

Public Document Pack

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Our Ref: A.1142/1579
Date: 28 September 2017



NOTICE OF MEETING



Meeting: **National Park Authority**
Date: **Friday 6 October 2017**
Time: **10.00 am**
Venue: **The Board Room, Aldern House, Baslow Road, Bakewell**

SARAH FOWLER
CHIEF EXECUTIVE

AGENDA

1. **Apologies for Absence**
2. **Appointment of Secretary of State Member**
RECOMMENDATION:

“To note that the Secretary of State has appointed Mr James Berresford as a Member of the Authority and appoint him as a Member of the Audit Resources and Performance Committee until the Annual Meeting in July 2018.”
3. **Chair's Announcements**
4. **Minutes of Previous Meeting: AGM held on 7 July 2017 (Pages 5 - 18)**
5. **Urgent Business**
6. **Public Participation**
To note any questions or to receive any statements, representations, deputations and petitions which relate to the published reports on Part A of the Agenda.

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|------------|---|---------|
| 7. | Members Declarations of Interest Members are asked to declare any disclosable pecuniary, personal or prejudicial interests they may have in relation to items on the agenda for this meeting. | |
| 8. | NPMP - Update On Consultation Feedback, Project Timescales And Extension Of The Current Plan (MM) <i>(Pages 19 - 46)</i> Appendix 1 | 45 mins |
| 9. | Approval Of Modifications To The Development Management Policies Document (DPD)/ BJT <i>(Pages 47 - 216)</i> Appendix 1 Appendix 2 | 45 mins |
| 10. | Market Supplement Policy (TR) <i>(Pages 217 - 234)</i> Appendix 1 Appendix 2 | 20 mins |
| 11. | Member Learning & Development Annual Report (RC) <i>(Pages 235 - 252)</i> Appendix 1 Appendix 2 | 20 mins |

Duration of Meeting

In the event of not completing its business within 3 hours of the start of the meeting, in accordance with the Authority's Standing Orders, the Authority will decide whether or not to continue the meeting. If the Authority decides not to continue the meeting it will be adjourned and the remaining business considered at the next scheduled meeting.

If the Authority has not completed its business by 1.00pm and decides to continue the meeting the Chair will exercise discretion to adjourn the meeting at a suitable point for a 30 minute lunch break after which the committee will re-convene.

ACCESS TO INFORMATION - LOCAL GOVERNMENT ACT 1972 (as amended)

Agendas and reports

Copies of the Agenda and Part A reports are available for members of the public before and during the meeting. These are also available on the website www.peakdistrict.gov.uk.

Background Papers

The Local Government Act 1972 requires that the Authority shall list any unpublished Background Papers necessarily used in the preparation of the Reports. The Background Papers referred to in each report, PART A, excluding those papers that contain Exempt or Confidential Information, PART B, can be inspected by appointment at the National Park Office, Bakewell. Contact Democratic Services on 01629 816200, ext 362/382. E-mail address: democraticservices@peakdistrict.gov.uk.

Public Participation and Other Representations from third parties

Anyone wishing to participate at the meeting under the Authority's Public Participation Scheme is required to give notice to the Director of Corporate Strategy and Development to be received not later than 12.00 noon on the Wednesday preceding the Friday meeting. The Scheme is available on the website www.peakdistrict.gov.uk or on request from Democratic Services 01629 816362, email address: democraticservices@peakdistrict.gov.uk.

Written Representations

Other written representations on items on the agenda, except those from formal consultees, will not be reported to the meeting if received after 12noon on the Wednesday preceding the Friday meeting.

Recording of Meetings

In accordance with the Local Audit and Accountability Act 2014 members of the public may record and report on our open meetings using sound, video, film, photograph or any other means this includes blogging or tweeting, posts on social media sites or publishing on video sharing sites. If you intend to record or report on one of our meetings you are asked to contact the Democratic and Legal Support Team in advance of the meeting so we can make sure it will not disrupt the meeting and is carried out in accordance with any published protocols and guidance.

The Authority uses an audio sound system to make it easier to hear public speakers and discussions during the meeting and to make a digital sound recording available after the meeting. From 3 February 2017 the recordings will be retained for three years after the date of the meeting.

General Information for Members of the Public Attending Meetings

Aldern House is situated on the A619 Bakewell to Baslow Road, the entrance to the drive is opposite the Ambulance Station. Car parking is available. Local Bus Services from Bakewell centre and from Chesterfield and Sheffield pick up and set down near Aldern House. Further information on Public transport from surrounding areas can be obtained from Traveline on 0871 200 2233 or on the Traveline website at www.travelineeastmidlands.co.uk.

Please note that there is no catering provision for members of the public during meal breaks. However, there are cafes, pubs and shops in Bakewell town centre, approximately 15 minutes walk away.

To: National Park Authority Members

Constituent Authorities
Secretary of State for the Environment
Natural England

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MINUTES

- Meeting: **National Park Authority**
- Date: Friday 7 July 2017 at 10.00 am
- Venue: The Board Room, Aldern House, Baslow Road, Bakewell
- Chair: Cllr Mrs L C Roberts
- Present: Mr P Ancell, Mrs P Anderson, Cllr D Chapman, Cllr J Atkin, Cllr D Birkinshaw, Cllr P Brady, Cllr C Carr, Cllr A R Favell, Cllr C Furness, Mr Z Hamid, Cllr A Hart, Cllr Mrs G Heath, Mr R Helliwell, Cllr A Law, Cllr H Laws, Cllr Mrs C Howe, Cllr J Macrae, Cllr A McCloy, Cllr C McLaren, Cllr J Perkins, Cllr Mrs K Potter, Cllr Mrs N Turner, Cllr Mrs J A Twigg, Cllr F J Walton and Cllr B Woods
- Apologies for absence: Mrs F Beatty.

30/17 ANNOUNCEMENTS

At the invitation of the Deputy Chair in the Chair, Cllr Mrs L Roberts paid tribute to Ms Stella McGuire a former Authority Member who had recently passed away. She also reported on the death of Mrs Tracey Dixon, the wife of the Authority's former Chief Executive Jim Dixon, who had been well known to a number of Members. Cllr Mrs Roberts confirmed that a card of condolence would be sent to both families and led a minute's silence in remembrance of Stella and Tracey.

31/17 ELECTION OF AUTHORITY CHAIR & DEPUTY CHAIR (A.111/JS)

Cllr D Chapman, the Deputy Chair of the Authority, presided for the appointment of the Chair for 2017/18.

Two Members, Cllr P Brady and Cllr Mrs L Roberts, had expressed an interest in the role of Chair of the Authority and provided a written statement, circulated to all Members in advance of the meeting. The two nominations were moved, seconded and, in accordance with Standing Order 1.12(4) the voting was carried out in the form of a ballot.

Following the ballot both candidates received an equal number of votes so, in accordance with Standing Order 1.12(3), Cllr Mrs L Roberts was appointed as Chair of the Authority for 2017/18 using the Deputy Chair's casting vote. Cllr Mrs Roberts then presided for the remainder of the meeting.

Two Members, Cllr D Chapman and Cllr Mrs J A Twigg had expressed an interest in the role of Deputy Chair of the Authority and provided a written statement, circulated to all Members in advance of the meeting. The two nominations were moved, seconded and,

in accordance with Standing Order 1.12(4) the voting was carried out in the form of a ballot.

Following the ballot Cllr D Chapman was appointed as Deputy Chair of the Authority for 2017/18.

RESOLVED:

- 1. To appoint Cllr Mrs L Roberts as Chair of the Authority for a term expiring at the Annual Meeting in July 2018.**
- 2. To appoint Cllr D Chapman as Deputy Chair of the Authority for a term expiring at the Annual Meeting in July 2018.**

32/17 CHAIR'S ANNOUNCEMENTS

The Chair welcomed new employees, Debbie Read, Head of Marketing & Fundraising Development, and David Marsden, Transport Policy Officer, to their first meeting of the Authority.

33/17 MINUTES OF PREVIOUS MEETING HELD ON 26TH MAY 2017

The minutes of the last meeting of the Authority held on 26 May 2017 were approved as a correct record and signed by the Chair.

34/17 MEMBERS DECLARATIONS OF INTEREST

There were no declarations of interest.

35/17 REPORT OF THE MEMBER APPOINTMENT PROCESS PANEL - APPOINTMENT OF COMMITTEE CHAIRS AND VICE-CHAIRS, ANNUAL APPOINTMENTS TO COMMITTEES, SUB-COMMITTEES, PANELS AND ADVISORY GROUPS (A.111/ RC)

The meeting considered the reports of the Member Appointments Process Panel and considered each of the appointments in the order set out in recommendations 2 to 13 in the report. In most cases the appointments were moved, seconded and approved in accordance with the expressions of interest in the report. Any changes to the report are identified below.

During consideration of the report, in accordance with Standing Order 1.12(4), a motion was moved and seconded proposing that all the remaining contested appointments be determined by a ballot. The motion was put to the vote and, as an equal number of votes were cast for and against the motion, the motion was carried using the Chair's casting vote. Therefore all the remaining contested appointments, including appointments to outside bodies were determined following a ballot.

Appointment of the Vice Chair of Audit Resources and Performance Committee

At the meeting Cllr C Furness was nominated and seconded for this role. Cllr C Furness was provided with a brief opportunity to explain his reasons for seeking nomination on the day. This resulted in both Cllr C Furness and Cllr J Walton being nominated for the role. Following a ballot Cllr J Walton was appointed as Vice-Chair of the Committee.

Planning Committee and Audit Resources and Performance Committee

It was noted that the Authority had previously agreed that the Membership of both Standing Committees should be set at 15 and the Local Authority positions allocated according to the formula used in previous years, following receipt of expressions of interest 14 Members had indicated that they wished to be appointed to Planning Committee and 13 Members wished to be appointed to Audit, Resources and Performance Committee. It was agreed that, as the recent Parliamentary Elections had delayed the new Secretary of State Appointments, Planning Committee would hold one vacancy and Audit Resources and Performance Committee would hold two vacancies which would be allocated to the new Members on appointment.

Appeals Panel

Following an additional expression of interest it was agreed that the size of the Panel be increased to 9 Members (5 Council and 4 Secretary of State).

Charity Member Advisory Group

Although two additional Members had expressed an interest in joining the Group it was agreed that the Group be reappointed for 2017/18 based on the Membership previously agreed by the Authority.

Development Plan Steering Group

It was agreed that although there was one vacancy, as the work of the Group was nearing completion, appointments for 2017/18 should remain the same as those in the previous year.

Member Representatives

Food and Farming – Cllr J Atkin and Cllr D Chapman withdrew their expression of interest leaving Mrs F Beatty and Mr R Helliwell as candidates for this role. Both were nominated and seconded and following a ballot Mr R Helliwell was appointed.

Health and Wellbeing – Mr Z Hamid withdrew his expression of interest. Cllr Mrs L Roberts was nominated and seconded and, following an uncontested vote, appointed.

Member Learning and Development – As there had been no expressions of interest in this role Cllr A McCloy was nominated and seconded and, following an uncontested vote, appointed.

Rural Economy – Cllr J Macrae withdrew his expression of interest leaving Mrs F Beatty and Cllr C Furness as candidates for this role. Both were nominated and seconded and, following a ballot, both received an equal number of votes. Cllr C Furness was appointed using the Chair's casting vote.

RESOLVED:

- 1. To confirm the Authority's previous decision to set the size of the two Standing Committees to 15, with 8 Local Authority Members and 7 Secretary of State Members and allocate Local Authority places on Planning Committee as set out in Section B(i) of Appendix 1 of the report.**
- 2. To appoint the following Members to the offices of Chair and Vice Chair of the Standing Committees until the Annual Meeting in July 2018:**

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- | | | |
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| | Cllr A Law Cllr Mrs J A Twigg Cllr F J Walton | Cllr A R Favell Cllr A McCloy |
| 7. | To appoint the following Members to the Due Diligence Panel until the Annual Meeting in July 2018: | |
| | One Member One Deputy Member | Cllr Mrs C Howe Mr Z Hamid |
| 8. | To appoint the following Members to the Charity Member Advisory Group until the Annual Meeting in July 2018: | |
| | Mrs F Beatty Mr Z Hamid | Cllr A McCloy Cllr C McLaren |
| 9. | To appoint the following Members to the Budget Monitoring Group until the Annual Meeting in July 2018: | |
| | Chair and Vice Chair of Audit Resources and Performance Committee | Cllr A McCloy Cllr F J Walton |
| | Chair of the Authority | Cllr Mrs L Roberts |
| | One other Members | Mrs F Beatty |
| 10. | To appoint the following Members to the Development Plan Steering Group until the Annual Meeting in July 2018: | |
| | Chair of Planning Committee Vice Chair of Planning Committee | Mr P Ancell Cllr D Birkinshaw |
| | Chair of the Authority | Cllr Mrs L Roberts |
| | | Cllr P Brady Cllr C Furness Mr R Helliwell Vacancy |
| 11. | To appoint the following Members to the Appointments Process Panel until the Annual Meeting in July 2018: | |
| | Two Councillor Members | Cllr J Atkin Cllr J Perkins |
| | One Secretary of State Member | Mrs F Beatty |
| | One Parish Member | Cllr C Carr |
| 12. | To appoint the following Member Representatives until the Annual Meeting in July 2018: | |
| | Asset Management Communities Connecting Young People with Nature | Cllr A Favell Cllr P Brady Mr Z Hamid |

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| Food and Farming | Mr R Helliwell |
| Health and Wellbeing | Cllr Mrs L Roberts |
| Landscape and Heritage | Mr R Helliwell |
| Member Learning and Development | Cllr A McCloy |
| Planning Enforcement | Cllr D Chapman |
| Tourism and Participation | Cllr J Macrae |
| Rural Economy | Cllr C Furness |
| Thriving Natural Environments | Mrs P Anderson |

13. To confirm that only these appointments are approved duties for the payment of travel and subsistence allowances as set out in Schedule 2 in the Members' Allowances Scheme.

36/17 REVIEW OF MEMBER REPRESENTATION ON OUTSIDE BODIES (A.1155/RC)

The Authority considered a report on making appointments to Outside Bodies until the Annual Meeting in July 2018.

At the 2017 Annual Meeting the Authority had asked Officers to carry out a review of the list of outside bodies to establish whether Member Representation was still needed. The report provided information on the outcome of this review.

At the meeting there was a discussion on whether Oldham and National Park Partnership should be included in the list of outside bodies. The Chief Executive agreed to look into the status of the Partnership and would bring a report back to a future Authority meeting if an outside body appointment was needed.

In most cases the appointments were moved, seconded and approved in accordance with the report of the Appointment Process Panel attached as Appendix 1 subject to the following changes:

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| Derby and Derbyshire Economic Partnership Rural Forum | As Cllr J Atkin and Cllr C Carr had expressed an interest in being the Deputy Member for this outside body the appointment was made following a ballot. Cllr C Carr was appointed. |
| East Midlands Council | As no expressions of interest had been received for this appointment Members were asked for nominations at the meeting. Cllr J Atkin was nominated, seconded and appointed. |
| Peak District and Derbyshire Destination Management Partnership Board | At the meeting Cllr J Macrae and Cllr C Carr withdrew their expressions of interest leaving the Member and Deputy roles uncontested. Cllr Mrs J Twigg was appointed as a Member with Cllr J Atkin appointed as her deputy. |
| Sheffield City Region | As Cllr C Furness and Cllr A Law had expressed an interest in being a Member of this outside body the appointment was made following a ballot. Cllr C Furness was appointed. |

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| South West Peal Landscape Partnership | At the meeting Mr P Ancell and Mr Z Hamid withdrew their expressions of interest leaving the Member and Deputy roles uncontested. Cllr J Macrae was appointed as a Member with Mrs F Beatty appointed as his Deputy. |
| Stanage Forum Steering Group | At the meeting Cllr C Furness withdrew his expression of interest leaving the position uncontested. Mr Z Hamid was appointed. |

RESOLVED:

- 1. To note the outcome of the review of Member representation on outside bodies.**
- 2. To make appointments to the Outside Bodies set out in Appendix 1 to the minutes to expire at the Annual meeting in July 2018.**
- 3. To confirm that attendance at meetings of the Outside Bodies identified in Appendix 1 be an approved duty for the payment of travelling and subsistence allowances.**
- 4. To ask Members appointed to Outside Bodies to produce a short annual report on activities, as appropriate, to be circulated in June 2018 as part of preparations for the 2018 Annual Meeting.**

The meeting was adjourned from 11.20am to 11.25am following consideration of this item.

37/17 AMENDMENTS TO STANDING ORDERS (JS)

The Authority considered a report setting out proposals to amend parts 1 and 4 of Standing Orders relating to the arrangements for the sealing of documents and the Terms of Reference for Authority, Committees, Sub-Committees and Advisory Groups by making minor changes to the terms of reference of the Audit, Resources and Performance Committee to incorporate feedback from the External Auditors on the 2016/17 Annual Governance Statement.

As a notice had been received under Standing Order 1.28(11) this item, identified on the Agenda as a not for discussion item, was the subject of a discussion.

RESOLVED:

- 1. To amend Standing Order 1.34(2) to read as follows:**

“(2) The seal shall be attested by one at least of the following persons present at the sealing viz by the Chief Executive (National Park Officer), the Director of Corporate Strategy & Development, the Monitoring Officer, or the Democratic Services Manager. An entry of every sealing of a document shall be made and consecutively numbered in a book to be provided for the purpose and shall be signed by the person or by persons who shall have attested the seal.”

2. To make the following amendments to section G in Part 4 of Standing Orders so that paragraph 5 of the terms reference for Audit, Resources and Performance Committee reflect CIPFA guidance on Audit Committees:

5. **AUDIT & CORPORATE GOVERNANCE**

a) Internal and External Audit matters including:

- i. Annual Governance Statement and the Annual Governance Report
- ii. Internal Audit Plan and Audit Reports
- iii. Risk Management
- iv. Assurance Frameworks and Assurance Planning
- v. Value for Money and Best Value
- vi. Countering Fraud and Corruption
- vii. External Audit
- viii. Financial Reporting
- ix. Partnership Governance

b) Matters relating to the Authority's corporate governance framework.

c) Effective scrutiny of the Treasury Management Strategy and Policies.

38/17 MEMBERS' ATTENDANCE ANNUAL RETURN (JS)

The meeting considered the annual return of Members' attendance at Authority and Committee meetings and Training and Development events for 2016/17.

RESOLVED: To note the annual return of Members' attendance for 2016/17.

39/17 CALENDAR OF MEETINGS 2018 (A.111/RC)

The meeting considered a report setting out proposals for a schedule of meetings to cover the period from 1 January 2018 to 31 December 2018.

As a notice had been received under Standing Order 1.28(11) this item, identified on the Agenda as a not for discussion item, was the subject of a discussion.

RESOLVED: To approve the calendar of meetings for 2018 as set out in Appendix 2 of these minutes.

AGM Minutes - Appendix 1 - Outside Body Member Appointments July 2017

AGM Minutes - Appendix 2 - 2018 Meeting Schedule

The meeting ended at 11.45 am

APPOINTMENTS TO OUTSIDE BODIES – 2017/18

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| Campaign for National Parks | <p><u>1 Member:</u> Cllr Mrs L Roberts</p> <p><u>2 Deputies</u> Mr Z Hamid Mr P Ancell</p> |
| Derby and Derbyshire Economic Partnership Rural Forum | <p><u>1 Member:</u> Cllr Mrs J A Twigg</p> <p><u>1 Deputy:</u> Cllr C Carr</p> |
| Derbyshire Archeological Advisory Committee | <p><u>1 Member:</u> Cllr C Furness</p> |
| Derbyshire Health and Wellbeing Board | <p><u>1 Member:</u> Cllr Mrs J A Twigg</p> |
| Derbyshire Partnership Forum | <p><u>1 Member:</u> Cllr D Chapman</p> <p><u>1 Deputy:</u> Cllr Mrs J A Twigg</p> |
| Derwent Valley Community Rail Partnership | <p><u>1 Member:</u> Cllr C Furness</p> <p><u>1 Deputy</u> Cllr Mrs J A Twigg</p> |
| Hope Valley and High Peak Community Rail Partnership | <p><u>1 Member:</u> Mr R Helliwell</p> <p><u>1 Deputy</u> Cllr Mrs J A Twigg</p> |
| East Midland Councils | <p><u>1 Member</u> Cllr J Atkin</p> <p><u>1 Deputy</u> Vacant</p> |
| Europarc | <p><u>1 Member (Usually Chair of Authority):</u> Cllr Mrs L Roberts</p> |
| Land Managers Forum | <p><u>1 Chair (Usually Chair of Authority):</u> Cllr Mrs L Roberts</p> <p><u>1 Deputy Chair:</u></p> |

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| | <p>Cllr D Chapman</p> <p><u>2 Members:</u> Mrs Frances Beatty Mr Robert Helliwell</p> |
| Moors for the Future Partnership Group | <p><u>1 Chair:</u> Cllr D Chapman</p> <p><u>1 Deputy Chair and 1 Member</u> Mrs P Anderson and Mr R Helliwell</p> |
| National Parks England | <u>1 Member (Usually Chair of Authority):</u> Cllr Mrs L Roberts |
| National Parks Partnerships LLP – Annual Meeting | <u>1 Member (Usually Chair of Authority):</u> Cllr Mrs L Roberts |
| National Parks UK | <p><u>1 Member:</u> Cllr Mrs L Roberts</p> <p><u>1 Deputy</u> Cllr D Chapman</p> |
| Peak District and Derbyshire Destination Management Partnership Board | <p><u>1 Member:</u> Cllr Mrs J A Twigg</p> <p><u>1 Deputy:</u> Cllr J Atkin</p> |
| National Park Management Plan Advisory Group | <u>1 Member (Usually Deputy Chair of Authority)</u> Cllr D Chapman |
| Peak District Local Nature Partnership | <p><u>1 Member:</u> Mrs P Anderson</p> <p><u>1 Deputy:</u> Mr R Helliwell</p> |
| Peak District Local Access Forum | <u>1 Member:</u> Cllr J Walton |
| Peak District National Park Youth Forum Group | <u>1 Member:</u> Mr Z Hamid |
| Peak District Parishes' Forum Annual Liaison Meeting | <p><u>1 Member (Usually Chair of Authority)</u> Cllr Mrs L Roberts</p> <p><u>1 Deputy:</u> Cllr D Chapman</p> |
| Peak District Partnership | <u>1 Member:</u> Cllr Mrs J Twigg |

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| | <u>1 Deputy:</u> Cllr J Atkin |
| Sheffield City Region Forum | <u>1 Member</u> Cllr C Furness <u>1 Deputy</u> Mr Z Hamid |
| South West Peak Landscape Partnership | <u>1 Member</u> Cllr J Macrae <u>1 Deputy</u> Mrs F Beatty |
| Staffordshire Destination Management Partnership | <u>1 Member:</u> Mrs F Beatty |
| Stanage Forum Steering Group | <u>1 Member:</u> Mr Z Hamid |

Authority Meeting 7 July 2017

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PROGRAMME OF MEETINGS 2018

Bank Holidays 2018: 1 Jan, 30 March 2 April, 7 & 28 May, 27 Aug, 25 & 26 Dec

All Meetings/Events start at 10am except where shown

Appendix 2

| Formal Committee Meetings | 2018 | | | | | | | | | | | |
|--------------------------------|------|-----|-----|-----|-----|------|----------|-----|------|-----|-----|-----|
| | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
| Authority | | 2 | 16 | | 25 | | 6 AGM | | | 5 | | 7 |
| Audit, Resources & Performance | 19 | | 2 | | 18 | | 20 | | 7 | | 2 | |
| Local Joint | | | | | | 8 | | | | | 16 | |
| Planning | 12 | 9 | 9 | 13 | 11 | 15 | 13 | 10 | 14 | 12 | 9 | 14 |
| Site Visits | 11 | 8 | 8 | 12 | 10 | 14 | 12 | 9 | 13 | 11 | 8 | 13 |

| Advisory Groups, Workshops & Events | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
|-------------------------------------|-------------------------|-------------|--------------|-----|-------------------------|---------------------------|-------------------------|-----|--------------------|--------------------|-------------------------|-------------|
| Members' Forum | | 2 1.30pm | 16 1.30pm | | 25 1.30pm | | 6 1.30pm | | | 5 1.30pm | | 7 1.30pm |
| Member Workshop | | | | | | | | | 21 | 19 | 16 | |
| Essential Training | | | | | | 8 New Member Induction | | | 28 Planning (1) | 26 Planning (2) | | |
| Other events | 19 Budget Monitoring | | | | 18 Budget Monitoring | 22 Annual Tour | 20 Budget Monitoring | | | | 16 Budget Monitoring | |

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8. NPMP - UPDATE ON CONSULTATION FEEDBACK, PROJECT TIMESCALES AND EXTENSION OF THE CURRENT PLAN (MM)

1. Purpose of the report

The purpose of this report is three fold, as follows. Firstly, to provide a summary of the consultation responses received on the areas of impact and special qualities during the public consultation on the updated Peak District National Park Management Plan (NPMP). It then goes on to outline the headline changes that have been made as a result of the consultation responses. Secondly, for Members to agree the timetable for the completion of the update. Finally, to extend the current NPMP until the updated plan can be adopted.

Key Issues

- Section 66 of 1995 Environment Act requires National Park Authorities to produce and update a National Park Management Plan every 5 years.
- Members gave approval to undertake a public consultation on the updated NPMP at the May 2017 Authority meeting (minute reference 24/17).
- Members are asked to note the summary of consultation responses provided at appendix 1 of this report.
- The public consultation demonstrated that in general there is overall support for the areas of impact and special qualities.
- We have revised the vision as a result of the consultation responses, as outlined at paragraph 6 of the report.
- We do not intend to change the areas of impact as a result of the public consultation, so the eight areas will remain broadly the same.
- We have added two new intentions under the areas of impact, and broadened three existing intentions, as detailed at paragraph 6 of the report.
- Members are asked to note the timescales for completion of the update to the NPMP, including Member involvement, as set out in paragraph 7 of the report.
- Members as requested to extend the existing NPMP until the updated NPMP can be adopted, as set out in paragraph 8 of the report.

2. Recommendations(s)

- 1. That the results of the public consultation undertaken as part of the update of the National Park Management Plan and changes made as a result of it be noted.**
- 2. That the timescales for completion of the updated National Park Management Plan be noted.**
- 3. That Members approve extending the current National Park Management Plan; A Partnership for Progress the Peak District National Park Management Plan 2012-2017 until adoption of the updated plan on 25 May 2018.**

How does this contribute to our policies and legal obligations?

3. Requirement to review the National Park Management Plan

Section 66 of 1995 Environment Act requires National Park Authorities to produce a National Park Management Plan which '*formulates policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park*' and should reflect national park purposes. This should be updated at least every 5 years.

The UK Government vision and circular 2010 for the English National Parks and the Broad states that 'Park Management Plans are the over-arching strategic document for

the Parks and set the vision and objectives which will guide the future of the Park over the next 10 to 20 years. The Park Management Plans are for the Parks and not just the Authorities. They should be supported by clear strategies with evidence of significant ‘buy-in’ from key partners and stakeholders, including communities, land owners and land managers. The Government expects public agencies and authorities active within or bordering a Park to cooperate in the development of the Park Management Plan and the achievement of the Management Plan objectives.’

This means the National Park Management Plan is not a plan for the work of the National Park Authority, or of any one organisation, but about what can be achieved by everyone with an interest in the Park and its future. We must involve all the relevant local authorities, partners and other stakeholders in its development and review. The plan is therefore a partnership plan reflecting ambitions across the whole National Park.

The Authority’s Corporate Strategy 2016-2019 Cornerstone 2: Our Services is relevant to this report.

2. Ensure clear policies are in place through facilitated and effective engagement and communication

- Review and update the National Park Management Plan

Updating the NPMP directly relates to this key activity within the corporate strategy.

Background Information

4. Members gave approval to undertake a public consultation on the areas of impact and special qualities, which will both be part of the updated NPMP at the May 2017 Authority meeting (minute reference 24/17). The consultation ran for 6 weeks between 19 June and 31 July 2017. Paragraph 5 of this report summarises the public consultation results.

Proposals

5. Summary of Consultation Responses

During the 6 weeks of public consultation, we received a total of 206 responses through the online survey, along with an additional 13 responses by letter or email. Some of the latter responses did not follow the structure of the online survey but were brought together in our analysis.

The responses came from a wide range of partners and stakeholders including local authorities, parish and town councils, environmental bodies and groups, representatives of interest groups and members of the public. In total 142 responses came from individuals and 77 from organisations.

Attached at appendix 1 to this report is a consultation summary report, which summarises all the responses received. This will be a public document, and will sit alongside the consultation document on our website.

6. Changes After the Consultation

The report at appendix 1 shows that in general there is overall support for the areas of impact and special qualities. We do not intend to change the areas of impact as a result of the public consultation, so the eight areas will remain broadly the same.

The most frequently made general point about the direction of the work within the National Park was that we should focus almost exclusively on the statutory purposes of

the National Park. As Members are aware, these are as follows.

- Conserve and enhance the natural beauty, wildlife and cultural heritage; and
- Promote opportunities for the understanding and enjoyment of the special qualities of the area by the public

In making these comments consultees often stated that the first purpose should be given more weight in decision making. This fits with the direction given in the Environment Act. This states that where there is a conflict between those purposes, all public bodies shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area.

A number of respondents suggested that retaining the existing vision was no longer satisfactory as the link to the Areas of Impact identified in the management plan was not sufficiently clear.

Therefore, we will be revising the vision framework to combine 'Thriving and vibrant communities' and 'An enterprising and sustainable economy'. The reduction to three main areas will better reflect our two statutory purposes and the duty to foster the economic and social well-being of local communities within the National Park. It also aligns better with the eight areas of impact. The revised vision framework will therefore be as follows.

- A diverse working and cherished landscape
- A welcoming and inspiring place
- Thriving communities and a sustainable economy.

We received consultation comments regarding the intentions - the green boxes that sit beneath each area of impact – which we have taken into account as we will be using the revised intentions at the delivery planning workshop in October. As a result of the public consultation, we have created two new intentions, as follows.

In Area of Impact 6: Ensuring a future for farming and land management, we have added the following intention.

Ensure the sustainable management of upland moors to deliver environmental, social and economic benefits

We want management of upland moors to conserve and enhance the special qualities of the Peak District National Park.

In Area of Impact 7: Managing Landscape Conservation on a big scale, we have added the following intention.

Ensure the South West Peak Landscape Partnership has a sustainable legacy

We want to continue to build on the work delivered by the South West Peak Landscape Partnership to ensure it has a sustainable legacy beyond its current funded lifetime.

We have also revised some of the existing intentions to broaden them, with the new text in *italics* as follows.

Area of Impact 5: Enhancing the benefits that the Peak District National Park provides

Engage with businesses on the benefits of the Peak District National Park

We want to support a dynamic network of businesses committed to conserving and enhancing the special qualities on which so many livelihoods rely on.

We want to increase business's knowledge of the benefits that the Peak District National Park provides and encourage them to promote this to others.

We want an environment where businesses can modernise and evolve while conserving and enhancing the special qualities of the Peak District National Park and enriching the communities that live within it.

Area of Impact 8: Supporting sustainable communities

Improve access to services

We want to ensure adequate access to services across the Peak District National Park by supporting new models for service delivery.

We want to maintain a range of settlements as the focus for key services. We want to support people to shape their own community and support service providers to explore new and alternative models of service delivery. We want to support the local economy.

We want a Peak District National Park-wide enhanced broadband service to support employment and allow communities to access services.

Support the provision of locally needed housing

We want to ensure a proactive approach to addressing the local need for appropriate housing in the Peak District National Park.

We will explore opportunities for proactive delivery for locally needed housing in a way that supports and delivers conservation and enhancement of the special qualities of the Peak District National Park. We will work together to grow our understanding of different housing products.

We will work together in the active delivery of affordable housing appropriate to the needs of local people. We want to support community-led housing initiatives that recognise the importance of delivering affordable homes with the community at the heart of the development process.

We want to attract appropriate levels of inward investment from Government and others that reflects the cost of building affordable homes in the Peak District National Park.

The consultation demonstrated that there was overall support for the special qualities. Therefore, we do not intend to significantly change these as a result of the public consultation, so the eight special qualities will remain broadly the same. However, there were quite a few suggested word changes, the majority of which we have been able to take into account. The most significant word changes have been within special qualities 5 (landscapes that tell a story of people and industry since prehistoric times) and 7 (historic features offering visible and buried reminders of past lives), as many responses stated that these overlapped. We have rewritten these to try and remove this overlap, but the intention behind these two special qualities remains the same.

We received a number of comments regarding the wording of the document, and will take account of appropriate ones as we finalise the draft NPMP prior to the second public consultation in Spring 2018.

7. Timetable to Completion

We have a detailed and robust project plan to take us from where we currently are to a point where the updated NPMP will be adopted. This has the following key milestones, including Member involvement throughout the timeline.

- 3 October 2017 - Partner and internal workshop to form the basis of the delivery plan.

- 6 October 2017 – this report.
- Approximately 23rd October to 15th Dec 2017 - Beyond the workshop effort will be required to achieve commitment to the suggested actions from each partner. This is a critical task to the success of the update and will to a large extent determine the success of the approach being taken. All significant work towards this will need to be completed prior to the Christmas holidays 2017. This includes identifying partners, refining and negotiating actions and dates and securing commitment.
1 December 2017 - Members Forum update on developing actions from the workshop and share emerging draft NPMP text.
- 2 February 2018 - Authority to seek approval to consult on the draft plan, including the delivery plan.
- Approximately 23 February to 6 April 2018 - 6 week consultation period on the draft plan.
23-Feb-18 until 06-Apr-18
- 6 April – 1 May – Revisions to the draft plan to take account of appropriate comments received during the consultation.
- Last week of April – revised NPMP circulated to all Members via email for any final comments before approval for adoption is sought.
- 25 May 2018 - Authority approval to adopt the plan.

8. **Extension to the Current National Park Management Plan**

The current management plan 'National Park Management Plan - Partnership for Progress' (2012 to 2017) was adopted by the National Park Authority Meeting 3 February 2012 (minute reference 7/12). As the NPMP is our most strategic framework, we want to ensure that a valid plan is in place throughout the update period. Therefore, we propose to extend the current plan until the new plan can be adopted.

Are there any corporate implications members should be concerned about?

Financial:

9. There are no direct financial implications resulting from this report. In terms of the update of the NPMP, this has a budget associated with it.

Risk Management:

10. The greatest risk to the update of the NPMP is ensuring that there is buy in from partners and stakeholders to the NPMP, including the delivery plan. This risk has been mitigated by ensuring the update process has steps within it to work with partners and stakeholders.

Sustainability:

11. National Park Management Plans are subject to the EU Directive on Strategic Environmental Assessment (SEA) which is delivered via a Sustainability Appraisal (SA), and are also subject to the Habitats Regulation and require a Habitat Regulations Assessment (HRA). It is intended to complete the SA and HRA as part of the update.

12. **Background papers (not previously published)**

None

13. **Appendices**

Appendix 1 - Consultation report

PTO

Report Author, Job Title and Publication Date

Matt Mardling, Senior Strategy Officer, 28 September 2017

National Park Management Plan Consultation June – July 2017 Responses Report

1. Introduction

This report summarises the responses to the Peak District National Park National Park Management Plan (NPMP) consultation that ran for 6 weeks between 19th June and 31st July 2017. The consultation set out the big issues all partners will seek to tackle in the next five years, and sought feedback on these. The results of this consultation will form the basis of the next NPMP.

More specifically we consulted on the following

- **8 special qualities** which aim to capture what is distinctive and significant about the Peak District National Park compared with other parts of the country. Understanding these qualities helps us to plan effectively and manage the Peak District National park in order to protect them.
- **8 areas of impact** where our actions can make the greatest difference. They will become the focus of the next National Park Management Plan, with deliverable actions for each area of impact.

A second public consultation on the draft NPMP, including the delivery plan, will be undertaken in winter/spring 2018. This will provide another opportunity for organisations and members of the public to comment on the detail of the final document.

How we conducted the consultation

The consultation was undertaken using an online survey and comprised of both open and closed questions. The consultation was promoted in the followings ways.

- An email was sent to 629 key partners and stakeholders of the National Park on the 19th June 2017 to launch the consultation.
- A follow up email was sent on 18th July to contacts on this distribution list who had not already completed the survey.
- Several internal and external presentations/workshops were conducted by the Strategy and Performance Team and the PDNPA Chief Executive to raise the profile of the consultation.
- A press release led to over 5 articles in the local press promoting the consultation.
- The consultation was advertised on our website and via social media.

Who responded to the consultation?

We received a total of 206 responses through the online survey along with an additional 13 responses by letter or email. Some of the latter responses did not follow the structure of the online survey but were brought together in our analysis.

The responses received came from a wide range of partners and stakeholders including local authorities, parish and town councils, environmental bodies and groups, representatives of interest groups and members of the public. In total 142 responses came from individuals alongside 77 from organisations.

2. Headline messages from consultation

From analysis of the consultation responses several headline messages emerged. The following are the overall levels of support for the special qualities and areas of impact.

Special Qualities:

1. As a collective 68%, of respondents believed the special qualities captured what makes the Peak District National Park special for them.
2. Respondents agreed the most with special quality 1, beautiful views created by contrasting landscapes and dramatic geology, with 61% strongly agreeing (90% including agree and strongly agree) that it is a special quality of the Peak District National Park.
3. Respondents agreed the least with special quality 4, characteristic settlements with strong communities and traditions, with 29% strongly agreeing (66% including agree and strongly agree) that it is a special quality of the Peak District National Park.

Areas of Impact:

1. There is a high level of support for all 8 areas of impact
2. When combining both strongly disagree and disagree answers the average level of disagreement across all eight areas of impact was 7%.
3. There was least support for area of impact 6, securing the most for the Peak District National Park, being a focus of the National Park Management Plan for the next 5 years, with 9% strongly disagreeing that this should be a focus of the National Park Management Plan for the next 5 years.

The main open text points made in response to the areas of impact are as follows.

1. **Negative impacts of grouse moor management:** 86 respondents or 40% of all respondents made comments about the negative impacts of grouse moor management. These included the intensity of heather burning and the alleged persecution of birds of prey.
2. **Focus on statutory purposes:** 60 respondents or 28% of all respondents made comments about focusing on statutory purposes. These comments generally made reference to the first statutory purpose to conserve and enhance natural beauty, wildlife and cultural heritage. The emphasis was towards landscapes and wildlife with reference to this taking precedence over other initiatives where there was conflict between them.
3. **Promote a more natural landscape:** 33 respondents or 15% of all respondents mentioned things like high nature value farming, rewilding, species re-introduction, enabling natural succession and native woodland afforestation. These comments generally aspired to a less intensively management landscape with greater emphasis on nature conservation.
4. **Wildlife crime:** 29 respondents or 13% of all respondents made comments about greater focus on tackling wildlife crime.
5. **Transport provision:** 24 respondents or 11% of all respondents mentioned that transport improvements needed to be addressed. These mostly focused on the need for better public transport provision but some also identified the negative impacts of vehicle traffic such as public safety and inconsiderate parking.
6. **Greater focus on the rural economy:** 23 respondents or 11% of all respondents made comments on the need for a greater focus on the rural economy. These tended to be focused on either the benefits that the visitor economy brought and how this could be enhanced or the role of businesses in supporting sustainable communities particularly the retention of young people in the area.
7. **Approach to affordable housing:** 15 respondents or 7% of respondents mentioned affordable housing as an issue to be addressed. These mostly focused on the need for affordable housing to provide for young people from the local area.

These headline messages and others are discussed in more detail in the following section.

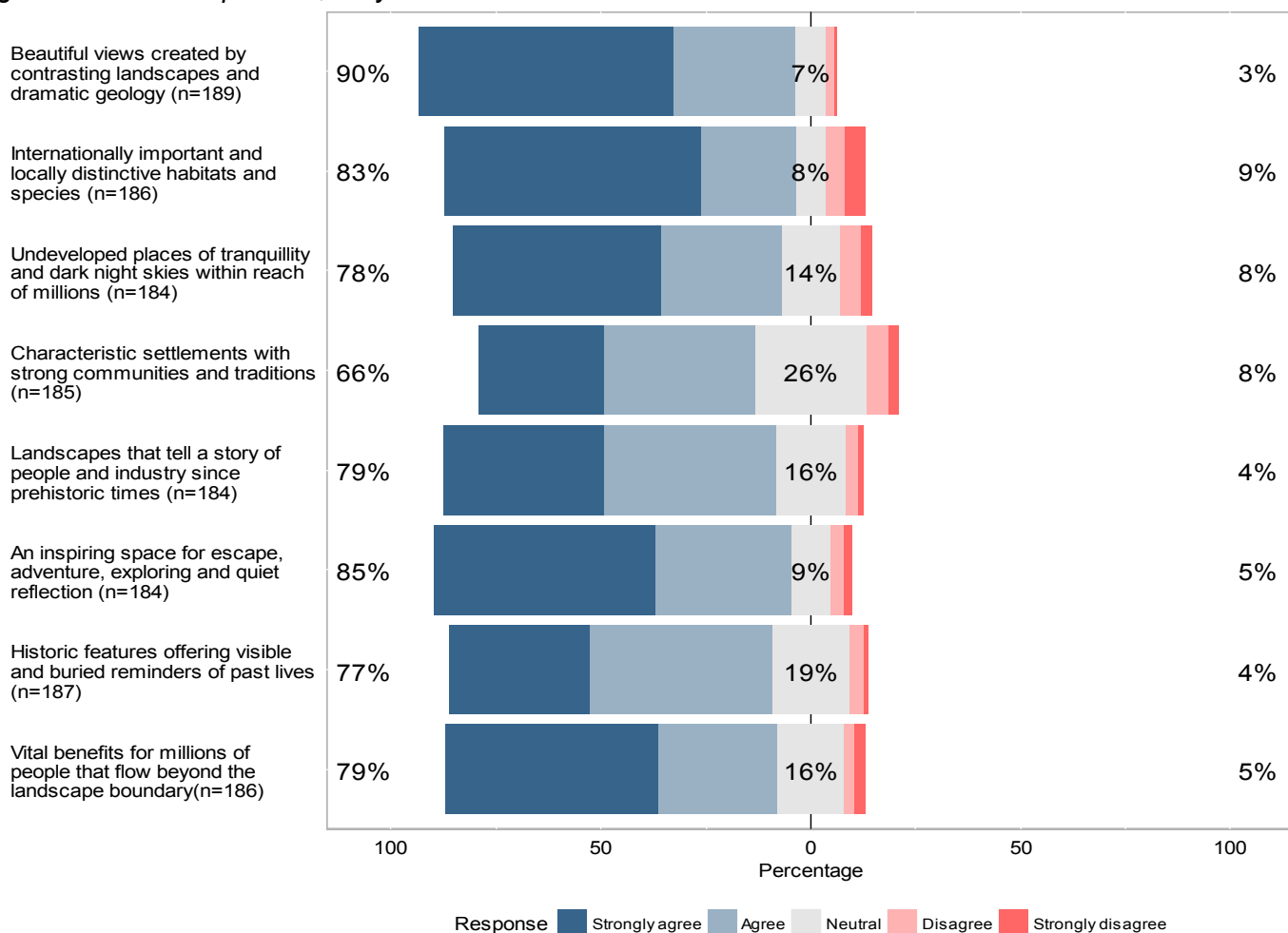
3. Consultation Analysis

Special Qualities

Overview

93% of respondents answered this section of the survey. The level of overall agreement with the individual special qualities was strong although it varied between 90% for special quality (SQ)1, beautiful views created by contrasting landscape and dramatic geology, and 66% for SQ4, characteristic settlements with strong communities and traditions. This special quality also had the highest level of neutrality associated with it at 26% of respondents. As a collective 68%, of respondents believed the special qualities captured what makes the Peak District National Park special for them.

Figure 1: This is a Special Quality of the Peak District National Park



Key themes emerging from this section

- Poor condition of the special qualities:** It was noted that the condition of some of the special qualities does not match the description. As one respondent succinctly pointed out;

“There is a marked disparity between what the special qualities could and should be and what in fact what they are.”

A number of others made similar comments and in particular questioned whether the Peak District National Park really provided places of tranquillity, dark night skies and a space for escape and adventure.

- Poor condition of special quality 2, internationally important and locally distinctive habitats and species:** The description of this special quality in particular was identified as being aspirational

rather than accurate. The descriptive prose regarding the potential to see a hen harrier was challenged as these birds have only bred twice in the Peak District National Park since 2006. Respondents who commented on this theme also alleged wildlife crime was rife within the National Park with birds of prey and mountain hares in particular sighted as falling victim to management activities undertaken on grouse moors. Going further one respondent suggested;

“One of the problems with designated upland landscapes.....is that hills and mountains are “pretty” because of their shape alone, but their beauty is at best skin deep.....Impoverished wildlife and damaged soils are the most striking characteristic of tens of thousands of hectares of the PDNP landscape.”

Other comments questioned the ecological integrity of the National Park and suggested that there is an opportunity, when discussing the special qualities, to stress the connectedness between beautiful views, biodiversity, tranquillity and wildness. As one respondent noted:

“Landscape is not just about the view but the habitats and species that make it up. A superficially attractive view of green fields can be a relative desert for wildlife”.

- *Combine special qualities 5 and 7:* These special qualities, “Landscapes that tell a story of people and industry since prehistoric times” and “historic features offering visible and buried reminders of past lives” were considered by to be very similar. It was suggested that they could be combined into a single special quality highlighting the wealth of cultural heritage within the National Park that can be actively engaged with and celebrated.

