate countryside uses include:

- 'Access – public rights of way / cycle paths
- Outdoor sport and recreation
- Biodiversity/natural history – e.g. LNS, SSSI, waterways
- Agriculture
- Equine uses
- Woodland
- Parks
- Cemeteries '

<https://www.sheffield.gov.uk/planning-and-city-development/planning-documents/sheffield-plan/green-belt-review.html>

Q39. Do you support the option for a large urban extension in East Sheffield (as an extension to the Waverley development in Rotherham Borough)?

Yes, but priority should be given to the development of previously developed land.

Q40. Do you support the option of focusing major growth in South East Sheffield?

Yes, but priority should be given to the development of previously developed land.

Q41. Do you support the option for a large urban extension to the east of Norton (Sheffield District only)?

Yes, but priority should be given to the development of previously developed land.

Q42. -

¹ A. Landscape value and enhancement and visual amenity

The considerations applied are outlined below.

•Part or all the land parcel is within or forms the setting of an Area of Outstanding Natural Beauty, and/or

•Part or all of the land parcel provides the setting for a World Heritage Site, Conservation Area, Scheduled Ancient Monument or listed buildings

B. Biodiversity value and enhancement

Part or all of the land parcel has a national or local ecology designation.

Q43. Do you support the option of multiple smaller urban extensions around the built up areas?

Paragraphs 14 (ref 9) and 115 of the National Planning Policy Framework make clear that development should be restricted where necessary to take account of National Parks which have the highest status of protection in relation to landscape and scenic beauty (para 115 NPPF including reference 25 *English National Parks and the Broads: UK Government Vision and Circular 2010* provides further guidance and information about their statutory purposes, management and other matters).

The HRA Assessment notes that impacts are uncertain and recognises that integrity of sites must be maintained. Site specific impacts of any proposed development and in combination effects will need to be assessed in consultation with the PDNPA. The National Park Authority works with constituent local authorities to help to achieve the best outcome taking into account National Park purposes. The Provisional view of the Habitats Regulations Assessment of citywide options for Growth to 2034 (Nov 2015) is that “the majority of Sheffield’s Green Belt is too environmentally sensitive to be suitable for development.”

Q44. Should redevelopment of existing previously developed (brownfield) sites within the Green Belt for housing be permitted?

Great care should be taken to preserve the openness of the Green Belt and to conserve and enhance the Peak District National Park, respecting the statutory purposes of its designation. With the city’s reputation as one of the ‘greenest’ in the UK and the excellent facilities for climbing, mountain biking, walking and running, in areas bordering the National Park, the redevelopment of brownfield sites for the ‘provision of appropriate facilities for outdoor sport, outdoor recreation as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it may be more appropriate.

This type of approach would be consistent with the beneficial/appropriate countryside uses set out in the Proposed Sheffield City Region Combined Green Belt Review – A Common Approach – August 2014.

This type of approach would fit with the National Park purpose to ‘promote opportunities for the understanding and enjoyment of the special qualities of the National Park’ by encouraging closer ties with the Sheffield City and by developing more active lifestyles. As the Ministerial Forward to the NPPF stated, ‘Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul’.

Q45. What factors should be given greatest weight when deciding which sites should be allocated for development?

The impact of development on the Peak District National Park must be taken into consideration. Paragraphs 14 (ref 9) and 115 of the National Planning Policy Framework make clear that development should be restricted where necessary to take account of National Parks which have the highest status of protection in relation to landscape and scenic beauty (para 115 NPPF including reference 25 *English National Parks and the Broads: UK Government Vision and Circular 2010* provides further guidance and information about their statutory purposes, management and other matters).

The HRA Assessment notes that impacts are uncertain and recognises that integrity of sites must be maintained. In combination effects will need to be assessed in consultation with the PDNPA. The Provisional view of the Habitats Regulations Assessment of citywide options for Growth to 2034 (Nov 2015) is that “the majority of Sheffield’s Green Belt is too environmentally sensitive to be suitable for development.”

Q46-51 -

Draft Sustainability Appraisal and Strategic Environmental Assessment Scoping Report

The Sustainability Aim has been revised to ‘High quality natural landscapes protected and poor landscapes enhanced’.

It should be noted that the high quality natural landscapes of the Peak District National Park should be both protected and enhanced under the primary legislation of the National Parks and Access to the Countryside Act 1949 (as amended) and all relevant authorities are required to have regard to the statutory purposes in exercising or performing any functions in relation to, or so as to affect, land in a National Park (Section 11A (2)). The Sustainability Aim of the SEA should reflect both this primary legislation and the NPPF which it seemingly does in Table 1 in the ‘Objectives, requirements or targets’ and the ‘Sustainability Issues raised’.

The Peak District National Park Authority’s Landscape and Strategy Action Plan and National Character Area Profiles are relevant sources of information.

Landscape and Strategy Action Plan

<http://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/landscape-strategy>)

International Sites should include the EU-wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments. (See Habitats Directive (Council Directive 92/43/EC of 21 May 1992 and the Birds Directive 2009/147/EC.) This is in line with maximising the connectivity between wildlife habitats.

Appendix

Natural England, Natural Character Area Profile: 51 Dark Peak (NE378)

Page 5, para 2

A real characteristic feature of the NCA is the views towards (and from) the surrounding urban conurbations of Manchester, Sheffield and West Yorkshire. The views into and out from the NCA provide a clear illustration of the way in which this NCA 'fits into' the surrounding countryside and directly links to nearby centres of population.

<http://publications.naturalengland.org.uk/publication/3684793?category=587130>

Natural England, Natural Character Area Profile: 38. Nottinghamshire, Derbyshire and Yorkshire Coalfield (NE402)

page 61

Sheffield has become known as a green city with a high concentration of parks and open spaces linking directly with the Peak District National Park and is looking to build on this as providing a new sense of place for residents.

Opportunities:

Seek opportunities to encourage the large urban populations to engage with the natural environment. Improve the urban fringe through careful design and integration of green infrastructure to bring people closer to the natural environment, linking urban green spaces with the wider countryside and reducing negative impacts from urban activities on the rural area.

page 65

Within the urban fringe, opportunities should be sought to plant woodlands and shelter belts and ensure any new developments are sensitively designed to reduce visual and infrastructure impact on the green belt areas.

Regeneration projects and new developments should seek opportunities to provide additional green spaces for people and ensure their management into the future is such that it retains a sense of tranquillity within the wider environment.

<http://publications.naturalengland.org.uk/publication/4743624?category=587130>

Duty to Co-operate Meeting 12th January 2017

Sheffield City Council – Peak District National Park Authority

Laura Stephens (SCC), Brian Taylor (PDNPA), Kirsten Marsh (observing)

Local Plan and Green Belt Review

- LS outlined Sheffield's Green Belt methodology, site selection process and Local Plan progress to date, including growth options. LS explained that the SHLAA and Green Belt Review are separate exercises, but undertaken in parallel.
- PDNPA were part of the group that developed and signed off the Sheffield City Region (SCR) Green Belt Review Common Approach. Consider it particularly important that the CA sets out exclusion areas to guide consideration of Green Belt parcels and avoid new homes being built in areas protected by designations.
- PDNPA are going to be mapping sites being promoted by LPAs in fringe areas around the Peak Park. PDNPA expressed concerns about the potential degradation of landscape character in these fringe areas and the impact this has on the conservation of natural and scenic beauty in the National Park.
- Rather than having a set 'buffer' approach to commentary on site options in areas around the Park's fringe, sites will be considered from a technical assessment point of view, taking account of factors such as topography, landscape type and natural buffers. PDNPA don't want to block all development in fringe areas, but sites will need to be assessed on an individual basis.
- PDNPA have Memoranda of Understanding with High Peak BC and Derbyshire Dales DC, highlighting that PDNPA are not obliged to meet the objectively assessed need for housing within the area, as well as referring to landscape character assessment. This is available in the PDNPA Interim DtC statement.
- A core principle of PDNPA's concern with adjacent Local Plans is to ensure that the statutory purposes of National Parks are taken account of in fringe areas and that landscape character in those areas is taken into account. Section 62 of the Environment Act place a duty on relevant bodies (including adjacent planning authorities) to have regard to National Park purposes). One way of achieving this is for adjoining Local Plans to include rationale on character and form and the flow of National Park characteristics into those fringe areas.
- PDNPA concerned about long term growth strategy of adjoining authorities, and that this round of Green Belt reviews seem only to be satisfying housing need for the current plan period, not looking at what the next steps would be for urban growth in subsequent plans. The long term aim of the PDNPA is to protect the National Park and influence the conservation of its setting.
- PDNPA would support retaining a very clear boundary edge to the built-up area along Hathersage Road in the south west of the city. This would be a long term defensible position in an area where the fringe area is very important to the statutory purposes of the National Park.
- In the Dore area the PDNPA would consider it important to ensure distinctive character edges to the urban area, and that the gap between Whirlow and Dore is important as part of the character of the view from the National Park and its fringe.
- Improvement or enhancement of the urban edge through new development following Green Belt review could improve the impact on the PDNPA compared to the current urban edge.

Neighbourhood Planning

- PDNPA are working with / talking to Dore Village Society (DVS) about their neighbourhood plan. Highlighted that DVS should try to make a connection between the neighbourhood plan and the context of the National Park, and that they should be proactive about managing growth.
- Advised groups involved in neighbourhood plans to go into detail about characteristics and values that can go deeper than the Local Plan. This may have led to DVS thinking about how to protect the Green Belt. PDNPA might assist in looking at where protection is needed.
- DVS want to say something in the neighbourhood plan about Green Belt – PDNPA advised to talk about landscape quality, character and value as a statement. This may lead to inclusion of a Green Belt policy for which DVS would need evidence.
- PDNPA have helped with the neighbourhood planning process and advised about policies being consistent PDNPA objectives as well as giving general advice on proactive neighbourhood planning.

Fracking

- Ministers have confirmed that there should not be surface level operations within National Parks, but that drilling could go under Parks from adjacent urban areas. PDNPA is concerned about the implications for biodiversity, springs, geology etc. Request that planning applications for fracking within Sheffield that would go under the National Park should be shared.
- LS/KM noted that currently SCC Members are anti-fracking. KM sent BT a copy of minutes from the November SCC Council meeting, at which the issue of fracking was discussed.
- General advice on renewable technologies within the National Park is that it should be in scale with the landscape and the expectation would be that the same approach is adopted in the fringe landscape.

Other

- There has been an exercise to 're-interpret' the boundary of the National Park using modern GIS technology, based on conventions set out in similar work in the Lake District. This is now shown on the recent consultation version of the Policies Map.