Area of impact 1: A National Park for Everyone

Overview

89% of respondents answered this section of the survey. The results show strong support for this area of impact with three quarters (75%) of respondents agreeing or strongly agreeing that this should be a focus of the NPMP over the next 5 years, as opposed to 14% who indicated they disagreed or strongly disagreed with this area of impact. In terms of creating a national park for everyone there was strong collective agreement that focusing on removing the physical and perceived barriers to access is an appropriate way to make a difference.

Figure 2: Area of impact 1: A National Park for Everyone

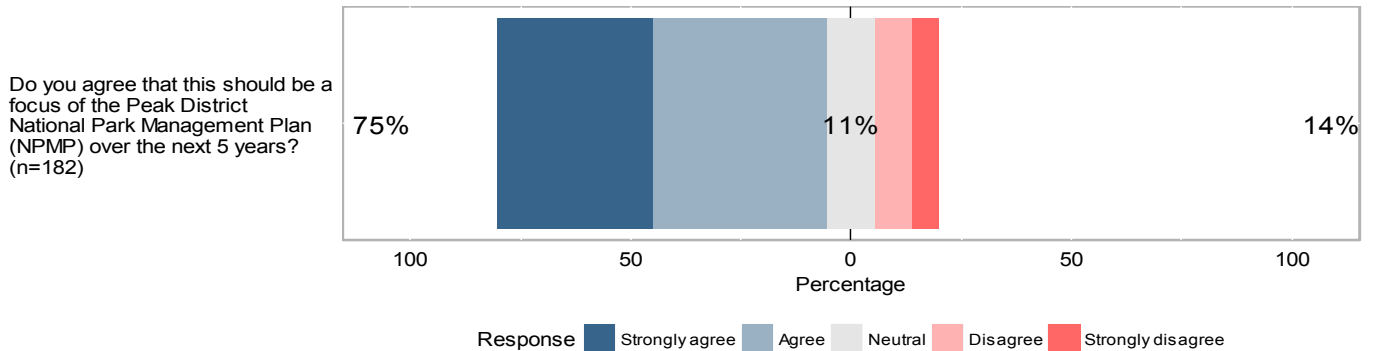
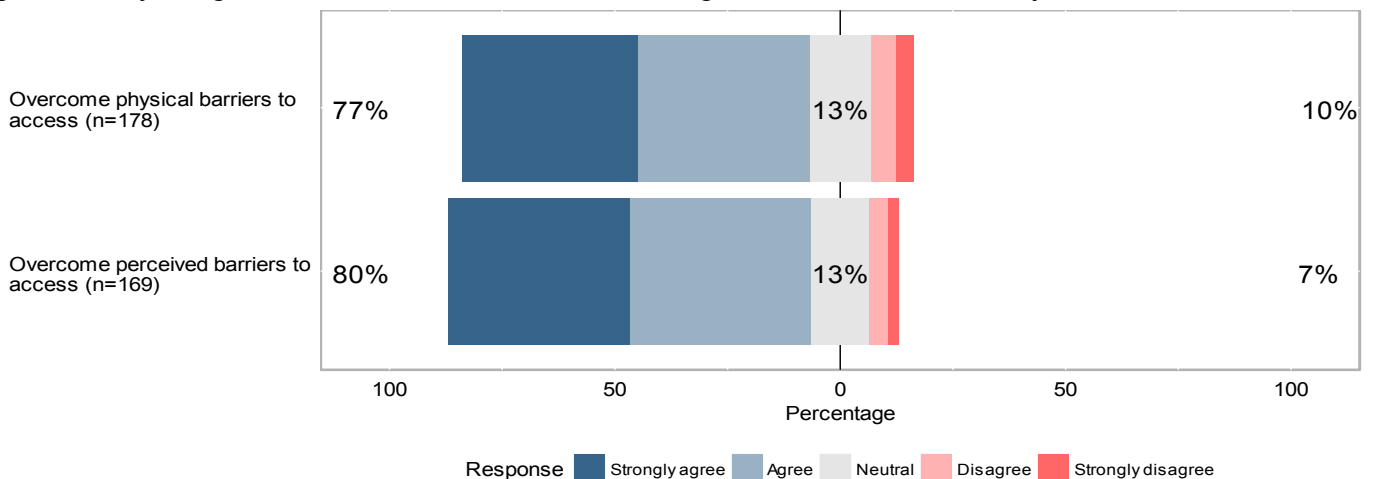


Figure 3: Do you agree with 'what we want to do' creating a National Park for everyone?



Key themes emerging from this section

The following key themes have emerged from the open ended questions within this section of the consultation:

- Focus on implementing the statutory purposes of National Parks:** Both those who agreed and disagreed with this area of impact stressed that it should be viewed through the context of the Environment Act 1995 which clearly states that if there is any conflict between the two statutory purposes of national parks then greater weight shall be given to preserving their natural beauty, wildlife and cultural heritage.
- Excessive access:** There was concern raised by some that promoting and enabling greater access to the National Park would erode the condition of the special qualities. These respondents believed that the Peak District National Park is already at saturation point with “honey pot” sites attracting excessive visitor numbers which contributes to a diluted visitor experience and brings with it problems such as traffic congestion and littering.

- *Provide appropriate access rather than access for all everywhere:* An emerging theme centred on the need to provide appropriate access for the many different types of visitor to the National Park. For example one comment supported providing access for users with limited mobility but suggested this should not be used as a reason to undertake insensitive track work across the whole National Park. This also recognises that different users have different needs and there is a need to have in place an appropriate recreation strategy which provides something for everyone whilst not compromising the special qualities.
- *Anti-grouse moor management:* Of concern to many were the alleged activities that take place on moors managed for driven grouse shooting. These included alleged persecution of raptors and mountain hares, the use of medicated grit and the use of snares to control predators. It was stated that knowledge of these activities taking place within the Peak District National Park created a mental barrier which prevented people from visiting. Some responses commented that grouse moor management is not compatible with achieving a national park for everyone as it is focussed on providing sporting opportunities for an elite few. It was also suggested that this type of land management was not sustainable as it contributed to downstream flooding, poor biodiversity and prevented access during the shooting season. It was suggested that abandoning this type of land management in favour of enabling more natural processes to take place would do more to create a national park for everyone and be more consistent with working towards the National Park's statutory purposes. It should be noted that pro-grouse moor comments were put forward but not within this area of impact.
- *Current work:* A number of organisations indicated that they are currently undertaking projects aimed at removing the barriers that prevent people from coming to enjoy all that the Peak District National Park has to offer. Many of these projects provide structured volunteer days to encourage people to actively take part in conservation activities. For example the Peak District Mosaic group has champions who work within their communities who arrange visits to the National Park. These visits enable people from underrepresented groups to experience all that the National Park has to offer. Other examples of existing work included providing access on private land and improving access around visitor hubs such as Longshaw.
- *Public transport:* It was noted that multi organisational partnerships must work together to provide the public with a suite of recreational opportunities and that a more integrated public transport system needs to be developed to help people access those opportunities.
- *Stronger brand awareness:* Ideas put forward that could further help to remove those physical and perceived barriers included having a stronger "brand" presence in the surrounding cities and conurbations.
- *Identification of barriers:* It was suggested that the consultation document did not articulate very well what physical and mental barriers actually exist and as a consequence it was recommended that more work be undertaken to help identify and understand what they are so any action taken is based on a clear evidence base.
- *Access to water:* It was suggested more could be done to investigate ways of gaining better access to water for recreational purposes.

Area of impact 2: Securing the most for the Peak District National Park

Overview

86% of respondents answered this section of the survey. The results show strong support for this area of impact with 75% of respondents agreeing or strongly agreeing that this should be a focus of the NPMP over the next 5 years, as opposed to 12% who indicated they disagreed or strongly disagreed with this area of impact. There was strong agreement that collectively influencing land management policy and funding opportunities as we exit the European Union, alongside engaging in new ways of working are appropriate ways to make a difference.

Figure 4: Area of impact 2: Securing the most for the Peak District National Park

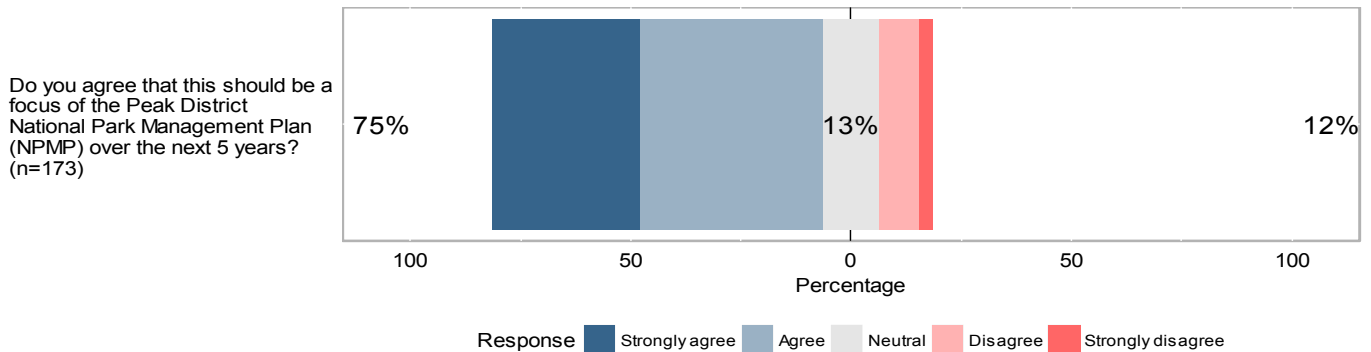
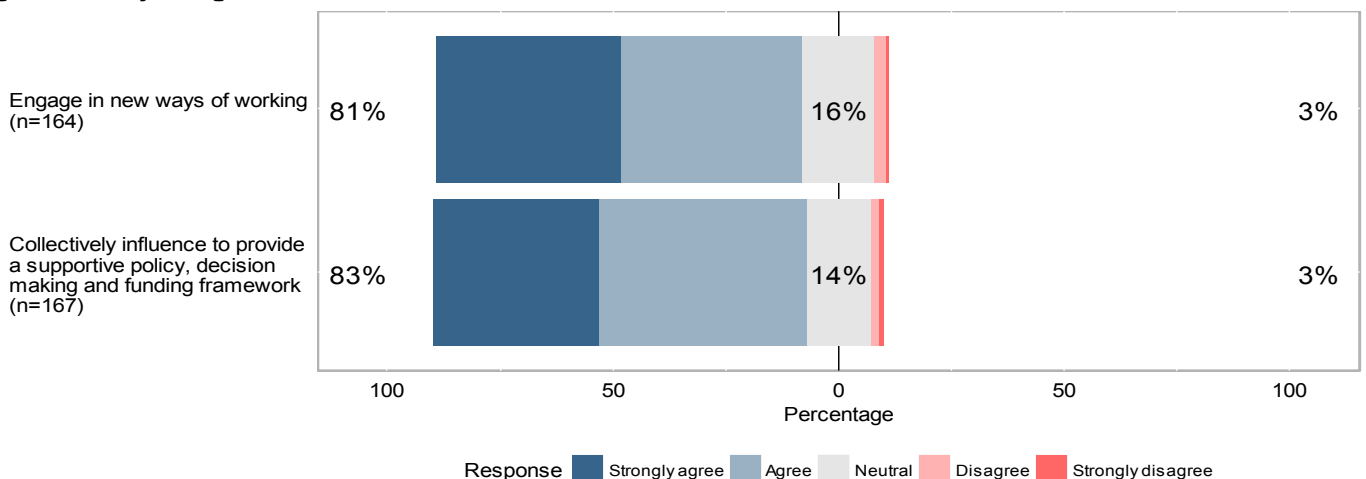


Figure 5: Do you agree with 'what we want to do' to secure the most for the Peak District National Park?



Key themes emerging from this section

The following key themes have emerged from the open ended questions within this section of the consultation:

- Better articulation of the Area of Impact:** It was suggested that using the word “most” was too competitive as it implied the National Park would be competing with others for valuable financial resources. Instead it was proposed that focus should be on getting the “best” for the National Park as this would immediately broaden the scope to include other resources such as technical expertise. It was further suggested that the best solution may not be the most expensive.
- Collaborative working:** There was support for continued partnership working with references made to all existing landscape partnerships currently delivering work across the Peak District National Park. Working more closely with other National Parks was also suggested as a means of adding value to work streams and projects within this area of impact.

- Effective Lobbying: Numerous comments highlighted both the uncertainties and the opportunities that the UK's departure from the European Union will bring. In order to get the most from this opportunity it was suggested that partners who wanted the same thing could come together to speak with one voice to raise the profile of their ambitions to those in positions of influence. As one respondent stated;

"It will be a case of who lobbies loudest and hardest will get funding"

Several topics were identified that people believed should be highlighted to the relevant decision makers. These included funding for access and access infrastructure, enhanced legal protection for wildlife and the need to develop a post exit of the European Union funding model for land management that supports the enhancement of the Peak District National Park's special qualities.

- Combine with Area of Impact 5: Two respondents saw an opportunity to combine the intent of Areas of Impact 2 and 5 together along the theme of "*securing the future of the Peak Districts special qualities*".

Means of delivering other Areas of Impact: One comment suggested that this area of impact was one of the "*mechanisms for achieving all the other areas of impact and therefore should be underpinning these rather than being an area of impact on its own.*"

This highlights that issues raised in the consultation are often relevant to multiple areas of impact and often one action can lead to many benefits.

Area of impact 3: Encouraging enjoyment with understanding

Overview

89% of respondents answered this section of the survey. The results show strong support for this area of impact with 90% of respondents agreeing or strongly agreeing that this should be a focus of the NPMP over the next 5 years. Only 3% indicated they disagreed or strongly disagreed with this area of impact. In terms of how to encourage enjoyment with understanding there was strong agreement (~90%) that there is a need to balance opportunities for enjoying all the Peak District National Park has to offer whilst ensuring everybody recognises they have a responsibility to share it and care for what makes it special.

Figure 6: Area of impact 3: Encouraging enjoyment with understanding

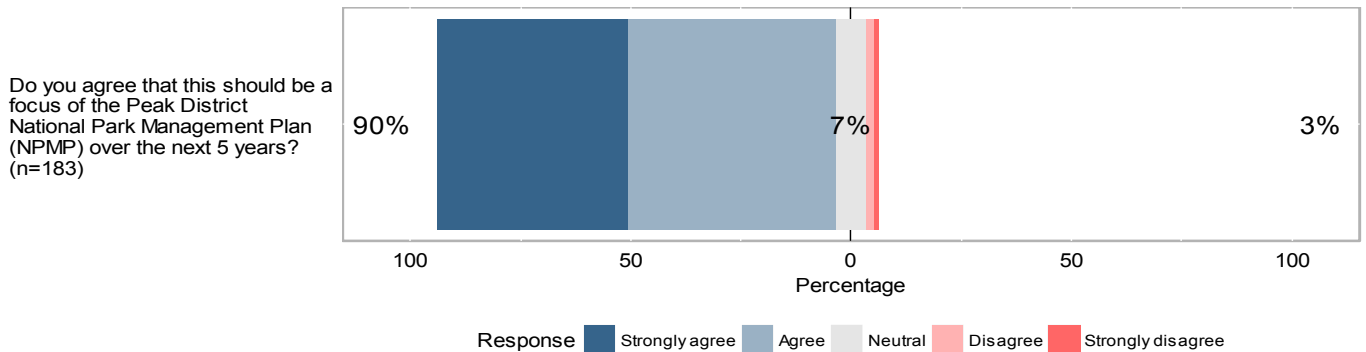
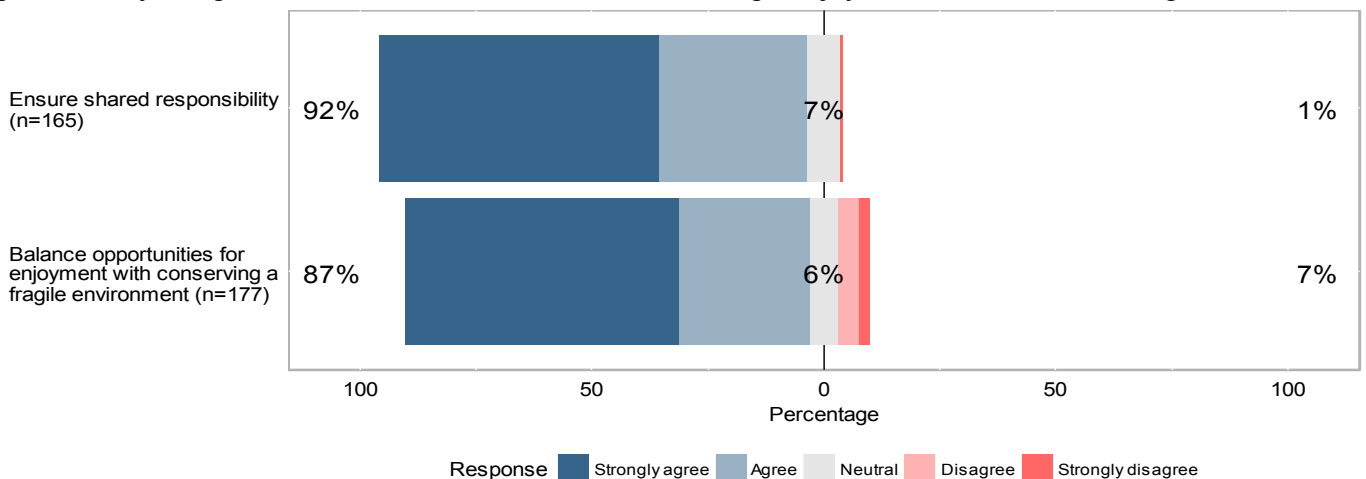


Figure 7: Do you agree with 'what we want to do' to encourage enjoyment with understanding?



Key themes emerging from this section

The following key themes have emerged from the open ended questions within this section of the consultation:

- ***Is the word "balance" appropriate?*** Some respondents questioned the use of the word balance as they believed this suggested that at times there may need to be a compromise taken between delivering the two statutory purposes of National Parks even though legislation dictates that purpose one always takes priority where there is conflict.
- ***Increase educational opportunities:*** Many individuals and organisations commented that education is vital to achieving understanding of the Peak District National Park's special qualities and what is required to enhance them. Education was also seen as an important way of aiding understanding between different user groups. The idea of promoting the countryside code was mentioned several times as one potential way of achieving this.

- Broaden Outreach Activity: It is well known that the Peak District National Park is bordered on all sides by major cities and conurbations. The need to connect with these places through more imaginative ways was highlighted by a number of respondents as was the need to create better links into schools both inside and outside of the National Park. One respondent suggested that the greatest threat to the National Parks special qualities was from people who are not affiliated to specialist interest groups and that more thought should be given in how to engage with them.
- Current work: Many organisations commented that they are already working hard to promote an understanding of the Peak District National Parks special qualities. This work includes the “wild child” project within the South West Peak Landscape Partnership, the information on display at visitor centres and the trips organisations undertake to promote awareness and understanding of the National Park.
- Caring about the Peak District National Park: Whilst agreeing that this area of impact is fundamental to ensuring the continued existence of the Peak District National Park one organisation suggested that we should:

“want visitors to be inspired, not just understand the park but be thrilled and excited (by it)”

Once this is achieved then people will begin to care for the National Park and support it in many different ways.

- GIS as a means to encourage understanding: The practise of enabling public participation in decision making through the use of GIS is gaining popularity. One respondent suggested that undertaking a stakeholder workshop designed to facilitate the mapping out of environmental and social problems may:

“promote a greater sense of harmony and responsibility across potentially conflicting themes (e.g. grouse moor management and wider biodiversity).”

Area of impact 4: Preparing for a future climate

Overview

91% of respondents answered this section of the survey. The results show strong support for this area of impact with 87% agreeing or strongly agreeing that this should be a focus of the NPMP over the next 5 years. Only 3% indicated they disagreed or strongly disagreed with this area of impact. The proposals for “what we want to do” to prepare for a future climate were strongly supported with at least 80% of respondents supporting each proposal. All four sub areas of impact are equally well supported with only a slight reduction in support for ‘Balance changes in land management practices’.

Figure 8: Area of impact 4: Preparing for a future climate

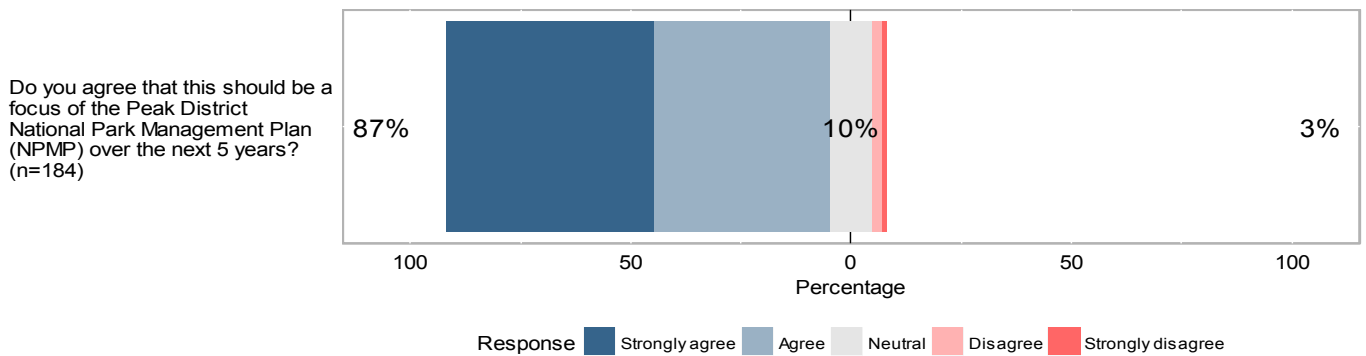
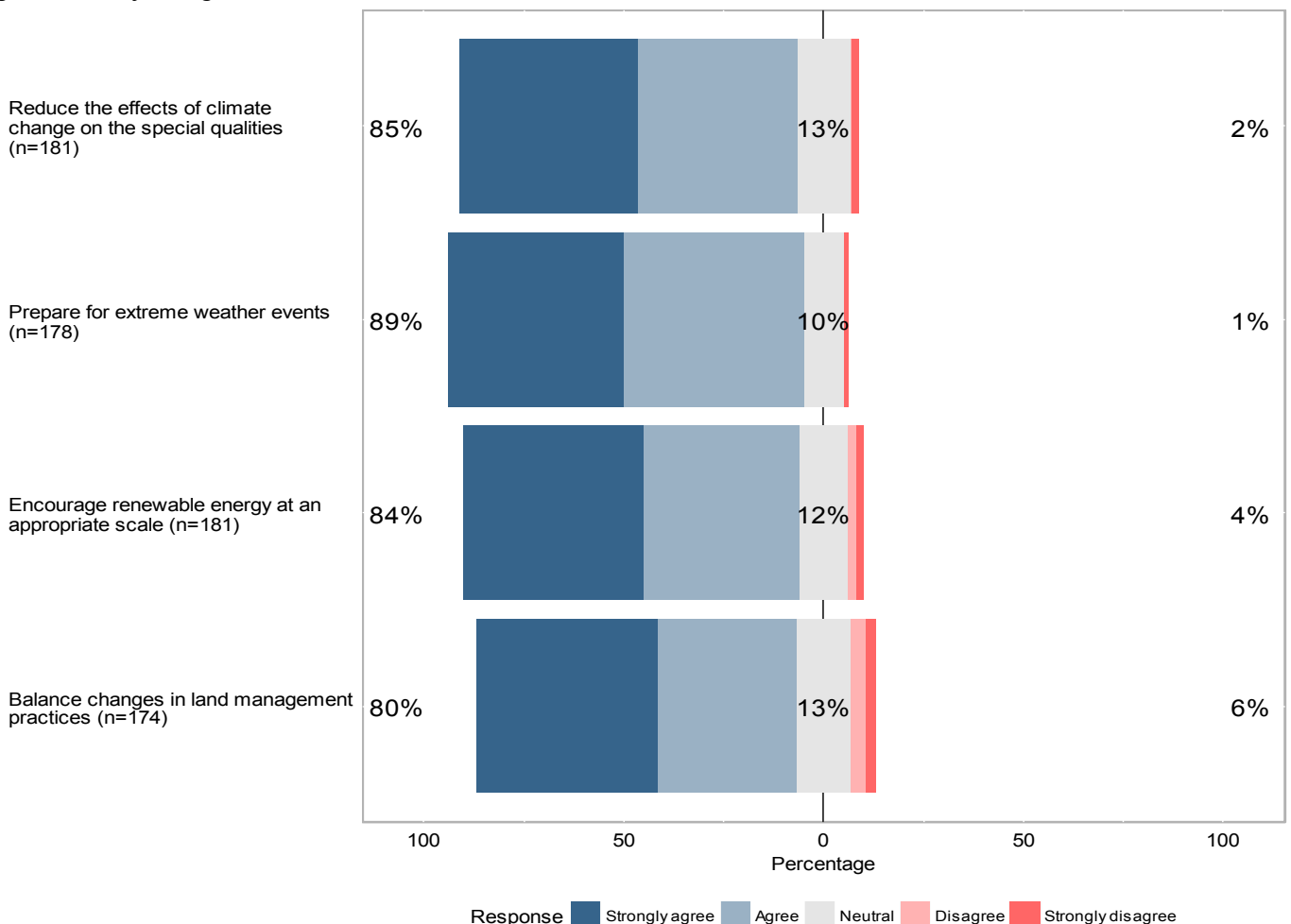


Figure 9: Do you agree with ‘what we want to do’ to secure the most for the Peak District National Park?



Key themes emerging from this section

The following key themes have emerged from the open ended questions within this section of the consultation:

- Develop resilient landscapes: Several respondents suggested that in order to help species adapt to climate change more work needs to be done to create resilient landscapes. Currently many of our most important sites for wildlife are fragmented, isolated and support communities that may find it difficult to migrate as the climate changes. In order to begin to create these resilient landscapes one respondent suggested;

“We need to identify which species, species assemblages and habitats are going to be most at risk and assess what measures are going to be open to us to try and mitigate the effects of climate change.”

Respondents who commented on this theme also referenced the 2010 Lawton Report *“Making Space for Nature”* which called for the landscape to have wildlife sites that are *“bigger, better, more and joined up”*.

- Grouse moor management contributions to climate change: Contradictory submissions were received in relation to the contribution grouse moor management makes to climate change. Practises such as burning heather, track cutting and over grazing were all cited as ones that contributed to climate change through releasing of carbon and increasing run-off. On the other hand it was suggested rapidly growing young heather following a prescribed burn sequesters more carbon than that lost during the burning and more than is sequestered by older heather.
- Promote more tree planting: Pro-afforestation comments were common in this section. A number of benefits were cited that could be gained by adopting such a policy. These included; greater biodiversity, contribution to natural flood management, carbon sequestration, increased wildlife corridors and as a positive change to current land management practises that leave the landscape “bare”.
- Current work: Many organisations are already engaged in work to mitigate the effects of climate change. For example utility companies and NGO’s are already working in partnership to enhance degraded blanket bog for a number of benefits that include habitat restoration, carbon sequestration, water retention and alleviating flood risk to downstream communities.
- Clarity of wording: Again the use of the word “balance” was questioned by a number of respondents as they felt this did not push forward an ambitious enough agenda in this area. One proposal suggested the wording be strengthened to note:

“that a more pro-active approach is taken to enhancing the special qualities and climate change resilience through habitat creation, restoration and management.”

- Climate change vulnerability assessment: Of those that supported this area of impact a few noted that an essential part of planning for climate change is to understand the threats and opportunities that it presents. One respondent noted:

“A full assessment of the unavoidable and potential risks of the trends, and risk assessment would help to identify additional actions to prepare for the future; these should be captured in an adaptation plan and implemented.”

- Climate change effects on cultural heritage values/features: Whilst recognising that climate change will have an effect on the natural world it is important to note that it will also have a profound effect on the cultural landscape and identity of the Peak District National Park. As one respondent noted:

“changes in vegetation, changes in land management practice, land suddenly becoming more or less productive, will have a huge impact on the management of the historic landscape and our archaeological heritage.”

Area of impact 5: Enhancing the benefits that the Peak District National Park provides

Overview

88% of respondents answered this section of the survey. The results show strong support for this area of impact with over 80% of respondents agreeing or strongly agreeing that this should be a focus of the NPMP over the next 5 years. 5% indicated they disagreed or strongly disagreed with this area of impact.

There was strong support for 'what we want to do' within this Area of Impact. However, 20% were 'neutral' in response to 'engaging with businesses on the benefits of the Peak District', the reasons for which are unclear from the responses received.

Figure 10: Area of impact 5: Enhancing the benefits that the Peak District National Park provides

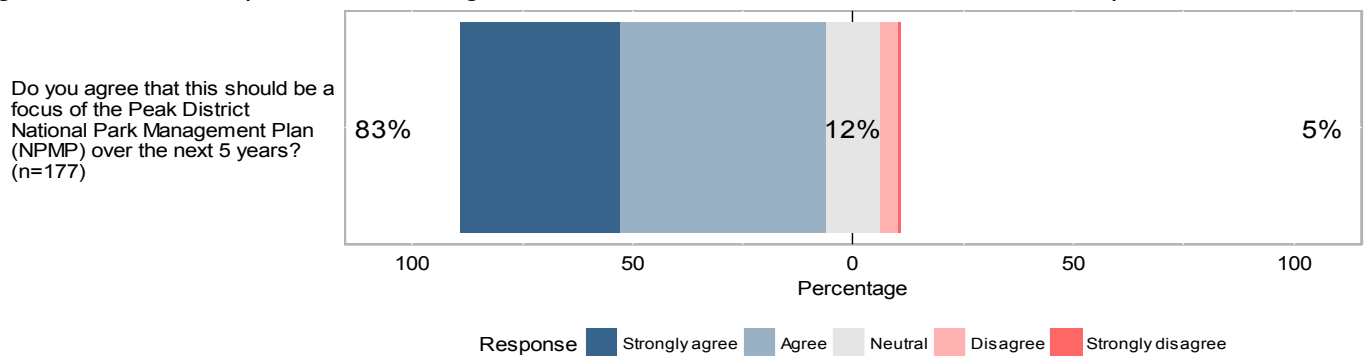
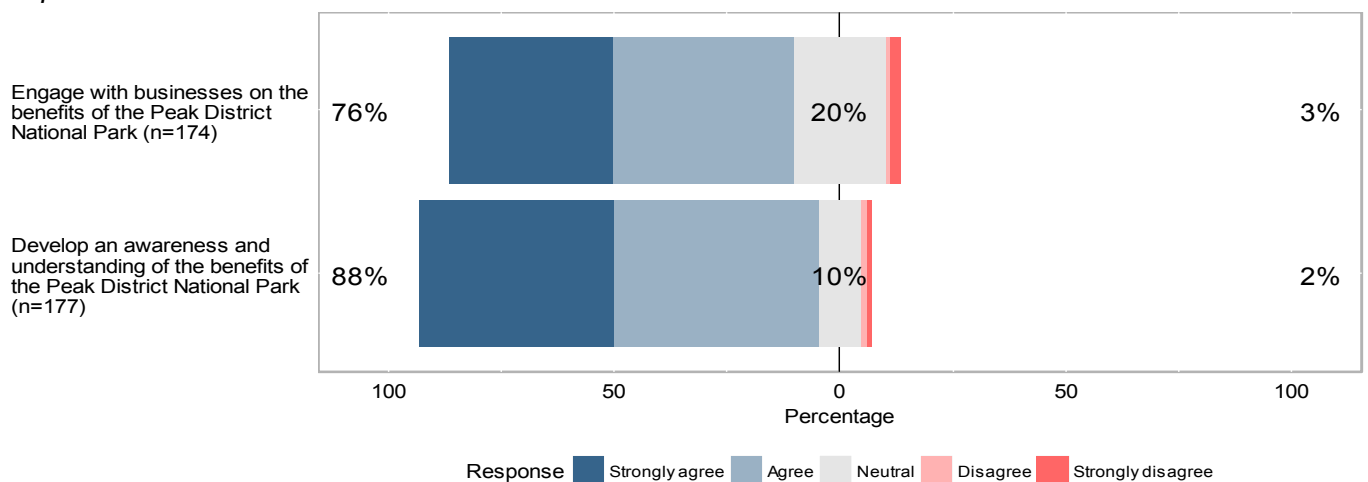


Figure 11: Do you agree with 'what we want to do' to enhance the benefits that the Peak District National Park provides?



Key themes emerging from this section

The following key themes emerged from the open ended questions within this section of the consultation:

- Communicating the benefits of the Peak District National Park:** There was a great deal of support from partners to work collectively to improve the knowledge of ecosystem services delivered by the Peak District and work collectively to communicate this knowledge back to the general public. This was offered at both a strategic and project based level.
- Enhancing the benefits through alternative land management:** A number of respondents challenged the title phrase 'enhancing the benefits' and stated that the supporting text does not address how this will be done. Instead the text focuses primarily on promoting the benefits already provided by the Park. It was suggested that more should be included about working alongside land managers and farmers to deliver greater public money for public goods. A small number of respondents went

further and suggested that an ecosystem service approach should be used to inform how we manage and monitor the land. Reforming agricultural payments was also included in a number of comments within this section.

- *Grouse moor management and delivery of public goods*: Closely linked to the above theme was the concern that grouse moor management objectives are not consistent with the ambitions of this Area of Impact. Burning of heather and illegal persecution of wildlife were cited as unsustainable land management practises within this topic. A small number of organisations responded that the delivery of ecosystem services provided by grouse moor management should be better communicated to the public. There was a clear divide within this topic and in some cases contradictory evidence was cited. Many felt that this subject should be addressed within the NPMP and that it was deliberately overlooked to avoid controversy. For example, one respondent wrote:

“Your suggested options are not really much in your gift. And the elephant stomping around your room is ‘which land management do we want in the PDNP?’ You may have picked up from my comments by now that I would like to see an end to intensive grouse moor management in the PDNP. Your consultation avoids this issue and appears happy with the status quo – I believe this is a big mistake and represents a failure to address properly your major responsibility to ‘to conserve and enhance the natural beauty, wildlife and cultural heritage’.”

- *Cultural benefits need to be more evident within this section*: Suggestions were made that the benefits of cultural heritage/historic features (such as sense of place) should be recognised within this section, not just the benefits provided by the natural environment.
- *Greater focus on businesses and economy*: Several respondents advocated that supporting economic development and the visitor economy should be included. For example, one respondent mentioned the need for greater collaboration with Local Enterprise Partnerships to develop a clear strategy for the Peak District economy that supports appropriate economic diversification and growth. In comparison, many respondents also opposed this suggesting that the statutory role of the National Park should come first and that engaging with businesses should not be a high priority. Many felt that conservation should be the overriding focus.
- *Branding the National Park*: Some respondents suggested that more could be done to encourage businesses to protect the special qualities and improve their green credentials. Building on the existing Environmental Quality Mark (EQM) model was referenced by a few stakeholders along with promoting high quality, sustainable and local products.

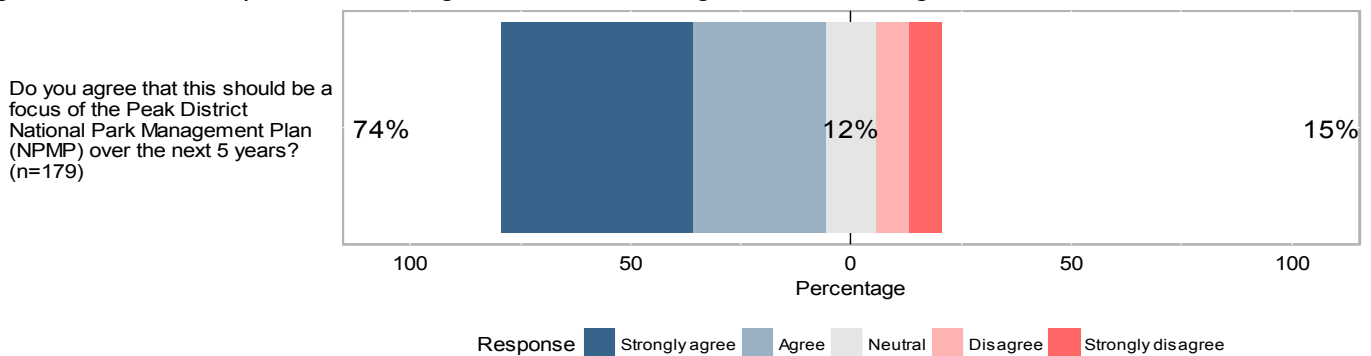
Area of impact 6: Ensuring a future for farming and land management

Overview

81% of respondents answered this section of the survey. There was a good level of support for this Area of Impact with over 74% of respondents strongly agreeing or agreeing that this should be a focus. However, in comparison to other sections within this consultation, there was a noteworthy level of opposition, nearly 15% disagreed or strongly disagreed that this should be a focus.

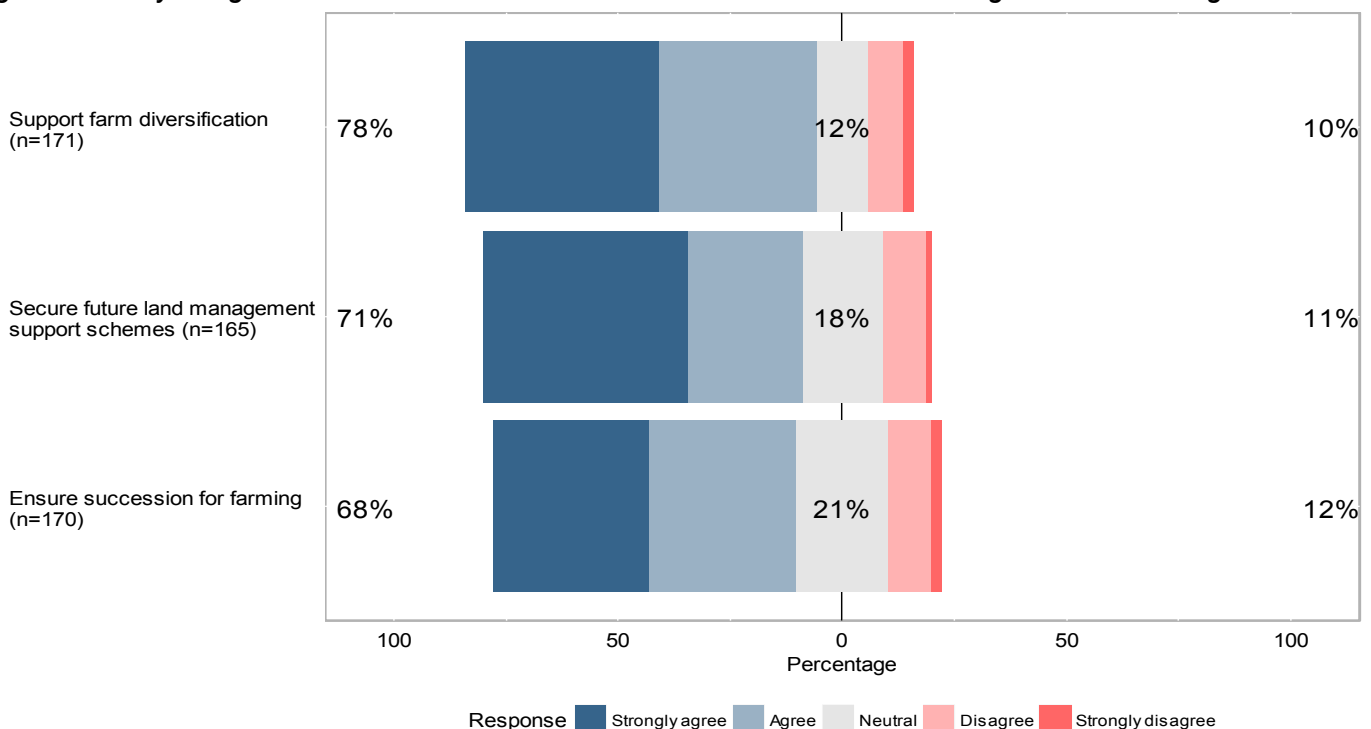
The proposals for “what we want to do” to secure a future for farming and land management were strongly supported with at least two thirds of respondents supporting each proposal. All three sub areas of impact are well supported with only a slight reduction in support for ‘ensure succession to farming’.

Figure 12: Area of impact 6: Ensuring a future for farming and land management



The graph below shows support for ‘what we want to do’ in this section. However, 20% of respondents showed no level of agreement for ‘ensuring succession for farming’ and ‘securing future land management support payments’. As highlighted in the themes below, this was largely due to the feeling that land based subsidies should provide more in terms of public goods or protection for wildlife. Many suggested that to achieve this we need to explore alternative approaches to land management. Regarding diversification, it was felt that that the NPMP needed to be clearer about the type of diversification that is acceptable within the National Park.

Figure 13: Do you agree with ‘what we want to do’ to secure a future for farming and land management?



Key themes emerging from this section

The following key themes emerged from the open ended questions within this section of the consultation:

- *Collaboration to shape future agri-environment schemes:* There was strong support from a range of organisations regarding collectively working to shape the future of agri-environment schemes. Whilst several organisations mentioned that they were already doing this at different levels, many felt that the Peak District National Park could be a testbed for new models and a collective voice for the Park was needed to achieve this. However, others felt that it was ‘beyond the gift’ of the NPMP to effectively influence policy at this level.
- *Greater focus on suitable landscape management:* Many respondents felt that the importance of sustainable land management and protection of natural beauty, wildlife and cultural heritage should have greater focus within this section. Farming and land management may be seen as a means to achieving this but not the end goal in itself. It was noted that many wanted a clear steer on what acceptable and sustainable modern farming should look like in a National Park. Environmental sustainability was a key theme rather than simply ensuring that farming businesses remain economically viable. As in previous sections, intensive grouse moor management was a repeated theme and this was linked to its significant negative impacts on the upland environment. One respondent went further to suggested rephrasing this section:

“Ensuring a future for sustainable farming and land management that conserves and enhances the special qualities’ Aol 6- Suggest reword title as “Ensuring a future for sustainable farming and land management which delivers National Park objectives”. Not all land management furthers National Park objectives, and why would we encourage it if it doesn’t?”

A bold new vision for land management: Closely linked to the above theme was the idea that the National Park should be promoting a bold new vision that explores alternative forms of land management (such as High Nature Value Farming) to address issues such as biodiversity loss. Many respondents stressed that current farming practices have resulted in a significant loss of biodiversity across the National Park and this is despite the best efforts of many individuals and organisations. Many felt that the NPMP could provide a clear direction of what this would be like and how it can be achieved.

- *The impact of controlled burning:* There was a concern by a number of respondents that control burning of grouse moors had a negative impact on wildlife and ecosystem services provided by the moorlands. It was felt more needed to be done to address this issue.
- *Greater collective working with farming community:* Many believed there is a greater need to work closer with the farming community and foster farmer collaboration especially to encourage the next generation of farmers and land managers to adopt sustainable farming practises.
- *Modernise farming practises:* A number of respondents mentioned that the NPMP should embrace technological innovation to modernise farming practices in a way that is sensitive to the Peak District National Park landscape. One stakeholder felt there needs to be a focus on bringing more technical, scientific and manufacturing businesses to the National Park. Some stakeholders felt that higher and further education opportunities need to be strengthened. This could be done by improving transport infrastructure to education providers, continuing support for the Skills Development Programme and creation of more modern apprenticeships for farming, fishing, catering and land management. It was suggested the development of a Tourism Academy and greater collaboration with agricultural colleagues was needed to achieve this.
- *Local branding:* Many felt there was a need to go further to promote food of local provenance and open up new markets such as meat from traditional breeds. The Environmental Quality Mark was mentioned as a model that should be built on to encourage appropriate farming practices that protect the special qualities by providing a recognised award.
- *Rewilding:* There was a high level of support for a range of rewilding approaches including High Nature Value Farming, increasing woodland cover, species reintroduction and passive land management, especially of the moorlands. Many questioned the viability of encouraging upland management and suggested that alternative ideas should be explored further.

Area of Impact 7: Managing landscape conservation on a big scale

Overview

82% of respondents answered this section of the survey. There was a significant level of support for this Area of Impact with over 82% of respondents agreeing or strongly agreeing that this should be a focus, 4% disagreed or strongly disagreed. Although there was strong support for “what we want to do” within this Area of Impact there was also higher than average levels of neutrality, perhaps due to the reference to specific initiatives about which there may be little public awareness.