Meeting outputs:

- Consider whether there is need for a MoU between Sheffield and PDNPA. This would include principles for joint working and understanding of the statutory obligations of the National Park. LS suggested waiting until SCC have carried out sites consultation in mid-2017 and the implications of PDNPA comments on site options proposed are understood.

6. North East Derbyshire

Peak District National Park Authority

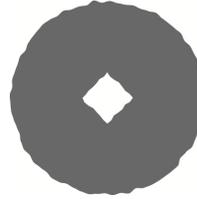
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**PEAK
DISTRICT
NATIONAL
PARK**

Helen Fairfax
North East Derbyshire District Council
District Council Offices
2013 Mill Lane
Wingerworth
Chesterfield
S42 6NG

Your ref: DtC

Our ref:

Date: 25/01/2018

Dear Helen

Emerging North East Derbyshire Local Plan 2014-2034

Thank you for your letter dated 15th January 2018 outlining your challenges in finding sufficient sites to meet your objectively assessed housing need. The National Park Authority notes that the extent of the challenge has led your council to release green belt land for development. Nevertheless, National Park status confers the highest level of protection for landscape in the country. Government policy and guidance in the NPPF and the English National Park and the Broads UK Government Vision and Circular 2010 makes clear that National Parks are not suitable locations for unrestricted housing and that National Park Authorities should concentrate instead on addressing local need for affordable housing.

The Authority's Core Strategy adopted in 2011 establishes a development strategy outlining 63 settlements where, in principle, the Authority would accept new housing via an 'exceptions sites' approach to address such a local need. None of these settlements lie within the North East Derbyshire area, characterised as the Eastern Moors landscape character area. This is a relatively wild and undeveloped area largely defined as Natural Zone in which development is not acceptable other than in exceptional circumstances. There are no other places within the North East Derbyshire area of the National Park where the release of land for new housing would be accepted in principle. The protection afforded to the National Parks and enshrined in adopted policies creates a spatial logic that general housing need is therefore better accommodated in sustainable locations either in accordance with the settlement strategy or outside the National Park, in order to assist the conservation objectives of the protected landscape.

The Authority therefore has no policy position or evidence that would justify new housing development in the North East Derbyshire area of the Peak District National Park and is unable to offer any sites as a contribution to North East Derbyshire's housing target for 2014 – 2034.

Yours sincerely

Brian Taylor
Head of Policy and Communities

9. Derbyshire Dales

Duty to Co-operate Discussion

Peak District National Park Authority

25th July 2013

Attendance

Mike Hase (DDDC)

Brian Taylor (PDNPA)

Ian Fullilove (PDNPA)

MH outlined the chronology and situation with regards to the Derbyshire Dales Local Plan, and the key housing policies contained within it, and also how the Derbyshire Dales Local Plan Pre Submission Draft is intended to compliment the PDNPA Core Strategy, and the High Peak Local Plan by ensuring that there is consistency in approach across on issues and policies in the Peak Sub Region.

MH also indicated that the Derbyshire Dales Local Plan Pre Submission Draft also included Policy DM5 which sought to ensure that any development within the plan area should not have an adverse impact upon the purposes of the National Park, and was in fact a continuation of the policy contained within the currently adopted Derbyshire Dales Local Plan.

BT/IF indicated their support for this approach, and pointed out that in their reps on the Derbyshire Dales Local Plan Pre Submission Draft that where it refers to the National Park it should refer to the Peak District National Park Authority (**MH agreed to correct it where necessary**).

It was also suggested that the Peak Distinct National Park may appear in support of the Local Plan at the Local Plan EIP, especially in relation to enabling work undertaken in respect of affordable housing, to show support for the approach being taken.

A discussion was held in respect of the affordable housing policy, which allows open market housing in certain circumstances as part of an exceptions scheme – MH explained that this was against a backdrop of reducing HCA funding and the advice contained within the NPPF. BT/IF understood why the approach was being taken but the approach was different in the National Park, because of the need to ensure that the conservation purposes are addressed as primacy and advised that they are preparing a paper on cross subsidy and interpretation within the National Park – further details to be provided.

The next part of the discussion focussed upon the relationship of the Local Plan with the LSP (now known as the Peak District Partnership), and Business Peak District, and how the Derbyshire Dales Local Plan Pre Submission Draft is seen to complement their aims and objectives.

On housing markets a number of comments were made in respect to the decision by High Peak Borough Council not to undertake a Joint SHMA update with DDDC, and that the PDNPA preference was for the existing housing markets with the Sub Region HMA area be used as the basis for any future housing requirement assessments.

IF pointed out that there were a couple of settlements, where the Settlement Framework Boundaries included within the Derbyshire Dales Local Plan Pre Submission Draft Settlement

Framework Boundaries fell part within and part outside the National Park eg Bonsall - some adjustments would be required to be made to the Settlement Framework Boundaries to reflect the PDNPA boundary.

There was acknowledgment of the work we had undertaken jointly across the Peak Sub Region such as in respect of climate change, and affordable housing for example. Agreed that this work would continue where feasible and appropriate to do so.

On cross boundary matters the following issues were identified as being important to ensure that there is consistency.

1. Long Distance Trails – Need to ensure there is continuing support for these especially as £12m available for cycling funding to support improvements to the Monsall Trail
2. Nature Conservation – Agreed that need to ensure consistent approach for both designated areas eg SSSI's and SAC's and for non designated areas such the Natural Zone

Finally agreed that it would be useful if there was a note from PDNPA which indicated that they were happy with the joint working and that in their opinion it satisfied the requirements of the Duty to Co-operate

Duty to Cooperate Meeting – Derbyshire Dales District Council and Peak District National Park Authority

24th September 2015 Derbyshire Dales District Council Offices, Matlock at 10am

Present

Mike Hase (MH) – Policy Manager Derbyshire Dales District Council

Esther Smith (ES) – Senior Planning Policy Officer Derbyshire Dales District Council

Brian Taylor (BT) – Peak District National Park Authority

Ian Fullilove (IF) – Peak District National Park Authority

Purpose

The District Council has recently published updated evidence on the assessment of housing and economic development need to inform the next stages of plan preparation. The aim of the meeting was to discuss assumptions about potential housing provision within the Peak District National Park part of the District over the plan period 2013-2033. In addition to discussion on the outcomes of the emerging evidence the main points for consideration were:

1. Level of past completion rates in five year tranches from 1991 to date
2. Level of existing commitments within Derbyshire Dales in the National Park (i.e. sites with planning permission) and likelihood of development
3. SHLAA sites with potential for development and intelligence on sources of supply
4. Overall Conclusions

Introduction

MH provided an update on progress with the revised evidence base for the emerging Derbyshire Dales Local Plan, principally work on the OAN for housing and economic development needs, landscape sensitivity study, infrastructure and CIL and settlement hierarchy. The emerging evidence is to be presented to meetings of the Local Plan Advisory Committee during September, with a meeting of Council scheduled for 12th October 2015 at which agreement to undertake a strategic consultation on the emerging findings of the evidence will be undertaken across the Derbyshire Dales authority area including within the Peak District National Park. A 'newsletter' identifying the key issues from the evidence for the Local Plan will be delivered to all households, with consultation scheduled to run from 2nd November – 14th December 15.

Derbyshire Dales District Council – Assessment of Housing and Economic Development Needs

MH outlined the findings of the OAN study, key points discussed include:

- **HMA** – Derbyshire Dales is not within a self-contained HMA, with the southern part of the District overlapping with the Derby HMA, the northern part of the District overlapping with Sheffield and middle having links to Derby, Chesterfield and Sheffield. The conclusions on HMA and links to neighbouring areas will help to inform discussions under the Duty to Cooperate in terms of assistance to meet housing needs and any identified shortfall in provision. The study states that there are very limited links between Derbyshire Dales and High Peak Borough Council, reaffirming that the previous grouping under the RSS of a Peak Sub Region now has very limited weight.
- It is intended that a workshop is held with all neighbouring authorities to discuss the emerging evidence on the HMA of the Derbyshire Dales and objectively assessed need for housing.

- Due to the different stages of plan preparation in neighbouring authorities and that their evidence has been prepared on traditional HMA groupings – such as Derby HMA, further work will be required with partners to ensure that the wider influences of the identified Derbyshire Dales HMA are addressed to satisfy an Inspector.
- **Economic Influences** – BT queried the extent to which economic influences, including the growth aspirations of LEPs and the District Council had been reflected in the study. MH stated the consultants had considered two different forecasting models. The report recommends that the Local Planning Authority should take a more positive approach to economic growth and accordingly concludes that on the basis of all available data, a reasonable evidence based assessment of economic growth potential would be for employment growth of 1,700 jobs over the period 2013-2033, accordingly 57 additional dwellings would be required per annum to support economic growth.
- **Market Signals** - MH outlined the market signals considered in the OAN report in respect of affordable housing needs across the district, recommending that there is clear evidence to support an uplift on the overall housing requirement to address the affordable housing needs of the District.
- The report identified an Objectively Assessed Need for housing for 322 homes per year (2013-33) across the whole of the Derbyshire Dales (244 demographic + 57 economic growth + 21 affordable = 322).
- The final recommendations of the report state that the OAN should be split across the District, based upon a 65% and 35% split of population. Using these proportions the consultants have sought to calculate the need arising from within and outside the National Park, as 95 dwellings per annum in the PDNP and 227 within the Plan area.
- Emerging evidence on SHLAA capacity indicates a significant shortfall to meet the OAN across the Derbyshire Dales.

Evidence of Supply within the Peak District National Park

BT and IF outlined the special circumstances and statutory designations of the PDNP which limit the ability of the authority to assist with housing needs. National policy expects the designation of a National Park to restrict development and thus there is not an expectation that a National Park will seek to meet its objectively assessed housing needs in full, rather the policy focus is on meeting local needs with a specific aim to provide affordable housing in the Park.

BT Questioned whether GL Hearn had considered the special circumstances when concluding that a 35% split and 95 dwellings per annum should be provided within the PDNP? BT made the point that simply apportioning a figure based on population split is not an adequate means of taking National Park purposes into account. It is not a reasonable assumption to simply apply the same aspirational objectives for jobs growth and affordable housing uplift across the whole District, including the National Park. As such the figure of 95 is not accepted and there was no consultation with the National Park Authority in developing this figure. However MH stated this had been considered and it was agreed that the statutory purposes of the PDNP result in constraint and accordingly the PDNPA will be unable to deliver the 95 dwellings per annum identified in the GL Hearn report.

IF outlined intelligence on possible sources of housing supply within the Park, including the following:

- Redevelopment at Bradwell engineering for 55 dwellings. Agreement between the developer and community through the Neighbourhood Plan has informed the scheme for this site. BT stated that in policy terms a scheme for more than 55 units would have been supported in principle and still could if material considerations indicate otherwise.
- The Bradwell Neighbourhood Plan identifies a boundary for the settlement, BT outlined that there may be some scope for small scale infill within the boundary but this would only be to support local needs on an exception basis. 5 -10 dwellings may be brought forward in this context.