Figure 14: Area of Impact 7: Managing landscape conservation on a big scale

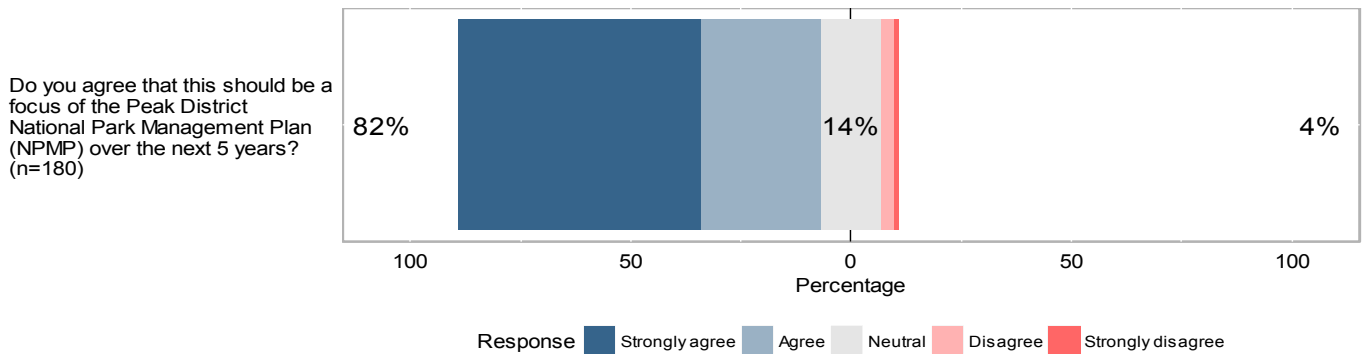
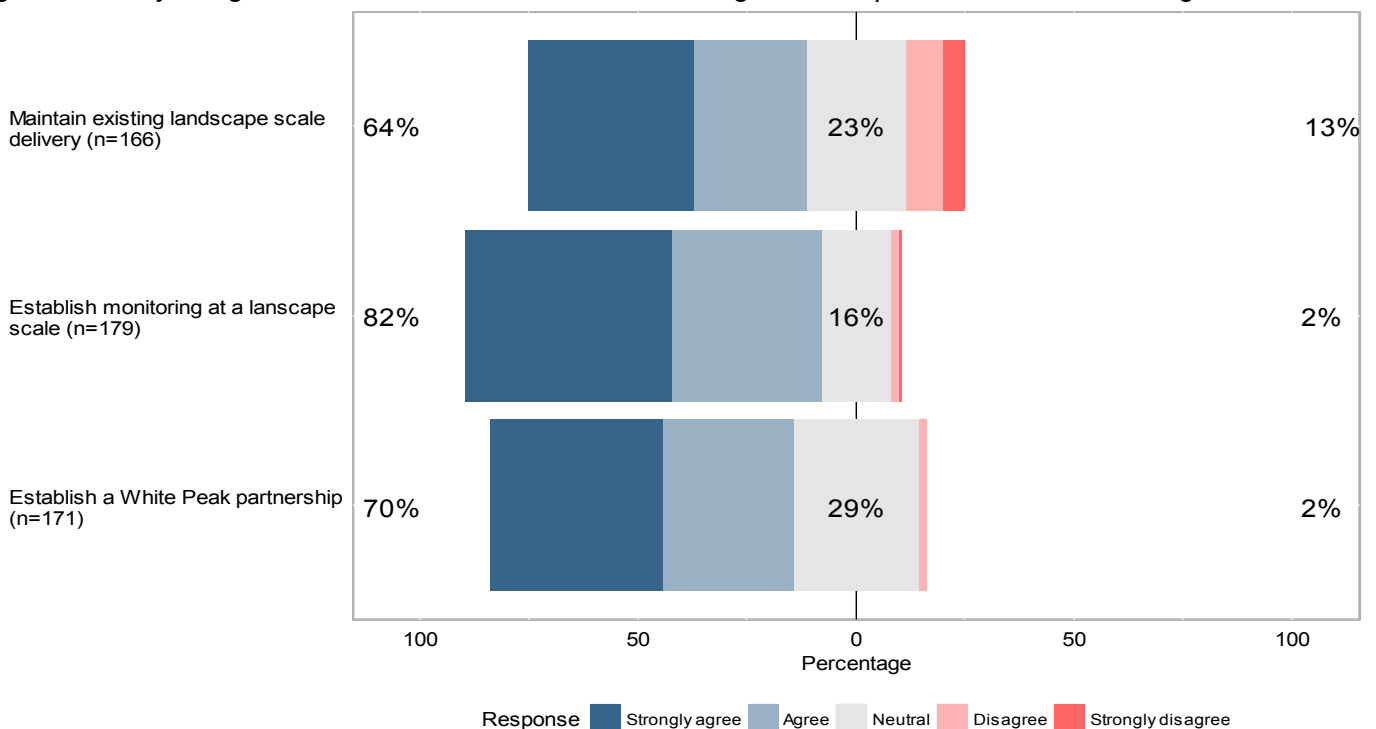


Figure 15: Do you agree with ‘what we want to do’ to manage landscape conservation on a big scale?



South West Peak actions missing from consultation: A number of partners suggested that a major oversight of the consultation was not including the South West Peak Landscape Partnership in the ‘what we want to do’ section. It was felt that this character area needed as much attention and priority as the White and Dark Peak yet received very little recognition.

- Greater importance of the wider Peak District setting:** It was felt that the setting of the wider Peak District should be added to the priorities in this section. Reference was made to the severe threat from new infrastructure for fracking, roads and housing. Better joint working with neighbouring authorities was needed not only to understand the importance of the setting but also to value it for the benefits it brings to their areas. Landscapes know no boundaries and Lawton’s ‘bigger, better, more and joined up’ aspiration should continue across the boundary of the Park. Achieving this by

extending the approach out into neighbouring authority areas would extend benefits outside the Park and help communicate the intrinsic value of the designation.

- *The future of other landscape scale partnerships operating within the Peak District:* The future of other landscape partnerships was mentioned by a number of respondents, including the emerging Sheffield Lakelands Partnership and the Eastern Moors Partnership. It was felt that legacy planning for all these landscape scale initiatives should be included within the NPMP to ensure the positive work of these partnerships continues in a time of uncertainty and change.
- *Cultural benefits need to be more evident within this section:* A number of comments were made suggesting that the benefits of cultural heritage/historic features should be recognised within this section, not just the benefits provided by the natural environment.
- *Rewording: Landscape Scale Delivery:* A number of respondents mentioned that there was some confusion of the term landscape scale delivery – and suggested that this should be re-phrased. One partner also suggested that the relationship between the 8 character areas of the Landscape Strategy and the 3 main landscape character areas commonly referenced throughout the consultation document should be clarified.
- *Must adopt the Lawton Principle:* A repeated theme within this section was that any future landscape scale delivery should adopt the Lawton Principle of 'bigger, better, more and joined up'.
- *Working beyond the moorlands in the Dark Peak:* Many felt there was a need to extend the work in the Dark Peak Moors to other landscape types such as the cloughs, valley sides and in by land.
- *Value of small projects:* Linked closely to the theme above was the contribution multiple small scale projects can make to wider landscape scale conservation objectives. It was mentioned that whilst landscape scale projects have a great deal of impact, they also have a great deal of publicity and the accumulation of lots of smaller scale projects should also be promoted.
- *Clear measurement of conservation objectives required:* Many felt that there was a need to create clear monitoring framework that reports honestly on the status of the biodiversity of the Peak District. A number of respondents referred to the need to build on the work carried out on the State of Nature Report in 2016.
- *Targets not met by Birds of Prey Initiative:* Linked to the above point was the fact that the Birds of Prey Initiative did not achieve its targets in restoring raptor populations. Wildlife crime was again a key theme that emerged from comments in this section. It was felt that the NPMP should play an important role in holding this initiative to account for its targets on numbers of birds of prey and more needed to be done to address wildlife crime.
- *White Peak Partnership:* There was a high level of support for establishing a White Peak Partnership (nearly 70% agreed or strongly agreed). However, it was acknowledged that the challenges such as the larger number of small land owners and conflicting interests within this area would make it harder to achieve than a project like Moors for the Future.

Area of Impact 8: Supporting sustainable communities

Overview

80% of respondents answered this section of the survey. There was a significant level of support for this Area of Impact with 82% of respondents agreeing or strongly agreeing that this should be a focus. Fewer than 4% disagreed or strongly disagreed that this should be a focus.

Figure 16: Area of Impact 8: Supporting sustainable communities

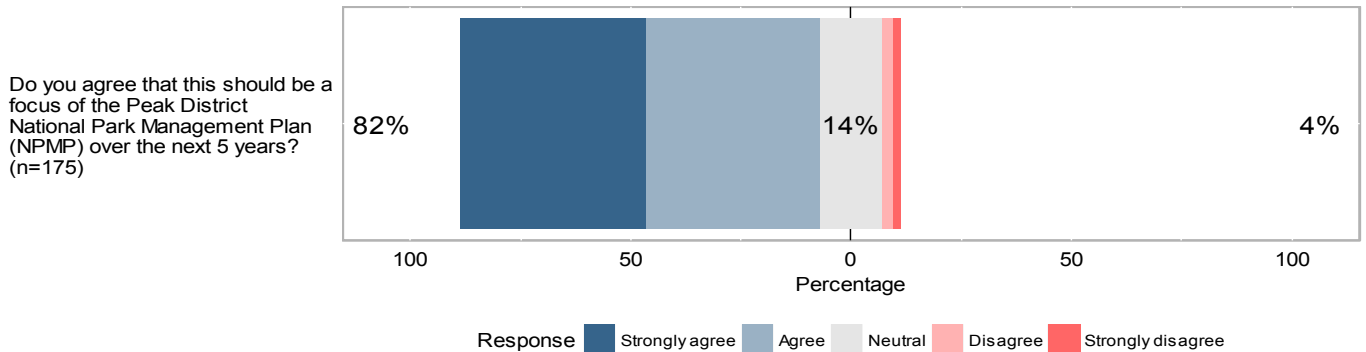
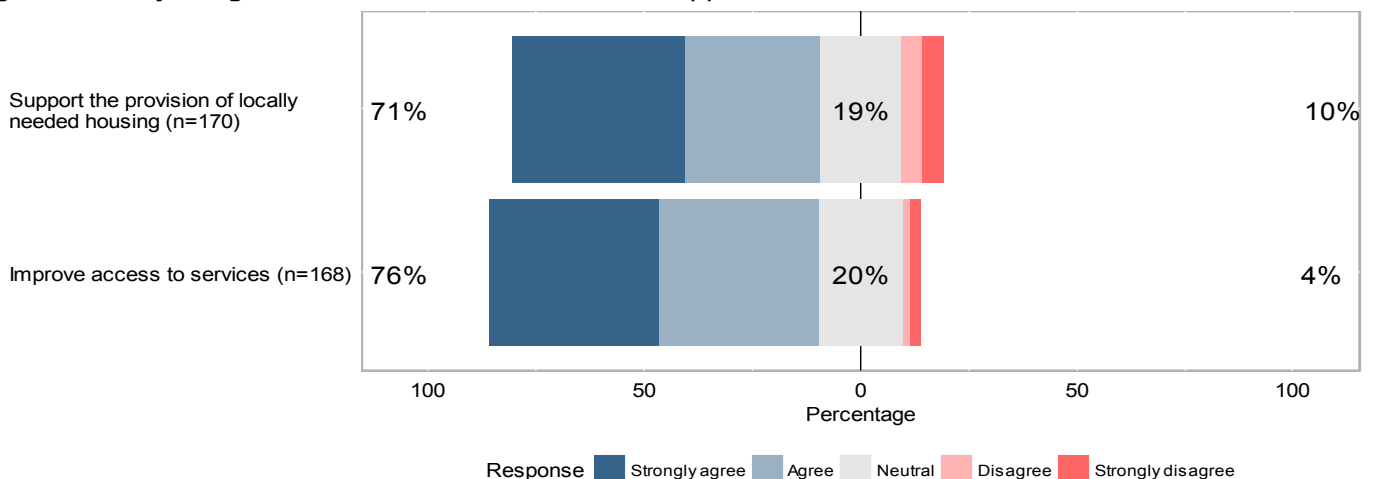


Figure 17: Do you agree with 'what we want to do' to support sustainable communities?



- ***Thriving and vibrant communities need greater priority:*** Several respondents suggested that greater weight should be given to supporting communities within the NPMP and there was a feeling that the needs of communities had not been prioritised within the consultation document. It was felt that whilst it was a prominent theme within the 2012-17 NPMP many issues (such as those outlined below) need to be addressed to deliver 'thriving and vibrant communities'.
- ***Greater focus on economic growth:*** Economic growth and sustainable employment were both repeated themes that emerged throughout the consultation. Many felt that it was the role of the NPMP to create a vision for a high value job economy designed to keep younger people in the National Park. There was a suggestion that planning restrictions should be more flexible to allow suitable industrial growth for local businesses wanting to employ local workers. A small number of respondents from across all stakeholder groups were of the view that there is a shortage of small business and industrial units which is providing a barrier to new businesses and businesses locating within the Peak District National Park. Other respondents highlighted the need for a range of business units from small to large scale that are affordable, particularly for new businesses.
- ***Affordable housing strategy required:*** Many felt that a clear approach to affordable housing was required within the NPMP. There were differing views on the best approach to address this. Some

believed that affordable housing alone would not address this issue and more market housing should be permitted to encourage investment. Others felt that a clear definition and target for affordable housing should be taken.

Some respondents suggested that more needs to be included around partnership work with district and borough council in the active delivery of affordable housing appropriate to the needs of local people. In addition support for community-led housing initiatives that recognise the importance of delivering affordable homes with the community at the heart of the development process is required.

- Second homes: Closely linked to the above was the feeling that more should be done to prevent the purchase of second homes and holiday let purchases to ensure housing supply is available and that the market is not inflated.
- Integrated Public Transport strategy required: Many respondents encouraged greater recognition of sustainable transport within this section. It was felt that a National Park wide strategy was required to proactively partner constituent authorities and encourage a joined-up approach to transport to reduce the dependence on private vehicle use. Access to services for ageing and vulnerable members of the community was an increasing issue and a high priority by a number of respondents. It was raised that connectivity into the Peak District National Park is very important. A number of community organisations highlighted that greater investment in all public transport (and public transport integration) is needed and should be prioritised. Rail infrastructure was raised by a number of stakeholders as being an area in need of improvement – both the infrastructure and service provided.
- Broadband and mobile phone coverage Digital connectivity and broadband provision was another issue raised across a range of stakeholder groups. Many highlighted the logistical remoteness within the Peak District National Park but suggested that improved digital connectivity means that technology and digital industries can exist anywhere and home working is viable option for residents.
- Closer engagement with communities: A number of respondents felt that closer work needed to be done to engage with communities inside the Peak District National Park. One respondent stated that the periodic residents' survey should be better designed to improve evidence of the state of communities within the Park, and understand the key issues that are impacting residents as well as get a better feel for grass root community led initiatives that are already being delivered.

General Comments

Overview

52% of respondents who used the online survey chose to make some general comments alongside 11 respondents who chose to respond via letter. Again some themes emerged throughout this section, they are presented here.

- *Better enforcement of wildlife protection legislation:* During the consultation period a video and report was released by the Hunt Investigation Team (HIT) which was alleged to show the methods used to control pests on a local estate as part of their grouse moor management practises. The report and footage showed distressing scenes of snared animals and highlighted that of those animals caught within them only 29% were target species. These reported activities were referenced by many respondents who called for better enforcement of existing wildlife and environmental protection legislation. In particular respondents wanted better protection for birds of prey and mountain hares, species that should be synonymous with moorland habitats but are currently heavily under represented. Respondents making these comments firmly believed that management practises on grouse moors are contributing to this under representation. Representative organisations of grouse moor owners in their responses condemned any illegal persecution of protected species, promoted the management of grouse moors in line with best practise guidelines and confirmed their willingness to work towards increasing bird of prey numbers.
- *Benefits of grouse moor management:* One respondent noted that approximately 26% of the Peak District National Park is managed heather moorland for the purpose of driven grouse shooting with 75% of that land being designated as SSSI, SAC or SPA. It was further noted that the park itself was designated in 1951 because of:

“the historic land management (driven grouse shooting and agriculture) and land managers should be encouraged, recognised and supported by the (Peak District National) Park Authority for maintaining this.”

Respondents noted that today’s grouse moors make valuable contributions to conservation through habitat management and predator control, to peatland restoration through grip and gully blocking, to local economies through expenditure with local business and creating employment.

- *Areas for improvement:* Some respondents suggested ways in which the proposed areas of impact could be improved. For example areas of impact 4, 6 and 7 could be combined around the theme of habitat/ecosystem restoration and areas 2 and 5 could be focused on securing the future of the Park’s special qualities. It was suggested that:

“if the plan can be simplified and focussed more (it) could aid commitment and delivery”

- *Sustainability of the NPMP:* It was suggested that the areas of impact are not sustainable as they focus primarily on environmental aspirations and fail to balance these against social and economic aspirations as detailed in the vision framework.
- *Linking the vision to the special qualities and areas of impact:* Another respondent noted:

“there seems to be little coherence between the three sections of the draft management plan consultation. The vision framework doesn’t seem to link to the special qualities or the areas of impact.”

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9. APPROVAL OF MODIFICATIONS TO THE DEVELOPMENT MANAGEMENT POLICIES DOCUMENT (DPD)/ BJT

Purpose of the report

1. To recommend the approval of the Statement of Representations (Appendix 1) and the Schedule of Modifications (Appendix 2) to the Development Management Policies DPD and Policies Map as the second part of the Local Development Plan for the National Park. To gain delegated authority for the final sign off of these documents for submission to the Secretary of State.

Key issues

2.
 - Achieving the correct application of National Park purposes through planning policies;
 - Taking a positive approach to foster the social and economic well-being of local communities and businesses in pursuing National Park purposes;
 - Seeking consistency with the adopted Core Strategy;
 - Seeking consistency with the National Planning Policy Framework as far as possible within this context;
 - Resolving the issue of major development in the National Park
 - To ensure ongoing dialogue with communities and partners up to and through the submission and examination stages;
 - To consider the weight to be attached to the document at this stage

Recommendations

3.
 1. **That members agree the Statement of Representations as laid out at Appendix 1;**
 2. **That members agree the Schedule of Modifications at Appendix 2;**
 3. **That members agree the additional text at para 32 re major development and that this be added to Appendix 1 and 2 in response to representations and more recent evidence.**
 4. **That delegated authority is granted to the Director of Conservation and Planning in consultation with the Chair and Vice Chair of Planning Committee to agree any further modifications and finalise the documents at Appendix 1 and 2 and other documents necessary for the submission stage; and**
 5. **That officers produce a further work to establish the weight of emerging policies at this stage and that this is brought back for approval by the Authority.**

How does this contribute to our policies and legal obligations?

4. Development Plan policies form a crucial part in delivering National Park purposes as they form the starting point for all planning decisions. The Development Management Policies Development Plan Document (DPD) will form part 2 of the Local Development Plan, alongside the Core Strategy adopted in 2011.

5. Ultimately, the adoption of Development Management Policies will enable legal the replacement of the existing Local Plan adopted in 2001. The only exception to this will be in respect of policies for Bakewell which will continue to need saving as (apart from a shared position of the new Bakewell Development Boundary) the Development Management Document does not provide detailed policy coverage for Bakewell owing to the emergence of the Bakewell Neighbourhood Plan. As such (other than policy and map coverage of the boundary) policies for Bakewell will be saved until such time as they are replaced by the emerging Neighbourhood Plan.
6. The commitment to produce the Development Management Policies (DMP) is set in Corporate Objectives as it provides a key mechanism for supporting the Authority's legal purposes and duty. In the same way the DMP supports many headline objectives and actions in the National Park Management Plan.

Background

7. The work on the DMP began immediately after the adoption of the Core Strategy at the end of 2011, and the first round of public consultation, which took place in 2012, used the existing Local Plan as the basis of the consultation document. In addition, the Authority considered and agreed the consistency of Local Plan policies with the Core Strategy, and the National Planning Policy Framework (NPPF) as well as a range of issues emerging from Annual Monitoring Reports up to that point.
8. Following this stage progress on the DMP slowed down owing to the need to respond to major government consultations on permitted development rights and other changes to the planning system. In addition the Policy Planning Team brought forward much needed guidance on climate change, sustainable buildings and renewable energy.
9. Nevertheless successive Parish Council Days and other parish liaison events, as well as Land Management Forums and contact with social housing bodies, have ensured that key debates relating to housing delivery, farming and business interests have been maintained.
10. Furthermore a series of member workshops during 2013 and 2014 gave a valuable steer on the preferred direction of travel across all areas of policy. From this members identified a subset of issues which had proved to be the most contentious and which required deeper debate. This led to a chaired session on the following topics:
 - Housing need and eligibility
 - Replacement dwellings
 - Barn conversions
 - Safeguarding employment sites
11.
 - Redevelopment of brownfield sites and economic viability

On the back of this work officers brought forward a first full compendium of policies to the Authority meeting in March 2015. Members resolved to note these policies as a basis for detailed testing meetings with an agreed member steering group which comprised:

- Chair and Vice Chair of Planning Committee;
- Chair of the Authority; and
- Member representatives for:
 - Cultural Heritage
 - People and Communities
 - Biodiversity

12. ○ Economy

The group met four times over the summer months of 2016. This allowed several hours of detailed discussion and testing to be undertaken which proved invaluable for officers. A detailed record of issues was taken and officers used this to reconsider policy in order to address specific issues. It has also enabled officers to identify issues which officers concluded could not be dealt with at this stage without significantly undermining the adopted Core Strategy. As such, some matters were recommended to be recorded and brought back for consideration during the more substantive review of strategic policy. This will commence on completion of the DMP work.

13.

This work allowed the production of a full draft consultation document (known as the Publication Version).

14.

Consultation on the Publication version of the Plan

Public consultation took place between Friday 18 November 2016 and Friday 27 January 2017, leading to over 900 separate points emerging from representations. Officers collated these points and presented the early findings at two further meetings of the member steering group during February and March 2017. These meetings provided a useful steer to officers to prepare a comprehensive set of modifications in response to the representations.

15.

A further two meetings were then held during September 2017 to work through the detailed comments and proposed modifications. The outcome of these discussions is now included as Appendix 1 and 2.

16.

Issues Arising from the Representations

A key aspect of the work by officers has been to make judgements on the significance of the representations made, with reference to the soundness tests for plan making. In the majority of cases officers have deemed that points raised, whilst helpful in identifying grammatical and presentational issues or by seeking greater clarity or emphasis, did not raise significant soundness issues for the plan. The Document at Appendix 1 is called the Statement of Representations. This summarises the main issues arising from representations and is organised in order of each chapter and policy of the plan. This approach also provides the opportunity to state who commented on each policy. Officers have then cross referenced from each representation where this has produced a modification to the plan.

17.

Modifications

The submission and examination stages in plan making give scope to make changes (**modifications**). These are produced in response to the representations and fall into two categories: **minor** and **main**.

18.

Minor modifications

These allow changes which provide clarity and emphasis, or which simply correct grammar and presentation.

19.

Main modifications

These provide an opportunity to respond to objections and representations which present more significant concerns over the soundness of the plan. Soundness tests are the principles by which an inspector will use to examine the plan and include:

- Effectiveness (related to the delivery of the plan)
 - Justification (the reasoned justification and evidence for the policy)
 - Positively prepared (with the aim of achieving sustainable development); and
20. • Consistent with national policy (consistency with the National Planning Policy Framework)

21. Appendix 2 to this report sets out the suggested changes arising from the representations and as discussed with the Member steering group.

The Member Steering Group

The steering group has met at key stages of the production of the Publication version and in considering the representations and giving a steer on the modifications. The work set out at Appendix 2 highlights that overall there are relatively few main issues of soundness impacting on the DMP. Judgements on representations follow these categories:

- Agree with representation based on soundness leading to main modification;
 - Agree with representation on minor point leading to minor modification;
 - Disagree with representation on point of principle or evidence and maintain Publication plan in existing form;
 - Disagree with representation owing to it moving beyond scope of Core Strategy. Maintain Publication plan in existing form
- 22.

Completing the work for Submission

While the key issues have been adequately addressed and recorded in the appended documents, there remain a number of small grammatical and presentational changes checks to be made, to ensure completeness and coherence between the documents. Moreover a small number of technical changes remain to be made to the Policies Map in respect of Minerals Safeguarding. As such it is proposed that delegated authority be granted to the Director of Conservation and Planning in consultation with the Chair and Vice Chair of Planning Committee to oversee the final sign-off of all relevant documents in readiness for submission to the secretary of state. This is planned for late November (subject to agreement with the Planning Inspectorate).

23.

Need for approval of an outstanding matter re Major Development

Since the member meetings at the beginning of September the National Parks Heads of Planning have discussed recent evidence by the Council for National Parks (CNP) regarding major development policy tests for National Parks. Adopted Core Strategy policy GSP1 relates the consideration of major development back to the tests in national policy. Whilst produced in the context of former Planning Policy Statement 1 (prior to the NPPF), the same tests appear in paragraph 116 of the framework and as such the tests are as follows:

24.

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

- i. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- ii. the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

25. iii. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."
The national policy position is reinforced in Defra's 'English National Parks and the Broads: UK Government Vision and Circular' (2010) which is specifically referred to in the NPPF (footnote 25).

Nevertheless the only statutory definition of major development in both the English and Welsh planning systems is through the Town and Country Planning (Development Management Procedure) Orders. These set out specific types and scales of development such as:

- the winning and working of minerals or the use of land for mineral-working deposits;
- waste development;
- 26. • the provision of dwelling houses where the number provided is 10 or more or where development is carried out on a site having an area of 0.5 ha or more;
- the provision of a building where the floor space is 1000 sq m or more; or
- 27. • development on a site having an area of 1 ha or more

This is significantly different from major development in the context of national parks (NPPF para 116 above) and the so-called major development test(MDT), which has effectively been in place since the National Parks and Access to the Countryside Act 1949

28. In assessing this disparity the South Downs National Park undertook Counsel opinion in which James Maurici QC concluded that determination is a "matter of planning judgment to be decided by the decision maker", taking into account whether "the development has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by a national park...by reason of its scale, character or nature". He concluded that it would be wrong in law to "apply the definition of major development contained in the 2010 Order to
29. paragraph 116 of the NPPF".

30. Planning Practice Guidance now states "Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context".

31. In addition the study recently completed by the CNP advocates a consistent approach across the National Parks that reflects this approach but also embeds consideration of a Park's special qualities.

32. As such the Heads of Planning group, informed by the Policy Planning officers from across the National Parks have agreed that National Park Local Plans should include a policy or text to reflect this up to date advice.

It is therefore proposed that the Chapter 1 introduction of the Development Management Policies document should add text after paragraph 1.23 and **policy DM1 The Presumption of Sustainable Development in the Context of National Park Purposes** to state:

“Approach to Major Development

*Long standing national policy objectives and guidance in the National Parks' Vision and Circular (2010) are reflected in **Core Strategy policy GSP1** which sets out the principle that major development should not take place within the Peak District*

33. *National Park other than in exceptional circumstances. Major development will only be permitted following rigorous consideration of the criteria in national policy. Since adoption of the Core Strategy national policy tests have been reaffirmed in paragraph 116 of the NPPF. Moreover National Planning Practice Guidance now states, “Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context.” In making this assessment close regard should therefore be had to the impact of a scheme on the special qualities of the National Park utilising the Landscape Strategy and other tools advocated by this document. The Authority will consider whether a development has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by the national park, by reason of its scale, character or nature.”*

Outstanding Strategic Issues

34. The principles set out in para 21 above have also set the parameters used in the member steering group. Officers acknowledge that there are further outstanding issues which may not be covered or adequately dealt with for some stakeholders and members. The recommendation from officers is that the DM DPD must stay within the remit of the Core Strategy, in order to achieve coherence overall. Only a subsequent review of the Core Strategy will allow a full investigation into wider strategic matters.

Attaching weight to the DPD

35. Officers consider that owing to the low overall numbers of objections made on substantive points, that it is possible to ascribe weight to the emerging DPD as a material consideration, in accordance with the provisions in paragraph 216 of the NPPF. Areas where the weight may be more limited are those where outstanding objections to the plan remain and where the policies move away from policies in the Framework.

Communicating the outcome of our work

36. Where individuals or organisations have made representations on the plan it is the intention of officers to now write out and explain what will now be happening with each representation, i.e. to either explain the modifications being taken forward to examination, or to explain why no change has been suggested. It is also proposed to use existing forums such as the annual Parishes Day to communicate to stakeholders the progress made and stages going forward.

Proposal

In summary it is therefore proposed to agree Appendix 1 and 2 and provide delegated authority for any final minor changes to be made to enable these documents to be submitted to the Planning Inspectorate alongside the Publication Version of the Development Management Policies. In addition it is proposed that the additional text set out at paragraph 32 be dealt with and added to these tables. Finally it is also proposed that for clarity a table of emerging development management policies be brought back to Authority in order to determine the weight the may be applied prior to their full adoption by the National Park Authority in due course.

Are there any corporate implications members should be concerned about?

37. **Financial:** If members support the recommendation to progress to submission and

examination stages a request will be required to the Head of Finance to draw down specific reserves in slippage to finance the Inspector costs. It is estimated a sum of £50,000 will be required for this purpose.

38. **Risk Management:** Officers consider that the recommendation to progress the DMP document is the best means of managing risk to adopted policies. It offers the quickest route to producing an up to date Local Plan for the National Park.
39. **Sustainability:** None, the adoption of new policies assists the overall sustainability of the area through the function of the planning system.
40. **Background papers** (not previously published) – None
41. **Appendices:** -
1. Statement of Representations
2. Schedule of Modifications

Report Author, Job Title and Publication Date

Brian Taylor, Head of Policy and Communities, . 28 September 2017

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Authority Meeting 6 October 2017 - Item 9 Appendix 1 Statement of Representations

Introduction

- The main objection is from the Peak Park Parishes Forum, which considers that references to use of section 106 agreements in the Introduction paves the way for an unreasonable and unjustified use of Section 106 agreements to, in their words, tax development. The Forum also considers that the policies do not complement one another and cannot therefore be seen to be sound.
- DM1 is seen as a repetition of Core Strategy GSP1 and it is questioned whether it will lead to sustainable development. (Peak Park Parishes Forum)
- The commitment to sustainable development in both the policy and the text is questioned. (Peak Park Parishes Forum, Chatsworth Settlement Trustees)
- The terms special qualities and valued characteristics needs to be more clearly set out and explained (Friends of the Peak District)
- The policy does not reflect the NPMP, particularly in regard to thriving & vibrant communities (Peter O’Brien)

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Request for hearing |
|--------------------|-------------------------------|-----------------------|--------------------------|------------------|---|--|----------------------------|
| Contents | Stella McGuire | 10 | 10.1 | Y | Y | N | N |
| 1.29 -1.30 | Peak Park Parishes Forum* | 23 | 23.1 | N | N | Y – M1.7 | N |
| 1.29 -1.30 | Peak Park Parishes Forum* | 23 | 23.2 | N | Y | N | Y |
| 1.26 | Friends of the Peak District* | 28 | 28.4 | Y | N | Y | Y |
| Appendices list | PDNPA | - | INT1.1 | Y | Y | N | N |

| | | | | | | | |
|---------------|------------------------------|----|--------|---|---|---|---|
| Contents list | PDNPA | - | INT2.1 | Y | Y | N | N |
| 1.25 | PDNPA | - | INT2.2 | Y | Y | N | N |
| DM1 | PDNPA | - | INT1.3 | Y | N | N | N |
| DM1 | PDNPA | - | INT1.4 | Y | N | N | N |
| DM1 | Peak Park Parishes Forum* | 23 | 23.3 | Y | N | N | Y |
| DM1 | Peak Park Parishes Forum* | 23 | 23.4 | N | N | N | Y |
| DM1 | Peak Park Parishes Forum* | 23 | 23.5 | N | N | N | Y |
| DM1 | Peak Park Parishes Forum* | 23 | 23.6 | N | N | N | Y |
| DM1 | Peak Park Parishes Forum* | 23 | 23.7 | N | N | N | Y |
| DM1 | Peak Park Parishes Forum* | 23 | 23.8 | N | N | N | Y |
| DM1 | Peak Park Parishes Forum* | 23 | 23.9 | N | N | N | Y |
| DM1 | Friends of the Peak District | 28 | 28.1 | N | N | N | Y |
| DM1 | Friends of the Peak District | 28 | 28.2 | N | N | N | Y |
| DM1 | Friends of the Peak District | 28 | 28.3 | N | N | N | Y |

| | | | | | | | |
|-----|-----------------------------------|----|-------|---|---|---|---|
| DM1 | Friends of the Peak District | 28 | 28.4 | Y | N | N | Y |
| DM1 | Derbyshire Dales District Council | 34 | 34.1 | Y | N | N | N |
| DM1 | Chatsworth Settlement Trustees | 35 | 35.14 | Y | N | N | N |
| DM1 | Peter O'Brien | 64 | 64.10 | N | N | N | Y |

Chapter 2: Development Management Practice

- The role of pre-application advice and the importance of accurate policy led information on policy and local issues (to encourage a positive three way dialogue between communities developers and planners leading up to a planning application) is not spelt out in this section and this is seen as an omission. (Friends of the Peak District)
- The omission of reference to NPPF paragraph 116 means the protections for the National Park are not spelt out in their entirety. (National Trust)

| Para/policy | Respondent/agent | Responder ID | Representat ion ID | Sound Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Request for hearing |
|--------------------|------------------------------|---------------------|-------------------------------|------------------|--|---|--------------------------------|
| 2.1 | Friends of the Peak District | 28 | 28.5 | N | N | N | Y |
| 2.1 | National Trust | 50 | 50.1 | N | N | N | N |

Chapter 3: Conserving and enhancing the National Park (Conservation)

- 22 responders (including two internal responders) making 236 individual points, of which 61 points were considered by the responder to raise soundness issues. It is mainly soundness issues that are outlined below.
- For this chapter 13 responders asked to attend the examination hearings, but only 5 of those asked to attend hearings on points of soundness. (Peak Park Parishes Forum*, Great Hucklow Parish Council, Taddington Parish Council, National Trust, Alan Newby PME Planning Services)
- Of the 236 individual points made, 99 related to supporting text and 137 related directly to policies. A significant number of points are from PDNPA staff picking up spelling, grammar and formatting errors.

Strategic context

- No issues of soundness raised

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|---|-----------------------|--------------------------|------------------|---|--|------------------------|
| General | East Midlands Chamber (Nick Chischniak) | 3 | 3.3 | Y | N | N | Y |
| 3.1 | PDNPA | - | INT1.5 | Y | Y M3.1 | N | N |
| 3.3 | PDNPA | - | INT1.13 | Y | N | N | N |
| 3.3 | PDNPA | - | INT1.14 | Y | N | N | N |
| 3.3 | PDNPA | - | INT1.15 | Y | N | N | N |
| 3.3 | Stella McGuire | 10 | 10.2 | Y | YM3.2 | N | N |
| 3.5 | PDNPA | - | INT1.6 | Y | YM3.3 | N | N |
| 3.6 | Stella McGuire | 10 | 10.15 | Y | N | N | N |
| 3.8 | PDNPA | - | INT1.7 | Y | N | N | N |
| 3.8 | Stella McGuire | 10 | 10.5 | Y | N | N | N |

Policy DMC1: Conservation and enhancement of nationally significant landscapes

Summary of issues raised

- DMC1 requirement for landscape assessment is considered unnecessarily onerous on developers (Roger Yarwood Planning Consultants Ltd)
- DMC1 requirement for assessment is not in line with national planning guidance and the policy should require Landscape and Visual Impact Assessment rather than landscape assessment, with supporting text referencing the Guidelines for LVIA (National Trust)
- Part C of policy DMC1 is considered unenforceable and contrary to national planning guidance (Peak Park Parishes Forum)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--|-----------------------|--------------------------|------------------|---|--|------------------------|
| 3.1-3.13 | Friends of the Peak District | 28 | 28.6 | Y | N | N | Y |
| 3.9 | PDNPA | - | INT1.66 | Y | N | N | N |
| 3.9 | PDNPA | - | INT2.4 | Y | N | N | N |
| 3.10 | Stella McGuire | 10 | 10.2 | Y | N | N | N |
| 3.15 | Peak Park Parishes Forum* | 23 | 23.11 | N | N | N | Y |
| DMC1, DMC2 | Jean Howarth | 1 | 1.1 | Y | N | N | Y |
| DMC1 | Derbyshire County Council | 21 | 21.3 | Y | N | N | N |
| DMC1 | Natural England | 22 | 22.1 | Y | N | N | N |
| DMC1 | Stanton in peak PC | 33 | 33.1 | Y | N | N | Y |
| DMC1 | National Trust | 50 | 50.2 | N | N | N | N |
| DMC1 | Roger Yarwood Planning Consultants Ltd | 60 | 60.1 | N | N | N | Y |
| DMC1 | Rowsley PC | 69 | 69.1 | Y | N | N | Y |
| DMC1 3.92 | Peak Park Parishes Forum* | 23 | 23.10 | N | N | N | Y |

Policy DMC2 Protecting and managing the Natural Zone

Summary of issues raised

- It is suggested part C (iv) is likely to lead to failure to meet the six tests set out in PPG. Paragraph: 015 Reference ID: 21a-015-20140306. (Allen Newby PME Planning Services)
- It is suggested Part C (iv) is inconsistent with paragraph 3.21 and that it needs to be clarified whether a personal and time limited consent is a mandatory or discretionary requirement of permission. (Peak Park Parishes Forum)
- It is suggested that Part C (iv), if requiring a legal agreement rather than a condition, is contrary to para 204 of the NPPF (Peak Park Parishes Forum)
- It is suggested that an Article 4 direction should be made for the Natural Zone to avoid the need for personal and time limited consents (Peak Park Parishes Forum)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|-----------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.17/3.22 | Stella McGuire | 10 | 10.3 | Y | Y M3.4 | N | N |
| 3.17 | PDNPA | - | INT4.1 | Y | Y M3.5 | N | N |
| 3.17 | Stella McGuire | 10 | 10.4 | Y | Y M3.6 | N | N |
| 3.17 | Stella McGuire | 10 | 10.5 | Y | N | N | N |
| 3.22 | Stella McGuire | 10 | 10.3 | Y | Y M3.7 | N | N |
| DMC2 | Allen Newby PME Planning Services | 9 | 9.1 | N | N | N | Y |
| DMC2 | Friends of the Peak District | 28 | 28.7 | Y | N | N | Y |
| DMC2 | NFU (Paul Tame) | 2 | 2.2 | Y | N | N | Y |
| DMC2 | Stanton in Peak PC | 33 | 33.2 | Y | N | N | Y |
| DMC2 | National Trust | 50 | 50.3 | Y | N | N | N |
| DMC2 | Rowsley PC | 69 | 69.2 | Y | N | N | Y |
| DMC2 | Peak Park Parishes Forum* | 23 | 23.12 | N | N | N | Y |

| | | | | | | | |
|------|---------------------------|----|-------|---|---|---|---|
| DMC2 | Peak Park Parishes Forum* | 23 | 23.13 | N | N | N | Y |
| DMC2 | Peak Park Parishes Forum* | 23 | 23.14 | N | Y | N | Y |
| DMC2 | Peak Park Parishes Forum* | 23 | 23.15 | N | N | N | Y |
| DMC2 | Peak Park Parishes Forum* | 23 | 23.16 | N | N | N | Y |

Policy DMC3: Siting, design, layout and landscaping

Summary of issues raised

- No representations were made on soundness of this policy
- Some concern that light pollution should be more of a consideration (Rowsley PC and Stanton in Peak PC)
- Suggestion to highlight the importance of understanding the implications that the design of new development can have on flood risk, water conservation and sustainable drainage (United Utilities)
 - Objection to policy DMC3 because a common set of design criteria does not allow for consideration of the individual characteristics of each village. (Great Hucklow PC)
 - The last sentence of Part A is poorly drafted: "Siting.....will be essential.....". and , it also seems to be duplicated by Part B(i).