- Hartington Creamery scheme – recently refused and pending an appeal hearing. Application for 26 dwellings.
- Bakewell Riverside – mixed use scheme being promoted. Seek to retain employment uses on site with element of housing, retail and commercial uses
- Historical commitment data within the PDNP is not complete with gaps in evidence. BT acknowledged that this area of work needed to be reviewed and updated. IF agreed to provide MH with historical commitment data by mid October 15.
- Completions – IF agreed to provide MH with completion data by mid October 15.
- BT stated that work will be undertaken to review potential sources of future supply within the key settlements identified in the adopted PDNPA Core Strategy – notably Bakewell, Bradwell, Hartington, Tideswell and Hathersage.
- SHLAA evidence – IF has previously appraised all sites identified in the Peak Sub Region SHLAA published in 2009. It was agreed that a detailed review and schedule of sites from the previous SHLAA would be provided by IF. MH stated that the re- appraisal of historical SHLAA sites should be mindful of guidance in the NPPF/NPPG regarding demonstrating the availability, suitability and achievability of sites included in evidence of housing land supply.

Agreed Actions

The principle actions and next steps agreed at the meeting include:

1. PDNPA to provide an updated schedule of sites and opportunities in the Park to meet housing needs. This will include appraisal of SHLAA sites and information on historic completion and commitment data.
2. Intelligence and evidence to support a windfall allowance will be documented and supplied.
3. A statement on the statutory purposes of the National Park and the implications of constraint on the ability of the PDNPA to contribute towards the level of housing need identified in the GL Hearn Study and thus associated impact upon Derbyshire Dales District Council to meet the identified OAN will be provided and agreed by both parties.
4. IF and BT agreed to provide the above information by Mid October.

Date of Next Meeting

Next meeting to be arranged for the beginning of November. ES to liaise with IF to arrange next meeting.

Peak District National Park Authority

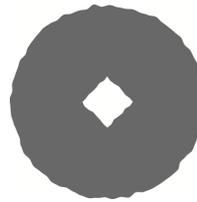
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**PEAK
DISTRICT
NATIONAL
PARK**

Mr P.L Wilson
Corporate Director
Derbyshire Dales District Council
Town Hall
Matlock
Derbyshire
DE43NN

Your ref: PHS-PW

Our ref:

09/05/2016

DERBYSHIRE DALES LOCAL PLAN - DUTY TO CO-OPERATE

Dear Paul,

Thank you for your letter dated 7 April 2016. We can confirm that the matters indicated represent a correct summary of the strategic cross boundary matters identified with the Peak District National Park Authority.

The National Park Authority has considered its position with regard to the requirement for Derbyshire Dales to meet Objectively Assessed housing need. We note that your Draft Local Plan includes a figure for delivery from sites of over 10 units, and that it also includes figures for completions and commitment and windfall opportunities on sites of less than 10 units. However, whilst your Plans Advisory Group papers from February 2016 include a table showing the 400 indicative figure for the National Park (made up of commitments between 2013 – 2015, plus an indicative figure for 2015 – 2033), the Draft Local Plan does not. The NPA requests that you quantify the contribution that is anticipated from the National Park as **400 indicative** in the Local Plan.

The figure of 400 has been carefully worked out taking into account our intelligence of sites most likely to come forward during the plan period. Reference to this figure will helpfully show the agreed quantum anticipated in the National Park area. As you will know the National Park operates an exceptions approach to housing development in order to reflect the statutory purposes and duty of National Park designation. As such it is not possible for the Authority to plan for a different figure with any degree of certainty, be it high or lower. Monitoring consistently reveals that fluctuations take place within housing commitments reflecting, for example, changing economic cycles, government spending programmes and the speculative nature of larger redevelopment opportunities driven by our conservation and enhancement purposes.

However, the figure also reflects the fact that since the adoption of the Core Strategy in 2011, work to establish capacity for development in the larger villages in the National Park, plus adopted neighbourhood plans, suggests that there may be marginally less scope for new housing on some sites than was evident in 2011. This is partly because the anticipated numbers set out in the 2009 SHLAA have had to be reassessed, e.g. those numbers anticipated for sites in Bakewell, Bradwell and Hartington have all been reduced following local community input into planning decisions or via the Neighbourhood Plan process. So it is not unreasonable to consider that numbers might actually decrease rather than increase.

As such it is felt that the indicative figure of 400 remains the best estimate for delivery and this should be formally reflected in the Derbyshire Dales Local Plan. To simply set an arbitrarily higher figure in order to accommodate unmet needs in the remainder of the Derbyshire Dales is the wrong spatial logic when considering the impact of National Park purposes. This is a position the Authority has expressed consistently in duty to cooperate discussions with the other constituent authorities that share the area of the Peak District National Park.

The National Park Authority considers that both positive and negative factors will influence its ability to permit housing up to 2033, and that on balance those factors justify retention of the 400 indicative figure.

The National Park Authority stresses that the indicative figure is neither a target nor a limit, and the Authority will continue to co-operate with Derbyshire Dales District Council to provide figures for housing commitments and delivery, in so far as that is reasonable given its own monitoring capability.

Yours sincerely

A handwritten signature in black ink that reads "Brian Taylor". The signature is written in a cursive style with a large, looping 'B' and a long, sweeping tail on the 'y'.

Brian Taylor
Policy Planning Manager

Cc John Scott and Sarah Fowler

DUTY TO CO-OPERATE

Memorandum of Understanding between Derbyshire Dales District Council and the Peak District National Park Authority Agreed December 2016

This Memorandum of Understanding establishes a framework for co-operation between Derbyshire Dales District Council and the Peak District National Park Authority. It primarily relates to the preparation of Development Plans in the two Local Planning Authority areas but also sets out a framework for future collaboration on identified strategic cross boundary planning issues. It is made within the context of the Duty to Co-operate as required under Section 110 of the Localism Act 2011.

Purposes

- Establish areas of agreement in relation to strategic planning and development issues between Derbyshire Dales District Council and the Peak District National Park Authority.
- Identify areas where further work is required.
- Set out a future work programme for areas of collaboration.

Scope

The scope of this Memorandum of Understanding is to cover:-²

- Planning and monitoring housing provision across the Derbyshire Dales, including with the Derbyshire Dales' part of the National Park.
- The protection of the setting of the Peak District National Park and recognition of the Park's statutory purposes.
- Joint working on infrastructure planning.
- Joint working on evidence gathering to inform future planning policy reviews and strategies.
- Support for neighbourhood Plans that cover both Local Planning Authority areas.

Limitations

For the avoidance of doubt, this Memorandum shall not fetter the discretion of the Local Authorities in the determination of any planning application, or in the exercise of any of its statutory powers and duties, or in its response to consultations, and is not intended to be legally binding. The terms of the Memorandum of Understanding can be dissolved at the written request of either party.

Established Joint Working Arrangements

Derbyshire Dales District Council, the Peak District National Park Authority and High Peak Borough Council have worked jointly to commission evidence base studies which relate to the Peak Sub-Area¹ as identified in the former East Midlands Regional Plan. The Peak Sub-Area Local Planning Authorities have also jointly explored infrastructure requirements and potential funding arrangements in the form of joint workshops with infrastructure providers and the commissioning of a Community Infrastructure Levy Study.

Both Authorities are members of wider partnerships that help to inform and deliver Development Plans in the Derbyshire Dales and Peak District National Park. These include : Marketing Peak District and Derbyshire; Peak District Partnership; the Wider Peak District Cycle Strategy Steering Group and Business Peak District.

² Peak Sub-Area consisted of Derbyshire Dales District Council, High Peak Borough Council and the whole of the Peak District National Park Authority.

Regular communication is taking place and meetings have been held between the two Local Planning Authorities to discuss and agree strategic cross boundary planning matters in accordance with the Duty to co-operate as set out in statute and National Planning Policy Framework and Guidance.

Current Development Plan Position (December 2016)

The current position is as follows:-

- The Peak District National Park Core Strategy was adopted in 2011. It provides the spatial strategy policies for the National Park up to the year 2026.
- A Development Management Policies Development Plan document for the Peak District National Park Authority was published on the 18th November 2016. Along with the revised Policies Map this will form part 2 of the Local plan for the National Park and replace the saved policies of the Peak District National Park Local Plan 2001.
- The Derbyshire Dales Local Plan Pre Submission Draft was published on the 11th August 2016. The document sets out the overall vision and planning strategy for the Derbyshire Dales outside of the Peak District National Park, along with allocating all development sites and specifying development management policies.

Main Provisions

Planning monitoring and enabling housing provision across the Derbyshire Dales, including within the Peak District National Park.

Agreed

- The Derbyshire Dales Local Plan makes provision for at least 6,440 dwellings over the period 2013 – 2033 at an average annual development rate of 322 dwellings. The planned provision meets the full objectively assessed need for housing arising in the whole of the District, including the Peak District National Park (20 dwellings per annum as at December 2016).
- The Peak District National Park Authority support the proposed level of housing provision in the Derbyshire Dales Local Plan and will work closely with Derbyshire Dales District Council to establish and justify future needs and potential constraints in addressing the objectively assessed needs of the area as plans are reviewed. The Derbyshire Dales Local Plan includes an estimated contribution of 400 dwellings towards Derbyshire Dales' housing needs which may be delivered within the part of the Derbyshire Dales which lies within the National Park. This figure relates to the Local Plan period 2013 – 2033 and is an estimate based on past delivery rates within the National Park. It does not represent a target for the Peak District National Park Authority. The figure will be subject to monitoring.
- The Peak District National Park Core Strategy does not include a target for housing development. Such development is strictly controlled in order to address the needs of communities in the National Park and ultimately to conserve and enhance the National Park.
- Housing Officers from the District Council will continue to reflect National Park purposes, policies and legal mechanisms when discharging their statutory housing functions in the National Park area, e.g. through the allocation of completed affordable homes to people who meet the terms of signed Section 106 Agreements. This is to ensure that future development implications are taken into consideration. Close liaison with both the National Park Authority and Parish Councils in the rural parts of the Local Plan area can ensure the future sustainability of schemes by addressing the needs of National Park communities in perpetuity.

Commitment to Future Work

- Data relating to housing commitments and completions across the whole of the Derbyshire Dales will be monitored and shared between the two Authorities on an annual basis in order to effectively monitor housing provision to ensure that the 400 dwelling contribution identified in the

Derbyshire Dales Local Plan remains an accurate estimate. This information will inform any future review of the Derbyshire Dales Local Plan. Use of the Derbyshire Local Planning Authority planning monitoring database (CDP Smart) will assist with this process.

- Derbyshire Dales District Council and the Peak District National Park Authority will continue to liaise and consult on future evidence gathering and Development Plan updates in relation to housing matters.

The protection of the setting of the Peak District National Park and recognition of the Park's statutory purposes

Agreed

- Derbyshire Dales District Council recognises the duty to have regard to the purposes of the National Park as specified in the Environment Act 1995, namely:-
 - (i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks; and
 - (ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.
- The vision, objectives, spatial strategy and policies of the Derbyshire Dales Local Plan support the purposes of the National Park.
- In particular, the policies contained in the Derbyshire Dales Local Plan provide an appropriate degree of protection to the setting of the National Park. The policies and the sites to which they relate have been informed by the Derbyshire Dales Local Plan Landscape Sensitivity Study (August 2015). This assessment considered the impact of development sites on the setting of the National Park and recommended appropriate mitigation measures and policy responses to be included in the Derbyshire Dales Local Plan.

Commitment to Future Work

- Derbyshire Dales District Council will apply the policies of the Local Plan that relate to the protection of the setting of the National Park during the determination of planning applications. These include Policy S4 (Development within Defined Settlement Framework Boundaries), Policy S5 (Development in the Countryside), Policy PD1 (Design and Place Making), Policy PD5 (Landscape Character), Policy EC8 (Promoting Peak District Tourism and Culture) as set out in the Derbyshire Dales Local Plan Pre Submission Draft.
- Derbyshire Dales District Council will continue to consult with the National Park Authority on planning applications which adjoin or are in close proximity to the National Park boundary. Consultation on planning applications which are located away from the National Park boundary but which may have a significant impact on the National Park will also be undertaken.
- In accordance with the provisions of the Derbyshire Dales Local Plan Policy PD1, the District Council will encourage applicants to engage with the Peak District National Park Authority where relevant in the early stages of drafting proposals to discuss and agree appropriate designs, layouts, boundary treatments and other measures to mitigate landscape impacts and protect the setting and character of the countryside and National Park. When applicable, such matters will be discussed at the pre-application stage.
- Derbyshire Dales District Council and the Peak District National Park Authority will continue to consult and liaise on the progress being made on development sites close to the National Park boundary or which are located away from the National Park boundary but which may have a significant impact on the National Park in terms of the agreed policy positions regarding design and landscaping treatments to respect the urban / rural transition and the overall character and appearance of development and its impact on the setting of the National Park.

Joint Working on Infrastructure Planning

Agreed

- The Peak District National Park Core Strategy, Derbyshire Dales Local Plan and Derbyshire Dales Infrastructure Delivery Plan have been informed by joint working in relation to identifying infrastructure capacity, future requirements and the viability of introducing a Community Infrastructure Levy.
- Derbyshire Dales District Council and the Peak District National Park Authority will continue to work with and support partnerships that support and deliver infrastructure improvements.
- Derbyshire Dales District Council and the Peak District National Park Authority share many key services and facilities which serve local communities, including schools, health care, transport and green infrastructure.
- The Derbyshire Dales Local Plan provides policy support for the protection and enhancement of shared infrastructure and services.

Commitment to Future Work

- Derbyshire Dales District Council and the Peak District National Park Authority will liaise on future infrastructure planning to identify opportunities for further joint working.
- In the event that Derbyshire Dales District Council decides to implement a Community Infrastructure Levy, the scope to include Green Infrastructure shares with the Peak District National Park Authority on its Regulation 123 “Infrastructure List” would be considered and prioritised accordingly alongside other measures required to support growth.

Joint Working on Evidence Gathering to Inform Future Planning Policy Reviews and Strategies

Agreed

- Derbyshire Dales District Council and the Peak District National Park Authority have longstanding informal arrangements to jointly gather evidence to inform planning policies and strategies. Since 2007, the agreed basis for sharing the cost of commissions between the Authorities has been based on the split of population and the degree of benefit that commissioned evidence can bring to the work of each Authority. The District Council will utilise evidence to support planning, housing and economic development functions as opposed to the single planning purpose for the National Park Authority. A contribution of 10% from the National Park Authority towards commission costs has historically been agreed as logical and reasonable broadly based on the distribution of population between the two Local Planning Authority areas and contributions from other relevant Authorities.

Commitment to Future Work

- A joint programme will be agreed by both Authorities to outline the timetable for reviewing and updating joint evidence base studies. The cost will continue to be shared on a basis proportionate to the nature and scope of the study. When applicable, this will reflect the distribution of population between the two Local Planning Authority areas.

Support for Neighbourhood Plans that Cover Both Local Planning Authority Areas

Agreed

- Derbyshire Dales District Council and the Peak District National Park Authority support the preparation of Neighbourhood Plans that accord with the strategic policies of the Derbyshire Dales Local Plan (Pre Submission Draft) and the Peak District National Park Core Strategy.
- Neighbourhood Planning support for Town / Parish Councils and Neighbourhood Forums will be provided by both Derbyshire Dales District Council and the Peak District National Park Authority when a defined Neighbourhood Area spans the plan areas of each respective Local Planning Authority.
- Where formal decisions are required by a Local Planning Authority in relation to the stages of neighbourhood planning as set out in the Neighbourhood Planning (General) Regulations 2012, the decisions will be taken by both Derbyshire Dales District Council and the Peak District

National Park Authority. The Authorities will liaise over both Committee timetabling and the content and recommendations of committee reports. Decision statements will be issued jointly and publicised by both Authorities.

- Publicising neighbourhood areas and draft neighbourhood plans for public consultation will be carried out jointly by both Authorities over the same timeframe.
- The appointment of an independent Examiner will be made following agreement between both Authorities and the Town or Parish Council / Neighbourhood Forum.
- Department for Communities and Local Government Neighbourhood Planning Grant will be claimed by Derbyshire Dales District Council. Following receipt of each quarter's grant, the Peak District National Park Authority will invoice for a share, reflective of the distribution of population across the Peak District National park and Derbyshire Dales Local Plan areas within the neighbourhood area in question.

Commitment to Future Work

Derbyshire Dales District Council will continue to liaise with the Peak District National Park Authority over the preparation, publication, examination and referendum of neighbourhood plans that cross the boundary of both Local Planning Authorities.

Monitoring

Details of activities undertaken in relation to this Memorandum of Understanding shall be recorded and published in a monitoring report in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012.

Review

This Memorandum of Understanding shall be reviewed in whole or in part as required and at a minimum at the time of any relevant Development Plan update or Development Plan review.

Councillor Lewis Rose, OBE
Signed for Derbyshire Dales District Council

Councillor Lesley Roberts
Signed for Peak District National Park Authority

Dated:

Dated:

12. Staffordshire Moorlands

Note of Planning Policy meeting between Staffordshire Moorlands District Council and the Peak District National Park Authority

Date: 7 January 2016

Venue: Aldern House, Bakewell

Present: Ruth Wooddisse (SMDC) Brian Taylor (PDNPA)
Mark James (SMDC) Ian Fullilove (PDNPA)

1. Local Plan / LDF update

a. SMDC Options Consultation and forthcoming Preferred Options

MJ and RW provided an update on the content and feedback from the Options Consultation held during the summer of 2015. The consultation considered site options and wider policy matters and generated 5500 responses. Comments were being analysed to inform the preparation of the Preferred Options Local Plan which was due for public consultation in April 2016.

b. SMDC evidence base update

MJ referred to the recently commissioned update to the assessment of the objectively assessed need for housing which was due to report back in late January. An assessment of plan and site viability had also been commissioned recently. It is also proposed to commission a heritage and landscape study to consider the impact and potential mitigation measures for the Preferred Options sites.

c. PDNPA plan and evidence update

BT and IF explained that a Development Management Policies DPD was due for consultation in April 2016. The plan would relate to the adopted Core Strategy. A new Policies Map would also be prepared. In addition, a series of "Area Action" style plans are scheduled for Recreational Hubs within the National Park to set the framework for future improvements. An Issues and Options consultation on these plans would take place in 2016.

2. Discussion of potential areas of cooperation

a. Housing development within the National Park

A discussion was held around the scope for the new Staffordshire Moorlands Local Plan to make an allowance for potential housing completions within the parts of the district that lies within the National Park. This approach has previously been taken forward in High Peak and Derbyshire Dales. Furthermore, it was confirmed by MJ that the objectively assessed need for housing figure for Staffordshire Moorlands relates to the whole district.

BT set out two possible options for calculating the potential number of relevant completions in the National Park. 1. – a trend based approach looking at past completions, or 2. – a review of potential sites that may come forward. Given the relatively small size of sites expected to come forward in Staffordshire Moorlands and the associated potential for windfall sites, it was agreed that a trend based approach was appropriate.

ACTION – PDNPA to advise SMDC on an appropriate trend based housing completions figure for the plan period (2011 to 2031). Ideally, this information would be available before SMDC agrees its Preferred Option housing requirement in early February.

b. Policies to consider the setting of the National Park

RW began the discussion by talking through the potential housing allocations and infill boundary proposals in the vicinity of the National Park as identified in the recent Options Consultation. These included proposals at Blackshaw Moor, Meerbrook, Bradnop, Winkhill and Waterhouses.

BT and IF did not identify any significant concerns with the options. However, BT stated that development should look to soften the edge of settlements through sensitive layouts and design where appropriate.

MJ stated that the policies of the new Local Plan would seek to ensure landscape matters, including the settling of the National Park. They could take the form of a generic design policy and site specific policies where appropriate.

ACTION – MJ to share relevant draft policies with the PDNPA for comments

c. Evidence base studies

It was agreed that it would be helpful if the PDNPA had the opportunity to review the forthcoming landscape and heritage assessment of the Preferred Option Local Plan. The study was expected to commence after the publication of the Preferred Options in April 2016.

ACTION – MJ to invite PDNPA to comment on study as details emerge.

d. Management of neighbourhood planning

It was agreed by all parties that a consistent approach to supporting Neighbourhood Planning in Parishes that span the two Local Plan areas. The approach could reflect that already agreed between High Peak and the National Park Authority.

3. Duty to Cooperate Statement / Memorandum of Understanding

A MoU between SMDC and the National Park Authority was proposed by SMDC to cover the issues identified above where continued cooperation was appropriate.

The principle of the MoU was agreed by the National Park Authority who also suggested that this could potentially relate to the Strategic Alliance and therefore also include the existing MoU with High Peak Borough Council.

ACTION - MJ look into the suitability of a MoU for the three authorities and to circulate a draft MoU for consideration by the National Park Authority in due course.

4. AOB

BT suggested that he would welcome the opportunity to discuss housing enabling work with the relevant contact at SMDC. A discussion was held around housing enabling work in Meerbrook and on whether the Housing Needs Survey had been refreshed.