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.23 | PDNPA | - | INT1.8 | Y | Y M3.8 | N | N |
| 3.24 | PDNPA | - | INT1.9 | Y | Y M3.9 | N | N |
| 3.25 | PDNPA | - | INT1.10 | Y | N | N | N |
| 3.25 | PDNPA | - | INT1.11 | Y | N | N | N |
| 3.26 | PDNPA | - | - | Y | Y M3.10 | N | |
| 3.26 | PDNPA | - | INT1.12 | Y | Y M3.11 | N | N |
| 3.30 | PDNPA | - | INT1.13 | Y | N | N | N |
| 3.31 | PDNPA | - | INT1.16 | Y | N | N | N |
| 3.33 | PDNPA | - | INT1.17 | Y | N | N | N |

| | | | | | | | |
|------|---------------------------|----|-------|---|---|---|---|
| DMC3 | Peak Park Parishes Forum* | 23 | 23.17 | Y | N | N | Y |
| DMC3 | Peter Abbott | 24 | 24.3 | Y | N | N | N |
| DMC3 | Stanton in Peak PC | 33 | 33.3 | Y | N | N | Y |
| DMC3 | Great Hucklow PC | 43 | 43.2 | N | N | N | Y |
| DMC3 | United Utilities | 44 | 44.2 | Y | Y | N | N |
| DMC3 | National Trust | 50 | 50.4 | Y | N | N | Y |
| DMC3 | Rowsley PC | 69 | 69.3 | Y | N | N | Y |

DMC4: Settlement Limits

Summary of issues raised

- DMC4 is framed by paras 3.38 and 3.41 but it is not clear whether DMC4B is intended to apply to all open spaces identified by conservation area plans, i.e. all those identified on the inset maps. (Peak Park Parishes Forum)
- It is suggested that the kind of protection proposed by DMC4B is akin to the protection given to “Local Green Space” referred to in paras 76 and 77 of the NPPF, but it is questioned whether there is evidence that the considerations set out in those paragraphs has been addressed. (Peak Park Parishes Forum)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.37 | PDNPA | PDNPA | INT4.2 | Y | Y M12 | N | N |
| 3.38 | PDNPA | PDNPA | INT4.3 | Y | Y M13 | N | N |
| 3.39 | PDNPA | - | INT1.18 | Y | Y | N | N |
| 3.40 | PDNPA | - | INT1.19 | Y | Y M3.14 | N | N |
| 3.41 | PDNPA | - | INT1.20 | Y | Y M3.15 | N | N |
| 3.41 | PDNPA | - | - | Y | Y M3.16 | N | N |
| 3.41 | PDNPA | - | INT2 | Y | Y M3.16 | N | N |
| DMC4 | PDNPA | - | - | Y | N | Y M3.17 | N |

| | | | | | | | |
|------|-----------------------------------|----|--------|---|---|---|---|
| DMC4 | Friends of the Peak District | 28 | 28.8 | N | N | N | Y |
| DMC4 | Derbyshire Dales District Council | 34 | 34.3 | Y | N | N | Y |
| DMC4 | Peak Park Parishes Forum* | 23 | 23.18 | Y | N | N | Y |
| DMC4 | Peak Park Parishes Forum* | 23 | 23.19 | N | N | N | Y |
| DMC4 | Peak Park Parishes Forum* | 23 | 23.20 | N | N | N | Y |
| DMC4 | Peak Park Parishes Forum* | 23 | 23.22 | N | Y | N | Y |
| DMC4 | Peak Park Parishes Forum* | 23 | 23.23 | N | N | N | Y |
| DMC4 | PDNPA | - | INT2.3 | Y | N | N | N |
| DMC4 | Peak Park Parishes Forum* | 23 | 23.21 | N | N | N | Y |

DMC5: Assessing the impact of development on heritage assets and their settings

Summary of issues raised

- It is suggested that part 12 of the NPPF, particularly paras 133 and 134 requires a planning authority to weigh public benefits against any harm to the heritage asset and that DMC5 doesn't interpret "exceptional circumstances" (expressed in Core Strategy policy L3B) in this context because there is no provision to balance public benefit against impact on heritage assets. It is therefore suggested that the policy is incompatible with the NPPF (Peak Park Parishes Forum)
- It is suggested that the supporting text to DMC5 doesn't explain how non designated heritage assets are considered to be such by the Authority so there is no indication of the criteria to be applied in arriving at that judgement. It is suggested that criteria for arriving at that judgement should include the value of a building to the local community (Peak Park Parishes Forum)
- It is suggested that DMC5 A (ii) is contrary to NPPF paras 128 and 131 – 134 in requiring an applicant to demonstrate why the proposed development is desirable or necessary (Emery Planning Partnership)
- It is suggested that DMC5 F(i), (ii) and (iii) are unsound because they are not consistent with NPPF paragraphs 133-134, which requires decision makers to weigh harm/loss against public benefits. DMC5 Part F by comparison appears to allow no harm or loss (however minor) to any heritage assets. The policy therefore fails to recognise that alterations and additions to heritage assets are sometimes required in order to keep them in

good repair, fit for purpose and viable for the future. The policy is also negatively couched because it does not recognise the scope for enhancements to be secured, for example by removing inappropriate modern elements. (National Trust)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA Y/N | Main modification proposed by NPA Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|-----------|--|---------------------------------------|-----------------|
| 3.43 | PDNPA | - | INT1.21 | Y | Y | N | N |
| 3.46 | Stella McGuire | 10 | 10.6 | Y | Y M3.18 | N | N |
| 3.46 | PDNPA | - | INT1.22 | Y | Y M3.18 | N | N |
| 3.47 | PDNPA | - | INT1.23 | Y | Y M3.19 | N | N |
| 3.49 | PDNPA | - | INT1.24 | Y | Y M3.20 | N | N |
| 3.51 | PDNPA | - | INT1.25 | Y | Y M3.21 | N | N |
| 3.51 | PDNPA | - | INT1.26 | Y | Y M3.22 | N | N |
| 3.51 | Stella McGuire | 10 | 10.7 | Y | Y M3.23 | N | N |
| 3.51 | Stella McGuire | 10 | 10.9 | Y | Y M3.23 | N | N |
| 3.52 | PDNPA | - | - | Y | Y M3.24 | N | N |
| 3.52 | PDNPA | - | INT1.27 | Y | N | N | N |
| 3.52 | Stella McGuire | 10 | 10.12 | Y | N | N | N |
| 3.53 | PDNPA | - | INT1.28 | Y | N | N | N |
| 3.55 | PDNPA | - | INT1.31 | Y | Y M3.25 | N | N |
| 3.54 | PDNPA | - | INT1.30 | Y | Y M3.26 | N | N |
| 3.55 | PDNPA | - | INT1.29 | Y | Y M3.27 | N | N |
| 3.56 | PDNPA | - | INT1.32 | Y | Y M3.28 | N | N |
| 3.58 | PDNPA | - | INT1.33 | Y | Y M3.29 | N | N |
| 3.58 | PDNPA | - | INT1.34 | Y | Y M3.30 | N | N |
| 3.53 | Stella McGuire | 10 | 10.13 | Y | N | N | N |
| 3.58 | Stella McGuire | 10 | 10.14 | Y | Y M3.30 | N | N |
| 3.60 | Stella McGuire | 10 | 10.16 | Y | Y M3.31 | N | N |
| 3.60 | PDNPA | - | INT1.35 | Y | Y M3.31 | N | N |

| | | | | | | | |
|-----------|-----------------------------------|----|---------|---|---------|---------|---|
| 3.61 | PDNPA | - | INT1.36 | Y | N | N | N |
| 3.61 | PDNPA | - | INT1.37 | Y | Y M3.32 | N | N |
| Page 26 | Stella McGuire | 10 | 10.10 | Y | N | N | N |
| Page 26 | Stella McGuire | 10 | 10.11 | Y | N | N | N |
| Page 26 | Stella McGuire | 10 | 10.8 | Y | N | N | N |
| 3.63 | PDNPA | - | INT1.38 | Y | Y M3.33 | N | N |
| 3.64 | PDNPA | - | INT1.39 | Y | N | N | N |
| 3.64 | PDNPA | - | INT1.40 | Y | N | N | N |
| 3.64 | PDNPA | - | INT1.41 | Y | N | N | N |
| 3.64 | Stella McGuire | 10 | 10.17 | Y | Y M3.34 | N | N |
| 3.66 | PDNPA | - | INT1.42 | Y | Y M3.35 | N | N |
| DMC5 | Allen Newby PME Planning Services | 9 | 9.2 | N | N | Y M3.36 | Y |
| DMC5 | Stella McGuire | 10 | 10.18 | Y | N | N | N |
| DMC5 | Peak Park Parishes Forum* | 23 | 23.29 | N | N | N | Y |
| DMC5 | Peak Park Parishes Forum* | 23 | 23.30 | N | N | N | Y |
| DMC5 | Peak Park Parishes Forum* | 23 | 23.31 | N | N | N | Y |
| DMC5 | Peak Park Parishes Forum* | 23 | 23.32 | N | N | N | Y |
| DMC5 | Peak Park Parishes Forum* | 23 | 23.33 | N | N | N | Y |
| DMC5 | Peak Park Parishes Forum* | 23 | 23.34 | N | N | N | Y |
| DMC5 | Chatsworth Settlement Trustees | 35 | 35.13 | Y | N | Y | Y |
| DMC5 3.71 | Emery Planning | 48 | 48.2 | N | N | Y | Y |
| DMC5 | National Trust | 50 | 50.5 | N | N | Y | Y |
| DMC5 | PDNPA | - | INT1.43 | Y | Y M3.37 | N | N |
| DMC5 | PDNPA | - | INT1.44 | Y | Y M3.38 | N | N |
| DMC5 | PDNPA | - | INT1.45 | Y | Y M3.39 | N | N |
| DMC5 | PDNPA | - | INT1.46 | Y | N | N | N |
| DMC5 | PDNPA | - | INT1.47 | Y | Y M3.40 | N | N |
| DMC5 | Peter Abbott | 24 | 24.5 | Y | Y M3.41 | N | N |

| | | | | | | | |
|------|-------|---|---------|---|---|---|---|
| DMC5 | PDNPA | - | INT1.48 | Y | N | N | N |
| DMC5 | PDNPA | - | INT1.49 | Y | N | N | N |
| DMC5 | PDNPA | - | INT1.50 | Y | N | N | N |

DMC6: Schedule Monuments

Summary of issues raised

- It is suggested that the Core Strategy pre-dates the NPPF and as such pre-dates up to date government guidance on heritage assets and the requirement to weigh public benefits (positive benefits) against impact. (Chatsworth Settlement Trustees)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.67 | PDNPA | - | INT1.51 | Y | Y M3.42 | N | N |
| 3.68 | PDNPA | - | INT1.52 | Y | Y M3.43 | N | N |
| 3.69 | PDNPA | - | INT1.53 | Y | N | N | N |
| 3.72 | PDNPA | - | INT1.57 | Y | N | N | N |
| 3.73 | PDNPA | - | INT1.58 | Y | N | N | N |
| 3.73 | Stella McGuire | 10 | 10.18 | Y | Y M3.45 | N | N |
| 3.77 | PDNPA | - | - | Y | Y M3.47 | | |
| DMC6 | Peter Abbott | 24 | 24.6 | Y | Y M3.57 | N | N |
| DMC6 | Stanton in Peak PC | 33 | 33.4 | Y | N | N | Y |
| DMC6 | Chatsworth Settlement Trustees | 35 | 35.12 | N | N | N | Y |
| DMC6 | National Trust | 50 | 50.8 | Y | N | N | Y |
| DMC6 | Rowsley PC | 69 | 69.4 | Y | N | N | N |
| DMC6 | PDNPA | - | INT1.54 | Y | N | N | N |
| DMC6 | PDNPA | - | INT1.55 | Y | N | N | N |

| | | | | | | | |
|------|-------|---|---------|---|---|---|---|
| DMC6 | PDNPA | - | INT1.56 | Y | N | Y | N |
|------|-------|---|---------|---|---|---|---|

DMC7: Listed Buildings

Summary of issues raised

- It is suggested that DMC7 A (ii) is unsound as it is not consistent with NPPF paragraphs 131-134, and 140 of the NPPF in requiring an applicant to demonstrate why the proposed development is desirable and necessary.(Emery Planning Partnership and Roger Yarwood Planning Consultants Ltd)
- It is suggested that DMC7 Parts D and E are unduly restrictive in light of the NPPF paragraphs 133 and 134 (Roger Yarwood Planning Consultants Ltd) and that the criteria of part D are unnecessary in the light of Listed Building legislation. It is suggested that if criterion in Part D is retained, the policy should acknowledge the need to consider public benefit of the development proposed. (Peak Park Parishes Forum)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--|-----------------------|--------------------------|------------------|---|--|------------------------|
| DMC7 | Chatsworth Settlement Trustees | 35 | 35.11 | Y | N | N | Y |
| DMC7 | Great Hucklow PC | 43 | 43.8 | N | N | N | Y |
| DMC7 | Emery Planning | 48 | 48.3 | N | N | N | Y |
| DMC7 | Fisher German pp Tissington Estate | 52 | 52.1 | Y | N | N | N |
| DMC7 | Roger Yarwood Planning Consultants Ltd | 60 | 60.2 | N | N | N | Y |
| DMC7 | Roger Yarwood Planning Consultants Ltd | 60 | 60.3 | N | N | N | Y |
| DMC7 | Roger Yarwood Planning | 60 | 60.4 | N | N | N | Y |

| | | | | | | | |
|------|--|----|---------|---|---------|---|---|
| | Consultants Ltd | | | | | | |
| DMC7 | Roger Yarwood Planning Consultants Ltd | 60 | 60.5 | N | N | N | Y |
| DMC7 | PDNPA | - | INT1.59 | Y | Y M3.46 | N | N |
| DMC7 | Peak Park Parishes Forum* | 23 | 23.35 | Y | N | N | Y |
| DMC7 | Peak Park Parishes Forum* | 23 | 23.36 | N | N | N | Y |
| DMC7 | Peak Park Parishes Forum* | 23 | 23.37 | N | N | N | Y |
| DMC7 | National Trust | 50 | 50.9 | Y | N | N | Y |

DMC8: Conservation Areas

Summary of issues raised

- It is suggested that the Authority's policy and evidence on open spaces is not compatible with the requirements of NPPF paragraph 126 Peak Park Parishes Forum and that the mapping for these spaces leads to confusion (Peak Park Parishes Forum and Taddington Parish Council)
- It is suggested that DMC8C is not justified because anyone has the right to submit an outline planning application (and this needn't be problematic because the planning authority has the right to ask for further information) (Peak Park Parishes Forum*)
- It is suggested that DMC8D and DMC10 A are contrary to NPPF paragraph 12 (Peak Park Parishes Forum*)
- It is suggested that DMC8F is dubious in terms of the legality of the requirement. (Peak Park Parishes Forum* and Great Hucklow Parish Council)
- It is suggested that Paragraphs 3.107 and 3.108 conflict with draft policies DME2 (Farm Diversification), and DMH5, which would often involve the conversion of buildings that are not heritage assets. The NPPF para. 28 states that local plans should "support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and 'well designed' new buildings" (para 28). Para. 55 indicates that housing development which would re-use redundant or disused buildings and lead to an enhancement to the immediate setting is capable of being a very special circumstance. It is suggested that neither of these paragraphs is restricted to heritage assets and consequently, the draft paragraphs 3.107 and 3.108 are in direct conflict with the NPPF. (Emery Planning)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.76 | Stella McGuire | 10 | 10.20 | Y | N | N | N |
| 3.76 | PDNPA | - | INT1.60 | Y | N | N | N |
| 3.79 | Peak Park Parishes Forum* | 23 | 23.27 | Y | Y M3.48 | N | Y |
| 3.79 | Peak Park Parishes Forum* | 23 | 23.28 | Y | Y M3.48 | N | Y |
| 3.81 | Peak Park Parishes Forum* | 23 | 23.25 | Y | Y M3.49 | | Y |
| 3.81 | Peak Park Parishes Forum* | 23 | 23.26 | Y | Y M3.49 | | Y |
| 3.81 | Peak Park Parishes Forum* | 23 | 23.27 | Y | Y M3.49 | | Y |
| 3.82 | PDNPA | - | INT1.61 | Y | N | N | N |
| 3.82 | National Trust | 50 | 50.10 | Y | Y M3.50 | N | N |
| 3.83 | PDNPA | - | INT1.62 | Y | N | N | N |
| 3.84 | PDNPA | - | INT1.63 | Y | N | N | N |
| DMC8 | National Trust | 50 | 50.11 | Y | Y M3.51 | | N |
| DMC8 | Taddington PC | 19 | 19.2 | N | N | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.26 | N | N | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.27 | N | Y M3.47 | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.28 | N | Y M3.47 | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.38 | N | N | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.39 | N | N | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.40 | N | N | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.41 | N | N | N | Y |
| DMC8 | Friends of the Peak District | 28 | 28.9 | N | N | N | Y |
| DMC8 | Chatsworth Settlement Trustees | 35 | 35.1 | Y | N | N | Y |
| DMC8 | Great Hucklow PC | 43 | 43.1 | N | N | N | Y |
| DMC8 | Fisher German pp Tissington Estate | 52 | 52.2 | Y | N | N | N |
| DMC8 | Anita Dale | 66 | 66.4 | Y | N | N | N |

| | | | | | | | |
|-------|---------------------------|----|---------|---|---------|---|---|
| DMC8 | Peak Park Parishes Forum* | 23 | 23.24 | Y | N | N | Y |
| DMC8 | Peak Park Parishes Forum* | 23 | 23.25 | N | N | N | Y |
| DMC8 | PDNPA | 1 | 1.64 | Y | N | N | N |
| DMC8 | National Trust | 50 | 50.11 | Y | Y M3.50 | N | N |
| DMC8 | PDNPA | - | INT1.66 | Y | Y M3.51 | N | N |
| DMC8 | Taddington PC | 19 | 19.3 | N | N | N | Y |
| DMC8F | Great Hucklow PC | 43 | 43.9 | N | N | N | Y |

DMC9: Registered parks and gardens

Summary of issues raised

- It is suggested that the Core Strategy pre-dates the NPPF and as such pre-dates up to date government guidance on heritage assets and the requirement to weigh public benefits (positive benefits) against impact. (Chatsworth Settlement Trustees)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.86 | PDNPA | - | INT1.65 | Y | N | N | N |
| 3.87 | PDNPA | - | - | Y | Y M3.52 | N | N |
| DMC9 | Chatsworth Settlement Trustees | 35 | 35.9 | N | N | N | N |
| DMC9 | National Trust | 50 | 50.12 | Y | N | N | N |

DMC10: Conversion of heritage assets

Summary of issues raised

- It is suggested that elements of DMC10 are inconsistent with the Core Strategy. For example, "DCM10.A.iii. It is unlikely that a "higher intensity use" (e.g. a dwelling house) in a smaller hamlets, farmsteads or groups of buildings will be in "sustainable locations" but such changes of use may nevertheless be acceptable under Core Strategy Policy. (Roger Yarwood Planning Consultants Ltd).
- It is suggested that "Part B and Part.C.i and ii are not consistent with Core Strategy HC1.C. (Roger Yarwood Planning Consultants Ltd)
- It is suggested that Part A. Criterion A (iii) restricts the locations in which the conversion of heritage assets will be permitted whereas Paragraph 28 of the NPPF states that Local Plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas, including through the conversion of existing buildings. NPPF also requires Local Plans to "support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside." (para. 28). NPPF does not restrict such development to that occurring within settlements, smaller hamlets, and farmsteads and in groups of buildings. Similarly, paragraph 55 of the NPPF indicates that residential conversions in isolated locations may be acceptable where, "development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting". It is suggested that proposed criterion A (iii) would thwart Core Strategy HC1 compliant proposals that accorded with paragraph 55 of the NPPF and that DMC10 is therefore not consistent with existing local or national policy. (Emery Planning)
- It is suggested that Part A(iv) ought to reflect the NPPF 133-134 required balancing exercise. (National Trust)
- It is suggested that Part B and the draft paragraphs in the main text, are in conflict with Core Strategy Policy HC1 (New Housing) which states that "exceptionally, new housing (whether newly built or from re-use of an existing building) can be accepted" subject to specified criteria, none of which restrict conversions to heritage assets alone. (Emery Planning)
- It is suggested that Part B, by preventing possible re-use, to high intensity uses, of buildings that are not heritage assets, could be considered contrary to NPPF paragraph 55 which, in the context of housing delivery by re-use of buildings in isolate locations, allows for possible re-use of redundant or disused buildings where that leads to an enhancement of the immediate setting. It is suggested that it is also inconsistent with Core Strategy HC1Ci) which enables re-use of 'valued vernacular' buildings to residential use (i.e. a higher intensity use) but does not limit that to heritage assets. (Peak Park Parishes Forum*)
- It is suggested that Part B and supporting paragraphs 3.107-3.108 prevent the conversion of buildings that are not heritage assets, to higher intensity uses. Paragraph 3.108 states that these buildings will rarely be worthy of conversion to higher intensity uses and as such, their conversion "will not be permitted". The statement that these will "rarely be worthy of conversion" suggests there will be instances where such buildings are worthy of conversion. It is suggested there are situations where the conversion of a disused building could lead to enhancements to the immediate/wider setting in accordance with paragraph 55 of the NPPF and that the application of a blanket ban on conversion is therefore not justified under the tests in paragraph 182 of the NPPF. (Emery Planning)

- It is suggested that DMC10 Part C essentially repeats Core Strategy HC1 part C and is therefore unnecessary. (Emery Planning)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.90 | PDNPA | - | INT1.66 | Y | Y M3.53 | N | N |
| 3.91 | PDNPA | - | INT1.67 | Y | N | N | N |
| 3.92 | PDNPA | - | - | Y | Y M3.54 | N | N |
| 3.93 | PDNPA | - | INT1.68 | Y | Y M3.55 | N | N |
| 3.94 | PDNPA | - | INT1.69 | Y | Y M3.56 | N | N |
| 3.97 | PDNPA | - | INT1.70 | Y | Y M3.57 | N | N |
| 3.98 | PDNPA | - | INT1.71 | Y | Y M3.56 | N | N |
| 3.98 | PDNPA | - | INT1.72 | Y | N | N | N |
| 3.99 | PDNPA | - | INT1.73 | Y | N | N | N |
| 3.106 | PDNPA | - | INT1.74 | Y | Y | N | N |
| 3.106 | PDNPA | - | INT1.75 | Y | Y M3.58 | N | N |
| 3.107 | PDNPA | - | INT1.76 | Y | N | N | N |
| 3.107 - | Emery Planning | 48 | 48.6 | N | N | N | Y |
| 3.107/3.109 | Stella McGuire | 10 | 10.21 | Y | N | N | N |
| 3.108 | Stella McGuire | 10 | 10.22 | Y | N | N | N |
| 3.109 | Stella McGuire | 10 | 10.23 | Y | Y | N | N |
| 3.109 | Stella McGuire | 10 | 10.24 | Y | Y | N | N |
| DMC10 | Peter Abbott | 24 | 24.6 | Y | Y M3.59 | N | N |
| DMC10 | Roger Yarwood Planning Consultants Ltd | 60 | 60.6 | N | N | Y M3.60 | Y |
| DMC10 3.92 | Holme Valley PC | 7 | 7.3 | Y | N | N | N |
| DMC10 | PDNPA | - | INT1.78 | Y | N | N | N |
| DMC10 | Allen Newby | 9 | 9.3 | Y | N | Y M3.61 | Y |
| DMC10 | Roger Yarwood Planning | 60 | 60.7 | N | N | N | Y |

| | | | | | | | |
|---------------------------|-----------------------------------|----|---------|---|---|---|---|
| | Consultants Ltd | | | | | | |
| DMC10 | Stella McGuire | 10 | 10.25 | Y | N | N | N |
| DMC10 | Peak Park Parishes Forum* | 23 | 23.42 | N | N | N | Y |
| DMC10 | Peak Park Parishes Forum* | 23 | 23.43 | Y | N | N | Y |
| DMC10 | Peak Park Parishes Forum* | 23 | 23.44 | Y | N | N | Y |
| DMC10 | Peak Park Parishes Forum* | 23 | 23.45 | N | N | N | Y |
| DMC10 | Peak Park Parishes Forum* | 23 | 23.46 | N | N | N | Y |
| DMC10 | Peak Park Parishes Forum* | 23 | 23.47 | N | N | N | Y |
| DMC10 | Peter Abbott | 24 | 24.7 | Y | N | N | N |
| DMC10 | Friends of the Peak District | 28 | 28.1 | N | N | N | Y |
| DMC10 3.89 -3.109 | Chatsworth Settlement Trustees | 35 | 35.8 | N | N | N | N |
| DMC10 3.107 -3.109 | Emery Planning | 48 | 48.4 | N | N | N | Y |
| DMC10 3.107 – 3.108 | Emery Planning | 48 | 48.5 | N | N | N | Y |
| DMC10 | Emery Planning | 48 | 48.7 | N | N | N | Y |
| DMC10 | National Trust | 50 | 50.13 | N | N | N | Y |
| DMC10 | PDNPA | - | INT1.77 | Y | N | N | N |
| DMC10 | PDNPA | - | INT1.78 | Y | N | N | N |

DMC11: Safeguarding, recording and enhancing conservation interests

Summary of issues raised

- Suggestion that aiming for no net loss of biodiversity or geodiversity will not be effective in promoting an improvement, over time, in the biodiversity of the National Park, and thereby to its resilience to climate change and its ability to provide ecosystem services, both to the communities within the Park and to its beneficiaries in adjacent urban areas. (Friends of the Peak District)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.111 | Stella McGuire | 10 | 10.26 | Y | N | N | N |
| 3.112 | PDNPA | - | INT1.79 | Y | Y M3.62 | N | N |
| 3.113 | PDNPA | - | INT1.80 | Y | N | N | N |
| 3.114 | Stella McGuire | 10 | 10.27 | Y | N | N | N |
| 3.115 | Stella McGuire | 10 | 10.28 | Y | Y M3.63 | N | N |
| 3.120 | Stella McGuire | 10 | 10.29 | Y | Y M3.64 | N | N |
| DMC11 | Stella McGuire | 10 | 10.3 | Y | N | N | N |
| DMC11 | Natural England | 22 | 22.2 | Y | N | N | N |
| DMC11 | Friends of the Peak District | 28 | 28.11 | N | N | Y M3.65 | Y |
| DMC11 | National Trust | 50 | 50.14 | Y | N | N | N |

DMC12: Sites, features or species of wildlife, geological, or geomorphological importanceSummary of issues raised

- No responders objected to this policy on soundness grounds but three responders requested a hearing on the two points below
- It is suggested that in part B 'Exceptional circumstances' should probably be followed by 'where development may be permitted' (as per Part A). It is suggested that it should also be made clear that the term 'management' in DMC12 Bi refers to management for the nature conservation interests for which the site is important. Otherwise, the word can be misinterpreted to refer to all types of management that do or could take place on that site, some of which might be regarded as 'essential' in terms of another aspect of the management of the site but which would be damaging to the nature conservation interest. (National Trust)
- It is suggested that Part C of the policy does not make clear whether 'loss'/'harm' relates only to impacts on the special interest of the site, or to all impacts of the development on wildlife/geology, or to the impacts of the development taken as a whole.(National Trust)

- It is suggested that a maintained and regularly updated list of locations of sites, features or species, wildlife, geological or geomorphological importance would be helpful otherwise developers may be unaware of them. It isn't clear that such a list exists or is intended. (Rowsley PC)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| DMC12 | Natural England | 22 | 22.3 | Y | N | N | N |
| DMC12 | Stanton in Peak PC | 33 | 33.5 | Y | N | N | Y |
| DMC12 | National Trust | 50 | 50.15 | Y | N | N | Y |
| DMC12 | Rowsley PC | 69 | 69.5 | Y | N | N | Y |
| DMC12 | PDNPA | - | INT2.15 | Y | N | N | N |
| DMC12 | PDNPA | - | INT1.81 | Y | Y M3.66 | N | N |

DMC13: Protecting trees, woodland or other landscape features put at risk by development

Summary of issues raised

- No responders objected to this policy on soundness grounds.
- Policy is sound because it complies with NPPF paragraph 118. (Natural England, National Trust and Woodland Trust)
- Parts B and C of the policy should include a commitment to ensuring that layouts avoid future threats to trees in the future, e.g. because of root damage, boundary issues, proximity to buildings etc. (Peak Park Parishes Forum*)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
|-------------|------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|

| | | | | | | | |
|-------|---------------------------|----|---------|---|---------|---|---|
| 3.121 | PDNPA | - | INT1.82 | Y | Y M3.67 | N | N |
| 3.122 | PDNPA | - | INT1.83 | Y | Y M3.68 | N | N |
| 3.125 | PDNPA | - | INT1.84 | Y | Y M3.69 | N | N |
| DMC13 | Natural England | 22 | 22.4 | Y | N | N | Y |
| DMC13 | Peak Park Parishes Forum* | 23 | 23.48 | Y | N | N | Y |
| DMC13 | National Trust | 50 | 50.16 | Y | N | N | N |
| DMC13 | The Woodland Trust | 55 | 55.1 | Y | Y M3.70 | N | N |

DMC14: Pollution and disturbance

Summary of issues raised

- Policy is not sound because there is no reference to roads or vehicle movements which they consider are a primary cause of air, light and noise pollution. (Friends of the Peak District)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 3.128 | United Utilities | 44 | 44.3 | Y | Y M3.71 | N | N |
| DMC14 | Peter Abbott | 24 | 24.8 | Y | N | N | N |
| DMC14 | Friends of the Peak District | 28 | 28.13 | N | N | N | Y |
| DMC14 | National Trust | 50 | 50.17 | Y | N | N | N |

DMC15: Contaminated and unstable land

Summary of issues raised

- Invasive species should be considered 'contaminated land' and afforded that status in policy (Rowsley and Stanton in Peak PCs)
- It would be useful to add in advice on applying part B (United Utilities).

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor Modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|-------------------------|-----------------------|--------------------------|------------------|---|--|------------------------|
| DMC15 | Stanton in Peak PC | 33 | 33.6 | Y | N | N | Y |
| DMC15 | United Utilities | 44 | 44.4 | Y | N | N | N |
| DMC15 | Rowsley PC | 69 | 69.6 | Y | N | N | Y |
| DMC15 | PDNPA | - | INT2.6 | Y | N | N | N |

Chapter 4: Farming and Economy

Strategic context

Summary of main issues raised

- The scope for new businesses in the open countryside is seen as too limited by constituent councils (High Peak Borough and Staffordshire Moorlands)
- The need for high value low impact jobs requires a much more permissive housing policy to attract those who would provide such jobs (Great Hucklow Parish Council)
- The evidence of strategic need for employment sites is questioned with the inference that the figures given as the basis for the safeguarding policy are too low (Staffordshire Moorlands District Council)

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|-------------------------|-----------------------|--------------------------|------------------|---|--|------------------------|
| 4.2 | PDNPA | - | INT1.85 | Y | Y M4.1 | N | N |
| 4.3 | PDNPA | - | INT1.86 | Y | Y M4.2 | N | N |
| 4.4 | PDNPA | - | INT1.87 | Y | Y M4.3 | N | N |
| 4.6 | PDNPA | - | INT1.88 | Y | N | N | N |
| 4.9 | PDNPA | - | INT2.9 | Y | Y M4.4 | N | N |
| 4.9 | Stella McGuire | 10 | 10.31 | Y | N | N | N |
| 4.9 | PDNPA | - | INT2.7 | Y | N | N | N |
| 4.10 | PDNPA | - | INT1.89 | Y | Y M4.5 | N | N |

DME1: Agricultural or forestry operational development

Summary of issues raised

- It is suggested there is conflict between DME1 (D&E) and paras 4.13-4.15 because the implication is that ‘modern’ agricultural buildings are effectively temporary, while ‘traditional’ agricultural buildings are intrinsic to the character of the place. This implies that ‘traditional’ agriculture is more appropriate to the National Park than contemporary agricultural practice. This is suggested as being at odds with supporting the continuing role of agriculture with such wording as ‘critical to the ongoing conservation and enhancement of the National Park landscape.’ (para 4.13) (Friends of Peak District)
- It is suggested that the wording of Policy DME1 is not clear so the policy is likely to lead to misunderstandings, and thus be ineffective. (Chatsworth Settlement Trustees)
- It is suggested that policy could make it difficult for farmers and other land management organisations to implement higher environmental and welfare standards so would be unsound by virtue of failing to be positively prepared and consistent with NPPF paragraph 28 (National Trust)
- It is suggested that the word “proven” in part A sets the bar too high and should be replaced with “shown.” (Roger Yarwood Planning Consultants Ltd)
- It is suggested that parts A(v) and A(vi) will place an additional unnecessary burden on the farmer and that part A(x) is meaningless, wholly unreasonable and unnecessary. (Roger Yarwood Planning Consultants Ltd)

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--------------------------------|-----------------------|--------------------------|------------------|---|--|------------------------|
| 4.11 | PDNPA | - | INT1.90 | Y | Y M4.6 | N | N |
| 4.11 | Stella McGuire | 10 | 10.32 | Y | Y M4.7 | N | N |
| 4.11 | PDNPA | - | INT1.91 | Y | N | N | N |
| DME1 | Friends of the Peak District | 28 | 28.14 | N | N | N | Y |
| DME1 | Chatsworth Settlement Trustees | 35 | 35.6 | N | Y M4.8 | N | N |

| | | | | | | | |
|------|--|----|---------|---|---|---|---|
| DME1 | National Trust | 50 | 50.18 | N | N | N | Y |
| DME1 | Roger Yarwood Planning Consultants Ltd | 60 | 60.8 | N | N | N | Y |
| DME1 | PDNPA | - | INT1.92 | Y | N | N | N |

DME2: Farm diversification

Summary of issues raised

- Some concern was expressed that diversification is a green light for loss of farms to holiday accommodation and uses that 'prettify' the working landscape (Stanton in Peak and Rowsley Parish Councils)
- Some concern was expressed that policy has to do more than simply support land management business and that the diversifying use and activity must be appropriate in its own right in the landscape before consideration of the benefits it might bring to the primary land management business. (PPPF)
- It is suggested that certain elements of draft Policy DME2 are not sound when considered against paragraph 182 of the National Planning Policy Framework because no justification is provided for the restrictions that would be imposed by Part A and paragraph 206 of the NPPF makes it clear that such restrictive planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. There is no evidence that the above could be demonstrated in the case of every application for farm diversification and the issues should therefore be addressed through the imposition of conditions on a case by case basis, where the relevant tests are met. Accordingly, it is suggested that part A is both unjustified, unnecessary, in conflict with the NPPF and does not represent the most appropriate strategy when considered against reasonable alternatives and proportionate evidence. (Emery Planning)
- It is suggested that Part A does not provide flexibility to the rural and farming economy because when a business unit becomes vacant there needs to be flexibility to market that building to a wide variety of businesses and secure continued support and growth to the local rural economy in line with the NPPF and Government Policy in the Rural Productivity Plan. (Fisher German pp Tissington Estate)
- It is suggested that Part B is contrary to Government policy because it would restrict the growth and development of rural businesses and prevent suitable rural businesses becoming a greater part of any traditional farm business. (Fisher German pp Tissington Estate)

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|-----------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 4.13 | PDNPA | - | INT1.93 | Y | N | N | N |
| 4.14 | PDNPA | - | INT1.94 | Y | N | N | N |
| 4.16 | PDNPA | - | INT1.95 | Y | Y M4.9 | N | N |
| 4.17 | Stella McGuire | 10 | 10.33 | Y | Y M4.10 | N | N |
| 4.19 | Stella McGuire | 10 | 10.34 | Y | Y M4.11 | N | N |
| 4.19 | PDNPA | - | INT2.8 | Y | Y M4.11 | N | N |
| DME2 | Chapel-en-le-Frith PC | 12 | 12.6 | Y | N | N | N |
| DME2 | Friends of the Peak District | 28 | 28.15 | Y | N | N | Y |
| DME2 | Stanton in Peak PC (+Sue Fogg) | 33 | 33.7 | Y | N | N | N |
| DME2 | Derbyshire Dales District Council | 34 | 34.4 | Y | N | N | N |
| DME2 | Emery Planning | 48 | 48.8 | Y | N | N | Y |
| DME2 | National Trust | 50 | 50.19 | Y | N | N | N |
| DME2 | Fisher German (Kay Davies) | 52 | 52.3 | Y | N | N | N |
| DME2 | Rowsley PC | 69 | 69.7 | Y | N | N | N |
| DME2 | PDNPA | - | INT2.9 | Y | N | N | N |
| DME2 | PDNPA | - | INT1.96 | Y | Y M4.12 | N | N |
| DME2 | PDNPA | - | INT2.9 | Y | Y M4.12 | N | N |
| DME2 | Peak Park Parishes Forum* | 23 | 23.49 | Y | N | N | Y |
| DME2 | Peak Park Parishes Forum* | 23 | 23.52 | Y | N | N | Y |

DME3: Safeguarding employment sites

Summary of issues raised

- There is a need to guard against loss of employment space and it is noticed that some sites are becoming dominated by other uses (Friends of Peak District and Derbyshire Dales District Council)
- Long term protection of sites is contrary to the NPPF and should be avoided (IBA Planning pp Don Clapham)
- It is suggested that using evidence derived through a neighbourhood plan for decision-making purposes, in conjunction with the additional policy requirements is inappropriate because paragraphs 160 and 161 of the NPPF state that it is for the local authority to collate an appropriate evidence base and have a clear understanding of business needs and economic markets within its area. Furthermore, it is suggested that the reference to “any adopted neighbourhood plan evidence or policy” within the presently proposed draft policy conflicts with paragraph 184 of the NPPF which clearly provides that it is for the Local Plan to take a clear planning policy lead on key sites. (NLP pp Litton Properties)
- It is suggested that the burden of policy requirements is a particularly important consideration where sites are subject to constraints, and that the effective double layering of policy requirements fails to fully recognise the wider economic and employment impacts. In doing so it is suggested that this could prevent viable and achievable development proposals from coming forward. Consequently it is suggested that the DME3 is contrary to the objectives of paragraph 21 of the NPPF, which provides that investment in business should not be over-burdened by the combined requirements of planning policy expectations. (NLP pp Litton Properties)
- It is suggested that Riverside Business Park has a range of complex physical and environmental constraints including historical assets, flood risk, and ecology, each of which imposes significant limitations on development. It is suggested that proposals to bring the site forward for development have sought to maximise its economic contribution, both to Bakewell and the wider National Park area. It is suggested that in accordance with Paragraph 21 of the Framework regard should be given to the difficulties these barriers present to investment and that the policy should not result in additional burdens which would be likely to prevent future development activity. For example, it is accepted that the existing accessibility issues would be improved through the construction of a new bridge over the River Wye but it is suggested that there are significant viability constraints to its construction. Having the scope to accommodate high value uses within the site would contribute significantly to the viability of the scheme, facilitating the sustainable redevelopment of the site in accordance with the core planning principles set out in paragraph 17 of the NPPF. It perhaps needs its own policy (NLP pp Litton Properties)

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|-------------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 4.21 | Stella McGuire | 10 | 10.35 | Y | Y M4.13 | N | N |
| 4.21 | PDNPA | - | INT1.97 | Y | Y M4.13 | N | N |
| 4.22 | Stella McGuire | 10 | 10.36 | Y | Y M4.13 | N | N |
| 4.21 | PDNPA | - | INT4.9 | Y | Y M4.13 | N | N |
| 4.22 | Stella McGuire | 10 | 10.37 | Y | Y M4.14 | N | N |
| 4.22 | Stella McGuire | 10 | 10.38 | Y | Y M4.14 | N | N |
| 4.23 | PDNPA | - | INT2.10 | Y | N | N | N |
| DME3 | Stella McGuire | 10 | 10.39 | Y | Y M4.15 | N | N |
| DME3 | Stella McGuire | 10 | 10.40 | Y | Y M4.15 | N | N |
| DME3 | Stella McGuire | 10 | 10.41 | Y | Y M4.15 | N | N |
| DME3 | PDNPA | - | INT4.23 | Y | Y M4.15 | N | N |
| DME3 | NLP pp Litton Properties | 57 | 57.7 | N | Y M4.15 | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.8 | N | Y M4.15 | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.10 | N | Y M4.15 | N | Y |
| DME3 | Friends of the Peak District | 28 | 28.16 | Y | N | N | Y |
| DME3 | Stanton in Peak PC (Sue Fogg) | 33 | 33.8 | Y | N | N | N |
| DME3 | Derbyshire Dales District Council | 34 | 34.5 | Y | N | N | N |
| DME3 | Great Hucklow PC | 43 | 43.10 | Y | N | N | N |
| DME3 | IBA Planning on behalf of D Clapham | 46 | 46.1 | Y | N | N | N |
| DME3 | IBA Planning on behalf of D Clapham | 46 | 46.2 | Y | N | N | N |
| DME3 | IBA Planning on behalf of D Clapham | 46 | 46.3 | Y | N | N | N |
| DME3 | NLP pp Litton Properties | 57 | 57.11 | Y | N | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.12 | Y | N | N | Y |

| | | | | | | | |
|--------|--|----|-------|---|---|---|---|
| DME3 | NLP pp Litton Properties | 57 | 57.13 | Y | N | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.14 | N | N | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.15 | N | N | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.16 | N | N | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.6 | N | N | N | Y |
| DME3 | NLP pp Litton Properties | 57 | 57.9 | N | N | N | Y |
| DME3 | Staffordshire Moorlands District Council | 58 | 58.5 | N | N | N | N |
| DME3 | High Peak Borough Council | 59 | 59.5 | Y | N | N | N |
| DME3 | Rowsley PC | 69 | 69.8 | Y | N | N | N |
| DME3-5 | Staffordshire Moorlands District Council | 58 | 58.6 | N | N | N | N |
| DME3-5 | High Peak Borough Council | 59 | 59.6 | N | N | N | N |

DME4: Change of use of nun-safeguarded, unoccupied or under occupied employment sites in DS1 settlements

Summary of issues raised

- It is suggested that the 12 months marketing requirement is unreasonable because in some cases the change of use will be desirable from a planning point of view and in other cases, keeping a building unused for 12 months is an unreasonable burden on the owner. (Roger Yarwood)
- It is suggested that the section following part A is confusingly drafted and completely unnecessary. (Roger Yarwood)
- The policy should refer to sites inside or on the edge of settlements to be compatible with other policies. (Peak Park Parishes Forum*)

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|----------------------|------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 4.26 new sub heading | PDNPA | - | - | Y | Y M4.16 | N | N |
| 4.26 | Stella McGuire | 10 | 10.42 | Y | Y M4.17 | N | N |

| | | | | | | | |
|------|--|----|----------|---|---------|---------|---|
| 4.27 | PDNPA | - | INT1.98 | Y | N | N | N |
| 4.29 | Stella McGuire | 10 | 10.43 | Y | N | N | N |
| 4.31 | Stella McGuire | 10 | 10.44 | Y | Y M4.18 | N | N |
| 4.32 | Stella McGuire | 10 | 10.45 | Y | N | N | N |
| 4.32 | PDNPA | - | INT1.99 | Y | N | N | N |
| 4.34 | Stella McGuire | 10 | 10.46 | Y | Y M4.19 | N | N |
| 4.36 | PDNPA | - | INT1.100 | Y | N | N | N |
| 4.37 | PDNPA | - | INT2.11 | Y | N | N | N |
| 4.37 | Stella McGuire | 10 | 10.47 | Y | Y M4.20 | N | N |
| 4.37 | Stella McGuire | 10 | 10.48 | Y | Y M4.20 | N | N |
| 4.37 | Stella McGuire | 10 | 10.49 | Y | N | N | N |
| 4.37 | PDNPA | - | INT1.101 | Y | Y M4.20 | N | N |
| 4.41 | PDNPA | - | INT1.102 | Y | N | N | N |
| 4.41 | Stella McGuire | 10 | 10.51 | Y | Y M4.21 | N | N |
| 4.42 | Stella McGuire | 10 | 10.52 | Y | N | N | N |
| 4.42 | Stella McGuire | 10 | 10.53 | Y | Y M4.22 | N | N |
| DME4 | Stella McGuire | 10 | 10.54 | Y | Y M4.23 | N | N |
| DME4 | Peak Park Parishes Forum* | 23 | 23.56 | N | Y M4.23 | N | Y |
| DME4 | Roger Yarwood Planning Consultants Ltd | 60 | 60.9 | N | N | Y M4.23 | Y |
| DME4 | PDNPA | - | INT2.12 | Y | Y M4.23 | N | N |
| DME4 | PDNPA | - | INT1.103 | Y | N | N | N |

DME5: Class B1 Employment uses in the countryside outside DS1 settlements

Summary of issues raised

- It is suggested that personal consents are rarely acceptable and are likely to fail the six tests set out in PPG. Paragraph: 015 Reference ID: 21a-015-20140306. (though it is noted that they will only be used in exceptional circumstances) National Planning Policy Guidance states that “Unless the permission otherwise provides, planning permission runs with the land and it is rarely appropriate to provide otherwise” (Paragraph: 015 Reference ID:

21a-015-20140306). It is accepted that there may be circumstances where the withdrawal of permitted development rights or the grant of a personal or temporary permission does meet the tests for a valid planning condition, but this would only be the case where it were necessary to ensure compliance with other local and national policy requirements. It is claimed that an assessment of proposals in the normal manner would identify whether such restrictive conditions were required and that there is therefore no justification to include a policy relating to what can, under national guidance, be an exceptional use of such conditions. (Allen Newby PME Planning Services Ltd)

- It is suggested that whilst Core Strategy policy E2A envisages new build by way of replacement, DME5 is silent on this issue and that this therefore limits the scope of the Core Strategy policy E2. (Peak Park Parishes Forum*)
- It is claimed that Part B to policy DME5 is not the most appropriate strategy when considered against reasonable alternatives. (Emery Planning)
- The policy should give provision for the NPA to agreed discontinued use in order to free up land/buildings to other uses without restriction to temporary uses. A Chatsworth specific policy would help (Chatsworth Settlement Trust)

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|---------------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 4.46 | PDNPA | - | INT2.13 | Y | Y M4.24 | N | N |
| 4.46 | Peak Park Parishes Forum* | 23 | 23.50 | Y | Y M4.24 | N | Y |
| 4.46 | PDNPA | - | INT4.22 | Y | Y M4.25 | N | N |
| 4.47 | PDNPA | - | INT1.104 | Y | N | N | N |
| 4.47 | PDNPA | - | INT1.105 | Y | Y M4.25 | N | N |
| 4.47 | PDNPA | - | INT4.22 | Y | Y M4.25 | N | N |
| DME5 | Allen Newby PME Planning Services Ltd | 9 | 9.4 | N | N | N | N |
| DME5 | Peak Park Parishes Forum* | 23 | 23.50 | Y | N | N | Y |
| DME5 | Peak Park Parishes Forum* | 23 | 23.51 | N | N | N | Y |
| DME5 | Peak Park Parishes Forum* | 23 | 23.53 | Y | N | N | Y |
| DME5 | Chatsworth Settlement Trustees | 35 | 35.5 | N | N | N | N |
| DME5 | Emery Planning | 48 | 48.9 | N | N | N | Y |
| DME5 | Peak Park Parishes Forum* | 23 | 23.55 | N | N | N | Y |

DME6: Home working

Summary of issues raised

- There were no representations on soundness issues

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|------------------|------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| Page 52 footnote | PDNPA | - | INT1.106 | Y | Y M4.26 | N | N |
| 4.48 | PDNPA | - | INT2.14 | Y | Y M4.27 | N | N |
| 4.48 | Great Hucklow Parish Council | 43 | 43.4 | Y | Y M4.27 | N | Y |
| 4.48 | PDNPA | - | INT1.107 | Y | N | N | N |

DME7: Expansion of existing industrial and business development where it is not ancillary to agricultural business

Summary of issues raised

- There were no representations on soundness issues

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------------------|----------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 4.49 | Great Hucklow Parish Council | 43 | 43.4 | Y | Y M4.28 | N | Y |
| 4.49 | Martin Beer | 56 | 56.2 | Y | Y M4.28 | N | N |
| 4.50 | PDNPA | - | INT4.24 | Y | Y M4.29 | N | N |
| 4.51 | PDNPA | - | INT4.14 | Y | Y M4.30 | N | N |
| 4.55 | PDNPA | - | INT2.15 | Y | Y M4.31 | N | N |

| | | | | | | | |
|------|----------------|----|----------|---|---------|---|---|
| 4.55 | PDNPA | - | INT4.14 | Y | N M4.32 | N | N |
| DME7 | Stella McGuire | 10 | 10.55 | Y | Y M4.33 | N | N |
| DME7 | PDNPA | - | INT1.107 | Y | Y M4.33 | N | N |

DME8: Design layout and neighbourliness of employment sites including haulage depots

Summary of issues raised

- There were no representations on soundness issues.

List of responses

| Para/policy | Respondent/agent | Representor ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|-------------------------|-----------------------|--------------------------|------------------|---|--|------------------------|
| 4.60 | PDNPA | - | INT4.16 | Y | Y M4.34 | N | N |
| 4.64 | Stella McGuire | 10 | 10.56 | Y | Y M4.35 | N | N |
| 4.65 | Stella McGuire | 10 | 10.57 | Y | Y M4.36 | N | N |
| 4.65 | PDNPA | - | INT1.109 | Y | Y M4.36 | N | N |

Chapter 5 Recreation and Tourism

Summary of main issues raised within Strategic Context and wider text:

- There is no reference to the Recreation Hubs SPD that the Authority is working on. (National Trust)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|--------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 5.1 to Para 5.4 | National Trust | 50 | 50.20 | N | N | Y M5.2/M5.3/M5.4 | No |

Policy DMR1: Touring camping and caravan sites

Summary of main issues raised:-

- DMR1C only allows for the provision of one shepherds hut, is questionable. (Allen Newby)
- Why are pods and shepherds huts referred to specifically in DMR1, there are other options including gypsy caravans or converted horse boxes. (Allen Newby)
- DMR1A should refer to “*neighbouring residents and uses*”. (Great Hucklow Parish Council)
- How can the policy reflect and address the impact of new or expanded sites on the surrounding road network as the PDNPA is not the highway authority? (Stanton in Peak Parish Council (+ Sue Fogg), Rowsley Parish Council)
- A question as to the reasonableness of the restriction on static caravans, chalets and lodges within the National Park. (Greg Potter)
- Tourism policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in demands from tourists. This includes allowing existing sites to develop and enhance their facilities. (The Caravan Club)

Listing of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|--------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMR1 | Allen Newby | 9 | 9.5 | Y | N | N | No |

| | | | | | | | |
|-------|---|----|-------|---|---|---|-----|
| DMR1A | Great Hucklow Parish Council | 23 | 23.57 | N | N | N | No |
| DMR1 | Stanton in Peak Parish Council (+ Sue Fogg) | 33 | 33.9 | Y | N | N | Yes |
| DMR1 | The Caravan Club | 37 | 37.1 | Y | N | N | No |
| DMR1 | Greg Potter | 65 | 65.1 | N | N | N | No |
| DMR1 | Rowsley Parish Council | 69 | 69.9 | Y | N | N | Yes |

Policy DMR2: Holiday occupancy of camping and caravan sites

Summary of main issues raised: -

- Tourism policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in demands from tourists. This includes allowing existing sites to develop and enhance their facilities. (The Caravan Club)

Listing of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|--------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMR2 | The Caravan Club | 37 | 37.1 | Y | N | N | No |

Policy DMR3: Holiday occupancy of self-catering accommodation

Summary of main issues raised: -

- It is unclear why if residential use is not suitable because of its relationship with adjoining house, that holiday occupancy is. (Stella McGuire)
- In relation to DMR3B(iii) the question is whether the property would fulfil a reasonable need as an affordable house, not its size. (Peak Park Parishes Forum)

- It is inappropriate to allow new build for holiday accommodation compared to for housing stock to allow for sustainable communities. Holiday lets should only be achieved through conversion. (Chelmorton Parish Council)

Listing of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-----------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMR3 | Stella McGuire | 10 | 10.60 | Y | N | N | No |
| DMR3C | Stella McGuire | 10 | 10.61 | Y | N | N | No |
| DMR3B(iii) | Peak Park Parishes Forum | 23 | 23.58 | N | N | N | Yes |
| DMR3 | Chelmorton Parish Council | 26 | 26.3 | N | N | N | No |
| DMR3 | Derbyshire Dales District Council | 34 | 34.8 | Y | N | N | No |
| DMR3B | PDNPA | - | INT6.1 | N | N | Y Modification – M5.10 | No |

Policy DMR4: Facilities for keeping and riding horses

Summary of main issues raised: -

- Policy DMR4B should stipulate the use of those materials for building, most in keeping with the National Park, for example a building resembling like a traditional stone barn. (Peak Park Parishes Forum)
- The policy is too prescriptive and discourages more sustainable options that are more in tune with the landscape. (Peak Park Parishes Forum)

- The policy is prejudicial to those wishing to keep horses compared with other uses including farm buildings, employment or tourist sites. (Peak Park Parishes Forum)
- The consideration of cumulative impact of equestrian facilities would strengthen the policy. (Peak Park Parishes Forum)
- It may be difficult to locate equestrian facilities close to existing buildings in all cases; therefore some measure of flexibility is required / the requirement should be removed. (Emery Planning, Roger Yarwood Planning)
- The phrase within DMR4B “or a building that would lend itself to future conversion for such” should be removed, as the Authority already has existing powers to prevent change of use. (Roger Yarwood Planning)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| DMR4B | Peak Park Parishes Forum* | 23 | 23.59 | N | N | N | Yes |
| DMR4B | Peak Park Parishes Forum* | 23 | 23.60 | N | N | Y M5.12 | Yes |
| DMR4 | Peak Park Parishes Forum* | 23 | 23.61 | N | N | N | Yes |
| DMR4C | Emery Planning | 48 | 48.13 | N | N | N | No |
| DMR4 | Roger Yarwood Planning | 60 | 60.10 | N | N | N | No |

Chapter 6: Housing

General

Summary of issues raised

- It is noted that the National Parks Circular 2010 absolves the National Park Authority from setting housing targets, but it suggested that this does not remove the other obligations required by the NPPF paragraph 50, and the need for policies that contribute to choice in the housing market, including starter homes and self-build. (PPPF*, Peter O Brien, Karen Bradley MP, High Peak Borough Council leader Cllr Tony Ashton)
- It is suggested that the National Park Authority should have assessed needs, as required by the NPPF, and either responded to them or demonstrated why they should not be met. (Derbyshire Dales District Council,)
- The NPA should have a housing target (High Peak Borough Council leader Cllr Tony Ashton)
- It is suggested that there is no incentive within policy whereby land can be released for affordable housing, and that therefore Paragraph 54 of the NPPF has not been addressed. (PPPF)
- It is suggested that the Core Strategy policy HC1 is not sound and that therefore housing policies in this part 2 plan cannot be considered sound. (Peter O Brien)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--|----------------------|--------------------------|------------------|---|--|------------------------|
| General | Osmaston and Yeldersley Parish Council | 63 | 63.1 | Y | N | N | N |
| General | Peter Abbott | 24 | 24.2 | Y | N | N | N |
| General | Peter O'Brien | 64 | 64.1 | N | N | N | Y |
| General | Great Hucklow PC | 43 | 43.5 | Y | N | N | Y |
| General | Great Hucklow PC | 43 | 43.6 | Y | N | N | Y |
| General | Peak Park Parishes Forum* | 23 | 23.62 | N | N | N | Y |
| General | Peak Park Parishes Forum* | 23 | 23.63 | N | N | N | Y |
| General | Karen Bradley MP | 70 | 70.7 | Y | N | N | N |
| General | Chelmorton PC | 26 | 26.2 | N | N | N | N |
| General | IBA Planning pp D Clapham | 46 | 46.4 | N | N | N | N |
| General | Peak Park Parishes Forum* | 23 | 23.64 | N | N | N | Y |
| General | Peak Park Parishes Forum* | 23 | 23.65 | N | N | N | Y |

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--|----------------------|--------------------------|------------------|---|--|------------------------|
| General | Peak Park Parishes Forum* | 23 | 23.66 | N | N | N | Y |
| General | Peak Park Parishes Forum* | 23 | 23.67 | N | N | N | Y |
| General | Peak Park Parishes Forum* | 23 | 23.68 | N | N | N | Y |
| General | Peak Park Parishes Forum* | 23 | 23.69 | N | N | N | Y |
| General | Karen Bradley MP | 70 | 70.4 | Y | N | N | Y |
| General | Derbyshire Dales District Council | 34 | 34.11 | Y | N | N | N |
| General | Derbyshire Dales District Council | 34 | 34.12 | Y | N | N | N |
| General | Derbyshire Dales District Council | 34 | 34.13 | Y | N | N | N |
| General | Derbyshire Dales District Council | 34 | 34.14 | Y | N | N | N |
| General | John Youatt | 54 | 54.1 | Y | N | N | Y |
| General | Anita Dale | 66 | 66.5 | Y | N | N | N |
| General | Stanton in peak PC (+Sue Fogg) | 33 | 33.11 | Y | N | N | N |
| General | Rowsley PC | 69 | 69.12 | Y | N | N | N |
| HC1 | HPBC (Cllr Tony Ashton) | 4 | 4.2 | N | N | N | N |
| HC1 | HPBC (Cllr Tony Ashton) | 4 | 4.5 | N | N | N | N |
| HC1 | Staffordshire Moorlands District Council | 58 | 58.1 | N | N | N | N |
| HC1 | High Peak Borough Council | 59 | 59.1 | N | N | N | N |

Strategic Context (up to paragraph 6.37)

Summary of issues raised

- It is suggested that the real level of housing need across the Districts that make up the National Park area is not outlined and that this means that the strategic context for the policies that follow is unsound. (Staffordshire Moorlands MP Karen Bradley and High Peak Borough Council leader Tony Ashton)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--------------------------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.1 | Stella McGuire | 10 | 10.62 | Y | Y M6.1 | N | N |
| 6.1 | Peter Abbott | 24 | 24.9 | Y | Y M6.1 | N | N |
| 6.1 | Peter O'Brien | 64 | 64.7 | N | N | N | Y |
| 6.2 | Peter O'Brien | 64 | 64.9 | N | N | N | Y |
| 6.2 | Peter O'Brien | 64 | 64.11 | N | N | N | Y |
| 6.2 | Bakewell and District Civic Society) | 8 | 8.4 | Y | N | N | N |
| 6.2 | Stella McGuire | 10 | 10.63 | Y | Y M6.2 | N | N |
| 6.2 | Stella McGuire | 10 | 10.64 | Y | Y M6.2 | N | N |
| 6.2 | Peter Abbott | 24 | 24.4 | Y | Y M6.2 | N | N |
| 6.2 | Friends of the Peak District | 28 | 28.17 | Y | Y M6.2 | N | Y |
| 6.3 | Peter O'Brien | 64 | 64.6 | N | N | N | Y |
| 6.4 | Peak Park Parishes Forum | 23 | 23.64 | Y | N | Y M6.3 | Y |
| 6.4 | Gt Hucklow PC | 43 | 43.5 | N | N | Y M6.3 | N |
| 6.4 | Stella McGuire | 10 | 10.65 | Y | Y M6.4 | N | N |
| 6.5 | Peter O'Brien | 64 | 64.12 | N | N | N | Y |
| 6.5 | Peter O'Brien | 64 | 64.13 | N | N | N | Y |
| 6.5 | Peter O'Brien | 64 | 64.14 | N | N | N | Y |
| 6.8 | Peter O'Brien | 64 | 64.8 | N | N | N | Y |

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-----------------------|---|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.9 | Stella McGuire | 10 | 10.66 | Y | Y M6.5 | N | N |
| 6.9 | Stella McGuire | 10 | 10.8 | Y | N | N | N |
| 6.10 | Stella McGuire | 10 | 10.67 | Y | Y M6.6 | N | N |
| 6.10 | Stella McGuire | 10 | 10.67 | Y | N | N | N |
| 6.13 | PDNPA | PDNPA | INT2.18 | Y | Y M6.7 | N | N |
| 6.13 | Anita Dale | 66 | 66.6 | Y | Y M6.7 | N | N |
| 6.14 | PDNPA | PDNPA | INT4.4 | Y | Y M6.8 | N | N |
| 6.13 | Peak District Rural Housing Association | 25 | 25.1 | Y | Y M6.9 | N | N |
| 6.13 | Peak District Rural Housing Association | 25 | 25.2 | Y | Y M6.9 | N | N |
| 6.14 | Peak Park Parishes Forum* | 23 | 23.86 | N | Y M6.10 | N | Y |
| Between 6.14 and 6.15 | Peak Park Parishes Forum* | 23 | 23.87 | N | Y M6.11 | N | Y |
| 6.16 | PDNPA | - | - | Y | Y M6.12 | N | N |
| Between 6.18 and 6.19 | Peak Park Parishes Forum* | 23 | 23.87 | N | Y M6.13 | N | Y |
| 6.17 | Peter O'Brien | 64 | 64.4 | N | N | N | Y |
| | Peter O'Brien | 64 | 64.5 | N | N | N | Y |
| 6.20 – 6.21 | Peak Park Parishes Forum* | 23 | 23.87 | N | N | Y M6.14 | N |
| 6.29 | Peak District Rural Housing Association | 25 | 25.3 | Y | N | N | N |
| 6.28 | Anita Dale | 66 | 66.7 | Y | N | N | N |
| | Emma Humphreys | 71 | 71.1 | Y | N | N | N |
| 6.31 | Peter O'Brien | 64 | 64.3 | N | N | N | Y |
| 6.37 | PDNPA | PDNPA | PDNPA | Y | Y M6.15 | N | N |
| 6.37 | Peak Park Parishes Forum* | 23 | 23.54 | N | Y M6.15 | N | Y |
| 6.37 | Peak Park Parishes Forum* | 23 | 23.75 | N | Y M6.15 | N | Y |

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|---|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.37 | Friends of The Peak district | 28 | 28.18 | N | Y M6.15 | N | Y |
| 6.37 | Allen Newby PME Planning Services | 9 | 9.6 | Y | Y M6.15 | N | N |
| 6.38 | Peak District Rural Housing Association | 25 | 25.4 | Y | Y M6.16 | N | N |
| 6.38 | Peak Park Parishes Forum* | 23 | 23.73 | N | Y M6.16 | N | Y |

DMH1: New Affordable housing

Summary of issues raised

- It is suggested that the lack of housing target puts unreasonable pressure on communities around the National Park to accommodate more housing. (High Peak Borough Council leader, Tony Ashton and Staffordshire Moorlands MP, Karen Bradley)
- It is suggested that the housing need of parishes that border the National Park include starter and market homes, and that these ought to be provided in the National Park as well as outside. (High Peak Borough Council and Chapel en le Frith Town Council)
- It is noted that the 'in principle' position established in the Core strategy DS1 allows some types of development outside of DS1 settlement so it is suggested that it is unjustified to restrict new build affordable housing to DS1 settlements on the grounds of sustainable development. (PPPF)
- It is suggested that the policy is unsound because it unnecessarily restricts demand and closes off options for other affordable housing products. (High Peak Borough Council Chapel Parish Council, Peter O Brien)
- The size thresholds are too low (PPPF, Anita Dale, Friends of the Peak District, Peter O Brien)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|------------------|---|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| DMH1 | Allen Newby PME Planning Services | 9 | 9.6 | Y | N | N | Y |
| DMH1 | Stella McGuire | 10 | 10.69 | Y | Y M6.17 | N | N |
| DMH1 | Chapel-en-le-Frith PC | 12 | 12.3 | N | N | N | N |
| DMH1 | Chapel-en-le-Frith PC | 12 | 12.5 | N | N | N | N |
| DMH1 | Waterhouses PC | 17 | 17.1 | Y | N | N | N |
| DMH1 | Taddington PC | 19 | 19.5 | Y | N | N | Y |
| DMH1 | Derbyshire County Council | 21 | 21.4 | Y | N | N | N |
| DMH1, 6.9 - 6.29 | Derbyshire County Council | 21 | 21.5 | Y | N | N | N |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.70 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.71 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.72 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.73 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.74 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.75 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.76 | Y | N | N | Y |
| DMH1, 6.52 | Peak Park Parishes Forum* | 23 | 23.77 | Y | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.78 | Y | N | N | Y |
| DMH1, 8.24 | Peak Park Parishes Forum* | 23 | 23.79 | N | N | N | Y |
| DMH1 | Peak Park Parishes Forum* | 23 | 23.8 | N | N | N | Y |
| DMH1 | Peak District Rural Housing Association | 25 | 25.5 | Y | N | N | Y |
| DMH1 | Anita Dale | 66 | 66.8 | Y | N | N | N |
| DMH1 | Peter O'Brien | 64 | c | Y | Y | N | Y |
| DMH1 | Friends of the Peak District | 28 | 28.18 | N | N | N | Y |

| | | | | | | | |
|-------------|-------------------------|----|------|---|---|---|---|
| DMH1 & DMH2 | Martin Beer | 56 | 56.5 | Y | N | N | N |
| DMH1, DMH2 | HPBC (Cllr Tony Ashton) | 4 | 4.6 | N | N | N | N |

DMH2: First occupation of affordable housing

Summary of issues raised

- It is suggested that the plan's definition of housing need is inadequate, and that the restrictions on occupancy based on this definition fail to recognise the requirements of NPPF paragraph 50, and, in addition, do not represent a positive response to the English National Parks and the Broads Vision and Circular, or the Authority's own National Park Management Plan with regard to the objective of maintaining vibrant and thriving villages. (PPPF, Peter O'Brien, Karen Bradley MP and High Peak Borough Council leader Cllr Tony Ashton)
- It is noted that notwithstanding policy DMH4: essential worker dwellings, policy DMH2 does not provide for those with an essential need to live near to their work to be allocated affordable housing as a first occupant. (PDRHA, Martin Beer)
- It is suggested that the ten year connection (allied to housing need) is an unjustified policy requirement. (Peter O'Brien, Derbyshire Dales District Council)
- It is suggested that this policy unnecessarily restricts demand and does not contribute to choice in the housing market. (High Peak Borough Council, Staffordshire Moorlands District Council, Martin Beer)
- It is not clear how other needs are to be addressed e.g. for elderly persons to downsize. (PPPF, Staffordshire Moorlands MP Karen Bradley, High Peak Borough Council)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.52 | Peter Abbott | 24 | 24.10 | Y | Y M6.18 | N | N |
| 6.52 | PDNPA | 4 | 4.8 | Y | Y M6.18 | | |

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--|----------------------|--------------------------|------------------|---|--|------------------------|
| DMH1 & DMH2 | Martin Beer | 56 | 56.5 | Y | N | N | N |
| DMH1, DMH2 | HPBC (Cllr Tony Ashton) | 4 | 4.6 | N | N | N | N |
| DMH2 | Peak Park Parishes Forum* | 23 | 23.81 | N | N | N | Y |
| DMH2 | Peak Park Parishes Forum* | 23 | 23.82 | N | N | N | Y |
| DMH2 | Peak Park Parishes Forum* | 23 | 23.83 | N | N | N | Y |
| DMH2, 6.22 | Peak Park Parishes Forum* | 23 | 23.84 | N | N | N | Y |
| DMH2 | Peak Park Parishes Forum* | 23 | 23.85 | N | N | N | Y |
| DMH2 | Peak District Rural Housing Association | 25 | 25.6 | N | N | N | Y |
| DMH2 | Derbyshire Dales District Council | 34 | 34.15 | Y | N | N | N |
| DMH2 | Peter O'Brien | 64 | 64.2 | N | N | N | Y |
| DMH2 & DMH3 | Staffordshire Moorlands District Council | 58 | 58.3 | N | N | N | N |
| DMH2 & DMH3 | High Peak Borough Council | 59 | 59.3 | N | N | N | N |

DMH3: Second and subsequent occupation of affordable housing (the occupancy cascade)

Summary of issues raised

- No representation on soundness that don't repeat those made on DMH2, but clarifications suggested to part B to clarify that it is owners and managers of such houses that need to follow the policy requirements (Peter Abbott)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|--|----------------------|--------------------------|------------------|---|--|------------------------|
| DMH2 & DMH3 | Staffordshire Moorlands District Council | 58 | 58.3 | N | N | N | N |
| DMH2 & DMH3 | High Peak Borough Council | 59 | 59.3 | N | N | N | N |
| DMH3 | Peter Abbott | 24 | 24.11 | Y | Y M6.19 | N | N |
| DMH3 | Peter Abbott | 24 | 24.12 | Y | Y M6.19 | N | N |
| DMH3 | Peak District Rural Housing Association | 25 | 25.7 | Y | N | N | Y |

DMH4: Essential worker dwellings

Summary of issues raised

- It is suggested that there is no need to restrict the size of the houses or restrict conversions to traditional buildings (PPPF)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|-------------------------|----------------------|--------------------------|------------------|---|--|------------------------|
| 6.57 | Stella McGuire | 10 | 10.71 | Y | Y M6.20 | N | N |
| 6.62 | Stella McGuire | 10 | 10.72 | Y | N | N | N |
| DMH4 | PDNPA | PDNPA | PDNPA | Y | Y M6.21 | N | N |

| | | | | | | | |
|------|---------------------------|----|-------|---|---------|---------|---|
| DMH4 | Stella McGuire | 10 | 10.73 | Y | Y M6.21 | N | N |
| DMH4 | Peak Park Parishes Forum* | 23 | 23.89 | N | N | Y M6.21 | Y |
| DMH4 | Stella McGuire | 10 | 10.73 | Y | Y M6.22 | N | N |
| DMH4 | Peak Park Parishes Forum* | 23 | 23.88 | N | N | N | Y |

DMH5: Ancillary dwellings in the curtilages of existing dwellings by conversion or new build

Summary of issues raised

- It is suggested that where permission is required for either conversion (where the building is not currently in ancillary residential use or not within the curtilage or where the alterations exceed permitted development), or building of a new build ancillary dwelling, it should always be possible to secure its ancillary status through use of a planning condition. It is noted that National Planning Practice Guidance states that “It may be possible to overcome a planning objection to a development proposal equally well by imposing a condition on the planning permission or by entering into a planning obligation under section 106 of the Town and Country Planning Act 1990”. (Emery Planning)
- It is claimed that the policy provision to use Section 106 legal agreements to tie the ancillary dwelling to the main dwelling in order to ensure its continued status as ancillary is contrary to NPPF paragraphs 203 and 204. (PPPF)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|--------------------|---------------------------|----------------------|--------------------------|------------------|---|--|------------------------|
| 6.69 | NFU (Paul Tame) | 2 | 2.1 | Y | Y M6.23 | N | N |
| DMH5 | Peak Park Parishes Forum* | 23 | 23.91 | N | N | N | Y |
| DMH5 | Emery Planning | 48 | 48.10 | N | N | N | Y |

DMH6: Re-development of previously developed land to dwelling use

Summary of issues raised

- It is questioned, from the preamble, or from the policy itself, why this policy is needed. Taking each bullet point in turn: All development must conserve and enhance (Core Strategy Policy GSP2 and GSP3) and DMC3; DMC3B(i), DMC4 and DMC8A(i) all deal with open areas (see above); Repetition of Core Strategy Policy HC1; Insofar as this is understood, it is dealt with as follows. It is not clear whether this policy is intended to enlarge upon Core Strategy Policy HC1 (CII) or has another purpose. However, the test in Core Strategy Policy HC1 for the redevelopment of sites (which could include buildings) is clear: conservation or enhancement within a DS1 settlement. It is therefore not understood why the list of sites in Para 6.77 (see also definition of previously developed land in Appendix 11) has been included - why, for example, exclude a site of a dilapidated prefabricated barn, simply because it was agricultural, and why limit it to sites that have had a permanent structure rather than despoiled sites generally? If it is in a DS1 settlement and conservation/enhancement occurs, the question is asked why its redevelopment for much needed housing would not in principle be sustainable and be to the benefit of the National Park and of the community (PPPF)
- It is suggested that paragraphs 6.78 and 6.79 require clarification to make the plan sound (PPPF)
- It is suggested that the relationship of this policy to DME4 isn't clear and needs to be explained (PPPF)
- It is suggested that the policy appears to relate to building conversions as well as brown field sites, in which case it is contended that it is contradicted by DMC10B (PPPF)
- It is suggested that the fourth bullet point of DMH6, taken with paras. 6.84 to 6.86, is confusing and the objectives unclear. It is suggested that if a site comes forward capable of accommodating two or more dwellings, whether previously developed or not, under CS Policy HC1C(IV), policies are needed:
 1. To ensure that the site is put to the optimum use, having regard to National Park purposes and the need to maximise housing provision, e.g. a policy to ensure a site capable of taking, say, four houses does not just have one large one;
 2. To prevent partial development;
 3. To ensure that any lawful financial contribution is payable, i.e. to prevent in the above example four separate applications of one house each to avoid the financial contribution.It is suggested that neither objective is met by the policy as written. (PPPF)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|---------------------------|---------------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| Page 74 first sub heading | PDNPA | PDNPA | 1.116 | Y | N | N | N |
| 6.76 | PDNPA | PDNPA | 1.116 | Y | N | N | N |
| DMH6 and 6.77 | Peak Park Parishes Forum* | 23 | 23.91 | N | N | Y M6.24 | Y |
| 6.80 | Stella McGuire | 10 | 10.75 | Y | Y M6.25 | N | N |
| 6.84 | Stella McGuire | 10 | 10.75 | Y | N | N | N |
| 6.84 | Peter O'Brien | 64 | 64.15 | N | Y M6.25 | N | Y |
| 6.84 | Peak Park Parishes Forum* | 23 | 23.64 | N | Y M6.25 | N | Y |
| 6.84 | Karen Bradley | 70 | 70.4 | N | Y M6.25 | N | N |
| 6.84 | PDNPA | - | - | Y | Y M6.26 | N | N |
| 6.85 | Stella McGuire | 10 | 10.76 | Y | Y M6.27 | N | N |
| 6.86 | Stella McGuire | 10 | 10.77 | Y | Y M6.28 | N | N |
| 6.87 | Stella McGuire | 10 | 10.78 | Y | Y M6.29 | N | N |
| 6.87 | PDNPA | PDNPA | PDNPA | Y | N | N | N |
| 6.87 | PDNPA | PDNPA | PDNPA | Y | N | N | N |
| DMH6, 6.78,6.79 | Peak Park Parishes Forum* | 23 | 23.92 | N | N | N | Y |
| DMH6 | Peak Park Parishes Forum* | 23 | 23.93 | N | N | N | Y |
| DMH6 | Peak Park Parishes Forum* | 23 | 23.94 | N | N | N | Y |
| DMH6, 6.84 -6.86 | Peak Park Parishes Forum* | 23 | 23.95 | N | N | N | Y |
| DMH6 | NHS Property Services | 38 | 38.8 | Y | N | Y M6.30 | N |
| DMH6 | National Trust | 50 | 50.21 | Y | N | N | Y |
| DMH6 | PDNPA | PDNPA | - | Y | N | N | N |

DMH7: Extensions and Alterations

- No representations go to the soundness of the policy and no issues were raised that cannot be dealt with by minor modifications

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--------------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.88 | Stella McGuire | 10 | 10.79 | Y | Y M6.31 | N | N |
| DMH7 | PDNPA | PDNPA | INT2.21 | Y | Y M6.32 | N | N |
| DMH7 | Peak Park Parishes Forum | 23 | 23.96 | Y | Y M6.32 | N | Y |
| DMH7 | PDNPA | PDNPA | - | Y | N | N | N |
| DMH7 | PDNPA | 4PDNPA | INT4.18 | Y | Y M6.32 | N | N |

DMH8: New outbuildings for domestic garaging and storage uses in the curtilage of dwelling houses

Summary of issues raised

- It is noted that the policy is ‘permissive’ meaning that the principle of development has already been considered to conserve and enhance in the context of National Park objectives. However, it is suggested that in situations where it is possible to conserve the desirable features of the National Park, but not further enhance it would be illogical to imply that conservation was not desirable. It is noted that Policy DMH8 as it is currently worded does not support applications for new outbuildings that conserve the immediate dwelling and curtilage (and the other features/characteristics referred to in the draft policy), but may not be considered to enhance. It is suggested that such proposals (provided they complied with other local and national planning policies) would not undermine the purposes of the National Park and that the otherwise permissive policy is therefore unduly restrictive. (Emery Planning)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|---------------------|--------------------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| Page 76 Sub heading | PDNPA | PDNPA | INT4.20 | Y | Y M6.33 | N | N |
| 6.91 | Peak Park Parishes Forum* | 23 | 23.97 | N | Y M6.34 | N | Y |
| DMH8 | Peak Park Parishes Forum* | 23 | 23.97 | Y | Y M6.35 | N | Y |
| DMH8 | PDNPA | PDNPA | INT4.19 | Y | Y M6.35 | N | N |
| DMH8 | Stanton in Peak PC (+Sue Fogg) | 33 | 33.1 | Y | N | N | Y |
| DMH8 | Emery Planning | 48 | 48.11 | N | N | N | N |
| DMH8 | Rowsley PC | 69 | 69.1 | Y | N | N | Y |

DMH9: Replacement dwellingsSummary of issues raised

- It is suggested that there is no incentive for low carbon or innovative designs which means that successful implementation of policies in the core strategy that encourage such designs will be a less likely outcome. (Allan Newby PME Planning Services)
- It is suggested that the wording unnecessarily restricts the requirement for significant enhancement to much larger replacements, when there may be clear opportunities to achieve this on more modest schemes. (PDNPA)
- It is suggested that the removal of the requirement to replace a house with one of similar size means there will be a loss of smaller houses and bungalows, both of which, it is suggested, serve a purpose for people needing more affordable and/ or more accessible property. (Rowsley PC)
- The policy needs to include an option to restrict permitted development rights to 'lock in' any enhancement gained (PDNPA)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|--------------------------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.92 | PDNPA | PDNPA | INT4.24 | Y | Y M6.36 | N | N |
| 6.94 | Stella McGuire | 10 | 10.92 | Y | Y M6.37 | N | N |
| 6.94 | Bakewell and District Civic Society) | 8 | 8.5 | Y | Y M6.37 | N | N |
| 6.95 | Stella McGuire | 10 | 10.94 | Y | Y M6.38 | N | N |
| 6.95 | Bakewell and District Civic Society) | 8 | 8.6 | Y | Y M6.38 | N | N |
| 6.97 | Peak Park Parishes Forum* | 23 | 23.100 | Y | Y M6.39 | N | Y |
| 6.98 | PDNPA | PDNPA | INT2.21 | Y | Y M6.40 | N | N |
| 6.98 | Stella McGuire | 10 | 10.96 | Y | Y M6.40 | N | N |
| 6.100 | Peak Park Parishes Forum* | 23 | 23.100 | Y | N | N | Y |
| DMH9 | PDNPA | PDNPA | INT4.21 | Y | N | YM6.41 | N |
| DMH9 | Allen Newby PME Planning Services | 9 | 9.7 | Y | N | YM6.41 | Y |
| DMH9 | PDNPA | PDNPA | - | Y | N | YM6.41 | N |
| DMH9 | Peak Park Parishes Forum* | 23 | 23.98 | Y | N | N | Y |
| DMH9 | Peak Park Parishes Forum* | 23 | 23.99 | Y | N | N | Y |
| DMH9 | Rowsley PC | 69 | 69.11 | Y | N | N | N |

DMH10: Sub-division of dwellings to create multiple dwelling units

Summary of issues raised

- One clarification was suggested for supporting text but no other issues were raised.

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main modification proposed by NPA | Hearing request |
|-------------|------------------|---------------|-------------------|-----------|------------------------------------|-----------------------------------|-----------------|
| 6.103 | PDNPA | PDNPA | INT2.22 | Y | Y M6.42 | N | N |

DMH11: Section 106 agreementsSummary of issues raised

- It is claimed that the motive behind the use of legal agreements is to avoid spending resource on monitoring and enforcing planning conditions. And that this is wrong in principle and in law, and not justified by paragraphs 1.24 to 1.30 or paragraph 6.107 (PPPF)
- It is noted that paragraph 6.107 suggests that s106 agreements have been successful in preventing breaches of condition and that for this reason the Authority will continue to use them. However, it is suggested that there is no evidence to support this assertion and that this approach is inconsistent with national planning policy. (Emery Planning)
- It is claimed that the powers in s106 allow a local planning authority to regulate the use of land or specified operations on land, but not to “tie” the land together as the policy attempts to do. The contention is that it is unnecessary to tie essential worker homes to the land, and that standard conditions, e.g. as for agricultural workers are adequate. (PPPF)
- It is accepted that a s106 agreement may be justified in exceptional circumstances in the context of part B to H of the policy, but it is claimed that those parts of the policy go beyond what is reasonably required, and beyond Paras 203 and 204 of the NPPF, and the legal scope of s106. (PPPF)
- It is suggested that the question of whether these matters are to be dealt with via Section 106 Agreement, or planning conditions, can be ably addressed through the tests that are applied in the National Planning Policy Framework section ‘Decision taking’, paragraphs 203 to 206 concerning planning conditions and obligations (and that the core strategy already covers this sufficiently for planning purposes) (Chatsworth Settlement Trustees)

List of responses

| Para/policy | Respondent/agent | Respondent ID | Representation ID | Sound Y/N | Minor modification proposed by NPA | Main Modification proposed by NPA | Hearing request |
|--------------------|---------------------------|----------------------|--------------------------|------------------|---|--|------------------------|
| 6.107 | Peak Park Parishes Forum* | 23 | 23.103 | N | N | N | Y |
| 6.107 | Emery Planning | 48 | 48.12 | N | N | N | Y |
| DMH11 | Stella McGuire | 10 | 10.97 | Y | Y M6.43 | N | N |
| DMH11 | Stella McGuire | 10 | 10.98 | Y | Y M6.44 | N | N |

| | | | | | | | |
|-------|--------------------------------|----|--------|---|---|---|---|
| DMH11 | Peak Park Parishes Forum* | 23 | 23.101 | Y | N | N | Y |
| DMH11 | Peak Park Parishes Forum* | 23 | 23.102 | Y | N | N | Y |
| DMH11 | Peak Park Parishes Forum* | 23 | 23.104 | N | N | N | Y |
| DMH11 | Peak Park Parishes Forum* | 23 | 23.105 | N | N | N | Y |
| DMH11 | Peak Park Parishes Forum* | 23 | 23.106 | N | N | N | Y |
| DMH11 | Friends of the Peak District | 28 | 28.19 | N | N | N | Y |
| DMH11 | Chatsworth Settlement Trustees | 35 | 35.4 | N | N | N | N |

Chapter 7: Shops, Services and Community Facilities

Summary of main issues raised on Strategic Context:

- Include reference to Bakewell Neighbourhood Plan (PDNPA)
- For the future sustainability of communities the document recognises the importance of resisting the loss of community facilities but does not really present any realistic ways of averting this. In contradiction, many of the policies outlined are likely to have the opposite effect, in further eroding community facilities (Karen Bradley MP)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|-----------------------------------|-----------------------|--------------------------|-----------------------|--|---|-------------------------|
| 7.3 | PDNPA | - | INT5.6 | Y | Y M7.12 | N | N |
| 7.4 | PDNPA | - | INT5.7 | Y | Y M7.13 | N | N |
| DMS | Derbyshire Dales District Council | 34 | 34.16 | Y | N | N | N |
| DMS | Karen Bradley MP | 70 | 70.6 | N | N | N | N |

DMS1: Shops, professional services and related activity in Core Strategy named settlements

- Part C of policy unclear and only appears justified by supporting text that comes after the policy instead of before. (Stella McGuire)
- Proposed retail developments within defined town centres are considered for their accordance with the NPPF's town centre first approach (which considers town centres as a whole). Importantly, there is no retail test in the NPPF which requires an assessment of retail impact for proposed retail developments within town centres on existing town centre retail destinations. Proposed retail developments within a town centre will, in all likelihood, increase the turnover of the town centre and will have an overall positive impact. Competition between retail destinations in defined town centres is not discouraged in the NPPF. (Litton Properties)
- Policy DMS1 refers to a requirement for evidence that local convenience shopping will not be 'adversely affected or undermined'. Paragraph 26 of the NPPF states that the impact test only applies to proposals exceeding 2,500 sq. m floorspace unless a different proportional locally set threshold is adopted by the local planning authority. Paragraph 27 of the NPPF states that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on [one or more of the factors listed in paragraph 26] it should be refused. Any development may have an impact but the NPPF is only concerned with 'significant adverse impacts'. It follows that any development below the floorspace threshold will not have a 'significant' adverse impact. It is noted that the Peak District National Park Authority has not adopted a locally set retail impact threshold for retail developments. There is no justification for Policy DMS1 limiting the requirement for a retail impact assessment to convenience retailing only. The policy should comply with paragraph 26 of the NPPF.
- There is no justification for Policy DMS1 limiting the requirement for a retail impact assessment to convenience retailing only. The policy should comply with paragraph 26 of the NPPF. (Litton Properties)
- Policy DMS1 makes no reference to the sequential test as set out in Paragraph 24 of the NPPF. The NPPF states that local planning authorities should apply a sequential test to applications for main town centre uses that are not located in an existing centre and are not in accordance with an up-to-date Local Plan. It requires applications for main town centre uses to be located first in town centres, then in edge of centre locations and only if suitable sites are not available should out-of-centre sites be considered. The fact that the sequential test is not referenced in Part 2 of the Local Plan is a key omission. On the basis of the above, Policy DMS1 is unsound as it is not in accordance with the guidance on vitality of town centres set out within the NPPF. (Litton Properties)
- It is recommended that Policy DMS1 is amended to accord with the NPPF so that proposals for retail and other 'main town centre uses' outside Bakewell Town Centre and the named settlements listed in Policy DS1 of the Core Strategy will only be permitted if they: a) comply with the sequential test as set out in Paragraphs 24 and 25 of the NPPF; and b) avoid having a 'significant adverse impact' upon existing, committed and planned public and private investment in a centre or centres in the catchment area of a proposal as assessed by the requirements set out in paragraph 26 of the NPPF. The policy should be redrafted accordingly. (Litton Properties)
- The overall policy approach to shops, services and community facilities is fully supported, particularly Policy DMS1 which is broadly consistent with the requirements of the National Planning Policy Framework (NPPF), that seeks to direct new shops and services to town, district or local centres so that their vitality and viability is maintained and enhanced; and particularly paragraph 28 which requires local planning authorities to promote the

retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. (Derbyshire County Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|--|---|-------------------------|
| 7.5 | Stella McGuire | 10 | 10.99 | Y | Y M7.11 | Y | N |
| DMS1 | Litton Properties | 57 | 57.1 | N | N | N | Y |
| DMS1 | Litton Properties | 57 | 57.2 | N | N | N | Y |
| DMS1 | Litton Properties | 57 | 57.3 | N | N | N | Y |
| DMS1 | Litton Properties | 57 | 57.4 | N | N | N | Y |
| DMS1 | Litton Properties | 57 | 57.5 | N | N | N | Y |
| DMS1 | Derbyshire County Council | 21 | 21.6 | Y | N | N | N |

DMS2: Change of use of shops, community services and facilities

- It is noted that Paragraph 7.12 excludes health facilities from the types of 'community facilities' that would be expected to require viability and marketing tests. Whilst supporting the exclusion of health services from this list, NHSPS seeks formal clarification that health facilities would be explicitly excluded from the requirements of this policy (for the reasons below). NHSPS would strongly object to any inclusion or interpretation that health facilities would be considered under this policy. (NHS Property Services)
- NHSPS strongly objects to the wording and requirements of Policy DMS2 in considering the change of use of vacant and surplus 'community facilities'. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing). Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities. (NHS Property Services)
- Policy is contrary to advice received from Planning Advisory Service in 2015 on soundness of Policy DMS2 that the steps required to safeguard a community use could potentially be overly onerous. There are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal. Restrictive policies, especially those which require substantial periods of marketing, could prevent or delay required investment in new/improved services and facilities. (NHS Property Services)
- "NHSPS would only support Policy DMS2 if it is clear that evidence of the wider NHS estate reorganisation programme would be accepted as justification for the loss of a community facility, and would therefore be excluded from the requirements of this policy. NHSPS would support the inclusion of the following: "The loss or change of use of existing health facilities will be acceptable if it is shown that this forms part of a wider estate reorganisation programme to ensure the continued delivery of services. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither needed nor viable and that adequate facilities are or will be made available to meet the ongoing needs of the local population. In such cases Part A of Policy DMS2 would not apply, and no viability or marketing information will be required." This would be in accordance with the requirements of NPPF Paras 28 and 70, and adopted Core Strategy Policy HC4." (NHS Property Services)
- This approach is also in conflict with the requirements of adopted Core Strategy Policy HC4. (NHS Property Services)
- The policy also provides no flexibility for alternative forms of development, for example to accommodate continuing community use on part of a site in new fit for purpose facilities, with redevelopment of the wider site for an alternative use. (NHS Property Services)
- In cases where a business is failing, it is considered that paragraph A (i) of this policy is overly restrictive and would result in unnecessary financial hardship for business owners, which could be alleviated by a shorter marketing period or the provision of reasonable alternative evidence that would still achieve the objectives of the policy. In view of this, the policy does not represent the most appropriate strategy when considered against reasonable alternatives. Furthermore, the policy is more restrictive than the DCLG Advice Note entitled "Community Right to Bid" (2012). This advice note is aimed at helping local authorities to implement Part 5 Chapter 3 of the Localism Act 2011 and the Assets of Community Regulations

2012. This advice note suggests a 6 week period; from the point the owner notifies the local authority of their intention sell a property to allow community interest groups to make a written request to be treated as a potential bidder. If none do so, the owner is free to sell their asset at the end of the 6 weeks. If a community interest group does make a request during this interim period, then it is advised that a 6 month moratorium (again from the point the owner notifies the local authority) should operate. Given that the national policy position suggests that the absolute maximum marketing period should be 6 months, it is considered a policy which requires marketing for a minimum of 12 months is entirely unjustified and is not consistent with Government guidance. It is suggested that the marketing period should be amended to no more than 6 months. (Emery Planning)

- The requirements in section A(ii) and A(iii) are unreasonable and places an additional unnecessary burden on the developer, contrary to government advice. The need to show either lack of need or non-viability is adequately addressed by the requirement in A(i). (Roger Yarwood Planning Consultants)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-----------------------|--|---|---|
| 7.12 | NHS Property Services | 38 | 38.2 | N | N | Y M7.7 | would welcome any further discussion |
| 7.12 | Stella McGuire | 10 | 10.100 | Y | N | N | N |
| 7.13 | PDNPA | - | INT2.23 | Y | Y M7.8 | N | N |
| 7.16 | Stella McGuire | 10 | 10.101 | Y | Y M7.1 | N | N |
| 7.19 | Stella McGuire | 10 | 10.102 | Y | Y M7.2 | N | N |

| | | | | | | | |
|----------|------------------------------------|----|--------|---|-----------|-----------|--------------------------------------|
| DMS2 | Stella McGuire | 10 | 10.103 | Y | Y M7.3 | N | N |
| DMS2 (C) | Stella McGuire | 10 | 10.104 | Y | Y M7.4 | N | N |
| DMS2 | NHS Property Services | 38 | 38.1 | N | N | N | would welcome any further discussion |
| DMS2 | NHS Property Services | 38 | 38.3 | N | N | Y M7.7 | would welcome any further discussion |
| DMS2 | NHS Property Services | 38 | 38.4 | N | N | Y M7.7 | would welcome any further discussion |
| DMS2 | NHS Property Services | 38 | 38.5 | N | N | Y M7.7 | would welcome any further discussion |
| DMS2 | NHS Property Services | 38 | 38.6 | N | N | N | would welcome any further discussion |
| DMS2 | Holme Valley PC | 7 | 7.4 | Y | N | N | N |
| DMS2 | Cheshire East Council | 27 | 27.4 | Y | N | N | N |
| DMS2 | Emery Planning | 48 | 48.1 | N | N | N | N |
| DMS2 | Roger Yarwood Planning Consultants | 60 | 60.11 | N | N | N | N |

DMS3: Retail development outside Core Strategy named settlements

- Description of goods at garden centres cannot be described as being produced 'on the premises'. (Stella McGuire)
- Clarification of Part D of DMS3 so that policy requires retail development outside of Core Strategy named settlements 'does not adversely affect', rather than that an applicant be asked to 'assess the impact'. This will also align with Policy DME5 on expansion of B1 employment uses outside DS1 ('named') settlements. (Stella McGuire)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|--|---|-------------------------|
| 7.26 | Stella McGuire | 10 | 10.105 | Y | N | N | N |
| DMS3 (D) | Stella McGuire | 10 | 10.106 | Y | N | Y M7.9 | N |

DMS5: Outdoor Advertising

- Part C of policy lacks clarity (Stella McGuire)
- Minor clarifications.

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|--|---|-------------------------|
| DMS5 | Stella McGuire | 10 | 10.107 INT7.1 | Y | Y M7.10 | | N |
| DMS5 | National Trust | 50 | 50.22 | Y | N | N | N |
| 7.7 | PDNPA | - | INT7.3 | Y | Y M15 | N | N |
| 7.10 | PDNPA | - | INT7.5 | Y | Y M.16 | N | N |
| 7.30 | PDNPA | - | INT7.8 | Y | Y M.17 | N | N |
| 7.31 | PDNPA | - | INT7.9 | Y | Y M18 | N | N |
| DMS7 | PDNPA | - | INT7.10 | Y | Y M19 | N | N |

DMS6: Safeguarding sites for community facilities

- NHSPS objects to Policy DMS6, where evidence from a wider NHS estate reorganisation programme should be accepted as justification for the loss of a community facility, and should therefore be excluded from the requirements of this policy. This policy provides no flexibility for sites where existing services are to be re-provided either on or off site, to continue to serve the local population. Without prejudice to the above, the policy wording should recognise that the sites allocation as a 'community facility' needs to form part of an adopted development plan document. (NHS Property Services)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|--|---|--------------------------------------|
| 7.36 | Stella McGuire | 10 | 10.108 | Y | Y M7.6 | N | N |
| 7.39 | PDNPA | - | INT2.24 | Y | N | N | N |
| 7.39 | Stella McGuire | 10 | 10.109 | Y | N | N | N |
| DMS6 | NHS Property Services | 38 | 38.7 | N | N | N | would welcome any further discussion |

Chapter 8: Bakewell

Summary of main issues raised on Strategic Context

- Whilst the paragraphs may add to the Core Strategy, on their own they appear to be disjointed. It is suggested that the information is either expanded to provide a fuller picture or, (as this is available elsewhere) the introduction signposts the other sources. (Bakewell Town Council)
- Use of word substantial in relation to safeguarded employment sites, needs changing to 'predominant' to align with DME policy. (PDNPA)
- “This plan does not include policies that are specific to Bakewell...” then lists policy DMB1 “Bakewell’s Settlement Boundary”. Suggest this be reworded. (Bakewell Town Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|-------------------------------------|-----------------------|--------------------------|-------------------|--|---|-------------------------|
| 8.1-8.4 | Bakewell Town Council | 49 | 49.1 | Y | N | N | N |
| 8.2 | Bakewell and District Civic Society | 8 | 8.3 | Y | Y M8.11 | N | ? |
| 8.4 | PDNPA | - | INT5.5 | Y | Y M8.15 | N | N |
| 8.5 | Bakewell Town Council | 49 | 49.2 | Y | Y M8.6 | N | N |

DMB 1: Bakewell Settlement Boundary

- Clarify relationship between DMP and neighbourhood plan regarding development boundary (PDNPA)
- Policy DMB1 provides very little in the way of specific policy advice . . . it is considered that (it) could be expanded to set out some key development management principles for Bakewell that are reflective of the Core Strategy but provide more detail to give the policy approach more weight and substance (Derbyshire County Council)
- Bakewell is the largest settlement within the Peak District National Park, and given the range of services and facilities it provides for those living in the surrounding catchment area it is considered that support should be given to the policies within the document that seek to maintain and enhance the future prospects of the town. However given the role and function that Bakewell plays within the Peak District National Park, it is considered that there should be more support and flexibility shown within the plan to the delivery of housing and employment development that maintains its future sustainably. Whilst this may result in Bakewell taking slightly more development, it is considered that having additional development on the edge of the town would be less harmful on the landscape character than development elsewhere in the plan area. (Derbyshire Dales District Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|--|---|-------------------------|
| 8.7 | Stella McGuire | 10 | 10.110 | Y | N | N | N |
| 8.7 | PDNPA | - | INT5.2 | Y | N | Y M8.9 | N |
| 8.7 | PDNPA | - | INT2.25 | Y | Y M8.9 | N | N |
| DMB1 | PDNPA | - | INT2.26 | Y | Y M8.10 | N | N |

| | | | | | | | |
|------|-----------------------------------|----|-------|---|------------|---|---|
| DMB1 | Derbyshire County Council | 21 | 21.7 | N | Y M8.16 | N | Y |
| DMB1 | Derbyshire Dales District Council | 34 | 34.17 | N | N | N | N |

Central Shopping Area

- “Bakewell is the only settlement boasting a wide range of shops...” contrasts poorly to the “modest settlement” and “modest size” in paragraph 8.9. **(Bakewell Town Council)**
- Amend to “The boundary of the Central Shopping Area’ to make clearer what ‘this area’ means? (Stella McGuire)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|---------------|---|----------------|----------------------|---------------|---|--|---------------------|
| 8.8/8.9 | Bakewell Town Council | 49 | 49.3 | Y | N | N | N |
| 8.9 | Stella McGuire | 10 | 10.112 | Y | Y M8.2 | N | N |
| 8.9 | Stella McGuire | 10 | 10.111 | Y | Y M8.2 | N | N |
| 8.10 | Stella McGuire/ Bakewell Town Council/PDNPA | 10/49/INT1 | 10.113/49.4/INT1.121 | Y | Y M8.1 | N | N |
| 8.10 | Stella McGuire | 10 | 10.114 | Y | Y M8.3 | N | N |

Principles for land use across the town

- Policies seem less strict than proposed in the draft Bakewell Neighbourhood Plan and wonder whether the BNP policies would take precedence. (Bakewell and District Civic Society)
- Lines 5 to 7 confused. Maybe a minor rewrite on lines of: “Given the strategic need for employment sites, the policy safeguards existing employment sites, and ensures that their redevelopment etc etc. (Stella McGuire)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|---------------|-------------------------------------|----------------|-------------------|---------------|---|--|---------------------|
| 8.11 | Bakewell and District Civic Society | 8 | 8.1 | Y | Y M8.14 | N | Y |
| 8.11 | Bakewell Town Council | 49 | 49.5 | Y | Y M8.7 | N | N |
| 8.11 | Stella McGuire | 10 | 10.116 | Y | N | N | N |
| 8.11 | Stella McGuire | 10 | 10.115 | Y | Y M8.4 | N | N |
| 8.13 | PDNPA | - | INT5.3 | Y | Y M8.12 | N | N |

Principles for land use in the central shopping area

- Would the meaning be clearer if sentence ran something like “The Central Shopping Area covers? / comprises? a small area of the town” – rather than ‘includes’? (Stella McGuire)
- Policies seem less strict than proposed in the draft Bakewell Neighbourhood Plan and wonder whether the BNP policies would take precedence: The DMP has ‘rarely justification to use planning to influence offer or prevent change of use’ but the BNP has ‘further changes of use from A will not be permitted’. . (Bakewell and District Civic Society)
- Paragraph should be reviewed and reworded to make its intent clearer to the reader. (Bakewell Town Council)
- Align with draft neighbourhood plan policy. (PDNPA)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main Modification proposed by PDNPA? Y/N | Hearing request? |
|----------------------|-------------------------------------|-----------------------|--------------------------|-----------------------|--|---|-----------------------------|
| 8.14 | Stella McGuire | 10 | 10.117 | Y | Y M8.5 | N | N |
| 8.15 | Bakewell and District Civic Society | 8 | 8.2 | Y | N | N | N |
| 8.15 | Bakewell Town Council | 49 | 49.6 | Y | Y M8.13 | N | N |
| 8.15 | PDNPA | - | INT1.122 | Y | Y M8.8 | N | N |
| 8.15 | PDNPA | - | INT5.4 | Y | Y M8.13 | N | N |
| 8.15 | Stella McGuire | 10 | 10.118 | | | | |

Chapter 9 Travel and Transport

Summary of main issues raised within Strategic Context and wider text:

- Whether all the tests for all of the development criteria within DMT1 should apply.