ACTION – MJ to let BT know who the relevant contact is following the Strategic Alliance Service Review.

ACTION – MJ to let BT know if an update to the Housing Needs Survey in Meerbrook was undertaken.

13. Cheshire East

Duty to Co-operate meeting – Peak District National Park and Cheshire East Local Plans

26th March 2015

Agenda

1. Introductions
2. Purpose of meeting – Update on current work streams for the Cheshire East Local Plan Strategy and other plan making activities being pursued by each authority
3. Background to suspension of Cheshire East examination
4. Progress with addressing the Cheshire East examination Inspector's interim views
5. Potential implications for the Peak District National Park
6. Plan making progress in the Peak District National Park
7. Other plan making activity in Cheshire East
8. Any follow up work to pursue

Led by Julian Jackson for Cheshire East council and Brian Taylor and Ian Fullilove for the Peak District National Park Authority

Extract of map from Peak District National Park Core Strategy showing the designated area in relation to constituent authorities



Background to suspension of Cheshire East examination

Need to consider the effects of a changing plan on neighbouring areas

Examination into Cheshire East Local Plan took place in September 2014 but after 3 weeks the hearings were held in abeyance.

The hearings did not cover/deal with site specific matters

The Inspector (Steven Pratt) was happy with the Duty to Cooperate

However he was principally concerned by the mismatch between Economic Strategy and proposed housing supply. Alongside this other concerns included:

- The need to take the LEP more firmly into account. The council should not distance itself from LEP aspirations as these are real objectives for Cheshire East;
- The need for a higher housing figure;
- Associated greenbelt review matters and the need for further work to be done;
- Insufficient justification for the new northern green belt;
- Underestimating jobs growth;

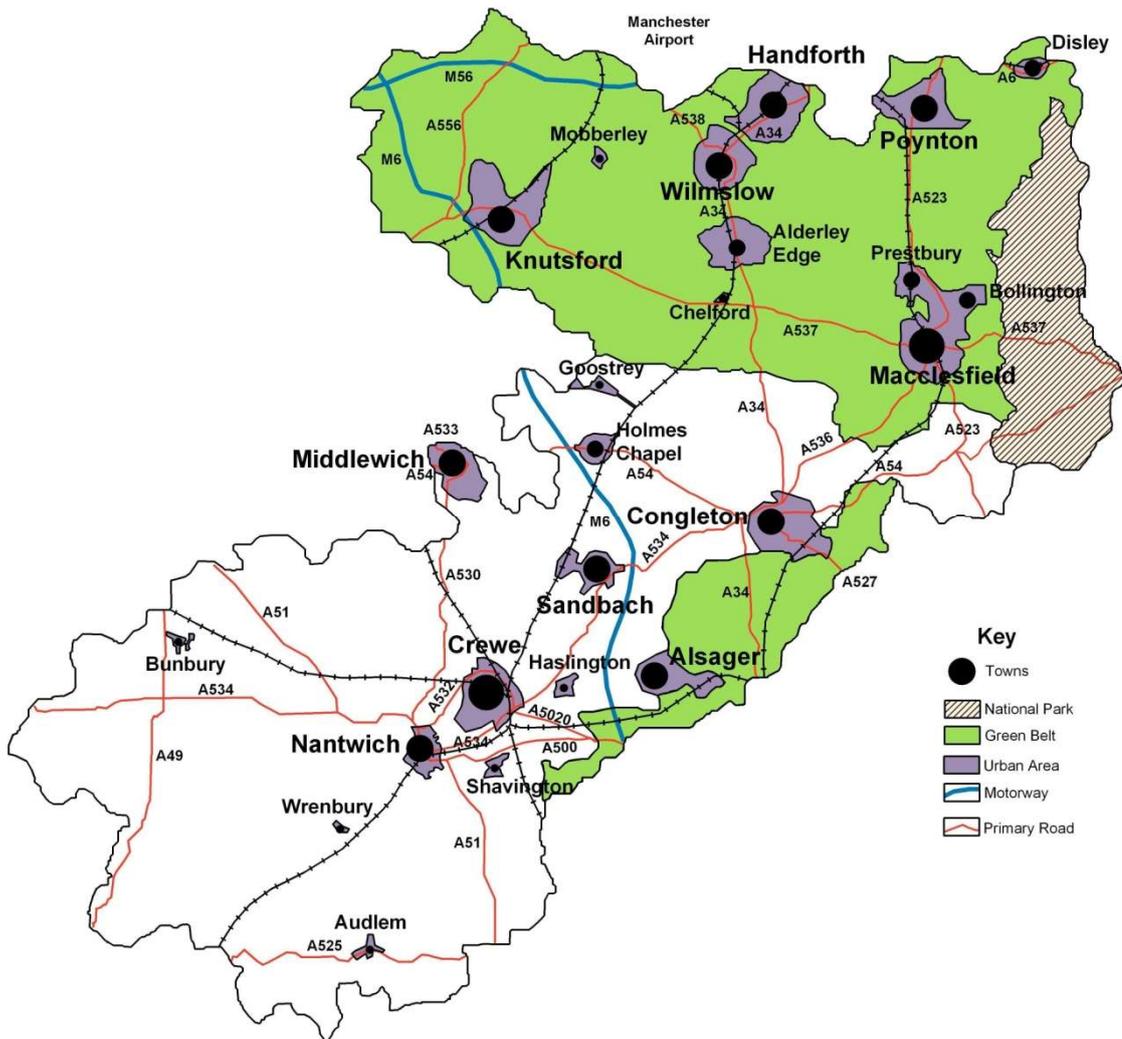
Progress with addressing the Cheshire East examination Inspector's interim views

As a result Cheshire East Council are forming work streams to respond to these concerns. Overall this work needs to be responsive to growth in Cheshire East with the message, "don't hold back".

While the previous work under DtC was satisfactory the Inspector has suggested that other areas (e.g. the Potteries) can look after themselves and there is a greater need to facilitate growth in their own area. For instance the smaller towns in the northern part of the area (historically protected by the greenbelt), may be an outlet for growth.

There is an overall need for the council to revisit housing numbers and site opportunities by reassessing urban capacity, particularly in the northern towns in the greenbelt.

Following this work a series of workshops are planned with the aim of going back to the Inspector in July with a set of proposed changes to the plan.



Potential implications for the Peak District National Park

Another question had been raised over the 500 homes that Cheshire East had offered to take from High Peak which had been viewed as a means of addressing a cross boundary issue in the north east corner near Disley and which in itself also eases some pressure on the National Park. However in offering to take on these numbers the Inspector queried the wider rationale, ie what need does it address in Cheshire East and for what objective? Economic growth or housing markets?

At this time the 500 house arrangement with High Peak still stands.

It was considered that there were unlikely to be implications from a changed approach to responding to economic growth.

The 5 purposes of greenbelt were being applied in the greenbelt review and this was considered adequate to consider the impact on wider landscape quality.

Improved policies for the setting of the National Park had already been agreed during the publication stage including references to the flow of landscape character.

Question asked as to whether there was any relationship between the flow of aggregates and the supply of housing in the National Park. However the exceptional routes for both housing and minerals were considered to be quite distinct from these more market driven pressures for housing growth.

Plan making progress in the Peak District National Park

National Park officers confirmed that the Core Strategy for the National Park was adopted in October 2011 and that the current work stream is centred on a part 2 style development management policies document and related Policies Map. Officers passed over a newly agreed Local Development Scheme setting out the programmes of work.

Future work streams include a Recreation Hubs Area Action Plan which have a bearing on areas such as Lyme Park and Macclesfield Forest as key sites and gateways into the National Park landscape.

In addition 8 areas have now been designated for neighbourhood plans in the National Park. This has the opportunity to respond creatively to large areas of constrained landscape with no settlement opportunities.

Other plan making activity in Cheshire East

There is a huge amount of activity in relation to neighbourhood planning. A change in leadership on community led work reflects the need to manage growth flowing from the Local Plan. An opportunity has been offered to communities to help manage the anticipated growth through localised neighbourhood plans.

Peak District National Park Authority

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**PEAK
DISTRICT
NATIONAL
PARK**

Your ref: SP4 LDF V

Our ref:

Date: 06/07/2015

Dear Adrian

CHESHIRE EAST LOCAL PLAN STRATEGY – DUTY TO COOPERATE

In response to your letter dated 29th June 2015, this Authority acknowledges and understands the position Cheshire East Council proposed to take to meet its objectively assessed housing need and allocate sufficient sites to enable that to happen.

This Authority has noted the work done to review the Cheshire East green belt. In so far as any of the areas of green belt are considered to be adjacent or very close to the National park boundary, this Authority notes and welcomes the conclusion that they are of major or significant contribution to the green belt. The conclusions lead us to conclude that these areas of green belt are the least likely to be developed, and on this assumption, this Authority is satisfied that the increased numbers of housing that need to be delivered in Cheshire East will be delivered in areas where development will not pose a threat to the integrity of the National Park. The Authority however welcomes the offer of ongoing dialogue on the development of the Cheshire East Local Plan Strategy and will assist the Council as necessary and proportionate to any Authority issues and concerns.

In line with the purposes of National Parks, the National Planning Policy Framework and the English National Park and the Broads Vision and Circular, and the Authority's development plan, the Authority does

not permit housing to meet general housing need. This Authority is therefore not in a position to offer to take any of the objectively assessed housing need on a formal basis. However, in common with our approach for other constituent authorities, this Authority agrees that any housing delivered in the Cheshire East part of the National Park can be counted towards the Council's housing delivery figures.

The Authority thanks the Council for its continued dialogue on the development of the Local Plan Strategy and will continue to follow the Council's progress through to plan adoption.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Fullilove', written in a cursive style.

Ian Fullilove
Policy Planner

14. High Peak

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Dai Larner
Executive Director
High Peak Borough Council
PO Box 136
Buxton
Derbyshire
SK17 1AQ

Your ref:

Our ref: A.6101/BJT

Date: 13th February 2014

Dear Mr. Larner

High Peak Local Plan Duty to co-operate

Thank you for your letter dated the 10th January.

Firstly, I can confirm that the Authority has responded to the latest Local Plan consultation for High Peak. Our response is consistent with comments made previously by the Authority with regard to proposed sites. We trust that this, along with other responses, will help provide High Peak Borough Council with the evidence they need to make decisions on these sites.

With regard to matters of housing numbers and delivery we fully understand the reasons for making this request under the Duty to Cooperate. However our position is clear and supported by the Government in its Vision and Circular for National Parks³ that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will focus on addressing affordable housing needs.

The National Park Authority is confident in its approach to managing development appropriate to its statutory purposes and in response to community needs. As such a move away from these sound principles to one involving the accommodation of growth from elsewhere is not a position the Authority can support and runs counter to the logical spatial principle that development pressure can be absorbed by areas outside the Parks in the national interest. This also ensures that neighbouring planning authorities in the wider Peak District are meeting their legal duty to have regard to National Park purposes in planning across strategic areas.

We welcome your recognition of the environmental protection afforded to the Borough, by virtue of both national park and green belt designation. It is clear that this has already helped to justify a constrained context for housing supply in the High Peak, and we support that position. We have also continued to support the facility that any housing permitted in the High Peak part of the National Park is counted towards any housing target for the Borough.

I was pleased to note your acknowledgement of the various commitments we have already made to work collaboratively on a range of initiatives, including evidence gathering and infrastructure matters.

The Authority takes its responsibility to its communities seriously. As such we were pleased to take up the offer of proactive work (through a service level agreement with High Peak Borough Council) to undertake housing need surveys, and site searches with High Peak communities within the National Park through to

³ English National Parks and the Broads – UK Government Vision and Circular 2010.

2015. This work offers High Peak Borough Council an up to date picture of housing need, and gives Housing Officers a clear steer on sites that are acceptable for development in principle, subject to land owner support and finances being available. The National Park Authority has a long history of helping to broker such schemes.

As such it is our feeling that the Authority is already meeting its duty to cooperate on these significant cross boundary matters.

I am, of course, happy to discuss any of this response with you if it raises questions that you wish to explore further.

Yours sincerely



Brian Taylor
Policy Planning Manager

Peak District National Park Authority

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**PEAK
DISTRICT
NATIONAL
PARK**

Your ref:

Our ref:

Date: 26th Jan 2017

Simon Baker
CEO
High Peak Borough Council

Dear Simon,

Planning for the National Park and the Wider Peak District.

I refer the letter from Cllr Tony Ashton dated the 16th December 2016 and to our reply to his letter which aimed to explain our position with specific responses on policy matters.

Constituent councils such as High Peak Borough Council are a significant partner in our work to look after the National Park and its communities.

We have a long history of joint working on strategic planning matters, aiming to achieve mutual understanding of the issues across the wider Peak District. The Borough Council has demonstrated a long history of support for the statutory purposes of the National Park. This was encapsulated in 2014 by the

Memorandum of Understanding signed by both authorities. The MoU acknowledged this close working particularly in respect of joint evidence gathering and close working on policies and proposals where these were close to our respective boundaries for planning purposes.

It is clear from the letter from Cllr Ashton despite the historic support for our planning principles the Borough Council now feels that the distinctive approach to policy in the National Park reflecting its statutory purposes unnecessary and too restrictive. National Park purposes have to drive our work and that of government policy as set out in the NPPF and the National Parks Vision and Circular from 2010. Therein lies the position of successive governments in respecting the distinctive purposes of National Parks. They must represent constraint.

The National Park Authority was previously known as the Peak Park Joint Planning Board and while we have moved a long way as an Authority, this concept of joint planning across many boundaries remains valid. We are a joint planning authority across the National Park geography, granted planning powers to reflect these legal purposes. Otherwise the normal policy approach in the NPPF would clearly apply. In the absence of regional planning this is the nearest thing we have to a strategic planning framework clarifying that some parts of the country should not face the same pressure from growth and development, but should be valued, economically as well as spiritually for its special qualities.

It was for these reasons that the decision was taken in 2007 not to enter into formal joint planning arrangements with High Peak Borough Council and Derbyshire Dales District Council on a common Core Strategy. Indeed the Localism Act and the removal of Regional Spatial Strategies has left many authorities returning to district wide Local Plans setting targets at a smaller geography. The East Midlands Regional Spatial Strategy usefully created a set of sub-areas reflecting common issues and landscape areas. The statutory purposes of the National Park were clearly stated as part of the strategy and sought to direct growth to urban areas including more significant employment and tourism developments in order to ease pressure on the National Park. This was all clear and accepted.

Within this context we began a productive era of collaboration on evidence gathering, together with Derbyshire Dales District Council. The MoU is clear this is still a mutually beneficial aim, as it allows us all to understand the objectively assessed needs of the area. Interestingly it was this joint work on the Employment Land Review which established the policy view that there was an over supply of employment land across the sub area and that for the National Park this meant no need for further allocation in the Core Strategy. Through the review of our plans we are, of course, amenable to reviewing this situation again.

The difference now in terms of policy development is clearly a political one with the government's drive for housing growth and boosting the economy. The National Park Authority recognises the great pressures on local planning authorities to find housing and employment sites and worked very hard at an officer level to find ways of accepting sites on the fringes of the National Park but within a policy framework that respects the cherished natural and historic qualities of the Peak District.

It is our strong belief that using the clear framework in the National Planning Policy Framework (NPPF) National Parks must have a different policy response that conserves and enhances its special qualities in the long term. This is why the NPPF reflects the highest levels of protection and why there is justification for a restricted approach to housing growth. The Vision and Circular for National Parks laid out by DEFRA in 2010 instructs that National Parks are not appropriate places to absorb the demand for market houses, hence there is no high level driver from a housing target. Conversely there is a clear driver to respond to locally needed affordable housing. Our housing policies therefore agree with your position that National Parks should not preclude housing development, but seek appropriate means of delivering that help achieve our statutory purposes and duty. This is also why we have had a Service Level Agreement in operation for the past 3 years to assist with housing enabling in the High Peak area.

In our letter to Cllr Ashton we explained that only a few points related to the current consultation on Development Management Policies and also acknowledged that the higher level points were very important matters for the wider Peak District to grapple with and needed to be evidenced and debated further initially through consultation on our National Park Management Plan, and then through a full scale review of our Core Strategy. This will follow the production of the Development Management plan, which we hope to complete this year.

In conclusion and moving forward we want to work with High Peak Borough Council to refresh the local evidence base for plan making, but we would also wish to work collaboratively with local councils to make a bid for affordable housing funds to help ensure a programme of delivery over the next strategic plan period. Many of these issues are currently being picked up in the review of our National Park Management Plan and we encourage you to engage with this process when we consult in spring this year.

I trust this response is helpful at this stage and hope it forms a basis for effective joint working in the future.
Yours Sincerely,

Sarah Fowler
Chief Executive

DUTY TO CO-OPERATE

Memorandum of Understanding between the Peak District National Park Authority and High Peak Borough Council.

This Memorandum of Understanding establishes a framework for co-operation between Peak District National Park Authority and High Peak Borough Council. It primarily relates to the preparation of Development Plans in the two local planning authority areas but also sets out a framework for future collaboration on identified strategic cross boundary planning issues. It is made within the context of the Duty to Co-operate as required under Section 110 of the Localism Act 2011.

Purposes

- Establish areas of agreement in relation to strategic planning and development issues between the Peak District National Park Authority and High Peak Borough Council;
- Identify areas where further work is required;
- Set out a future work programme for areas of collaboration

Scope

The scope of this Memorandum of Understanding is to cover:

- Planning and monitoring housing provision across High Peak Borough, including within the High Peak part of the National Park
- The protection of the setting of the Peak District National Park and recognition of the Park's statutory purposes
- Joint working on infrastructure planning
- Joint working on evidence gathering to inform future planning policy reviews and strategies
- Support for Neighbourhood Plans that cover both Local Planning Authority areas

Limitations

For the avoidance of doubt, this memorandum shall not fetter the discretion of the local authorities in the determination of any planning application, or in the exercise of any of its statutory powers and duties, or in its response to consultations, and is not intended to be legally binding. The terms of the Memorandum of Understanding can be dissolved at the written request of either party.

Established joint working arrangements

The Peak District National Park Authority, High Peak Borough Council and Derbyshire Dales District Council have worked jointly to commission evidence base studies which relate to the Peak Sub-Area⁴ as identified in the former East Midlands Regional Plan. The Peak Sub-Area Local Planning Authorities have also jointly explored infrastructure requirements and potential funding arrangements in the form of joint workshops with infrastructure providers and the commissioning of a Community Infrastructure Levy Study.

Both authorities are members of wider partnerships that help to inform and deliver Development Plans in the Peak District National Park and High Peak. These include; High Peak and Hope Valley Community Rail Partnership, Visit Peak District and Derbyshire, Peak District Partnership, the Wider Peak District Cycle Strategy Steering Group, and Business Peak District.

Regular communication is taking place and meetings have been held between the two local planning authorities to discuss and agree strategic cross boundary planning matters in accordance with the Duty to Co-operate as set out in statute and National Planning Policy Framework and Guidance

Current Development Plan position (June 2014)

The current position is as follows:

- The Peak District National Park Core Strategy was adopted in 2011. It provides the spatial strategy and strategic policies for the National Park up to the year 2026.
- A Development Management Policies Development Plan Document for the Peak District National Park Authority is under preparation and will replace the saved policies of the Peak District National Park Local Plan 2001;
- The High Peak Local Plan was published on 23rd April 2014. The document sets out the overall vision and planning strategy for High Peak along with allocating all development sites and specifying development management policies.
- A range of Neighbourhood Plans are also now emerging across these planning areas, the most progressed of which is the Chapel-en-le-Frith Neighbourhood Plan which crosses the boundary of High Peak and The National Park for planning purposes. If adopted this will form a part of the development plan for each area.

MAIN PROVISIONS

Planning, monitoring and enabling housing provision across High Peak Borough, including within the Peak District National Park

Agreed

- The draft High Peak Local Plan makes provision for at least 7,200 dwellings over the period 2011-2031 at an average annual development rate of 360 dwellings. The planned requirement is less than the full objectively assessed need for housing arising in the whole of the Borough, including the Peak District National Park (420 to 470 dwellings per annum, as at February 2014);

⁴ Peak Sub-Area consisted of High Peak Borough, Derbyshire Dales District and the whole of the Peak District National Park

- The High Peak Local Plan does not make provision to fully meet current objectively assessed needs for housing within High Peak due to development constraints related to impacts on landscape character, including the Peak District National Park and the impact on highways infrastructure in High Peak and Cheshire East and Greater Manchester;
- The Cheshire East Local Plan Strategy (as published in March 2014) will make provision for a 500 dwelling contribution towards the housing required in High Peak Borough during the period 2020-2030 (an average of 50 dwellings per year). This contribution is proposed, in part, to help avoid over development in proximity to the Peak District National Park. The 500 dwelling contribution will not result in the whole of High Peak's objectively assessed need for housing being met.
- The Peak District National Park Authority support the principle of below trend housing provision in the High Peak Local Plan in recognition of development constraints, including the need to protect the setting of the National Park. The principle of below trend housing provision in High Peak was previously established in the East Midlands Regional Plan;
- The High Peak Local Plan includes an estimated contribution of 110 dwellings towards High Peak's housing needs which may be delivered within the part of High Peak which lies within the National Park. This figure relates to the High Peak Local Plan period (2011-2031) and is an estimate based on past delivery rates within the National Park. It does not represent a target for the Peak District National Park Authority. The figure will be subject to monitoring;
- The Peak District National Park Core Strategy does not include a target for housing development. Such development is strictly controlled in order to address the needs of communities in the National Park and ultimately to conserve and enhance the National Park.
- Borough Council housing officers will continue to reflect national park purposes, policies, and legal mechanisms when discharging their statutory housing functions in the national park area, e.g. through the allocation of completed affordable homes to people who meet the terms of signed Section 106 Agreements. This is to ensure that future development implications are taken into consideration. Close liaison with both the National Park Authority and rural parishes can ensure the future sustainability of schemes by addressing the needs of National Park communities in perpetuity.