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|--|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| 9.2 | Derbyshire & Peak District Campaign for Better Transport | 62 | 62.1 | N | N | N | No |

Policy DMT1: Cross-park infrastructure

Summary of main issues raised:-

- The policy does not take into account the need for local schemes to address traffic management and congestion, particularly in relation to Chatsworth Estate land. (Chatsworth Estate Trustees).
- The policy does not take into account the environmental benefits for local communities of the Mottram – Hollingworth – Tintwistle bypass or the economic benefit of easier movement to and from Manchester. It also does not take into account impacts on the communities of Buxton and the Hope Valley. (HPBC (Cllr Tony Ashton), High Peak Borough Council)
- The policy does not refer to the proposed climbing lanes on the A628 within the Park [Trans-Pennine Upgrade Programme RIS 1]. An acknowledgement that this is acceptable should the design be appropriate would be welcomed. (Derbyshire County Council, Peak Park Parishes Forum)
- In reference to the Core Strategy Policy T2C, it has been suggested that the policy be positively framed to offer support to schemes meeting the criteria of DMT1. (Peak Park Parishes Forum)
- The policy should also reference the terms under which the National Park Authority will object to development and transport development proposals in adjacent authority areas that compromise the special qualities of the National Park; and require such authorities to actively consult and cooperate with the National Park Authority to enable the effective implementation of this policy. (Friends of the Peak District)
- The policy does not take into account developments outside the Park and their impact on roads within the Park, a more coordinated approach that considers development within, and outside the Park; and its effect on local traffic is required. (Great Hucklow Parish Council)

- Cross-Park roads such as the A623 should be improved due to the impact of tourists visiting the area, safety for cyclists and economic benefit to businesses and strategic importance. (Gordon Rooke, Martin Beer)
- Whether all the tests for all of the development criteria within DMT1 should apply, or if an addition of “F a substantial overall benefit to the Park” could apply for smaller schemes. (Derbyshire & Peak District Campaign for Better Transport)
- The policy does not account for the economic, environmental or sustainable travel benefits of reopening the Matlock to Buxton railway. (Chapel-en-le-Frith Parish Council)
- The policy is too restrictive and does not take account of congestion on the edge of the Park and may restrict rail development enabling the movement of quarry traffic onto rail. (Staffordshire Moorlands District Council)
- The policy is too restrictive and makes a presumption against cross-Park travel. It is too National Park centred, without considering the impacts on neighbouring settlements. (HPBC (Cllr Tony Ashton), Chapel-en-le-Frith Parish Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|-----------------------------------|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| DMT1 | HPBC (Cllr Tony Ashton) | 4 | 4.4 | N | N | N | No |
| DMT1 | HPBC (Cllr Tony Ashton) | 4 | 4.12 | N | N | N | No |
| DMT1 | Chapel-en-le-Frith Parish Council | 12 | 12.7 | N | N | N | No |
| DMT1 | Chapel-en-le-Frith Parish Council | 12 | 12.8 | N | N | N | No |
| DMT1 | Chapel-en-le-Frith Parish Council | 12 | 12.9 | N | N | N | No |
| DMT1 | Derbyshire County Council | 21 | 21.1 | Y | N | N | No |
| DMT1 | Peak Park Parishes Forum* | 23 | 23.111 | Y | N | N | No |
| DMT1 | Friends of the Peak District | 28 | 28.20 | N | N | N | Yes |
| DMT1 | Highways England | 31 | 31.1 | Y | N | N | No |

| | | | | | | | |
|----------------|--|----|-------|---|---|---|-----|
| Para 9.16-9.20 | Chatsworth Settlement Trustees | 35 | 35.2 | N | N | N | No |
| DMT1 | Great Hucklow Parish Council | 43 | 43.11 | N | N | N | Yes |
| DMT1 | Gordon Rooke | 53 | 53.1 | Y | N | N | No |
| DMT1 | Martin Beer | 56 | 56.3 | N | N | N | No |
| DMT1 | Staffordshire Moorlands District Council | 58 | 58.7 | N | N | N | No |
| DMT1 | High Peak Borough Council | 59 | 59.7 | N | N | N | No |
| DMT1 | Derbyshire & Peak District Campaign for Better Transport | 62 | 62.1 | N | N | N | No |

Policy DMT2: Access and design criteria

Summary of main issues raised: -

- The Transport Infrastructure SPD should acknowledge the Strategic Road Network. (Highways England)
- A request to be kept informed of the development of the Transport Infrastructure Design Guide SPD. (Highways England)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|--|--------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 9.22 | Highways England | 31 | 31.2 | Y | N | N | No |
| Response to DMT1, but applicable to DMT2 | Highways England | 31 | 31.1 | Y | N | N | No |

Policy DMT3: Railway construction

Summary of main issues raised: -

- Paragraph 9.32 does not provide adequate justification for the policy approach in DMT3D of the refusal or lack of support for tourist or heritage railways. (Peak Park Parishes Forum, Bakewell Town Council)
- Request for reference to “*railways acting as tourist attractions*” (paragraph 9.32) to be removed. (Peak Rail plc)
- A question over the legality of policy DMT3D in relation to the National Park Authority’s ability to refuse permission for new tourist or heritage railways. (Peak Rail plc, Rowsley Parish Council)
- Request for additional criteria under policy DMT3E regarding improved access to the national rail network for residents and visitors through new stations or termini within the National Park. (Derbyshire & Peak District Campaign for Better Transport)
- The policy does not account for the economic, environmental or sustainable travel benefits of reopening the Matlock to Buxton railway. (Chapel-en-le-Frith Parish Council)
- The policy is too restrictive and does not take account of congestion on the edge of the Park and may restrict rail development enabling the movement of quarry traffic onto rail. (Staffordshire Moorlands District Council)
- The policy is too restrictive and makes a presumption against cross-Park travel. It is too National Park centred, without considering the impacts on neighbouring settlements. (HPBC (Cllr Tony Ashton), Chapel-en-le-Frith Parish Council)
- The Parish Council would welcome further opportunities for rail travel along the route of the Hope Valley and between Buxton and Matlock, whether national or heritage, so objects to DMT3D. (Great Hucklow Parish Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|-----------------------------------|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| DMT3 | HPBC (Cllr Tony Ashton) | 4 | 4.4 | N | N | N | No |
| DMT3 | HPBC (Cllr Tony Ashton) | 4 | 4.12 | N | N | N | No |
| DMT3 | Chapel-en-le-Frith Parish Council | 12 | 12.9 | N | N | N | No |

| | | | | | | | |
|-------------------|--|----|--------|---|---|--------|-----|
| Para 9.32 / DMT3D | Peak Park Parishes Forum* | 23 | 23.112 | Y | N | Y M9.5 | No |
| DMT3D | Great Hucklow Parish Council | 43 | 43.12 | N | N | N | Yes |
| DMT3D | Bakewell Town Council | 49 | 49.9 | N | N | Y M9.5 | Yes |
| DMT3 | Staffordshire Moorlands District Council | 58 | 58.7 | N | N | N | No |
| DMT3 | High Peak Borough Council | 59 | 59.7 | N | N | N | No |
| Para 9.32 / DMT3 | Peak Rail plc | 61 | 61.1 | N | N | Y M9.5 | No |
| Para 9.32 / DMT3 | Peak Rail plc | 61 | 61.2 | N | N | Y M9.5 | No |
| Para 9.33 / DMT3 | Derbyshire & Peak District Campaign for Better Transport | 62 | 62.2 | N | N | N | No |
| DMT3D | Rowsley Parish Council | 69 | 69.14 | N | N | Y M9.5 | No |

Policy DMT4: Development affecting a public right of way

Summary of main issues raised: -

- There should be an additional criterion to ensure that the enjoyment of an existing public footpath by walkers will not be detrimentally affected by the introduction of new users, particularly cyclists. (Peak Park Parishes Forum)
- Policy DMT4D is over restrictive in relation to small improvements to the rights of way network, as small scale improvements such as permissive paths are unlikely to meet all of the criteria. (National Trust)
- The policy does not account for the economic, environmental or sustainable travel benefits of reopening the Matlock to Buxton railway. (Chapel-en-le-Frith Parish Council)
- The continuation of the Monsal Trail into Buxton to link with a cycle hub at the station would be welcomed. (David Carlisle)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-----------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMT4 | Chapel-en-le-Frith Parish Council | 12 | 12.9 | N | N | N | No |
| DMT4 | Peak Park Parishes Forum* | 23 | 23.113 | N | Y M9.8 | N | No |
| DMT4D | National Trust | 50 | 50.26 | Y | Y M9.8 | Y M9.9 | No |
| Para 9.42 | David Carlisle | 68 | 68.1 | Y | N | N | No |

Parking – general

Summary of main issues raised: -

- It is not clear that the residential parking standards provided in Policy DMT7A are the minimum standards. (Peak Park Parishes Forum)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|-------------------------------------|---------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 9.47 to Para 9.48 / DMT7 | Peak Park Parishes Forum* | 23 | 23.116 | No | N | Y M9.10 | No |

Policy DMT5: Business parking

Summary of main issues raised: -

None

Policy DMT6: Visitor parking

Summary of main issues raised: -

- The policy fails to address the massive increase in visitor numbers affecting on-street parking in villages and towns. Having extended the cycle facilities, no additional parking has been provided. (Stanton in Peak Parish Council (+ Sue Fogg))
- The restrictive nature of the policy and a lack of clarity as to how this will tie in to the planned Recreation Hubs SPD referred to in paragraph 9.64. (National Trust)
- There needs to be a positive view (from the Authority) to providing new or enlarged visitor car parks. (Rowsley Parish Council, Stanton in Peak Parish Council (+ Sue Fogg))
- The policy DMT6A should substitute the words “demonstrable need” for “demonstrable benefit” in relation to visitor car park provision. (Peak Park Parishes Forum)
- The benefits of additional parking facilities should not be lost if there is no mechanism to remove on-street parking as referred to in DMT7B. (Peak Park Parishes Forum)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| Para 9.63 | Peak Park Parishes Forum* | 23 | 23.114 | Yes | N | Y Modification M9.17 Y Modification M9.18 | No |
| DMT6A | Peak Park Parishes Forum* | 23 | 23.114 | Yes | N | Y M9.19 | No |

| | | | | | | | |
|------------------|---|----|--------|-----|---------|---------|-----|
| DMT6B | Peak Park Parishes Forum* | 23 | 23.115 | Yes | N | Y M9.20 | No |
| DMT6 | Stanton in Peak Parish Council (+ Sue Fogg) | 33 | 33.13 | N | Y M9.16 | N | Yes |
| Para 9.64 / DMT6 | National Trust | 50 | 50.27 | N | Y M9.16 | N | No |
| DMT6 | Rowsley Parish Council | 69 | 69.15 | N | Y M9.16 | N | No |

Policy DMT7: Residential off street parking

Summary of main issues raised: -

- The provision of minimum parking facilities is not likely to meet future need. Lower parking provision than the 6Cs Parking Standards is not acceptable. (Bradwell Parish Council)
- It is not clear that the residential parking standards provided in Policy DMT7A are the minimum standards. (Peak Park Parishes Forum)
- It should be made clear that conditions will be imposed in settlements to reserve garaging and off-street parking for those purposes only. (Peak Park Parishes Forum)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMT7 | Bradwell Parish Council | 11 | 11.6 | No | N | Y M9.21 | No |

| | | | | | | | |
|-------|---------------------------|----|--------|----|---|--------------------|----|
| DMT7A | Peak Park Parishes Forum* | 23 | 23.116 | No | N | Y M9.10 Y M9.21 | No |
| DMT7B | Peak Park Parishes Forum* | 23 | 23.118 | No | N | Y M9.21 | No |

Policy DMT8: Air transport

Summary of main issues raised: -

- The policy should refer to aircraft take-off and landing sites, rather than just landing sites. (PDNPA)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|---------------------------|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| DMT8A | PDNPA | PDNPA | PDNPA1.126 | Y | N | Y M9.28 | No |

Chapter 10 Utilities

Summary of main issues raised within Strategic Context and wider text:

- The policy needs to show a degree of flexibility or pragmatism to ensure that infrastructure is provided for the benefit of communities. (Derbyshire Dales District Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-----------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMU | Derbyshire Dales District Council | 34 | 34.19 | N | N | N | No |

Policy DMU1: Development that requires new or upgraded service infrastructure

Summary of main issues raised:-

- Reference to the inclusion of telecommunications cables within paragraph 10.1 in regard to the sharing of infrastructure by developers. (Friends of the Peak District)
- Paragraph 10.6 needs to reference the need to possibly phase delivery of development to enable to ensure connection into infrastructure facilities. (United Utilities)
- Concern that the policies do not reflect the need for additional infrastructure for broadband and mobile services. (Martin Beer, Great Hucklow Parish Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 10.1 | Friends of the Peak District | 28 | 28.21 | Y | Y M10.1 | N | Yes |

| | | | | | | | |
|-----------------------------------|------------------------------|----|------|---|---------|---|-----|
| Para 1.24 to Para 1.29 DMU1 | Great Hucklow Parish Council | 43 | 43.3 | N | N | N | Yes |
| Para 10.6 | United Utilities | 44 | 44.5 | N | Y M10.3 | N | No |
| Para 1.24 to Para 1.29 DMU1 | Martin Beer | 56 | 56.1 | N | N | N | Yes |

Policy DMU2: New and upgraded utilities services

Summary of main issues raised: -

- The importance of increasing access to broadband should be acknowledged in relation to the 'landscape first' approach of policies including (DMC1). (Cheshire East Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-----------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMU2 | Cheshire East Council | 27 | 27.2 | Y | N | N | Yes |

Policy DMU3: Development close to utility installations

Summary of main issues raised: -

- The table between paragraphs 10.12 and 10.13 is unclear, further clarification of the abbreviations would be helpful. (Friends of the Peak District)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|-------------------------------|------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 10.12 to Para 10.13 DMU3 | Friends of the Peak District | 28 | 28.22 | N | N | Y M10.6/M10.7 | No |

Policy DMU4: Telecommunications Infrastructure

Summary of main issues raised: -

- There is a sub-header missing before paragraph 10.14. (Stella McGuire)
- Concern that the policies do not reflect the need for additional infrastructure for broadband and mobile services. (Martin Beer, Great Hucklow Parish Council)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|-----------------------------|------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 10.14 / DMT4 | Stella McGuire | 10 | 10.121 | Y | N | Y M10.8 | No |
| Para 1.24 to Para 1.29 DMU4 | Great Hucklow Parish Council | 43 | 43.3 | N | N | N | Yes |
| Para 1.24 to Para 1.29 DMU1 | Martin Beer | 56 | 56.1 | N | N | N | Yes |

Policy DMU5: Restoration of utility and telecommunications infrastructure sites

Summary of main issues raised: -

- The introductory text providing context to the policy along with the subheading is missing (PDNPA)

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|-------------------------------|--------------------|----------------|--------------------|------------|----------------------------------|---------------------------------|------------------|
| New Paragraphs 10.22 to 10.25 | PDNPA | - | INT3.17 to INT3.21 | Y | N | Y M10.11 | No |

Chapter 11 Minerals and Waste**Summary of main issues raised within Strategic Context and wider text:**

- Definition of ‘minerals development’ and what it should or should not include (Hollister/AECOM).
- Query regarding the statement that the DMP policies only become relevant if an application is acceptable in principle when assessed against the Core Strategy – reference to s.38(6) of PCP Act 2004 refers to whole plan (Hollister/AECOM)
- The requirement that applicants should undertake consultation with Statutory Consultees and the local community before submitting an application goes further than national guidance and policy which states that pre-application engagement is ‘encouraged’ (Mineral Products Association; Cemex).

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-----------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| 11.1 | John Hollister/AECOM (Stancliffe) | 6 | 6.1 | N | Y M11.1 | N | Yes |
| 11.1 | John Hollister/AECOM (Stancliffe) | 6 | 6.2 | N | Y M11.3 | N | Yes |
| 11.13 | Mineral Products Association | 14 | 14.4 | N | Y M11.4 | N | No |

| | | | | | | | |
|-------|-------|----|------|---|---------|---|----|
| 11.13 | CEMEX | 39 | 39.3 | N | Y M11.4 | N | No |
|-------|-------|----|------|---|---------|---|----|

Policy DMMW1: The Justification for mineral and waste development

Summary of main issues raised:

- The policy does not take into account national considerations of need, impact of permitting or refusing on local economy or costs of developing elsewhere, and is therefore inconsistent with paragraph 116 of the NPPF and the exceptional circumstances test (Hollister/AECOM; Mineral Products Association).
- Uncertainty as to whether the policy solely relates to MIN1 type proposals or whether it should also include proposals falling under MIN2 and MIN3 of the CS (Hollister/AECOM)
- Consideration of proximity to market may or may not be relevant to considerations of public interest, dependent upon argument around national need (Mineral Products Association).
- Call for the policy text to make clear that proposals for minor extensions or deepening at existing building and roofing stone quarries will fall to be assessed under MIN3 in all cases rather than classifying such proposals as ‘major development’. Request for evidence not proportionate for smaller mineral operations (Hollister/AECOM; Chatsworth Settlement Trustees).
- There should be specific stand-alone policy in relation to unconventional hydrocarbon development proposals, in particular an explicit approach to the impact of surface infrastructure arising from projects both within and on the boundary of the National Park (Friends of the Peak District).

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|-----------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| Para 11.5 | John Hollister/AECOM (Stancliffe) | 6 | 6.3 | N | Y M11.5 | N | Yes |
| Para 11.5 | John Hollister/AECOM (Stancliffe) | 6 | 6.4 | N | Y M11.5 | N | Yes |
| DMMW1 | Mineral Products Association | 14 | 14.1 | N | Y M11.5 | N | No |
| DMMW1 | Derbyshire County Council | 21 | 21.x | Y | Y M11.1 | N | No |
| 11.4 | Friends of the Peak District | 28 | 28.1 | Y | N | N | No |

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|---------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| 11.1 | Stanton in Peak PC (+ Sue Fogg) | 33 | 33.2 | Not stated | N | N | No |
| 11.2 | Stanton in Peak PC (+ Sue Fogg) | 33 | 33.3 | Not stated | N | N | No |
| 11.5 | Stanton in Peak PC (+ Sue Fogg) | 33 | 33.4 | Not stated | N | N | No |
| DMMW1 | Stanton in Peak PC (+ Sue Fogg) | 33 | 33.5 | Not stated | N | N | No |
| DMMW1 | Chatsworth Settlement Trustees | 35 | 35.1 | Not stated | M11.4 | N | No |
| 11.1 – 11.5 | The Coal Authority | 36 | 36.1 | Not stated | N | N | No |
| DMMW1 | CEMEX | 39 | 39.1 | Not stated | N | N | No |
| 11.1 | Rowsley PC | 69 | 69.2 | Not stated | N | N | No |
| 11.2 | Rowsley PC | 69 | 69.3 | Not stated | N | N | No |
| 11.5 | Rowsley PC | 69 | 69.4 | Not stated | N | N | No |
| DMMW1 | Rowsley PC | 69 | 69.5 | Not stated | N | N | No |

Policy DMMW7: Safeguarding local building and roofing stone resources and safeguarding existing permitted minerals operations from non-mineral development

Summary of main issues raised:

- When read together, policy DMMW7 and Core Strategy MIN4 fail to explicitly state that local building and roofing mineral resources will be safeguarded; issue also with the fact that they only fall to be invoked in case of potential sterilisation from major non-minerals development (Hollister/AECOM; Mineral Products Association; Derbyshire County Council).
- Inconsistent reference on the Policies Map to policy DMMW1, believe it should be DMMW7. Approach on safeguarding and link to the Core Strategy needs clarification (Mineral Products Association).
- There does not appear to be a specific policy that relates to the safeguarded railheads (Derbyshire County Council)
- Some areas of building stone delineated by reference to national and intermediate use – consider this is contrary to the stated aims of the overall policy which is stone for a local need. If policy is aimed at safeguarding the remaining mineral against potential adverse development then it clearly needs to state that fact (Rowsley PC; Stanton in Peak PC).
- Consistent approach needed on all demarcations – a number of anomalies in the Stanton Moor area have been identified (Rowsley PC; Stanton in Peak PC).
- Safeguarding of limestone resources that facilitate building and roofing stone resources should be included (Mineral Products Association; Tarmac).

List of responses

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|----------------------|-----------------------------------|-----------------------|--------------------------|-------------------|---|--|-------------------------|
| DMMW7 | John Hollister (AECOM/Stancliffe) | 6 | 6.6 | N | N | Y M11.25 | Yes |
| DMMW7/Policies Map | Mineral Products Association | 14 | 14.7 | N | Y MPM.64 | N | No |

| | | | | | | | |
|---------------|---------------------------------|----|---------------|------------|----------|----------|----|
| DMMW7 | Derbyshire County Council | 21 | 21.10 | N | Y MPM.69 | Y M11.25 | No |
| DMMW7 | Heaton (Tarmac) | 45 | 45.3 | N | Y MPM.70 | Y M11.25 | No |
| 11.21 – 11.24 | Stanton in Peak PC (& Sue Fogg) | 33 | 33.25 + 33.28 | Not stated | Y MPM.70 | Y M11.25 | No |
| 11.21 – 11.24 | Rowsley PC | 69 | 69.27 | Not stated | Y MPM.67 | Y M11.25 | No |

Policy DMMW8: Ancillary mineral development

Summary of main issues raised:

- the relationship between ancillary development and the location which it can take place needed to be clearer (Hollister/AECOM; Rowsley PC; Stanton in Peak PC).

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|--------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMMW8 | Mineral Products Association | 14 | 14.8 | Not stated | Y M11.26 M11.27 | Y M11.28 | No |
| DMMW8 | Peak Park Parishes Forum* | 23 | 23.110 | Not stated | Y M11.26 M11.27 | Y M11.28 | |
| DMMW8 | Rowsley PC | 69 | 69.28 | Not stated | Y M11.26 M11.27 | Y M11.28 | No |
| DMMW8 | Stanton in Peak PC (+Sue Fogg) | 33 | 33.26 | Not stated | Y M11.26 M11.27 | Y M11.28 | No |

| Para / policy | Respondent / agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main Modification proposed? Y/N | Hearing request? |
|---------------|------------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|------------------|
| DMMW8 | John Hollister/ AECOM (Stancliffe) | 6 | 6.7 | Y | Y M11.26 M11.27 | Y M11.28 | Yes |
| DMMW8 | Tarmac (Heaton) | 45 | 45.4 | Not stated | Y M11.26 M11.27 | Y M11.28 | No |

Appendices

- 3 responders (including one internal responders) making 43 individual points. The majority of these were typographical errors and none of the points raised soundness issues.
- General points that it would improve presentation to have all appendices in the same font style and size, had page numbers and a common lay-out (Stella McGuire).

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main modification proposed by PDNPA? Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|------------|---|--|-----------------|
| General | Stella McGuire | 10 | 10.82 | Y | Y MA.1 | N | N |
| General | Stella McGuire | 10 | 10.83 | Y | Y MA.2 | N | N |

Appendix 1 – Historic Environment Records

Summary of issues raised

- Whether it would be useful to combine Appendix 1 and 4 (Stella McGuire)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| Appx 1 | Stella McGuire | 10 | 10.84 | Y | Y MA.4 | N | N |
| Appx 1 | PDNPA | - | INT1.141 | Y | N | N | N |

Appendix 2 – Natural Zone Definition

Summary of issues raised

- General tidying up

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| Appx 2 | Stella McGuire | 10 | 10.85 | Y | Y MA.6 | N | N |
| Appx 2 | PDNPA | - | INT1.142 | Y | Y MA.6 | N | N |

Appendix 3 – List of DS1 Settlements

Summary of issues raised

- General tidying up

List of responses

| Para/Policy | Respondent/agent | Representor | Representation | Sound? | Minor | Main | Hearing |
|-------------|------------------|-------------|----------------|--------|-------|------|---------|
|-------------|------------------|-------------|----------------|--------|-------|------|---------|

| | | ID | ID | Y/N | Modification proposed? Y/N | modification proposed? Y/N | request |
|--------|----------------|----|----------|-----|----------------------------|----------------------------|---------|
| Appx 3 | Stella McGuire | 10 | 10.86 | Y | Y MA.26 | N | N |
| Appx 3 | PDNPA | - | INT1.143 | Y | Y MA.26 | N | N |
| Appx 3 | PDNPA | - | INT1.144 | Y | Y MA.8 | N | N |

Appendix 4 – Source list for Historic Environment

Summary of issues raised

- Merge Appendix 1 and 4 (Stella McGuire), general tidying up/references (NT)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| Appx 4 | Stella McGuire | 10 | 10.84 | Y | Y MA.4 | N | N |
| Appx 4 | National Trust | 50 | 50.6 | Y | Y MA.37 | N | Y |
| Appx 4 | PDNPA | - | INT1.145 | Y | Y MA.27 | N | N |
| Appx 4 | PDNPA | - | INT1.146 | Y | Y MA.28 | N | N |
| Appx 4 | PDNPA | - | INT1.147 | Y | Y MA.32 | N | N |
| Appx 4 | PDNPA | - | INT1.148 | Y | Y MA.36 | N | N |
| Appx 4 | PDNPA | - | INT1.149 | Y | Y MA.35 | N | N |

Appendix 5 – Guidance for preparing a heritage statement

Summary of issues raised

- Amend reference to further information (NT)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| 50 | National Trust | 50 | 50.7 | Y | Y MA.38 | N | Y |

Appendix 6 – List of Scheduled Ancient MonumentsSummary of issues raised

- It was suggested that this list was out of date and not required (Stella McGuire)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-------------|------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| Appx 6 | Stella McGuire | 10 | 10.87 | Y | Y MA.39 | N | N |
| Appx 6 | PDNPA | - | INT1.150 | Y | N | N | N |
| Appx 6 | PDNPA | - | INT1.151 | Y | N | N | N |

Appendix 7 – List of Conservation AreasSummary of issues raised

- Reference to PDNPA website

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification | Hearing request |
|-------------|------------------|----------------|-------------------|------------|----------------------------------|-------------------|-----------------|
|-------------|------------------|----------------|-------------------|------------|----------------------------------|-------------------|-----------------|

| | | | | | | | |
|--------|----------------|----|-------|---|---------|----------------------|---|
| | | | | | | proposed? Y/N | |
| Appx 7 | Stella McGuire | 10 | 10.88 | Y | Y MA.40 | N | N |

Appendix 8 – Proving a housing need

Summary of issues raised

- Confusion between the two forms and where they come from (Stella McGuire)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|--------------------|-------------------------|-----------------------|--------------------------|-------------------|---|--|------------------------|
| Appx 8 | Stella McGuire | 10 | 10.89 | Y | Y MA.41/42 | N | N |
| Appx 8 | Stella McGuire | 10 | 10.132 | Y | Y MA.41/42 | N | N |

Appendix 9 – no issues raised

Appendix 10 – Parking Standards

Summary of issues raised

- Whose info is this? (Stella McGuire)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|--------------------|-------------------------|-----------------------|--------------------------|-------------------|---|--|------------------------|
| Appx 10 | Stella McGuire | 10 | 10.90 | Y | Y MA.43 | N | N |

Appendix 11 – Glossary of termsSummary of issues raised

- General clarification and typographical errors (Stella McGuire and Ken Smith)

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|--------------------|-------------------------|-----------------------|--------------------------|-------------------|---|--|------------------------|
| Appx 11 | Stella McGuire | 10 | 10.91 | Y | Y MA.44/62/63 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.134 | Y | Y MA.45 | N | N |
| Appx 11 | PDNPA | - | INT1.152 | Y | Y MA.46 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.135 | Y | Y MA.47 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.136 | Y | Y MA.48 | N | N |
| Appx 11 | PDNPA | - | INT1.153 | Y | Y MA.49 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.137 | Y | Y MA.49 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.138 | Y | Y MA.50 | N | N |
| Appx 11 | PDNPA | - | INT1.154 | Y | Y MA.51 | N | N |
| Appx 11 | PDNPA | - | INT1.155 | Y | Y MA.52 | N | N |
| Appx 11 | PDNPA | - | INT1.156 | Y | Y MA.53 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.139 | Y | Y MA.54 | N | Y |
| Appx 11 | Stella McGuire | 10 | 10.140 | Y | Y MA.55 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.141 | Y | N | N | N |
| Appx 11 | Stella McGuire | 10 | 10.142 | Y | Y MA.56 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.143 | Y | Y MA.57/58 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.144 | Y | Y MA.59 | N | N |
| Appx 11 | Stella McGuire | 10 | 10.145 | Y | Y MA.60 | N | Y |
| Appx 11 | PDNPA | - | INT1.157 | Y | Y MA.61 | N | N |

Policies Map

- Main amendment with regards to removing church yards as Community Recreation Areas

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed by PDNPA? Y/N | Main modification proposed by PDNPA? Y/N | Hearing request |
|--------------|---------------------------|----------------|-------------------|------------|---|--|-----------------|
| Policies Map | PDNPA | - | INT1.120 | Y | N | Y MPM.4-61 | N |
| Policies Map | Peak Park Parishes Forum* | 23 | 23.21 | Y | N | Y MPM.4-61 | Y |
| Policies Map | Taddington PC | 19 | 19.3 | Y | N | Y MPM.52 | Y |
| Policies Map | Taddington PC | 19 | 19.4 | Y | N | Y MPM.53 | Y |
| Policies Map | PDNPA | - | INT5.1 | Y | N | Y MPM.63 | N |

Minerals Map

Summary of issues raised

- General tidying up of maps

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-------------|-------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| Minerals | Minerals Products Association | 14 | 14.7 | Y | Y MPM.64 | N | Y |

| | | | | | | | |
|--------------|-------------------------------|----|-------|---|-------------|---|---|
| Map | | | | | | | |
| Minerals Map | Minerals Products Association | 14 | 14.9 | Y | Y MPM.65 | N | Y |
| Minerals Map | Rowsley PC | 69 | 69.27 | N | Y MPM.66/67 | N | N |
| Minerals Map | Derbyshire County Council | 21 | 21.10 | N | Y MPM.69 | N | Y |

Interactive Map

Summary of issues raised

- Add in some missing layers – building/roofing stone, neighbourhood plan layer
- Amend some of the pop-up info

List of responses

| Para/Policy | Respondent/agent | Representor ID | Representation ID | Sound? Y/N | Minor Modification proposed? Y/N | Main modification proposed? Y/N | Hearing request |
|-----------------|-------------------------------|----------------|-------------------|------------|----------------------------------|---------------------------------|-----------------|
| Interactive Map | Minerals Products Association | 14 | 14.7 | Y | Y MPM.70 | N | Y |
| Interactive Map | Minerals Products Association | 14 | 14.9 | Y | Y MPM.70 | N | Y |
| Interactive Map | Stanton in Peak | 33 | 33.28 | Y | Y MPM.70 | N | N |

* The response from the Peak Park Parishes Forum was supported by 13 other Parish Councils: Youlgrave PC, Abney PC, Bamford PC, Bradwell PC, Castleton PC, Chapel-en-le-Frith PC, Chelmorton PC, Edale PC, Great Hucklow PC, Hope with Aston PC, Over Haddon PC, Taddington PC, Winster PC.

Introduction

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmt etc For clarification Typographical error</i> |
|----------|--------|-----------------------|--|--|
| MI.1 | p4 | | Amend list of Appendices to: List of Appendices <ol style="list-style-type: none"> 1) <u>Historic Environment Records contact details and further information</u> 2) <u>Natural Zone Definition</u> 3) <u>List of DS1 Settlements, including which parish the settlement is in, and which parishes adjoin the parish that the DS1 settlement is in</u> 4) <u>Guidance for preparing a heritage statement</u> 5) <u>List of conservation areas (including those with detailed appraisals)</u> 6) <u>Sample parish housing needs survey</u> 7) <u>Registering a housing need</u> 8) <u>Sports England criteria for assessing applications for or affecting sports and communities facilities</u> 9) <u>PDNPA Parking Standards</u> 10) <u>Glossary</u> | Due to amendments to appendices (mainly rep 10.84, 10.89, 10.132) |
| MI.2 | p5-7 | | Add in page number references in 'List of Policies' | In response to rep 10.1 |
| MI.3 | p6 | | Amend DMS1 and DMS3 titles " named settlements " " <u>DS1 settlements</u> " | PDNPA rep |
| MI.4 | p11/12 | 1.25-1.30 | Amend references to s106 to read section 106 agreement | PDNPA rep |
| MI.5 | p12 | 1.29 | Delete repeated " of planning " on second line | PDNPA rep |
| MI.6 | p12 | 1.26 | "It is suggested that their Regulation 123 lists could <u>should</u> include...." | In response to rep 28.28 |
| M1.7 | P12 | 1.29-1.30 | 1.29 Monitoring has also highlighted a number of areas where approval of planning of planning permission has been granted contrary to policy, particularly in schemes involving judgement over the degree of conservation and enhancement benefit achieved in furtherance of National Park purposes. This has raised concern over the potential for loss of valued features and characteristics of the National Park prompting the call for further investigation of the use of s106 to seek wider benefits in order to mitigate such losses, particularly those involving heritage assets, areas of biodiversity or areas where the quiet enjoyment of the National Park is adversely affected. | In response to rep 23.1, 23.2 and 23.103 |

~~1.30 It is vital that priority remains with the achievement of the conservation and enhancement of the National Park's valued characteristics. In many cases planning conditions will provide an appropriate mechanism to mitigate the impact and allow sustainable development to progress. However in some cases planning conditions may not be sufficient to outweigh the harm to the National Park. Here, planning permission should be refused. Nevertheless if approval is otherwise granted for material planning reasons but contrary to policy, s106 agreements could be used to mitigate the impacts of the development and, where appropriate, secure wider benefit specifically in order to secure National Park purposes. Such benefits could include financial contributions towards landscape scale projects conservation projects or the pursuit of recreation opportunities.~~

Conserving and enhancing the National Park's Valued Characteristics

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from Government etc For clarification Typographical error</i> |
|----------|------|-----------------------|--|--|
| M3.1 | 14 | 3.1 | The Dark Peak and Moorland Fringes | Typographical REP PDNPA 1.5 |
| M3.2 | 14 | 3.3 | (Landscape Strategy and Action Plan) ¹⁶ <u>¹⁶ Landscape Strategy and European Landscape Convention Action Plan PDNPA July 2009 Final Report</u> | For clarification REP 10.2 |
| M3.3 | 14 | 3.5 | Development will not be permitted where there is harm to the acknowledged significance of a heritage asset. | For clarification REP PDNPA 1.6 |
| M3.4 | 18 | 3.17 | <u>The extent of the Natural Zone is shown in figure 3 below.</u> The Natural Zone represents the wildest and least developed parts of the National Park. The area combines high wildlife value and minimal obvious human influence. | For clarification REP 10.3 |
| M3.5 | 18 | 3.17 | The basis for defining the area is given in <u>paragraph 9.17 of the Core Strategy</u> (see Appendix ? <u>2</u>) | Typographical (font boldened and appendix number added) REP PDNPA 4.1 |

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| M3.6 | 18 | 3.17 | Applicants should also be aware of the provisions of the Habitats Directive ¹ , including the requirements for appropriate assessment under Article 6(3), for those areas which are underpinned by Natura 2000 sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). | Typographical REP10.4 |
| M3.7 | 19 | 3.22 | <u>The extent of the natural Zone is shown in figure 3 below</u> | For clarification REP 10.3 (text moved up to paragraph 3.17) |
| M3.8 | 21 | 3.23 | They require consideration of the character of buildings and their settings, appropriate scale and massing, the design, height, siting, landscaping, building materials and form <u>and detailing</u> . | For clarification REP PDNPA 1.8 |
| M3.9 | 21 | 3.24 | The contribution of the spaces between buildings is also recognised. This is particularly strengthened by Conservation Area status in many of the historic villages, where the relationship between the farmed and more natural landscape and the historic built environment is particularly valued. <u>(See policy DMC8 and supporting text for more guidance)</u> . Opportunities may exist to use development to positively conserve and/or enhance the significance of heritage assets in such areas but greater potential for development generally exists outside of Conservation Areas, subject to proposals being in accordance with other conservation policies. | REP PDNPA for clarification REP PDNPA 1.9 For clarification |
| M3.10 | 21 | 3.25 | Policies also require consideration of the intensity of a proposed use or activity; the impact on living conditions and on access and traffic levels; the potential for use of sustainable modes of transport; consideration of building techniques and ground conditions; and potential to incorporate measures that mitigate the impacts of climate change. Design must also be in accordance with the Peak District National Park Design Guide Supplementary Planning Document (Design Guide SPD). This includes detailed guidance notes on matters such as alterations and extensions, and shop fronts. Further guidance on the conversion of traditional buildings will also be published as a Supplementary Planning Document (SPD). In addition, the Authority provides guidance and information on wildlife and protected species. The Authority's Landscape Strategy and Action Plan and Conservation Area Appraisals provide applicants with an assessment of local character and landscape on which to base the design of proposals. <u>Adopted neighbourhood plans also play an important role in describing features and character of local value. These have a direct impact on the siting, design, layout and landscaping of proposals. In particular the Neighbourhood Plan may identify local greenspaces which a community has identified as worthy of protection.</u> | REP PDNPA for completeness |
| M3.11 | 21 | 3.26 | Core Strategy Policies L1, L2 and L3 link development considerations to landscape character | For clarification REP PDNPA 1.12 |

¹¹ Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora The Conservation of Habitats and Species Regulations 2010

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| | | | and valued characteristics, biodiversity, geodiversity and cultural heritage assets of significance , all of which affect what might be acceptable in terms of design, layout and landscaping. | |
| M3.12 | 24 | 3.37 | <p>3.37 Where there is uncertainty about a named DS1 settlement's capacity for further development, Core Strategy Policy DS1E requires an assessment of site alternatives to establish capacity. The assessment process should involve the Parish Council or Parish Meeting and demonstrate how development would complement:</p> <ul style="list-style-type: none"> • the settlement's overall pattern of development <u>both inside and outside any Conservation Area</u> • the character and setting of nearby buildings and structures; and • the character of the landscape in which the settlement sits. | For clarification REP PDNPA and REP PDNPA 4.2 |
| M3.13 | | 3.38 | <p><u>3.38 Particular regard should also be paid to:</u></p> <ul style="list-style-type: none"> • Historic settlement pattern including street layout • <u>The value of spaces with a recognised purpose to the community, such as graveyards, playing fields, play areas,</u> • Existing mass, scale, height, design, materials and the eaves and ridge heights of surrounding buildings • Conservation Area Appraisals • The Landscape Strategy and Action Plan. | For clarification REP PDNPA 4.3 |
| M3.14 | 24 | 3.40 | Because capacity for new development is limited in all settlements, schemes that propose to conserve and/or enhance the National Park by re-development of derelict or despoiled sites are more welcome than schemes that propose to build on green-field sites. | For clarification REP PDNPA 1.19 |
| M3.15 | 24 | 3.41 | In addition , Conservation Area Appraisals also provide a vital analysis and statement of the heritage significance of settlements. | For clarification REP PDNPA 1.20 |
| M3.16 | 24 | 3.41 | This is particularly helpful in conserving and enhancing the edge of a settlement and conserving important open spaces. (see Appendix 3 Appendix 5). | For accuracy REP PDNPA |
| M3.17 | 24 | DMC4 | <p>DMC4: Settlement Limits</p> <p>A. <u>To determine whether a proposed development is in or on the edge of a DS1 settlement,</u> Planning planning applications should provide sufficient information to allow proper consideration of the relationship between a proposed development and the settlement's historic pattern of development including the relationship of the</p> | REP PDNPA for clarification |

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| | | | <p>settlement to local landscape character. <u>The siting of the development should complement and not harm the character of these settlements</u></p> <p>B. Development which would adversely affect or lead to the loss of open areas forming an essential part of the character of the built environment will not be permitted.</p> <p>C. Development that is separated from the existing settlement to such a degree that it no longer forms part of the whole, or is likely to result in pressure to infill an intervening gap, will not be permitted.</p> | REP PDNPA to remove criteria relating to open spaces which is covered in other policy and text. |
| M3.18 | 25 | 3.46 | These include caves once occupied by Palaeolithic people, barrows and stone circles from <u>the</u> Neolithic and Bronze Age, evidence for Bronze Age and Iron Age farming and settlement, and later prehistoric hillforts such as Mam Tor. | Typographical REPS 10.6 and PDNPA 1.22 |
| M3.19 | 25 | 3.47 | Past industrial activity such as lead mining, quarrying and textiles has also left a rich legacy of mills, work-houses ; mine engine houses and weavers' cottages. | For clarification and typographical REP PDNPA 1.23 |
| M3.20 | 25 | 3.49 | Heritage assets include <u>both</u> designated heritage assets of international, national and regional importance and non-designated heritage assets of local importance or special interest and non-designated heritage assets. | For clarification REP PDNPA 1.24 |
| M3.21 | 25 | 3.51 | Non-designated heritage assets (heritage asset of local and regional importance or special interest) comprise <u>Non-designated heritage assets are those having a degree of significance meriting consideration in planning decisions but which are not formally designated. They can include heritage assets of local and regional importance or special interest. They comprise:</u> | For clarification REP PDNPA 1.25 |
| M3.22 | 26 | 3.51 | <ul style="list-style-type: none"> unregistered <u>historic</u> parks and gardens <u>and cemeteries</u> | For clarification REP PDNPA 1.26 |
| M3.23 | 26 | 3.51 | <p>Non-designated heritage assets (heritage asset(s) of local and regional importance or special interest) comprise:</p> <ul style="list-style-type: none"> landscape features identified in the Landscape Strategy and Action Plan and the Historic Landscape Characterisation project²⁹ <p>²⁹<u>The Historic Landscape Characterisation of the Peak District National Park was commissioned by English Heritage and carried out in the late 1990s under the direction of John Barnatt for the Peak District National Park Authority.</u> http://archaeologydataservice.ac.uk/archives/view/peaks_hlc_2016/</p> | For clarification REP 10.7 and 10.9 |