Commitment to future work

- Data relating to housing commitments and completions across the whole of High Peak will be monitored and shared between the two authorities on an annual basis in order to effectively monitor housing provision to ensure that the 110 dwelling contribution identified in the High Peak Local Plan remains an accurate estimate. This information will inform any future review of the High Peak Local Plan. Use of the Derbyshire Local Planning Authority planning monitoring database (CDPSmart) will assist with this process;
- High Peak Borough Council will continue to work with other neighbouring authorities to identify the scope for them to accommodate the outstanding housing need for High Peak;
- The Peak District National Park Authority and High Peak Borough Council will continue to liaise and consult on future evidence gathering and Development Plan updates in relation to housing matters

The protection of the setting of the Peak District National Park and recognition of the Park's statutory purposes

Agreed

- High Peak Borough Council recognises its duty to have regard to the purposes of the National Park as specified in the Environment Act 1995, namely;
 - (i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and
 - (ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.
- The vision, objectives, spatial strategy, and policies of the High Peak Local Plan support the purposes of the National Park;
- In particular, the policies contained in the High Peak Local Plan provide an appropriate degree of protection to the setting of the National Park. The policies and the sites to which they relate have been informed by the High Peak Local Plan Landscape Impact Assessment. This assessment considered the impact of development sites on the setting of the National Park and recommended appropriate mitigation measures and policy responses to be included in the High Peak Local Plan.

Commitment to future work

- High Peak Borough Council will apply the policies of the Local Plan that relate to the protection of the setting of the National Park during the determination of planning applications. These include Policies S1 (Sustainable Development Principles), EQ3 (Countryside and Green Belt Development), EQ5 (Design and Place Making) and relevant Strategic Development site policies;
- High Peak Borough Council will continue to consult with the National Park Authority on planning applications which adjoin or are in close proximity to the National Park boundary. Consultation on planning applications which are located away from the National Park boundary but which may have a significant impact on the National Park will also be undertaken.
- In accordance with the provisions of High Peak Local Plan Policy EQ5 (Design and Place Making) the Borough Council will require applicants to engage with the Peak District National Park Authority where relevant in the early stages of drafting proposals to discuss and agree appropriate designs, layouts, boundary treatments and other measures to mitigate landscape impacts and protect the setting and character of the countryside and National Park. When applicable, such matters will be discussed at the pre-application stage
- The National Park Authority and High Peak Borough Council will continue to consult and liaise on the progress being made on development sites close to the National Park boundary or which are located away from the National Park boundary but which may have a significant impact on the National Park in terms of the agreed policy positions regarding design and landscaping treatments to respect the urban/rural transition and the overall character and appearance of development and its impact on the setting of the National Park.
- The National Park Authority wishes to explore the scope for a gradual reduction in the spatial scale and quantum of housing delivery in respect of potential windfall sites and future land allocations at the edge of the National Park in response to landscape character

and capacity and to help High Peak Borough Council to have regard to National Park purposes⁵ in pursuing its plan making function.

Joint working on infrastructure planning

Agreed

- The Peak District National Park Core Strategy, High Peak Local Plan and High Peak Infrastructure Delivery Plan have been informed by joint working in relation to identifying infrastructure capacity, future requirements and the viability of introducing a Community Infrastructure Levy;
- The Peak District National Park Authority and High Peak Borough Council will continue to work with and support partnerships that support and deliver infrastructure improvements;
- The National Park and High Peak share many key services and facilities which serve local communities, including schools, health care, transport and green infrastructure;
- The High Peak Local Plan provides policy support for the protection and enhancement of shared infrastructure and services;

Commitment to future work

- The Peak District National Park Authority and High Peak Borough Council will liaise on future infrastructure planning to identify opportunities for further joint working;
- In the event that High Peak Borough Council decides to implement a Community Infrastructure Levy, the scope to include Green Infrastructure shared with the National Park Authority on its Regulation 123. "Infrastructure List" would be considered and prioritised accordingly alongside other measures required to support growth

Joint working on evidence gathering to inform future planning policy reviews and strategies

Agreed

- The Peak District National Park Authority and High Peak Borough Council have longstanding informal arrangements to jointly gather evidence to inform planning policies and strategies. Since 2007 the agreed basis for sharing the cost of commissions between the Authorities⁶ has been based on the split of population and the degree of benefit that commissioned evidence can bring to the work of each Authority. The Borough Council will utilise evidence to support planning, housing and economic development functions as opposed to the single planning purpose for the National Park Authority. A contribution of 10% from the National Park Authority towards commission costs has historically been agreed as logical and reasonable broadly based on the distribution of population between the two local planning authority areas and contributions from other relevant authorities.

Commitment to future work

⁵ National Parks and Access to the Countryside Act (1949) Section 11A as inserted by Section 62 of the Environment Act 1995.

⁶ Including Derbyshire Dales where appropriate

- A joint programme will be agreed by both authorities to outline the timetable for reviewing and updating joint evidence base studies. The cost will continue to be shared on a basis proportionate to the nature and scope of the study. When applicable, this will reflect the distribution of population between the two local planning authority areas.

Support for Neighbourhood Plans that cover both Local Planning Authority areas

Agreed

- The Peak District National Park Authority and High Peak Borough Council support the preparation of Neighbourhood Plans that accord with the strategic policies of the Peak District National Park Core Strategy and High Peak Local Plan where applicable;
- Neighbourhood Planning support for Town / Parish Councils and Neighbourhood Forums will be provided by both the Peak District National Park Authority and High Peak Borough Council when a defined Neighbourhood Area spans the plan areas of each respective Local Planning Authority;
- Where formal decisions are required by a local planning authority in relation to the stages of neighbourhood planning as set out in the Neighbourhood Planning (General) Regulations 2012, the decisions will be taken by both High Peak Borough Council and the Peak District National Park Authority. The authorities will liaise over both committee timetabling and the content and recommendations of committee reports. Decision statements will be issued jointly and publicised by both authorities.
- Publicising neighbourhood areas and draft neighbourhood plans for public consultation will be carried out jointly by both authorities, over the same time-frame.
- The appointment of an independent Examiner will be made following agreement between both authorities and the Town or Parish Council / Neighbourhood Forum.
- Department for Communities and Local Government Neighbourhood Planning Grant will be claimed by High Peak Borough Council. Following receipt of each quarter's grant, Peak District National Park will invoice for a share reflective of the distribution of population across the Peak District National Park and High Peak Local Plan areas within the neighbourhood area in question.
- Costs of examination and referendum for a cross boundary Neighbourhood Plan will be shared according to the same division of Neighbourhood Planning Grant

Commitment to future work

High Peak Borough Council will continue to liaise with the National Park Authority over the preparation, publication, examination and referendum of neighbourhood plans that cross the boundary of both local planning authorities.

Monitoring

Details of activities undertaken in relation to this Memorandum of Understanding shall be recorded and published in a monitoring report in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012

Review

This Memorandum shall be reviewed in whole or in part as required and at a minimum at the time of any relevant Development Plan update or Development Plan review.

Signed:
For High Peak Borough Council

Dated:

Signed:
For the Peak District National Park Authority
Dated:

Duty to Cooperate Meeting with Stockport MBC – 15th November 2017

From: Angie Jukes [<mailto:angie.jukes@stockport.gov.uk>]

Sent: 15 November 2017 15:39

To: Taylor Brian; Steve Johnson (Planning Policy); Sally Maguire; Nicholson Tim; Wilkins Clare

Subject: Meeting Notes: PDNP visit to SMBC 15th November 2017

Hi there – thanks everyone for attending today's meeting – very useful!!

Please feel free to amend if I have captured anything inaccurately:

SMBC PDNP

Steve Johnson (Local Plan Lead) Brian Taylor (Head of Policy & Communities)

Sally Maguire (Planning Policy) Tim Nicholson (Transport)

Angie Jukes (Health & Environment) Clare Wilkins (Technical Support)

SMBC – Core Strategy adopted 2011 (with Allocations work halted in 2013); saved elements of UDP 2006; Proposals Map 2006; GMSF underway (key decision on consultation in June 2018) – Stockport Local Plan (SLP) being prepared with issues paper out to consultation between July and October 2017; Preferred Option (with alternatives paper) due end of 2018

<https://www.stockport.gov.uk/showcase/stockport-local-plan>

<http://old.stockport.gov.uk/ldf/corestrategy/>

<https://www.greatermanchester-ca.gov.uk/gmsf>

PDNPA – Core Strategy adopted 2011; saved policies from 2001 Local Plan forming the basis of a review of Development Management Policies and associated Policies Map. Publication consultation on DM Policies completed in Jan 2017. Now commenced consultation on Modifications until Jan 2018. Following this we aim to submit DM policies and Policies Map early Feb for examination. Pending adoption of this document we then aim to commence Strategic review with a plan focussed on driving National Park purposes and special qualities. No normal housing target but focus on local needs and local sustainability across communities, farming and broader rural economy. Other docs preparing are Transport Design SPD to be followed by other heritage related SPD's for farmsteads and conversions, plus corporate priority to improve recreation hubs supported by a Supplementary Planning Document (see below).

LANDSCAPE

PDNP – no real concerns about Stockport in landscape terms; consistency needed with National Park fringe policies. LCA reflect statutory designations in the Park and include design requirements. PDNP Landscape Character Strategy (2009) needs to be referenced. 3 National Character Areas (Dark Peak; White Peak; South West Peak and some fringe areas including to west where Dark peak touches with Stockport's boundary). Guidance is available on the issues and pressures in those areas: http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0005/90824/landscape-strategy-western-fringe.pdf

Also an SPD for renewables with Landscape Sensitivity Analysis for all technologies especially wind turbines:

http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0010/332974/SPD-Landscape-Sensitivity-Assessment-and-Wind-Turbine-Guidance.pdf

Take account of Landscape Policy also around Natural Zones (driven by W&CA) with mapped areas for conservation; Special Qualities considerations also in place which include valued characteristics that should be taken into account with 8 Special Qualities statements to be developed which will be shared with neighbouring authorities: see recent consultation version of National Park Management Plan from draft Special Qualities.

http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0012/968799/National-Park-Management-Plan-Consultation-2017.pdf

Stockport controls housing in that area that borders PDNP including Green Belt constraints – SLP will include review of Green Belt DM policies (UDP 06); GMSF are yet to clarify Green Belt policy approach.