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| M3.24 | 26 | 3.52 | Cultural heritage significance is assessed by the National Park Authority using the criteria set out in Appendix 3.4 | For accuracy REP PDNPA |
| M3.25 | 26 | 3.54 | Crucial to the conservation and enhancement of heritage assets is an understanding of what makes them significant, and how their setting contributes to the that significance. Adaptive re-use may be possible where it does not harm their significance or that of their landscape setting (see policies DMC5 and DMC10) Historic England guidance states, that “the ability to assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process is very important to an applicant in order to conceive of and design a successful development.” Significance is a collective term for the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. | For clarification REP PDNPA 1.31 |
| M3.26 | 26 | 3.54 | Heritage assets such as Conservation Areas make a significant contribution to local character and are statutorily protected from development that is inappropriate in scale, design, materials, details and form. does not conserve or enhance their character or appearance. All development must also therefore respect local context and landscape character as outlined for example in Conservation Area Appraisals and the Peak District National Park Landscape Strategy and Action plan. Adaptive re-use may be possible where it does not harm their significance or that of their setting (see policies DMC9 and DMC14). | For clarification REP PDNPA 1.30 (final addition is bringing forward text deleted from the start of 3.54) |
| M3.27 | 26 | 3.55 | Historic England guidance states, that “the ability to assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process is very important to an applicant in order to conceive of and design a successful development.” Significance is a collective term for the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. | For clarification REP PDNPA 1.29 (deleted text moved to para. 3.54) |
| M3.28 | 26 | 3.56 | The information may be provided as a separate Heritage Statement, <u>an archaeological report</u> or as part of a Design and Access Statement where appropriate. (see Appendix 5 <u>4</u>) | For clarification REP PDNPA 1.32 |
| M3.29 | 26 | 3.58 | <ul style="list-style-type: none"> Describe and establish the degree <u>nature, extent and level</u> of significance of a heritage asset and its setting. | For clarification REP PDNPA 1.33 |
| M3.30 | 26 | 3.58 | <ul style="list-style-type: none"> Provide details of the history and development of the asset using the Historic Environment Record, other relevant sources of information (See Appendix 4 <u>1</u> Further sources of evidence for understanding significance <u>Source list for further information on historic environment</u>) historic maps and, <u>for buildings</u> annotated photographic records cross- | For clarification REPS 10.14 and PDNPA 1.34 appendix 4 becomes appendix 1 |

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| | | | referenced, for example, to plans and elevations. | |
| M3.31 | 26 | 3.60 | In open countryside many locations it is more likely that the setting of the heritage asset will have cultural heritage significance and in such locations it is therefore necessary to include in any such assessment of significance on , <u>any information available in</u> the Landscape Strategy and Action Plan (Core Strategy policy L1 and development management policy DMC1) and where relevant the Historic Landscape Characterisation. | For clarification REPS 10.16 and PDNPA 1.35 |
| M3.32 | 27 | 3.61 | This gives them cultural significance, and any changes in their use to more domestic uses can harm not only the integrity of the heritage asset but also the wider significance of the landscape setting including views to and from and topography. <u>The latter is often particularly important for archaeological sites and monuments.</u> | For clarification REP PDNPA 1.37 |
| M3.33 | 27 | 3.63 | This may be as part of, or in addition to <u>or, in exceptional circumstances, instead of</u> the Heritage Statement. | For clarification REP PDNPA 1.38 |
| M3.34 | 27 | 3.64 | (measures <u>Measures</u> might include removal of permitted development rights, preservation in-situ, excavation, watching brief, recording and publication) | Typographical REP 10.17 |
| M3.35 | 27 | 3.66 | Other policy concerns including requirements for Listed Buildings; Conservation Areas; Scheduled Ancient Monuments, <u>Registered Parks and gardens and</u> designated and non-designated heritage assets of local importance or special interest, shop-fronts; advertisements; landscape, biodiversity, cultural heritage and other assets; transport implications (including access and parking) are set out in this chapter and in Chapter 9 (Travel and Transport). | For clarification REP PDNPA 1.42 |
| M3.36 | 27 | DMC5 | (ii) result in the loss of, or irreversible damage to original features or other features of importance or significance or the loss of existing features which contribute to the character, appearance, significance or setting (e.g. boundary walls, railings or gates) <u>unless agreed by the Authority that the loss of such features is necessary;</u> | For clarification REP 9.2, the absence of which would mean that even if evidence required by A(ii) produces justifies loss, F(ii) would not enable that to happen. This begs the question as to why we ask someone for the information to justify their proposal if the policy would not allow it. The alternative is to drop A(ii) and rely on A (i) |
| M3.37 | 27 | DMC5 | A. Planning applications for development affecting <u>the significance of</u> a heritage asset, its setting and their significance including its setting must clearly demonstrate <u>in a Heritage</u> | For clarification REP PDNPA 1.43 |

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| | | | Statement : | |
| M3.38 | 27 | DMC5 | B. The Heritage Statement supporting evidence must be proportionate to the significance of the asset. It may be included as part of a Heritage Statement or Design and Access Statement where relevant. | For clarification REP PDNPA 1.44 |
| M3.39 | 27 | DMC5 | C Proposals likely to affect heritage assets with archaeological or other heritage interest or potential interest should be supported by appropriate information that identifies what impacts are anticipated, or a programme of archaeological works to a methodology approved by the Authority | For clarification REP PDNPA 1.45 |
| M3.40 | 27 | DMC5 | E Development will not be permitted if applicants fail to provide adequate or accurate detailed information to show the effect of the development on the character, appearance and significance of the heritage asset and its setting. | For clarification REP PDNPA 1.47 |
| M3.41 | 27 | DMC5 | F. Development will not be permitted if it would: (i) adversely affect the character and significance of a heritage asset and its setting by any means including scale, mass, height, proportion, design, plan-form, (including through subdivision), detailing or, materials used; | For clarification REP 24.5 If DMC5F(i) is referring to a list of characteristics of the proposed development as opposed to the asset, it should read something like "...and its setting by any means including |
| M3.42 | 28 | 3.67 | 1.1 There are currently 469 472 Scheduled Monuments in the National Park. (see Appendix ? List of Scheduled Monuments in the National Park-1 Source List for further information). | For clarification REP PDNPA 1.51 and REP PDNPA |
| M3.43 | 28 | 3.68 | The significance of ancient scheduled monuments derives not only from their physical presence, but also from their setting. | For clarification REP PDNPA 1.52 |
| M3.44 | 28 | DMC6 | A. The exceptional circumstances where development that might affect a scheduled monument involving scheduled monuments may be permitted are those where it can be demonstrated that the legislative provisions to protect a scheduled monument Scheduled Monuments can be fully met. | For clarification REP 24.6 DNC6A should read "...development that might affect a scheduled monument..." since the development itself is unlikely to "involve" one. Also singular is more precise than plural and clearly covers plurality whereas the converse could be argued not to be so (cf DCM10). |

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| M3.45 | 29 | 3.73 | Applicants should consult the Design Guide SPD ³³ for further information. 33 Design Guide Supplementary Planning Document Peak District National Park Authority | For clarification REP 10.18 |
| M3.46 | 30 | DMC7 D | (i) removal, alteration or unnecessary replacement of structural elements including walls, roof structures, beams, and floors; | Grammatical REP PDNPA 1.59 |
| M3.47 | 31 | 3.77 | There are 109 designated Conservation Areas in the National Park, which are shown on the Policies Map and listed in Appendix 5. Core Strategy policy L3 makes it clear that their conservation and, where appropriate, enhancement is essential. | For accuracy REP PDNPA |
| M3.48 | 31 | 3.79 | Conservation Area Appraisals provide a vital analysis, justifying the reason for designating the area and identifying (as shown on the inset maps) and explaining the value of open spaces and other valued characteristics. In some circumstances the impact of a development on a village street scene will not be visible from the wider landscape. However the planning assessment also needs to focus on localised viewpoints including views in and out of the area, sense of place and open spaces. In these areas it can be important to protect open spaces because in many cases these are a vital feature of the historic settlement form. | For clarification REPS 23.27, 23.28 |
| M3.49 | 31 | 3.79 | Since 2008 the Authority has undertaken a rigorous process of updating its Conservation Area appraisals, focussing on areas where either no appraisal existed or where it is timely to update older appraisals produced under earlier guidance. This is an on-going process and will continue beyond the adoption of this plan to inform the review of strategic policies. Where there is no appraisal or where only an older appraisal exists, applicants are advised to discuss these matters with the Authority's Cultural Heritage Team. The desirability of protecting open spaces is not however necessarily confined to those spaces identified as important by Conservation Area appraisals (See policy DMC3: siting design layout and landscaping; DMC4: Settlement Limits and supporting text; policy DMH6: Re-development of previously developed land to dwelling use and policy DMS7: Retention of community recreation sites and facilities) | For clarification on policy approach to dealing with open spaces REPS 23.25,23.26, 23.27 |
| M3.50 | 31 | 3.82 | Therefore, where a building (or other element) does not make a positive contribution to the heritage significance of the area, the loss of that building or feature should be treated as less than substantial harm or no harm . | For clarification REP 50.10 |
| M3.51 | 32 | DMC8 | A. Applications for development in a Conservation Area, or for development that affects its setting or important views into, or out of, across or through the area , should assess and | For clarification REP 50.11 |

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| | | | clearly demonstrate how the significance of the Conservation Area will be preserved or enhanced. The following matters should be taken into account: | |
| M3.52 | 33 | 3.87 | When considering development proposals that could affect the significance of a historic park and/or garden, including individual garden buildings or landscape features within them, or their settings, the Authority will refer to the National Register ² compiled by Historic England (see Appendix 11 1) and other historic, botanical or ecological information and other policy considerations. Where necessary, agreement may be sought with the owner of the property to strengthen the certainty about the future of a park or garden as a whole before land use decisions are made. | For accuracy PDNPA REP |
| M3.53 | 33 | 3.90 | Policy DMC 10 takes the principles above and broadens the scope to include the conversion of any heritage asset of archaeological, architectural, artistic or historic significance and states that such work needs to be carried out in a way that avoids adverse effects on the heritage asset's intrinsic character, context and landscape setting. Policy aims to promote adaptive re-use of heritage assets, both designated and non-designated, where the new use will not cause harm to the character, significance and landscape setting of the building. | For clarification REP PDNPA 1.66 |
| M3.54 | 33 | 3.92 | Formal assessment (a Heritage Statement) must be provided to establish the significance of the asset and justify its suitability for the proposed new use. This should be carried out by an appropriately skilled and qualified person. Historic Environment Records, Conservation Area Appraisals and the Peak District National Park Landscape Strategy and Action Plan are useful sources of information. For further sources of information see Appendix 12 1 | For accuracy REP PDNPA |
| M3.55 | 33 | 3.93 | The current state condition of the heritage asset is also an important consideration and the heritage asset as currently existing must however be capable of conversion. | For clarification REP PDNPA 1.68 |
| M3.56 | 34 | 3.94 | <ul style="list-style-type: none"> repairing and retaining a building in its original use (Re-roofing re-roofing and some extensive repairs require planning consent and may require listed building consent); | Typographical REP PDNPA 1.69 |
| M3.57 | 34 | 3.97 | This test applies to a designated (i.e. a Listed listed building) or a non-designated heritage asset identified by the National Park Authority. | For clarification REP PDNPA 1.70 |
| M3.58 | 35 | 3.106 | In the National Park the majority of traditional buildings which may be identified for conversion to new uses, are likely to be non-designated heritage assets, with a much smaller proportion being designated heritage assets such as Listed listed buildings. | For clarification REP PDNPA 1.75 |

² <http://historicengland.org.uk/listing/the-list/advanced-search>

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| M3.59 | 36 | DMC10 | DMC10 Conversion of <u>a</u> heritage assets | For clarification. REP 24.6. Singular is safer than plural as plural cannot be singular but singular will always include the asset being affected by development. Otherwise the title implies it might not be applicable to a singular heritage asset. |
| M3.60 | 36 | DMC10 | (iii) where the proposal involves the conversion to higher intensity uses, development will only be permitted within existing settlements, smaller hamlets, on farmsteads, and in groups of buildings in sustainable locations; | For accuracy. REP 60.6. The use of the term "in sustainable locations" in DMC10 A iii) does not fit with the spatial strategy logic in DS1. |
| M3.61 | 36 | DMC10 | (ii) the building is capable of conversion requiring no more than minor structural work , the extent of which would not compromise the historic interest and character of the building; and | REP 9.3 for accuracy. Whilst there may be occasion where wilful neglect of heritage assets hastens the need for more than minor works to conserve the historic interest of the asset, policy need not be written to assume such an approach will be taken by holders of such assets. The suggested modification from the responder would remove the words 'requiring no more than minor structural work' which then doesn't prevent more than minor structural work provided it 'would not compromise the historic interest and character of the building', these words being effectively the definition of 'capable of conversion' for the purposes of this policy. |
| M3.62 | 37 | 3.112 | The English National Parks and the Broads:- UK Government Vision and Circular 2010 (2010 National Parks Circular) recognises that 'habitats are less fragmented in the Parks then than elsewhere and the Authorities have an important role in helping to deliver habitat restoration and expansion at a landscape scale, especially against the backdrop of a changing climate.' | Typographical Rep PDNPA 1.79 |

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| M3.63 | 37 | 3.115 | These sites are protected under separate legislation with ODPM Circular 6/2005: <u>giving guidance on Biodiversity and Geological Conservation – Statutory Obligations and Their Impact within the Planning System</u> ' <u>Giving guidance on Biodiversity and Geological Conservation - Statutory Obligations and their impact within the Planning System</u> '. | For clarification REP 10.28 |
| M3.64 | 38 | 3.120 | <ul style="list-style-type: none"> Peak District Biodiversity Action Plan priority habitats or species, or Geodiversity Action Plan⁵¹ features <p><u>⁵¹ The UKGAP will raise the profile and importance of geodiversity and support its advocacy across the UK. It provides a framework in which actions for geodiversity can be captured in one place http://www.ukgap.org.uk/action-plan.aspx</u></p> | For clarification (new footnote) REP 10.29 |
| M3.65 | 39 | DMC11 | A. Proposals should aim to achieve no net loss of <u>net gains to</u> biodiversity or geodiversity as a result of development. | REP 28.11 replace the term 'no net loss' with the term 'net gain' |
| M3.66 | 40 | DMC12 | C. For all other sites, features and species, development will only be permitted ³ where : <ul style="list-style-type: none"> (i) the need for, and the benefits of, the development in that location clearly <u>outweighs outweigh</u> the loss; and (ii) significant harm can be avoided and the conservation status of the population of the species or habitat concerned is maintained. | Typographical REP PDNPA 1.81 |
| M3.67 | 40 | 3.121 | Management plans needs <u>need</u> to specify appropriate replacement where existing assets are put at risk. | Typographical REP PDNPA 1.82 |
| M3.68 | 40 | 3.122 | Applicants are encouraged to consult the National Park Authority's Natural Environment <u>and Rural Economy</u> Team for best practice advice regarding the mix of species and any exceptional circumstances where the use of Ash may be acceptable. | For clarification REP PDNPA 1.83 |
| M3.69 | 40 | 3.125 | Other landscape features such as dry stone walls are characteristic of the National Park landscapes and historic environment <u>cultural heritage</u> and must be conserved and enhanced according to policies DMC1, 3 and 8. | For clarification REP PDNPA 1.84 |
| M3.70 | 41 | DMC13 | B. Trees and hedgerows, including ancient woodland <u>and ancient and veteran trees</u> which positively contribute, either as individual specimens or as part of a wider group, to the visual amenity or biodiversity of the location will be protected. Other than in exceptional circumstances development involving loss of these features will not be permitted | For clarification REP 55.1 |

³ Refer to Paragraph 9.29 of the Core Strategy

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| M3.71 | 41 | 3.128 | <p>3.128 There is already a wide recognition of the importance of ecosystem services in the National Park, such as the link between healthy moorlands and better carbon storage. The National Park is also a valuable drinking water catchment area. Many settlements within the National Park and its surrounding conurbations rely on the catchment area for an adequate supply of fresh, clean drinking water. Many fast flowing streams drain the moorland plateau and large expanses of blanket bog store large quantities of water. The National Park Authority has an important role in safeguarding and managing this resource by helping with restoration of large areas of open moorland, conserving and enhancing the internationally important habitats and species of moorland, reducing soil erosion and improving water supply and quality.</p> <p><u>New development sites are more appropriately located away from locations which are identified as Ground Source Protection Zone 1 (SPZ1). Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population’.</u></p> | For clarification REP 44.3 suggests including reference to importance of steering development away from Ground Source Protection Zones. |
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Chapter 4: Farming and Economy

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from Government etc For clarification Typographical error</i> |
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| M4.1 | 44 | 4.2 | <p>A 2008 study highlighted that the Peak District landscape was worth £135 million to the regional economy⁶⁰</p> <p><u>The economic indications are still good: refreshed evidence released in August 2017 shows an increase in the Gross Valued Added (GVA) in English National Parks of over 30% in the 4 years between 2012 and 2016. This is almost twice the increase in the overall economy (16%). GVA for English National Parks in 2016 was between £5.5 and £8.7 billion compared to £4.1 to £6.3 billion in 2012. This indicates that the policies of English NPAs are enabling strong business performance whilst ensuring the valued landscapes and built environments are conserved and enhanced.⁴</u></p> | For clarification REP PDNPA 1.85 (updated evidence is not a direct update of the 2008 study and needs further work from research staff before a complete conclusion can be drawn into this chapter) |
| M4.2 | 44 | 4.3 | Farming and land management are essential to shaping the look of the n National p Park, | For clarification REP PDNPA1.86 |

⁴ A 2017 update of the ‘Valuing England’s National Parks’ produced by Cumulus Consultants for National Parks England (NPE) in May 2013

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| M4.3 | 44 | 4.4 | Farm diversification is therefore supported where the scale and impact is acceptable with <u>in</u> its rural location | Grammatical correction REP PDNPA 1.87 |
| M4.4 | 45 | 4.9 | Other retail businesses are accepted only in <u>Core Strategy</u> DS1 settlements in existing buildings and principally away from business sites | For clarification REP PDNPA2.9 |
| M4.5 | 45 | 4.10 | Core Strategy policy DS1 states that agricultural development will be acceptable in principle in the open countryside to reflect that <u>the</u> role of farming in managing landscape character. | Grammatical correction REP PDNPA 1.89 |
| M4.6 | 45 | 4.11 | Of particular practical importance for agricultural and forestry operational development is that it should relate <u>relates</u> well to local landscape and character, including that which will result from new afforestation or agriculture. | For clarification REP PDNPA 1.90 |
| M4.7 | 45 | 4.11 | Whilst considerable flexibility exists within the planning system for agricultural development, great care is still required and larger buildings are unlikely to be tolerated <u>permitted</u> where these cause adverse impacts to the natural beauty of the area. In the context of the National Park landscape even modern farm buildings may constitute major development. In such cases the test in GSP1 will apply. | To emphasise that what may be considered small in many landscape contexts may constitute major development because of the potential impact on the cultural heritage significance of a landscape (and that this may alter the policy tests for proposed development notwithstanding the general policy support for agricultural enterprises. REP PDNPA 10.32 |
| M4.8 | 46 | DME1 | <p>DME1: Agricultural or forestry operational development</p> <p>A. New agricultural and forestry buildings, structures and associated working spaces or other development will be permitted provided that it is <u>proven to the Authority's satisfaction that the building at the scale proposed is functionally required for the purposes of agriculture:</u> to the Authority's satisfaction, from information provided by the applicant on all the following criteria, that the building at the scale proposed is functionally required for the purposes of agriculture:</p> <ul style="list-style-type: none"> (i) Location and size of farm (ii) Type of agriculture practiced on the farm; (iii) Intended use and size of proposed building; (iv) Intended location and appearance of proposed building. | <p>For clarification REP 35.6</p> <p>Clarification REP PDNPA</p> |

- (v) Stocking type, numbers and density per hectare;
- (vi) Area covered by crops;
- (vii) Existing buildings, uses and why these are unable to cope with existing or perceived demand.
- (viii) dimensions and layout;
- (ix) Predicted building requirements by type of stock/crop/other usage; and
- (x) Contribution to NPA objectives, e.g. winter housing to protect landscape

~~and the proposed building(s) and structure(s):~~

~~B. — are close to the farmstead or main group of farm buildings, and in all cases relate well to, and make best use of, existing buildings, trees, walls and other landscape features;~~

~~C. — are not in isolated locations requiring obtrusive access tracks, roads or services;~~

~~D. — respect the design, scale, mass and colouring of existing buildings and building traditions characteristic of the area, reflecting this as far as possible in their own design;~~

~~E. — avoid adverse effects on the area's valued characteristics including important local views, making use of the least obtrusive or otherwise damaging possible location; and~~

~~— avoid harm to the setting, fabric and integrity of the Natural Zone~~

(B) New agricultural and forestry buildings, structures and associated working spaces or other development shall:

(i) be located close to the farmstead or main group of farm buildings, and in all cases relate well to, and make best use of, existing buildings, trees, walls and other landscape features; and

(ii) not be in an isolated location requiring obtrusive access tracks, roads or services; and

(iii) respect the design, scale, mass and colouring of existing buildings and building traditions characteristic of the area, reflecting this as far as possible in their own design; and

(iv) avoid adverse effects on the area's valued characteristics including important local views, making use of the least obtrusive or otherwise damaging possible location; and

(v) avoid harm to the setting, fabric and integrity of the Natural Zone.

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| M4.9 | 47 | 4.16 | This is logical in a protected landscape because financial support to land management operations can only offer net benefit to landscape if the non-agricultural business providing that support is not in itself undermining the quality of the landscape. | Grammatical correction REP PDNPA 1.95 |
| M4.10 | 47 | 4.17 | Relevant parts of the landscape strategy Landscape Strategy , any relevant conservation area analysis, and any neighbourhood plan, alongside the prevailing pattern of settlement in the area, will be used to consider the impact of proposed new buildings. Newly adopted evidence from the Peak District National Park Farmsteads Character Assessment and the Peak District National Park Farmsteads Assessment Framework will be used to consider impact of proposed new buildings⁵ This work shows the high survival rate of historic farmsteads and the NPA will therefore prepare a Supplementary Planning Document to embed it into the planning decision making process. | For clarification REP 10.33 PDNPA REP in light of new evidence |
| M4.11 | 47 | 4.19 | Developments such as farm shops are covered by Core Strategy policy E2, HC5 . Equestrian businesses are covered by policy DMR4. Camping and caravanning businesses by Core Strategy policy RT3 and policy DMR1 , or nature trails also relate to the tourist and visitor markets. | For clarification REPS PDNPA 2.8 and 10.34 |
| M4.12 | 47 | DME2 | <p>D. Development will be permitted to remove a stand-alone building and replace it with a new building within the building group provided the scale, massing and use of the new building is appropriate, it respects the historic form and character of the building group, and the existing building has no cultural heritage significance.</p> <p>E. New or expanded buildings for non-farming uses that generate income to support the farm business will be permitted provided there is not no net harm to any valued characteristics of the building group or valued landscape character as evidenced by the Landscape Strategy</p> | For clarification REPS PDNPA 1.96 and 2.9 |
| M4.13 | 48 | 4.21 | Core Strategy policy E1 D states that existing business land or buildings, particularly those which are of high quality business land and in a suitable location will be safeguarded for B class use ⁶² , and that the Employment Land review has been used to help define the principles behind safeguarding. <u>DME3 uses evidence of strategic need as a criterion against which proposals will be assessed. If there is a strategic need to retain these sites in business use there will be a presumption against loss of parts of the business space to other uses. If however, there is no such strategic need, or there is robust evidence provided by an applicant, and accepted by the Authority, that the proposed loss of the business space will not result in strategic shortfall of business space, the Authority is able to consider proposals for alternative uses on part of sites more favourably. The predominant, or main and strongest use of these sites should however remain business use.</u> | For clarification REPS 10.35, 10.36 and PDNPA 1.97; and additional text in response to Member plan working group comment sessions. REP PDNPA 4.9 |

⁵ Peak District National Park Farmsteads Character Assessment and the Peak District National Park Farmsteads Assessment Framework 2017 (Historic England, Locus consulting and PDNPA)

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| | | | <p><u>In the context of DME5, the word ‘predominant’ means character of a site rather than an absolute percentage or proportions of business use vis a vis other uses below which other uses could be considered in floor space terms to be the main uses. This is a pragmatic approach that recognises the differences in character between sites and locations, and the fact that some will be more suited to mixes of uses than others.</u></p> <p><u>For example, the quality of broadband coverage to a site is now a major contributor to a site’s attractiveness for business, and poor coverage with no foreseeable likelihood of improvement would be one factor in assessing the ongoing status of the sites listed in policy DME3 as the best quality employment sites. or whether other locations and sites should be considered as equals for business purposes. However, good broadband alone will not be justification to accept business use since because some areas with excellent broadband may be totally unacceptable for development for business use on the grounds that valued landscapes or built environments would be harmed by such development.</u></p> | |
| M4.14 | 48 | 4.22 | <p>Applications to change use away from B class uses must be accompanied by evidence that the business space is no longer needed in that location, and is unlikely to be needed in future. The core strategy Core Strategy requires <u>the best</u> sites in Bakewell and Hope Valley to be protected for employment use.</p> | For clarification REPS 10.36 – 10.38 |
| M4.15 | 48 | DME3 | <p>DME3: Safeguarding employment sites</p> <p>The following sites will be safeguarded for B1, B2 or B8 industrial use <u>and</u> employment use unless the development plan Development Plan and evidence of strategic need (including from any adopted neighbourhood plan evidence or policy) justifies mixed use development, in which case the predominant use (s) should remain in the B1, B2 or B8 use classes:</p> <p><u>Aston Industrial Estate</u> Bakewell: Deepdale Business Park, Ashford Road Bakewell: Riverside Business Park (incorporating Lumford Mill) Bakewell: Station Road Bamford Station Road Bradwell: Newburgh Bradwell/Brough: Stretfield Mill, Brough: Vincent Works Calver Sough Industrial units Great Hucklow: Cartledge House Business Centre Great Longstone Industrial Estate</p> | <p>For clarification REPS 10.39 and 10.40</p> <p>Soundness REPS 57.7, 57.8, 57.10</p> <p>For correct alphabetical ordering of sites REP 10.41</p> <p>For accuracy following post consultation evidence work by GL</p> |

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| | | | Hathersage Hall Farm Hathersage Station Yard Tideswell: Whitecross Industrial Estate | Hearn for Bakewell Neighbourhood Plan PDNPA 4.23 For clarification REP 10.41 |
| M4.16 | 48 | Sub heading | Re-use of non-safeguarded, and unoccupied business sites in named DS1 settlements | For clarification REP PDNPA |
| M4.17 | 48 | 4.26 | Where business sites are not safeguarded for class B use, proposals for other uses must nonetheless comply with other development plan Development Plan employment policies. | For clarification REP 10.42 |
| M4.18 | 49 | 4.31 | In terms of the community, one such consideration might be a communities' community's desire to retain employment space. | Grammatical correction REP 10.44 |
| M4.19 | 49 | 4.34 | The Authority will require marketing of employment premises where a change of use is sought in order to encourage the continued operation of the site, however large or small they it may be. | Grammatical correction REP 10.46 |
| M4.20 | 49/50 | 4.37 | <p>This approach is in line with the Employment Land Review⁶³ which underpins the policies of the Core Strategy and this plan. That The evidence from this study suggested that up to 2026, and to meet the economic aspirations of the constituent councils, there is a need for an additional 3.5 ha of industrial space and 1.5ha of office space.</p> <p>It suggested that this need could largely be met on three currently identified sites of Bakewell Riverside (Lumford Mill), Newburgh site, Bradwell, and Ashford Road Bakewell. However it also cautioned that whilst most of this provision could be met on those sites, if those sites for whatever reason were not developed, alternative sites in the National Park would need to be considered.</p> <p>It concluded that that there would also need to be scope to allow, through Development Plan policies, further small-scale employment developments to meet local needs in larger villages such as Hathersage and in rural building conversions⁶⁴.</p> <p>The plan policies therefore require great care to be exercised before releasing employment sites is can be justified, because in a protected landscape context, it may prevent the need for new sites.</p> | For clarification REPS 10.47, 10.48, PDNPA 1.101 |
| M4.21 | 50 | 4.41 | The following policy Policy DME4 applies to sites which are not safeguarded by the Plan. | For clarification REP 10.51 |
| M4.22 | 50 | 4.42 | d) Evidence that the asking price or market rent is the market value as defined by the RICS ⁶⁵ "Appraisal and Valuation Standards" ('The Red Book') which must take into account the structural condition of the property and the planning constraints affecting it; and | For clarification REP 10.53 |
| M4.23 | 51 | DME4 | DME4: Change of use of non-safeguarded, unoccupied or under-occupied employment sites in DS1 settlements | |

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| | | | <p>The change of use, or re-use of non-safeguarded, unoccupied or under-occupied employment sites in <u>or on the edge of</u> DS1 settlements to non-business uses will be permitted provided that:</p> <p>A. The site or buildings have been marketed to the Authority’s satisfaction for a continuous period of 12 months prior to the date of the planning application, in line with the requirements of this plan and the Authority agrees that there is no business need ;</p> <p>In the case of proposals to change to other class B uses where a change requires planning permission :</p> <p><u>1.218 B.</u> The changed nature of any business use proposed for land or buildings is justified by evidence of need for particular business premises and space in the National Park or, if expressed as a need for the district, borough, or metropolitan council, for that council area; and</p> <p><u>1.219 C.</u> In accordance with any evidenced need, the size and type of buildings proposed would address that need; and in all cases</p> <p><u>1.220 D.</u> The proposed use conserves and enhances any valued character associated with the site or premises, including any cultural heritage significance attached to the site or buildings and the wider settlement pattern</p> | <p>For clarification REP 23.56</p> <p>Typographical REPS 10.54,60.9, PDNPA 2.12</p> <p>Typographical</p> <p>Typographical</p> |
| M4.24 | 51 | 4.46 | <p>Core Strategy policy E2 sets out the policy principles for businesses in the countryside directing economic development <u>to existing buildings in</u> smaller settlements, farmsteads and groups of buildings in sustainable locations. It makes clear that business use in an isolated existing or new building in the open countryside will not be permitted.</p> | <p>For clarification REP PDNPA 2.13, and to clarify that the DME2 policy intent is to re-use buildings rather than encourage new development whilst DME5 covers scope for new buildings for Class B1 employment uses REP 23.50</p> |
| M4.25 | 51 | 4.47 | <p>The Authority may also remove permitted development rights { (i.e. those rights conveying permission for certain types of development without the requirement to obtain planning permissions) if that is felt necessary to make the development otherwise acceptable.</p> <p><u>business decisions about location, but good broad band coverage will not outweigh conservation concerns as laid out in policy DME5</u></p> | <p>Typographical REP PDNPA1.105</p> <p>Qualified modification to satisfy request for broadband issue to be covered in text REP PDNPA 4.22</p> |

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| M4.26 | 52 | Footnote 60 | ⁶⁰ B1 Use - Office use other than a use within Class A2, research and development of products or processeses <u>processes</u> , any industrial process which can be carried out in any residential area without causing detriment to the amenity of the area | Typographical REP PDNPA 1.106 |
| M4.27 | 52 | 4.48 | The Authority supports a flexible approach to working from home (Core Strategy policy E1). The key issues are the scale and nature of the business and its impact. In many cases, home working <u>requires nothing much more than good broadband connectivity and, in many cases</u> does not require planning permission, but where it does, it is reasonable to require clear limits to the type and size of activity | For clarification REP PDNPA 2.14 Stakeholder request to recognise the issue. Contrary to requests for a more campaigning tone, which is considered more appropriate for the National Park Management Plan or the next Core Strategy, this suggested modification recognises it without being judgemental of current provision, REP 43.4 |
| M4.28 | 52 | 4.49 | The aim of economic development agencies is to have super broadband access for over 90% of businesses by 2017 ⁶⁹ . | For clarification REPS 43.4 and 56.2 ask for footnote. |
| M4.29 | 53 | 4.50 | <u>Policy DME7 deals with the size of industrial and business development but not the design layout and neighbourliness of employment sites, which is dealt with by DME8.</u> Core Strategy policies E1 and E2 set out the principles for business growth. Where a business is in a built up area the impact on residents' amenity is a particularly important consideration <u>but it is important to also consider impact on biodiversity of built up areas e.g. bat roosts.</u> | REP PDNPA 4.24 |
| M4.30 | 53 | 4.51 | The Authority understands that when businesses are successful, site operators will desire expansion around the existing buildings rather than move to other locations. However, in the National Park, the importance of <u>conserving amenity and valued characteristics of the area such as the quality of the</u> landscape <u>conservation</u> and cultural heritage justifies strict limits to physical growth. The first consideration is always <u>the potential</u> impact on landscape <u>and cultural heritage</u> , and whether the expansion of the business in that location will conserve or enhance valued landscape character or other valued characteristics <u>such as the cultural heritage associated with the site and buildings and its environs.</u> | REP PDNPA 4.11 |
| M4.31 | 53 | 4.55 | Existing sites may well benefit from new investment and more efficient use, but business owners should consider if this can be better located in or adjacent to a Core Strategy <u>policy</u> DS1 settlement, or in a suitable location outside the National Park. | For clarification REP PDNPA 2.15 |
| M4.32 | 53 | 4.55 | <u>In accordance with Core Strategy policy GSP1, the Authority reserves the right to will treat each case on its merits. This may lead to it treating proposed business expansion as major development. which This could places a higher bar on planning permission than development</u> | REP PDNPA 4.14 |

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| | | | <p><u>that is not considered to be 'major'.</u></p> <p><u>The general presumption is that major development in National Parks should be avoided. Applicants are therefore encouraged to explore, at pre-application stages, the likelihood of a proposal being considered 'major'. This enables the applicant to understand what policy tests will be applied. This can help an applicant make an informed choice on business expansion rather than incurring potentially abortive cost on planning applications for development that may have little prospect of success.</u></p> <p><u>This advice is given following legal advice to the South Downs National Park Authority where it was advised that, in a national park, development falling outside of the thresholds for major development (see Glossary of terms) may be considered to be major⁶.</u></p> | |
| M4.33 | 54 | DME7 | <p>B. The scale and type of development can be accommodated without adversely affecting the amenity and valued characteristics of the area or to traffic safety and circulation; and</p> <p>E. The scale and type of development can be accommodated without adversely affecting the amenity and valued characteristics of the area or to traffic safety and circulation; and</p> <p>F. It does not adversely affect, and wherever possible secures the enhancement of the site as well as the future management of valued characteristics of the site and adjoining land within the ownership of the business ; and</p> | <p>Typographical REPS 10.55 and PDNPA 1.107</p> <p>Typographical</p> <p>For clarification</p> |
| M4.34 | 54 | 4.60 | <p><u>Policy DME8 deals with the design layout and neighbourliness of employment sites but not the question of whether a site can be expanded, which is dealt with by DME7.</u> Employment sites, and the types of building associated with them usually have an impact on the landscape and the amenity of those living in or visiting that area <u>but can also have an impact on biodiversity.</u> The extent and nature of the impact often depends on the care taken to achieve adequate screening, and on subsequent standards of operating practice or site maintenance. In some circumstances screening in itself will introduce an undesirable landscape feature and may not therefore always be considered to be an acceptable way to mitigate landscape impact of the development.</p> | REP PDNPA 4.16 |
| M4.35 | 55 | 4.64 | When faced with applications to expand road haulage businesses, the Authority will consider | Grammatical REP 10.56 |

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| | | | whether any positive planning gain relating <u>to</u> land management practices connected to the haulage business are sufficient to offset the negative impact of the expanded road haulage business itself. | |
| M4.36 | 55 | 4.65 | Subsequent unlawful use of such buildings for uses other than that permitted will be <u>the</u> subject of enforcement action, where this is felt necessary for the conservation of the landscape, or built environment, or to protect the residential amenity of anyone considered to be unreasonably impacted upon by the business. In this respect, the impact on people who visit and use the Park for recreational purposes is a material consideration, alongside the impact on people who live in the vicinity of the development. Where development is part of farm diversification, Policy DME2 also applies. | Grammatical REPS 10.57 and REP PDNPA 1.109 |

Chapter 5: Recreation and Tourism

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmt etc For clarification Typographical error</i> |
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| M5.1 | 56 | 5.4 | The National Park possesses a wealth of natural and historie <u>cultural heritage</u> attractions that with careful management can offer adventure and stimulation to inspire this and future generations. | Grammatical correction Responder Number INT1 – INT1.110 |
| M5.2 | 56 | New section heading | <u>Recreation Hubs</u> | New area in response to NT response Responder Number 50 – 50.20 Responder Number INT3 – INT3.22 |
| M5.3 | 56 | 5.5 (New) | <u>The National Park Authority recognises that there are a number of sites within the National Park that are located outside of settlements, and which attract large numbers of visitors, participating in a range of outdoor activities including, but not exclusive to walking, cycling, horse riding and climbing. Because such sites attract visitors to participate in recreational activities we have named such locations as recreation hubs. It is important that recreation hubs have appropriate facilities for visitors in order to enhance their experience and understanding of the National Park. It is also important to</u> | New paragraph in response to NT response Responder Number 50 – 50.20 Responder Number INT3 – INT3.23 |

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| | | | <u>ensure that their visit does not impact negatively on either the valued characteristics of the location or on the amenity of neighbouring settlements.</u> | |
| M5.4 | 56 | 5.6 (New) | <u>In order to ensure that facilities for visitors at recreation hubs are appropriate to the location and the number of visitors, the National Park Authority will bring forward a Recreation Hubs Supplementary Planning Document (SPD) to guide the development of facilities at such sites. This document will take a site specific approach, assessing existing provision of facilities, and the demand and suitability for additional facilities at specific sites. However, the SPD will also provide guidance for development of visitor facilities at any future sites that might come forward.</u> | New paragraph in response to NT response Responder Number 50 – 50.20 Responder Number INT3 – INT3.24 |
| M5.5 | 56 | 5.7 | <u>Core strategy</u> Policy RT1 is also clear that development must not prejudice or disadvantage people’s enjoyment of other existing and appropriate recreation, environmental education or interpretation activities, including the informal quiet enjoyment of the National Park; | For clarification Responder Number INT2 – INT2.16 |
| M5.6 | 56 | 5.9 | Core strategy policy RT3 supports the provision of touring camping and caravan sites particularly in areas where there are few sites, and where they can be well integrated within the landscape;. However the introduction of more permanent, non-traditional structures including static caravans, chalets or lodges will not be permitted. | Grammatical correction Responder Number INT3 – INT3.25 |
| M5.7 | 56 | 5.11 | Many measures to manage visitor pressure are dealt with without recourse to, or outside the control of, the land-use planning system. Current policies set out in the National Park Management Plan, Recreation Strategy, and <u>the Wider Peak District Cycle Strategy</u> have been negotiated and put into practice with our partner organisations, and form a crucial part of this approach. Work continues, to find further methods to sustain the National Park’s attractive features despite increased use. The National Park Authority aims to ensure consistency between these methods and its spatial policy. | For clarification Responder Number INT3 – INT3.26 |
| M5.8 | 57 | 5.15 | In terms of integrating development into <u>the</u> landscape, this is often a challenge because much of the quieter landscape is very open, whilst the busier valleys and dales are often narrow and ecologically sensitive, and already feel the pressure from day visitor use of small roads. Many of these roads are steep, narrow and poorly aligned. If the impact on location, access, and landscape setting, and valued characteristics are satisfactory then new low key sites may be acceptable. What is an appropriate size of site will vary from case to case, but, for the scale of development or activity to be considered appropriate, it should in no circumstance dominate its surroundings. | Grammatical correction Responder Number INT1 – INT1.112 |
| M5.9 | 57 | 5.18 | Core Strategy policy RT3 is clear that static caravans, chalets and lodges are not acceptable features in the National Park. The open character of large parts of landscape particularly in the White Peak and Dark Peak mean that the non-traditional <u>non-traditional</u> and permanent presence of such forms of accommodation are incompatible with the conservation purpose of the National Park. There is however a growing range of alternative forms of accommodation such as camping pods, yurts, shepherd’s huts etc. which have come onto the market in response to a demand for greater quality | Typographical error (extra space) Responder Number INT1 – INT1.113 |

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| | | | and comfort. For clarity, the National Park Authority considers all such forms of accommodation to have the same potential for adverse landscape impact and therefore they will be determined against Core Strategy policy RT3 part B. There may be exceptional circumstances where some structures may be acceptable. For example, experience has highlighted that wooden pod structures can provide a sensitive, low key form of accommodation particularly in woodland settings where the scope for landscape harm is negligible or indeed nil. Such solutions can help to support the local economy by extending the tourism season. Similarly the traditionally styled shepherd's hut accommodation can also provide an alternative form of provision with no landscape harm provided only one hut is installed on any one site and they are located close to existing farmsteads where existing access, parking arrangements and facilities can be utilised. | |
| M5.10 | 59 | DMR3B | B. for existing accommodation, the removal of any condition that stipulates <u>either:</u> a) months of occupation, <u>or</u> b) <u>occupation for no more than 28 days per annum,</u> will be permitted provided: | Soundness in response to Internal comments from Planning Team Responder Number INT6 – INT6.1 |
| M5.11 | 59 | DMR3 | Within a settlements listed in policy DS1 of the Core Strategy: | Grammatical error Responder Number INT1 – INT1.114 |
| M5.12 | 59 | DMR4 | B. is not constructed of a scale or design or materials, or any combination of these three aspects of a proposal which would be tantamount to creating a new dwelling or a building that would lend itself to future conversion for such purpose; and <u>B. is constructed to a scale and design, utilising materials that are appropriate to the function of the building, and which either separately or in combination, prevent the creation of a new building that is effectively a dwelling or one that would easily lend itself to a future conversion of a dwelling; and</u> | An attempt to provide a more positively worded element – see the PPPF Comment Responder Number 23 – 23.60 |

Chapter 6: Housing

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from Government etc For clarification Typographical error</i> |
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| M6.1 | 60 | 6.1 | National Park policies seek ways to address a particular part of overall housing provision and that is the un-met <u>unmet</u> need for new affordable homes, both now and for future generations ⁷ . | Typographical REPS 10.62 and 24.9 |
| M6.2 | 60 | 6.2 | However, the <u>The</u> adopted Core Strategy for the National Park states that it is not appropriate to permit new housing simply in response to the significant open market demand to live in it's <u>its</u> sought after environment. That view is confirmed by the National Park Vision and Circular ⁷³ , and the Strategic Housing Market Assessments (SHMAs), of Derbyshire Dales and High Peak. These two councils comprise 82.3% of the National Park population ⁷⁴ . This forms part of the evidence base for these councils' local plans and has led to agreed reasonable estimates for housing delivery in the National Park based on past trends. Estimates do not represent a target but neither do they represent a limit. <u>The Authority considers that an increase in overall provision of market housing would, rather than meet needs within the National Park, stimulate market demand from outside the National Park, with cumulative negative consequences for the special qualities of the National Park and for the ability of existing communities to access and afford the homes they need.</u> | For clarification REP 10.63 Typographical REP 10.64 Typo REP 24.4 For clarification REP 28.17 |
| M6.3 | 60 | 6.4 | All new housing is therefore permitted as an exception to the strategic principle that development of all types should be constrained in the National Park. All development on previously undeveloped land is classed as an exception site, insofar as housing allocations are not otherwise brought forward in the development plan. Nevertheless, as far as national park purposes can be upheld, the policies enable 'affordable housing' to address local needs on these sites. <u>The houses are affordable in the sense that they are attainable by those recognised by the housing authority to be in housing need. The cost of the houses is, in the case of rented accommodation, no more than the prevailing market rents relative to the size of the property minus 20%. Shared ownership, where possible, allows persons to purchase a share of the property with the remainder being owned by a social housing organisation such as a housing association. The restricted occupancy criteria (i.e. restricted to local persons with strong local connection to the area and being in housing need) suppresses the price that the property would be valued at were there no such restrictions on purchase or occupancy.</u> Policies also enable essential worker housing, ancillary accommodation, holiday accommodation and open market housing, by conversion or new build where this can drive the conservation and enhancement of the National Park, e.g. by re-development of previously developed sites. <u>None of these forms of accommodation is considered to be 'affordable' in the sense that it can address housing need (as evidenced by housing authority need surveys or other information on housing need). Some market housing can be provided by way of starter homes. Regulations define starter homes as housing provided for first time buyers under 40 and sold at no more than 80% of market value.</u> Any of these, in the right circumstances, can address national park purposes and/or community needs, <u>though in the case of starter homes their reduced financial value, and therefore value to local people in the community is likely to be temporary owing to a provision in regulations¹ that enables owners to sell the properties free from penalty after a period specified by Government. Because of this provision there is nothing to prevent these houses being sold outside of the local</u> | Stakeholder request for clarification on affordability and which types of accommodation we consider to be affordable REP 23.64, 43.5 The proposed modification, contrary to the representation request, avoids changes to DMH1 policy itself, which would make the policy unwieldy, but adds to paragraph 6.4 so that this important issue is addressed up front in this chapter. |

⁷ <http://www.peakdistrict.gov.uk/microsites/npmp/our-vision/thriving-and-vibrant-communities/tv4-affordable-housing>