ACTION: Clare to send link to Interactive Map; reinterpreted landscape maps will be provided to neighbouring authorities

ACTION: Sally to invite PDNP to LCA Workshop Stakeholder event
Greater Manchester LCA work going to be developed as well.

TRANSPORT

Tim outlined his involvement with A6 Corridor work reflecting its status as a key route through PDNP and asked whether there was any further information forthcoming on that activity?

Steve outlined the SEMMMS refresh due in Spring 2018 with TfGM to input – Amy Beasley should be able to provide more information (**ACTION:** Angie to introduce Tim and Amy)

Tim asked if High Peak development is informing SEMMMS and planning work – Steve replied that yes Atkins are feeding in High Peak sites into considerations
A6MARR opening in Spring 2018; Poynton RR gained permission last year; Macclesfield Bypass – Amy might have information; Possible A6 to M60 link informing planning work
ACTION: Tim to send link to PDNP Cycling Strategy – SLP needs to consider protecting cycling routes for access to PDNP

RECREATION HUBS

PDNP approach is to look at recreation hubs within the Park and also on gateways; SPD due; also consideration for inclusion in future PDNP local plans
Stockport to be aware of such Hubs and implications for SLP

TOURISM

Angie asked about Tourism in PDNP local plans – no specific strategy for tourism at the moment but the key document would be the National Park Management Plan
Opportunities for co-operative working in terms of boosting tourism for Stockport urban areas as places to stay with excellent access (preferably by sustainable modes) into the Park.

Regards

Angie Jukes

Technical Policy & Planning Specialist

Stockport Metropolitan Borough Council

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W: www.stockport.gov.uk/planningsustainabledevelopment

Environment Agency follow up from DtC meeting on 18th March 2016

Hi Brian,

Thanks so much for our catch-up today. I thought it would be helpful to set out the actions from our meeting:

- ND to make contact with Christine Massey at Derbyshire County Council about attending the next Derbyshire Planning Policy Group to discuss the [new climate change guidance](#) (briefing attached).
- ND to make contact with Pat Lunn, Chair of Bakewell Town Council to offer Environment Agency support and explore their ambitions for allocating sites in the emerging Bakewell Neighbourhood Plan, which may introduce the requirement for additional flood modelling to understand the impact of the new climate change guidance on flood risk from the River Wye.
- ND to collate existing flooding information held by the Environment Agency for Peak District National Park Authority and send GIS layers to Alfie Kelly at PDNPA for possible inclusion in the policy maps.
- ND to discuss with flood risk colleagues the potential for housing as part of the mix at Riverside Business Park in Bakewell and any concerns this brings e.g. access and egress.
- ND to discuss with flood risk colleagues the availability of reservoir inundation maps for those communities in the National Park downstream of reservoirs e.g. around Bradfield and on the Oldham-side.
- ND explained that JD is collating updated plans and programmes for the Sustainability Appraisal Update, which will be sent to BT in the next few weeks.
- BT send ND emerging chapters on the natural environment from the draft Development Management Policies for informal consultation prior to statutory consultation expected in summer 2016.

Perhaps if we get together again in a couple of months time, especially once I understand more about the ambitions for the Bakewell Neighbourhood Plan.

Kindest regards
Naomi

Naomi Doughty MSc (Hons); BSc (Hons)
Planning Specialist (Derbyshire)
Sustainable Places Team - Derbyshire, Nottinghamshire and Leicestershire Area

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✉ Environment Agency, Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR

Notes of meeting with Chatsworth to discuss Development Management, Planning Policy and wider Estate Management issues - 12th December 2013

Attendance

Brian Taylor (BJT) – Policy Planning Manager PDNPA
Emily Fox (EF) – Transport Policy Manager PDNPA
Will Kemp (WK) – Planning and Development Manager Chatsworth
Nick Wood (NW) – Land Agent Chatsworth

The Discussion

Parking and Traffic Impacts

BJT explained that Andrea Needham could not attend but that BJT had collected some points from Andrea to feed in:

- Several issues of car parking such as a rationalisation of spaces at the estate office, and a desire to rationalise the parking near to the Garden Centre. This would involve an increase to the numbers.
- An extension to the parking at the Farm Shop particularly to accommodate staff. This may also assist with knock-on parking pressures on street in Pilsley.
- Andrea has explained policy position regarding no overall increase in numbers and that car park extensions should be considered alongside on-street restraint.
- Andrea mentioned the good result that has been achieved at the new Energy Centre and mentioned upcoming works to improve flood management by building up the sides of the reservoirs in the woods above Chatsworth House.

WK and NW responded by accepting there was a danger in the Estate dealing with parking issues on a case by case basis rather than demonstrating how improved management at one site could improve parking issues across the wider Estate. Need to try and look at such issues comprehensively.

Awareness of the parking issues at the Farm shop in Pilsley and in Beeley village. NW also noted that the quality and appearance of grass verges, e.g. those at Calton Lees was deteriorating significantly by excessive resident parking.

Reflecting on previous National Park policies regarding public transport to Chatsworth, BJT enquired if the Estate had any future thoughts on methods such as Park and Ride, e.g. by combining with the car parks at Hassop Station and/or Rowsley. The NPA employs this method to deal with particularly high visitor numbers on Bakewell Show days. Could the same method assist high volume traffic management on Xmas and Summer Faire days?

NW said this was something the estate hadn't considered and felt that if pursued it should be underpinned by good survey evidence of the pressures and confidence that such a scheme would help and not hinder, e.g. by putting people in non-convenient locations. However the idea was acknowledged as one which had potential.

Alongside this NW mentioned that the Estate had already begun to work with DCC to try and create direct access onto the Baslow Roundabout from the Golden Gates end but via a dedicated access, not through the Gates themselves. NW suggested this idea already had support from DCC.

Barbrook Caravan site/kitchen garden area was also suggested as a site which is being considered by the Estate to provide additional parking spaces and possibly linked to a future visitor centre.

However all of this discussion was caveated by the fact that there is currently no strategic plan in place by the Estate to respond to these issues and bring forward such schemes in a planned way. Hence the current piecemeal approach to tackling parking issues. The recent priorities for the Estate have been with the restoration of the House, through a Masterplan which lasts to 2014.

So it is timely to think to the next set of issues facing the estate and how it can work with partners to tackle these.

Recreation Hubs and Gateways

At this point BJT raised the ideas emerging around Gateways and Recreational Hubs, explaining the move away from landscape zoning toward a Landscape Character-based approach. Nevertheless the Authority will be seeking to consult on an additional development management policy issue on the concept of gateways and hubs, exploring the value of identifying areas of high visitor attraction and therefore pressure which therefore merit a managed and proactive response to the provision of facilities, information, parking, refreshments etc, in ways which sit comfortably with the landscape, and provide linkage from gateway towns outside the National Park.

BJT encouraged Chatsworth to engage with the consultation which is planned for early in the new year.

NW said that Chatsworth would not be ready yet to provide a full site or estate brief to inform this but if we could hold back on the detail, then a strategic framework would be helpful to guide development and support future initiatives.

It could be that a broad strategy for Chatsworth could be developed in 2-3 years time.

Relationship to NPPF

WK then asked about the relationship between the NPPF and the planning strategy of the National Park with particular emphasis on viability and deliverability. WK encouraged the NPA to embrace the more positive approach advocated.

Experiences of Committee

WK also then referred to comments made previously regarding the protocols at committee feeling that members have sometimes continued debates using incorrect assumptions or information. Feeling that the system does not give enough scope for members to be corrected. Officers should be able to interject and put members right. Particular role for the Director of Planning and the Solicitor to come in and correct members.

Costs and Delays of the planning process

The planning process can result in unnecessary costs and delays such as that incurred for Burntwood Quarry where the options appraisal led to huge amounts of detail being required for every option. Would it have been possible to undertake a quicker desk top appraisal to draw out the preferred approach and then focus the time and detail on that site rather than having to go to the same length 7 times?

While Chatsworth were able to afford the large costs - £150,000 to put together the application, a smaller operator would not have been able to.

A feeling expressed that a Planning Performance Agreement could have helped in this case. WK suggested that if we could have speeded up the process Chatsworth would have agreed to any conditions required by the NPA.

Minerals Sites

The NPPF differentiates between commercial scale operations and small-scale whereby small-scale sites have greater freedom to supply small amounts of stone for specific heritage purposes, whereas the NP Core Strategy regards them all the same. BJT said that this definition was set out in the Core Strategy as a key principle of the approach taken. Hence this is not something that could be changed by virtue of Development Management Policy.

Barn Conversions

In terms of barn conversions WK mentioned the work that had been undertaken at Chatsworth's other estate at Bolton Abbey in the Yorkshire Dales. A survey of 70 barns had been done using a landscape-based approach.

In term of barn conversion policy WK and NW stated that too much flexibility in policy is bad whereas certainty is good. Therefore clarity that the more sensitive field barns would not be appropriate to convert to residential use was understood, feeling that those barns nearer to villages lend themselves better to conversion.

Landscape and heritage management

In terms of the PDNPA broad landscape policy, Chatsworth would agree that specific use of the landscape character approach works better than attempting to make the whole landscape strategy an SPD.

Chatsworth have recently adopted a heritage management plan for the Park. Is it possible that in any planning decisions the NPA can have regard to this as a local heritage management plan. Would it have weight as a material consideration?

The Authority has to better understand heritage management. Things change.

Question raised regarding Design and Access Statements in the future. The government seem to be flexing on the requirement for these. Are they helpful in all cases? Would this be a useful issue for the Planning Agents Forum? Should they just be prepared where there is a real focus on heritage?

Postive role of planners

However there was a generally good feeling about the PDNPA planning approach at the officer level, with mention of a sea change in the way that Pre-App advice is now provided. This is really good and John Scott and Andrea Needham have been particularly helpful. Positive discussions have been welcomed with speedy and helpful written responses. Every effort being made to facilitate good applications being made.

Some discussion on greening the House and Estate through biomass at the Energy Centre and thoughts on Solar tiles in the inner courtyard. (shop/restaurant area). WK pleased that the recently adopted Climate Change and Sustainable Building SPD has pointed to positive practical solutions.

BJT encouraged Chatsworth to attend future Forums as they have been very useful over the past year in sharing thoughts and experiences.

NW ended by saying that overall there is a genuine feeling that we are in a better place than we have ever been in terms of the working dialogue between the NPA and Chatsworth. Both planners and minerals planners have been understanding and helpful.