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| | | | <p><u>community and consequently there is a strong likelihood that their financial value will rise quickly making the houses no different in the medium to long term to unencumbered market housing in terms of their ability to address housing need. As such they should not be considered affordable in perpetuity and there should be no expectation amongst developers that they will be able to build more starter homes because existing starter homes have ceased function as starter homes for first time buyers.</u></p> <p><u>Because starter homes cannot address a proven community housing need in perpetuity, they can only therefore be permitted in order to secure the conservation and enhancement of the National Park.</u></p> <p><u>¹ Housing and Planning Act 2016 Part 1 Chapter1 Section 3 (1) (a)</u></p> | |
| M6.4 | 60 | 6.6 | <p>Chapter 12 of the Core Strategy establishes the strategic context and key principles for housing delivery. Policies HC1, HC2 and HC3 of the Core Strategy need to be read in conjunction with the policies of this chapter and the Supplementary Planning Guidance: Meeting the local need for affordable housing in the Peak District National Park adopted in Jul <u>July</u> 2003 (or any successor supplementary planning document SPD).</p> | Typographical REP 10.65 |
| M6.5 | 61 | 6.9 | <p>This all helps address an unmet community need, and to a small, but not insignificant extent, help <u>helps</u> communities remain vibrant and thriving.</p> | Typographical REP 10.66 |
| M6.6 | 61 | 6.10.2 | <p>Affordable rented housing - The government has introduced a new tenancy scheme for social housing landlord <u>landlords</u>, such as Housing Solutions. This new scheme is called Affordable Rents. The Affordable Rent Scheme allows housing associations to; let properties at rents of up to 80 per cent of those charged in the private sector; and</p> | Typographical and grammatical REP 10.67 |
| M6.7 | 62 | 6.13 | <p>What is affordable on a case by case basis depends on prices in relation to incomes and mortgage availability. The government considers that if more than 3.5 times income is required by way of a mortgage, the house is not considered affordable This means that for many people on average or lower quartile incomes, the majority of the housing stock in the National Park is not affordable. This situation is common across all desirable rural areas and is compounded by the fact the Peak District is close to many large urban areas to which people can reasonably easily commute.</p> | Accuracy REP 66.6 no clear evidence for this and doesn't help make the point that houses aren't affordable. |
| M6.8 | 62 | 6.13 | <p>6.11 <u>6.14</u> The Authority's objective is that new affordable housing addresses a range of local housing needs.</p> | Typographical REP PDNPA 2.18 (All paragraphs from paragraph 6.13 need re-numbering owing to repetition of paras 6.11, 6.12, 6.13) |
| M6.9 | 62 | 6.13 | <p>Housing authorities have some discretion over what is considered unsatisfactory. In this area it is rare that accommodation is considered unsatisfactory because of its condition or the quality of its facilities. The more common reasons are lack of space for the household and the cost (affordability) of the accommodation available. In this area, accommodation is considered unsatisfactory when it is</p> | Re-written for clarification REPs 25.1 and 25.2 |

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| | | | <p><u>of poor condition or lacking in basic facilities and it is also common that accommodation is unsatisfactory because it is too small for the size of the household and is too expensive for the household to sustain.</u> Affordability is often the reason why people are unable to set up a household for the first time. The degree of priority given to a person when properties are allocated through choice based lettings schemes such as Home Options and Moorlands Choice is determined by the housing authority. <u>(See Appendix 7: Registering a housing need)</u> They assess whether a person's claim of unsatisfactory accommodation justifies allocation of a property. A variety of choice based letting systems are used to assess and categorise peoples housing need⁸</p> | For clarification REP PDNPA |
| M6.10 | 62 | 6.14 | <p>Under housing law, there are two ways to calculate if a home is overcrowded. One is by the number of rooms for people to sleep in. This is called the room standard. The other is by the amount of space in the home and the number of people living in it. This is called the space standard. Statutory overcrowding is when there are too many people living in the home using either of the calculations.</p> <p><u>Young people and others forming a household for the first time</u></p> <p>However, m <u>Many people, and particularly young people seeking to form a household for the first time are however often in accommodation that is not legally overcrowded. The Authority acknowledges the genuine desire of persons of any age to form households away from the family home or houses in multiple occupation. The Authority considers it unsustainable that a person's genuine desire to form a household is hidden under the guise of legally satisfactory accommodation provided by benevolent families or friends.</u> <u>The Authority also acknowledges that many households require accommodation to rent rather than to buy</u></p> | <p>REP 23.86 request to acknowledge the need of hidden households i.e. those whose need is the need to set up a household for the first time.</p> <p>REP PDNPA requesting higher profile for new households and young people's housing needs</p> <p>REP 23.87 making text more accessible, and REP PDNPA requesting recognition that newly forming households often require homes to rent rather than buy</p> |
| M6.11 | 62 | Between 6.14 and 6.15 | <p><u>When is new affordable housing justified?</u></p> | REP 23.87 making text more accessible |
| M6.12 | 63 | 6.16 | Housing need in rural areas is however difficult to gauge because the housing need is often hidden | For accuracy REP PDNPA |

⁸ <https://www.home-options.org/>
<http://www.moorlandshomechoice.co.uk/>
http://cheshireeast.gov.uk/housing/housing_options/housing_options.aspx
<https://www.kirklees.gov.uk/community/housing/housingOptions.aspx>
<http://www.berneslaihomes.co.uk/about-us/>
<https://www.sheffield.gov.uk/in-your-area/housing-services/homelesshousingoptions/housingsolutions/housingoptions.html>
<http://www.ne-derbyshire.gov.uk/housing/strategic-housing-service/choice-based-lettings-allocation-policy/>
http://www.oldham.gov.uk/info/200255/find_a_home

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| | | | and some people are not registered as being in housing need. Therefore, the Authority encourages and supports any other methods of community engagement undertaken by housing bodies that helps establish genuine housing need. Housing Authorities use a series of questions to assess claims of housing need. This Authority has agreed with the Housing Authorities that it will require the same information when individuals apply to build affordable housing for their own use in a DS1 settlement (see Appendix ? 6) . | |
| M6.13 | 63 | Between 6.18 and 6.19 | <u>Housing created by other means</u> | REP 23.87 making text more accessible |
| M6.14 | 63 | 6.20 and 6.21 | <p><u>Downsizing</u></p> <p>However, there may be circumstances where release of capital alone cannot resolve a need to move for other reasons. For example, decreased mobility might not be able to be accommodated by adaptations to a person's current home, and there may be no suitable homes available that could accommodate such a change of circumstance. This may create a housing need, and may become more common as the proportion of elderly residents increases.</p> <p>Also, where people of any age 'own' a house but have a mortgage, unforeseeable changes to their circumstances, such as drop in income, redundancy, or household breakdown may lead to a break up of a household and/or a need to sell the property. In such cases, the capital gain from selling the property may be relatively modest by comparison with someone who owns a house outright. Where the changed circumstance is entirely unintended, it is not unreasonable to consider that a housing need is created. Such circumstances would be captured under the term 'otherwise unsatisfactory' which is part of the policy and is explained above.</p> <p><u>Some people who own their properties outright may want, as they get older, to move to smaller properties and remain in and contribute to the communities where they have lived for many years. Reasons may vary from decreased mobility and a practical difficulty in managing or adapting the current home to meet changed needs, to the need to realise capital to support their old age. This is commonly known as downsizing and should, wherever possible, be met through the existing housing stock where that is suitable. However, there may be circumstances where this is not possible and where the circumstances of the applicant justify the provision of a home to meet their needs. This may become more common as the proportion of elderly residents increases.</u></p> | <p>REP 23.87 making text more accessible</p> <p>REP 23.85 request to better reflect the wishes of people wanting to downsize. This modification acknowledges it, but stops short of saying every persons desire to downsize should be considered housing need. It would be inserted as new paras 6.20 and 6.21 below 6.19 and above 6.22</p> <p>REP 23.87 making text more accessible and clarifying objectives.</p> |

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| | | | <p>While it may not be practical or desirable to undertake a full means test, , the Authority will need to be persuaded that homeowners have no alternatives available to them on the open market or through social housing that can meet their changed circumstances. This means an applicant should provide evidence of search for housing on the market at the time of submitting a planning application and/or seeking pre application advice.</p> | |
| M6.15 | 65 | 6.37 | <p>Where affordable housing is proposed, the size of housing is controlled so the Authority can reasonably impose and retain legal agreements to ensure they remain affordable and for local people in housing need. Size can be controlled by a planning authority and has over successive plan periods proved an effective planning tool, alongside restricted occupancy in holding values below market value to the extent that houses remain affordable to people in housing need locally. It is considered the most reliable and practical way to achieve this objective because a planning authority can employ size as a way to control price but cannot use prevailing land and property values to indicate appropriate size. The mix of houses should reflect what is needed in the area. If this is not apparent from housing need surveys, the Authority will consult the relevant housing authority manager. Homes built by individuals to meet their own need are classified as intermediate houses (between pure affordable rent and shared ownership prices and unencumbered open market rent and sale prices) because they can be sold on or rented by the first owner and occupant after a period of three years to persons who are not in housing need provided the persons satisfies the local connection criteria. The ongoing value of these houses will be higher because of the less stringent occupancy conditions, but the size of the housing will nevertheless continue to be controlled in line with the original applicant's housing need. In these cases greater flexibility will be afforded in terms of the size requirement up to the maximum of 97 m².</p> <p>The provision of affordable housing units under policy DMC10 (which is concerned with conversion of heritage assets) will only be appropriate where units are of a size that conforms closely to the provisions of DMH1 and ensuring that the conservation and enhancement of any heritage asset is not compromised.</p> <p>Through policy DMR3, (which is concerned with occupancy of holiday accommodation) the removal of holiday occupancy conditions and the introduction of full time residential use can be a sustainable means of increasing the range and extent of stock to meet housing need in the area as it helps those in housing need without the need to build new houses. In order to address the local need for affordable housing the replacement of a holiday occupancy condition with a legal agreement for locally needed affordable housing will only be appropriate where the size of the unit conforms closely with the size provisions in policy DMH1.</p> | <p>REPS 23.54, 23.75, 28.18, 9.6. Request for clarity on reasons for controlling size of affordable housing</p> <p>REP PDNPA to clarify link to DMC10 and DMR3 both of which could enable occupancy of new housing units or changed occupancy from holiday accommodation to housing to address evidenced local need for an affordable house.</p> |
| M6.16 | 66 | 6.38 | Where affordable houses are built, it is considered that the smaller the area of land taken up by each | For clarification. The original text is |

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| | | | house, the lower the cost of the land per house value of the house will be on completion, and in perpetuity. There is however a need for all new development to be sensitive to any valued settlement pattern. This may justify different plot ratios from place to place including on occasions more generous gardens. For example, the pattern of estate farm villages might justify a low plot ratio <u>with bigger gardens</u> , whereas the pattern in former lead mining villages might lend itself to high densities <u>and smaller gardens</u> . However, whilst it is reasonable to provide gardens wherever possible the size of the plots should not, irrespective of the prevailing settlement pattern, be such that the value of the plot including the house cannot reasonably be retained as affordable does not affect the price that an RSL would pay for a plot. That is determined by the finance available to them to build affordable houses and their funds to do so. The design issues are covered in detail under the Conservation Chapter. | unclear because the land value for a plot on which to build affordable houses is, contrary to what original text suggested, unaffected by the size of the houses built (i.e. each individual plot within the size limits imposed by DMH1) The new text clarifies this point. REP25.4, 23.73 |
| M6.17 | 67 | DMH1 | <p>B. Starter homes will not be permitted on exception sites⁹ but may be permitted as part of a development of housing to enhance a previously developed <u>sites site</u></p> <p>C. Self-Build and Custom build plots will not be permitted on exception sites but may be permitted as part of a development of housing to enhance a previously developed <u>sites site</u></p> | Typographical REP 10.69 |
| M6.18 | 68 | 6.52 | The eligible person would be classed as <u>equally as equal to</u> persons in Winster or other adjoining Parishes. The allocation of the property is determined by other factors <u>relavant-relevant</u> to housing need and for a particular type and size of property. Therefore locational qualification is only one part of the allocation process. | For clarification REP 24.10 Typographical PDNPA 4.8 |
| M6.19 | 69 | DMH3 | <p>B. For RSL owned and managed homes, and privately owned and managed schemes of more than one affordable home, <u>owners and managers must</u></p> <p>C. For privately owned and managed affordable housing, <u>owners and managers must</u></p> | For clarification REPS 24.11 and 24.12 |
| M6.20 | 70 | 6.57 | The Authority will resist applications to remove the tie because without the tie the use of the housing will rarely help achieve the <u>this development</u> plan's conservation, housing, or economic objectives. | For clarification REP 10.71 |
| M6.21 | 71 | DMH4 | <p>The need for a worker dwelling to support agriculture, forestry or other rural <u>enterprises enterprise</u> businesses will be considered against the needs of <u>the</u> business concerned¹⁰. Development will be permitted <u>by conversion or new build</u> provided that:</p> <p>A. A detailed appraisal demonstrates that there is a genuine and essential functional need for the worker(s) concerned, with a requirement that they need to be readily available at most times, day and night, bearing in mind current and likely future requirements; and</p> | Typographical and grammatical and member working group request to re-order parts of the policy REPS PDNPA 4.11, and REP 10.73 |

⁹ The Housing and Planning Act gives planning authorities the power to dispense with the requirement to provide starter homes on rural exception sites.

<http://www.legislation.gov.uk/ukpga/2016/22/section/5/enacted>

¹⁰ The personal preferences of an employee are not a material planning consideration REP 10.74

B. Stated intentions to engage in or further develop land management business are genuine, reasonably likely to happen and capable of being sustained for a reasonable period of time; and

C. There is no accommodation available in the locality that could enable the worker(s) to be readily available at most times, day and night, bearing in mind current and likely future requirements;

Development meeting parts A, B and C of this policy and proposing new build dwellings(s) will be permitted provided that:

D. There is no traditional building that could be converted for use as a worker dwelling, within or close to the main group of buildings, in line with other policies and guidance on siting and design, and could serve this purpose; and

E. Where conversion of existing buildings is not an option, construction costs of new buildings reflect the likely sustainable income of the business; and

F. The new building is within or immediately adjacent to the site of the existing building group and enhances the building group when considered in its landscape setting; and

G. Where a house already exists, and is under the control of the business, the subsequent housing is subservient in size to the existing original house unless an acceptable landscape and building conservation outcome for the building group and the setting can only be achieved by a bigger house or the business as distinct from the intended first occupant justifies why a bigger house is necessary to the operation of the business;

~~H. Stated intentions to engage in or further develop land management business are genuine, reasonably likely to happen and capable of being sustained for a reasonable period of time.~~

Where there is uncertainty about the sustainability of an otherwise acceptable proposal, permission may be granted for an appropriately coloured caravan or other temporary accommodation.

Original part H moved to become part B

Original part B becomes part C

Clarification for cases where new build as opposed to conversion is proposed
Original part C becomes part D

Original part D becomes part E

Original part E becomes part F

Original part F becomes part G

REP 23.89 clarification for cases e.g. where new farm holding has modest house as business establishes but needs bigger main farm house as it becomes more established

Part H is moved to become part B

Clarification of scope for temporary accommodation as part of establishing a business need

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| M6.22 | 72 | footnote | The personal preferences of an employee is are not a material planning consideration | Grammatical. REP10.74 |
| M6.23 | 72 | 6.69 | <p><u>Succession Planning</u></p> <p>In other cases there may be a natural desire to make space for younger generations to remain at home or return home, e.g. to assist, or take on family-run businesses.</p> | New subheading building on REP 2.1 support |
| M6.24 | 74 | 6.77 | <p>The following policy clarifies that in the context of proposals for dwelling use, previously developed land means land which is, or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. <u>This is commonly referred to as brownfield land and is a nationally recognised definition for planning purposes.</u></p> <p><u>For the avoidance of doubt it previously developed land does not include (brownfield land) is not</u></p> <ul style="list-style-type: none"> ○ land that is or has been occupied by agricultural (including horticultural buildings) or forestry buildings; ○ land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through planning conditions and s106 agreements; ○ land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; ○ land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.¹¹ <p><u>Many sites that have been the subject of some development activity can fit into these categories (e.g. they have some evidence of previous farm buildings or other activity such as mineral working)</u></p> <p><u>In order to secure the optimum number of affordable houses and avoid increasing the pressure on greenfield land for such development, the first presumption is against re-use of such sites for market housing unless until it is proven that a site is previously developed land. This is especially important in the context of the pressure for market housing in the National Park and the limited capacity for greenfield (exception sites) development for affordable housing to address housing need (as evidenced by work with parish council and housing enablers to find sites)</u></p> <p><u>If it is proven that a site is previously developed land, and it is in a DS1 settlement, any application for market housing will be assessed in line with HC1C of the Core Strategy.</u></p> | Clarification required on the need to explain the policy presumption for previously developed land in respect of housing development REP23.91 (the footnote shows where the definition comes from) |

¹¹ <http://www.planningportal.gov.uk/general/glossaryandlinks/glossary/p>

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| | | | <p>If there is no evidence that the land is previously developed but the Authority still considers that enhancement would be beneficial in the wider interests of its statutory purposes, it may permit open market housing as a means of enabling this. This could be relevant to agricultural land and buildings in and on the edge of settlements. However, the expectation will remain that at least some of the proposed housing (subject to viability) will address an evidenced local need for affordable housing of the type provided for by DMH1.</p> <p>In cases where land and/or buildings do not have previously developed land status and have been deliberately neglected or despoiled, the Authority will achieve its objective of conservation and enhancement through the use of its powers under section 215 of the Town and Country Planning Act 1990, alongside normal planning enforcement, unless the site commends itself for development for other reasons.</p> <p>Outside of DS1 settlements and away from other forms of built development, applications for housing it will be assessed against Core Strategy Policies DS1 (Development Strategy) and GSP2 (Enhancing the National Park).</p> | |
| M6.25 | 74 | 6.80 | Consequently However, because the development plan does not allocate sites for housing, a Neighbourhood Plan identification of a site cannot constitute a site allocation. | Grammatical REP 10.75 |
| M6.26 | 75 | 6.84 | When a mixed scheme of housing is proposed as part of a site's re-development, the Authority will ask housing managers to confirm the type and mix of houses needed because it is important in conserving and enhancing the National Park that the Authority addresses the wider housing needs of the population wherever possible. The market element of the scheme should also help improve the housing mix but these houses are not considered to be in any way affordable in the sense that they can address housing need as those terms are understood by the NPPF and this development plan. | REP PDNPA 4.17 for clarification of the importance of the wider housing mix to communities |
| M6.27 | 75 | 6.85 | If housing need exists, and the type of housing that is needed could be provided in such a way that conserves and enhances the building(s) and its setting, or the site subject of re-development, the Authority will ask the applicant to demonstrate, through a financial viability assessment, the numbers and types of affordable housing units that can reasonably be gained for the community. | Grammatical REP 10.76 |
| M6.28 | 75 | 6.86 | Since the 1994 Structure Plan, opportunities for this type of development has have led to enhancement of former industrial and heritage sites such as Cressbrook Mill, the site of Station Yard Hathersage, the Glebe Mine site at Eyam, and led to conservation of the Filter House at Ladybower Reservoir. Chapter 3 of this development plan outlines conservation and enhancement requirements in more detail, so any policy in this chapter follows on from policies and text in that chapter. | Typographical REP 10.77 |

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| M6.29 | 75 | 6.87 | Designated and non-designated heritage assets can be converted to a number of uses, but the driver for conversion has to be first and foremost the conservation and enhancement that the new use can achieve as opposed to any benefits of the use itself. For this reason, proposals to convert designated and non-designated heritage assets are assessed against the policies in the Chapter 3. | For clarification and grammatical REP 10.78 |
| M6.30 | 75 | DMH6 | <p>A. Re-development of previously developed land for housing will be permitted provided that:</p> <p>(i) The development conserves and enhances the valued character of the built environment or landscape on, around or adjacent to the site; and</p> <p>(ii) An adopted neighbourhood plan has not identified the land for continued community or employment use or open space; and</p> <p>(ii) (iii) Where the land is inside or on the edge of a DS1 settlement, and subject to viability, an element of the housing addresses local need for affordable housing.</p> <p>(iii) (iv) Partial or proposed multi-phased development of sites can, by use of condition or if expedient legal agreement ensure the conservation and enhancement of the whole</p> | Soundness questioned concerning use of neighbourhood plans to potentially undermine the objectives of policy REP 38.8 |
| M6.31 | 75 | 6.88 | If a building is listed Listed, applicants should refer to Chapter 3 policy DMC7: Listed Buildings DMC11 current building and wider built environment. | Clarification REP 10.79 |
| M6.32 | 76 | DMH7 | <p>A Extensions and alterations to dwellings will be permitted provided that the proposal does not:</p> <p>(i) detract from the character, appearance or amenity of the original building, its setting or neighbouring buildings; or</p> <p>(ii) dominate the original dwelling particularly where it is a designated or non-designated cultural heritage asset; or</p> <p>(iii) amount to the creation of a separate independent dwelling; or</p> <p>(iv) create, by inclusion of land not previously within the residential curtilage, adverse effect on, or lead to undesirable changes to the landscape or any other valued characteristic.</p> <p><u>B.</u> Proposals for house extensions involving the conversion of adjoining buildings and by the provision of new ancillary buildings must also satisfy Policy DMH5</p> | Clarification REPS PDNPA 2.21, PDNPA 4.18, 23.96, |

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| | | | <p><u>C.</u> Where an extension provides ancillary accommodation and it is not possible to secure its ancillary status in perpetuity by planning conditions it will be tied to the main dwelling by way of a section 106 agreement.</p> | |
| M6.33 | 76 | DMH8 and pretext subheading | <p><i>New outbuildings for domestic garaging and storage use <u>and alterations to existing outbuildings in the curtilage of dwelling houses</u></i></p> | REP PDNPA 4.20 |
| M6.34 | 76 | 6.91 | <p>The impact may also be lessened by locating buildings adjacent to existing groups of buildings. The Authority will restrict the use of new outbuildings in the curtilage of dwelling houses by condition</p> | Clarification REP 23.97 |
| M6.35 | 76 | DMH8 | <p>DMH8: New outbuildings and alterations to existing outbuildings for domestic garaging and storage use in the curtilage of dwelling houses</p> <p><u>A: New outbuildings will be permitted for garaging and storage use provided:</u></p> <p>I. _____ the scale, mass, form, and design of the building conserves and enhances the immediate dwelling and curtilage, any valued characteristics of the adjacent built environment and/or the landscape, including listed building status and setting, conservation area character, important open space, valued landscape character; and</p> <p>II. _____ the building exhibits the minimum of features necessary for the proposed storage use. The scale, mass, form, and design of the building does not propose a development which through alterations permissible under the GPDO would be habitable for dwelling use.</p> <p>III. _____ The status of the new buildings can be restricted through conditions</p> <p><u>B: Alterations to existing outbuildings will be permitted provided:</u></p> <p>I. Changes to the mass, form, and appearance of the existing building conserves and enhances the immediate dwelling and curtilage, any valued characteristics of the adjacent built environment and/or the landscape, including Listed Building status and setting, conservation area character, important open space, valued landscape character; and</p> <p>II. The status of the new buildings can be restricted through conditions</p> <p>III. The outbuilding is not a garage</p> | Clarification REP 23.97 and PDNPA 4.19 |
| M6.36 | 77 | 6.92 | <p>Replacement of dwellings is considered <u>a sustainable way to enhance the housing stock</u> provided that over time the outcome is an improvement in the design, quality and mix of housing stock.</p> | REP PDNPA 4.24 |

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| M6.37 | 77 | 6.94 | <p>It may be acceptable to permit largerer larger houses (whether that is by height, floor space or mass, or a combination of these measures), but enhancement to the surrounding built environment and landscape cannot always be achieved by larger houses, even if, as individual buildings, their design is superior to the house it is proposed to replace. The Authority will also consider whether it is appropriate to include the footprint of other buildings in the calculation of existing floorspace as the start point for assessing a replacement dwelling.</p> <p>Some of these ancillary buildings may be valuable for their design and materials and therefore their positive contribution to the built environment, in which case it may be undesirable to lose them.</p> <p>In cases where it is agreed to lose buildings, the Authority will consider whether loss of such buildings will create pressure for additional buildings in future e.g. for garaging or other storage purposes.</p> <p>It will also consider whether, in light of the enhancement gained by the replacement dwelling, the impact of permitting further buildings on the enhancement already gained would be positive or negative.</p> <p>If it is considered that further changes would undermine the enhancement achieved by the replacement dwelling, it will remove permitted development rights.</p> | <p>Typographical REPS 8.5 and 10.92</p> <p>PDNPA REP to clarify why permitted development right might need to be removed (which is suggested new criteria I of policy DMH9)</p> |
| M6.38 | 77 | 6.95 | <p>Aside from size and design considerations, neighbours neighbours' residential amenity must be respected and it is also important that the activity created by the new dwelling is no more intrusive in the wider landscape, for example in terms of noise generated or dispersed artificial light.</p> | <p>Grammatical REPS 8.6 and 10.94</p> |
| M6.39 | 77 | 6.97 | <p>The Authority acknowledges that some National park communities perceive that this policy may lead to an unsustainable loss of smaller housing across national park villages. Whilst the Authority's Design Guide states that bungalow design does not reflect the built traditions of the Peak District, it does recognise that well-designed single storey dwellings can be acceptable. There must be recognition at pre application advice and decision making stages when considering whether a proposed replacement dwelling enhances landscape or built environments¹². However the Authority has no plan objective to protect smaller houses in themselves other than for conservation reasons</p> | <p>Responds to REP 23.1 concern that smaller houses including bungalows are being lost in significant numbers and possibly unnecessarily when they are seen as a valuable part of housing stock.</p> |
| M6.40 | 77 | 6.98 | <p>In accordance with Core Strategy GSP2 D, and taking into consideration the DS1 Core Strategy intention to concentrate new development into a range defined range of settlements, proposals on sites inside or on the edge of DS1 villages are more likely to be acceptable than sites that are not inside or on the edge of settlements.</p> | <p>Grammatical REPS 10.96 , PDNPA1.178</p> |
| M6.41 | 78 | DMH9 | <p>DMH9 Replacement Dwellings</p> | <p>New criteria B to emphasise the</p> |

¹² 2007 Design Guide paragraph 3.21

- A. The replacement of a dwelling will be permitted provided that the dwelling to be replaced:
- a. is not ~~listed~~ Listed individually or as part of a group listing;
 - b. is not considered to have cultural heritage significance; and
 - c. is not considered to contribute positively towards the valued landscape character or built environment in which it is located and
- B. All proposed replacement dwellings must be of better design, and materials than the dwelling proposed to be replaced;
- ~~B.C.~~ Any replacement dwelling should only be larger than the dwelling it replaces where the proposed replacement dwelling. Larger replacement dwellings should demonstrates significant overall enhancement to the valued character and appearance of the site itself, and the surrounding built environment and landscape; and
- ~~C.D.~~ In all cases the replacement dwelling must not create an adverse impact on neighbours' residential amenity; and
- C.E. In all cases the replacement dwelling must exhibit high sustainability standards and conserve and enhance its built environment and/or landscape setting
- ~~D.F.~~ In the event that the proposed replacement dwelling is on another footprint, the existing dwelling is removed from the site prior to the completion of the development, or within 3 months of the first occupation of the new dwelling, where the existing dwelling is in residential use; and
- ~~E.G.~~ In a DS1 settlement, demolition of one dwelling and re-development with more than one dwelling may be permitted provided that the proposed development satisfies the criterion above and is required in order to achieve conservation and enhancement in accordance with Core Strategy policies DS1 C and GSP2 D, and HC1 C.
- ~~F.H.~~ Where there is specific evidence of general housing need in the Parish for a particular size of dwelling (for example from a Neighbourhood Plan), the size of the net additional housing units should reflect that evidence.
- I. Permitted development rights may be removed if this is considered necessary to protect the enhancement achieved.

objective of enhancement in all cases

New criteria E to emphasise the importance of taking opportunities available in all new builds to include higher sustainability standards (which backs up the core strategy policies on this issue) REPS PDNPA 4.21, 9.7,

REP PDNPA request new criteria I to ensure any enhancement cannot be undone by permitted

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| | | | | development rights. |
| M6.42 | 78 | 6.103 | Applications to create new dwellings from such buildings will be considered under Core Strategy policy HC1, <u>GSP2</u> , the conservation policies of this plan, and policy DMH7: Extensions and Alterations. | For clarification REP PDNPA 2.22 |
| M6.43 | 80 | DMH11 | B. Where planning conditions cannot achieve the desired outcome of ensuring worker dwellings are retained by the business, the applicant will be required to enter into a Section 106 legal agreement that will: i) restrict the occupancy of the properties in perpetuity in line with policy DMH4 | For clarification REP 10.97 |
| M6.44 | 80 | DMH11 | D (iii) be temporarily occupied by <u>a</u> local person who has lived in the parish or adjoining parish for ten out of the last twenty years and is in housing need, until such time as a business need arises | Grammatical REP 10.98 |

Chapter 7: Shops, Services and Community Facilities

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmt etc For clarification Typographical error</i> |
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| M7.1 | 83 | 7.16 | Information relating to efforts to improve the viability and usage of the facility or to diversify <u>diversify</u> the use of the facility will be material. | Typo Comment number 10.101 |
| M7.2 | 83 | 7.19 | <u>Applicants must provide e</u> Evidence that the asking price or market rent is the market value as defined by the RICS "Appraisal and Valuation Standards" ('The Red Book') which must take into account the structural condition of the property and the planning constraints affecting it. | Grammar Comment number 10.102 |
| M7.3 | 84 | DMS2 (A) (i) | (i) evidence of a thorough viability <u>assessment</u> and a marketing exercise with a commercial property agent, . . . | Grammar Comment number 10.103 |
| M7.4 | 84 | DMS2 (C) | If segregation of the retail area from the dwelling would have an unacceptable impact on its residential amenity, permission will be granted for change to residential use. <u>Permission will be granted for change of use of the retail area to residential use if the retail use has</u> | Clarity Comment number 10.104 |

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| | | | <u>an unacceptable impact on residential amenity, and segregation of the retail area from the dwelling would also have an unacceptable impact on residential amenity.</u> | |
| M7.6 | 87 | 7.36 | The National Park Authority's approach is set out in <u>Core Strategy</u> policy HC4 part C. of the Core Strategy, including that any development of sites or buildings justified under policy should meet another community need including affordable housing. The absence of the required justification will demonstrate that alternative options to meet the social or economic needs of the local community have been insufficiently explored to warrant a change of use to a use not otherwise permitted by policy HC4 of the Core Strategy. | Clarification Comment number 10.108 |
| M7.7 | 84 | 7.23 | (new para) <u>7.23 A service provider may make representation to the Authority if it considers, and can demonstrate with reasoned justification, that evidence regarding viability that forms part of a wider estate reorganisation programme, is acceptable. A business may make representation to the Authority if it considers, and can demonstrate with reasoned justification, that 12 months marketing is too long a period for the type of business concerned.</u> (para numbers of rest of chapter will need adjusting) | Clarification Comment numbers 38.2 38.3 38.4 38.5 |
| M7.8 | 83 | 7.13 | user numbers and other supporting information--which | Typo Comment number INT2.23 |
| M7.9 | 85 | DMS3 | D. Proposals to expand or intensify the use of an existing site or building must assess the impact of the development in its landscape context by reference to the Peak District National Park Landscape Strategy and Action Plan. <u>D. Expansion or intensification of the use of an existing site or building will only be permitted where it is of a modest scale in relation to the existing activity and/or buildings and it does not adversely affect valued character, residential amenity and landscape setting.</u> | Clarification Comment number 10.106 |
| M7.10 | 87 | DMS5 | (vi) their scale, setting and design do not detract from features of architectural or historic importance or other valued characteristics of the area. <u>(vi) are of a scale, design and method of fixing that do not detract from features of architectural or historic importance or other valued characteristics of the area, and</u> <u>(vii) conform to guidance set out in the Authority's Shop Fronts SPD.</u> (B) External illumination will not be granted consent unless it is during opening hours in predominantly commercial areas ; or <u>for</u> is at public houses, restaurants or similar premises that <u>are reliant on evening trade</u> , (open after dark) providing it does not adversely affect dark skies. C(i) they are <u>projecting</u> hanging signs (ii) the building is a public house, hotel or restaurant that does not have a fascia and the sign or | Clarification Comment number 10.107 Comment number INT7.1 |

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| | | | advert has individual lettering attached to it so as to minimise any harmful visual impact and any damage to the stone or brickwork. <u>the architecture of the building dictates that a sign would be better sited higher up on a property.</u> | |
| M7.11 | 81 | 7.5 | In rural communities the local shop (convenience store) often provides the only shopping option available to the local community without the need to travel. <u>Planning applications are also expected to make provision for the separate use of upper floors.</u> | Clarification Comment number 10.99 |
| M7.12 | 81 | 7.3 | Bakewell is the main service centre within the National Park. Its development issues for shops, services and community facilities are considered in policy DMB1 <u>and Bakewell Neighbourhood Plan.</u> | Clarification Comment number INT5.6 |
| M7.13 | 81 | 7.4 | The National Park Authority's policies require clear justification for any change of use of a community facility, service or shop and, where it can be justified, provision <u>the new use</u> must, wherever possible, be to meet another community need or offer alternative community benefit such as local needs affordable housing. | Clarification Comment number INT5.7 |
| M7.14 | 84 | DMS2(A)(i) | Remove footnote. Remove blue line at end of coloured policy box | Clarification Comment number INT5.8 |
| M7.15 | 82 | 7.7 | Their use for single person accommodation or office space | Clarification Comment number INT7.3 |
| M7.16 | 82 | 7.10 | If the shop window is a feature of heritage significance it must be retained. <u>If the shop front (shop window) or any associated historic details are of heritage and / or streetscape value, they must be retained.</u> | Clarification Comment number INT7.5 |
| M7.17 | 86 | 7.30 | Shop fronts have a marked visual impact on the character of settlements. Whatever other attention has been paid to the quality of development, they can make a critical difference. The Authority's Detailed Design Supplementary Planning Document for Shop Fronts provides clear examples and advice about this area of commercial opportunity for owners to make the most of a building's character: recognising the strong attraction of the traditional appearance of settlements in the National Park. Shop fronts often incorporate advertising and require alterations to a building. Attention is, therefore, also drawn to Policies DMS5 and DMC3. <u>7.30 Shop fronts have a marked visual impact on the character of settlements. The Authority's Detailed Design Guide Supplementary Planning Document for Shop Fronts (2014) therefore provides clear advice and examples on this topic, demonstrating how shopfronts can make a positive contribution to a building and wider street scene. Shop fronts often incorporate advertising and require alteration. Attention is therefore also drawn to Policies DMS5 and DMC3.</u> | Clarification Comment number INT7.8 |
| M7.18 | 86 | 7.31 | Alternatives should be used. These include internal roller shuttering and internal shutters of a more traditional design. <u>Alternatives are suggested such as laminated security glass, robust stall-risers; or mesh security screens to the inside of the display window.</u> | Clarification Comment number INT7.9 |

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| M7.19 | 88 | DMS7 | <p>A. Development that would prejudice the continued use of community recreation sites or sports facilities will not be permitted unless:</p> <p>B (i) an assessment has been undertaken which has clearly shown the open space, buildings or land to be no longer required; and</p> <p>C <u>(ii)</u> the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; and</p> <p>D <u>(iii)</u> the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> | |
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Chapter 8: Bakewell

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough, new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmnt etc For clarification Typographical error</i> |
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| M8.1 | 90 | 8.10 | The n National p Park Authority | Typo Comment number 10.113 Comment number INT1.121 |
| M8.2 | 89 | 8.9 | For this reason the Core Strategy policy DS1 retained the central shopping area and this <u>Part 2 development management</u> plan shows what is considered to be the C central S shopping A area re-affirming that significant retail development should be contained within this boundary and <u>where it is considered to be significant retail development, it should not be permitted outside the boundary.</u> | Clarification Comment number 10.111 Comment number 10.112 |
| M8.3 | 89 | 8.10 | The boundary of this <u>the central shopping</u> area is that originally established | Clarification Comment number 10.114 |
| M8.4 | 90 | 8.11 | <u>Given the strategic need for employment sites, the policy safeguards existing employment sites, ensures</u> The strategic need for employment sites means that the policy safeguards existing employment sites so that their re-development includes a substantial element of business use, and promotes enhancement of underused employment sites. | Clarification Comment number 10.115 |
| M8.5 | 90 | 8.14 | However the central shopping area includes <u>comprises</u> | Clarification Comment number 10.117 |
| M8.6 | 89 | 8.5 | This plan does not include policies that are specific to Bakewell. However, <u>The</u> Core Strategy makes | Clarification |

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| | | | specific reference to Bakewell in the spatial objectives . . . | Comment number 49.2 |
| M8.7 | 90 | 8.11 | The Core Strategy policy DS1 establishes development expectations for Bakewell confirming that a development boundary and central shopping area will be retained. | Clarification Comment number 49.5 |
| M8.8 | 90 | 8.15 | This is especially the case where changes would not result in the loss of a valued facility or service: (in the sense that its loss would mean there was no other business offering that service in the town). | Clarification Comment number INT1.122 |
| M8.9 | 89 | 8.7 | The boundary shown is that agreed with the community as the preferred extent for growth and would be adopted by the proposed Neighbourhood Plan for the town. It is shown on the proposals map | Clarification Comment number INT2.25 Comment number INT5.2 |
| M8.10 | 89 | DMB1 Header | DMB-1 Bakewell's Settlement Boundary | Typo Comment number INT2.26 |
| M8.11 | 89 | 8.2 | The town retains reasonable public transport links north and south through bus services on the A6 but there is no rail link. | Clarification Comment number 8.3 |
| M8.12 | 90 | 8.13 | . . . demand leads to development. | Typo INT5.3 |
| M8.13 | 90 | 8.15 | The use of neighbourhood development orders or removal of usual permitted development rights to switch within use classes may be tools the community of Bakewell or the Authority considers using to slow down or reverse a pattern of retail use if it considers it is detrimental to the overall retail offer for residents or visitors. This may accompany a neighbourhood plan, and may serve to respond positively to deeply held concerns that the retail mix or range of facilities is unhealthy and working against securing a vibrant and thriving community. <u>(New Para) 8.16 The neighbourhood plan process has evidenced deeply held concerns that the retail mix or range of facilities is unhealthy and failing to secure a vibrant and thriving community. Bakewell Neighbourhood Plan policy will seek to slow down or reverse this trend but in order to implement neighbourhood policy the Authority would be required to consider removal of permitted development rights.</u> | Clarification INT5.4 |
| M8.14 | 89 | 8.11 | " . . . so that their redevelopment includes a substantial <u>predominant</u> element of business use . . ." | Clarification Comment number 8.1 |
| M8.15 | 89 | 8.4 | "However this site is an example of where premises could be improved, and policy would allow for a mix of uses provided a significant <u>predominant</u> element of business use is retained." | Clarification Comment number INT5.5 |
| M8.16 | 89 | 8.6 | <u>The intent of the planned approach for Bakewell is to give the community more influence through its emerging Neighbourhood Plan. Therefore this plan sets out the strategic context for Bakewell but leaves space for the community to devise local policy. The Neighbourhood Plan for Bakewell will</u> | Clarification Comment number 21.7 |

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| | | | <p><u>consider: development boundary, environmental resilience; protection and enhancement of the town's setting, special character and heritage assets, including the designation of local green spaces; housing; community facilities, shops and services; employment sites and transport and communications.</u> Any policies or neighbourhood development orders adopted in a neighbourhood plan for Bakewell will form part of the development plan and be given weight when planning proposals are put forward.</p> | |
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Chapter 9: Travel and Transport

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmnt etc For clarification Typographical error</i> |
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| M9.1 | 91 | 9.5 | The relationship with the need to reduce transport related carbon emissions is captured in paragraph 15.16, along with the role of the authority <u>Authority</u> in educating visitors about the impact of their travel choices on the valued characteristics of the National Park. | Grammatical correction. Responder Number INT1 – INT1.123 |
| M9.2 | 92 | 9.13 | Core Strategy policy T6 sets the strategic principles for the safeguarding of routes for walking, cycling and horse riding, ensuring that the Rights of Way network is protected from development. Similarly the Trails network is protected, although potential realignment of the Monsal and Trans Pennine Trails in the event of future rail use is acknowledged. The policy goes on to support the use of former railway lines for walking, cycling and horse riding. Finally, the policy acts to protect the Huddersfield Narrow Canal within the National Park. | Grammatical correction. Responder Number INT1 – INT1.124 |
| M9.3 | 92 | 9.16 | The Peak District National Park is located at the heart of England, surrounded by a number of towns and cities. There is a longstanding desire for connectivity between these urban areas which has resulted in the current road and rail network crossing the National Park and connecting these towns and cities, as shown on <u>the</u> Policies Map. | Grammatical correction. Responder Number INT3 – INT3.1 |
| M9.4 | 93 | DMT1 | New roads or railways for cross-park <u>cross-Park</u> travel will not be supported, and no proposals for a major alteration to an existing road or railway will be permitted, unless; | Grammatical correction. Responder Number INT3 – INT3.2 |
| M9.31 | 93 | DMT1E | E. There is a demonstrable long term net economic benefit within <u>for</u> the National Park. | Responder Number INT3 – INT3.28 |

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| M9.5 | 94 | 9.32 | <p>Look at para 9.32 re: conflict between new and existing corridor use.</p> <p>Policy DMT3D states that proposals to construct railways acting primarily as tourist attractions are unlikely to be successful because of their incompatibility with both transport and recreation policies. Elsewhere, railway stations usually generate road traffic, and a demand for additional facilities to cater for customers such as car parks and toilets. Where the line is aimed at the tourist market, such demands are likely to be even more acute. <u>It is likely that any demand for future tourist or heritage railways will be centred on former railway corridors. In most cases these have been replaced by multi-user trails, which have become sustainable transport and recreation corridors in their own right. The social and economic benefits of these trails would be in all likelihood compromised or lost with the introduction of tourist or heritage rail use. Whilst some visitors to the National Park may benefit from the availability of a tourist or heritage railway, it is unlikely that these benefits would not be outweighed by the loss of amenity for the existing users of these corridors.</u></p> <p><u>Because of the likely imbalance between benefit and impact resulting from a new railway acting primarily as a heritage or tourist attraction within the National Park, our likely approach will be one of refusal where an application comes through the Planning system and opposition where it comes through a Transport and Works Act Order. In all other cases Policies DMT1 and DMT3A to DMT3C apply.</u></p> | <p>For clarification – may need to be as an additional paragraph.</p> <p>Responder Number 23 – 23.112</p> <p>Responder Number 49 – 49.9</p> <p>Responder Number 61 – 61.1 & 61.2</p> <p>Responder Number 69 – 69.14</p> |
| M9.6 | 94 | 9.36 | <p>There are national programmes for <u>the electrification of railways</u>, within close proximity to the National Park, including the Trans Pennine and Midland Mainline <u>routes</u>. This would suggest that in the medium term, there may be plans to electrify the Hope Valley Line. Whilst there are clear benefits to electrification, including benefits to local air and noise pollution, as well as providing longer term sustainability and viability of the railway; at the same time, there are likely to be negative impacts for the National Park, in particular visual intrusion. Therefore, as with other rails schemes within the National Park, a clear net environmental or economic benefit would need to be demonstrated. In all cases of rail development in the National Park, Network Rail and their agents must have regard to National Park purposes, as stipulated in Section 62 of the Environment Act (1995).</p> | <p>Grammatical change for clarification</p> <p>Responder Number INT3 – INT3.3</p> |
| M9.7 | 95 | 9.42 | <p>The Pedal Peak Project focussed on the reopening of four disused railway tunnels on the Monsal Trail, which follows part of the former Derby to Manchester <u>Railway railway</u>. Since completion of the project in May 2011, there has been a significant increase in the Trail's use by cyclists, walkers and horse riders, with the Trail being voted the best short trail in the country by Sustrans. The Pedal Peak II Project focussed on attempts to extend the Monsal Trail from Bakewell to Matlock. Phase 1, the delivery of a link between Matlock and Rowsley has been delivered. There is an ongoing commitment to provide the Phase 2 link between Rowsley and Bakewell.</p> | <p>Grammatical correction</p> <p>Responder Number INT1 – INT1.125</p> |
| M9.8 | 96 | 9.43 | <p>Look at para 9.43 re: amenity for walkers</p> | <p>For clarification – wording may</p> |

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| | | | <p>Policy DMT4D goes further by providing clarification of criteria whereby proposals for new routes for walking, cycling and horse riding that do not fall within the highway can be brought forward. <u>All of the criteria should be met when delivering new and extensive multi-user trails. However, in the case of small scale improvements to existing rights of way, a less prescriptive approach may be acceptable. Where new routes are proposed on existing rights of way such as public footpaths, the amenity for existing users will be maintained.</u></p> | <p>need tidying slightly.</p> <p>Responder Number 23 – 23.113</p> <p>Responder Number 50 – 50.26</p> |
| M9.30 | 96 | DMT4 | <p>Slight amend to Policy DMT4A(i)</p> <p>(i) Is of equal, <u>or preferably, of better</u> quality than the original: and</p> | <p>Puts an emphasis on enhancement rather than just replacement</p> <p>Responder Number INT3 – INT3.27</p> |
| M9.9 | 96 | DMT4 | <p>Slight amend to Policy DMT4D</p> <p>D. The development of new routes for walking, cycling and horse riding including multi-user trails will be supported, provided that they conserve and enhance the valued characteristics of the area; and are subject to the following criteria:</p> <p>(i) They connect into the wider rights of way network; and</p> <p>(ii) They connect with settlements within and beyond the national park boundary; and</p> <p>(iii) They are designed and constructed to an appropriate standard, in keeping with its setting; and</p> <p>(iv) Where it is likely to act as a destination in its own right, that appropriate, new or existing visitor facilities are made available</p> <p><u>In the case of minor improvements to existing or permissive rights of way, (i) and (ii) are unlikely to apply.</u></p> | <p>Adds clarity re: minor improvements.</p> <p>Responder Number 50 – 50.26</p> |
| M9.10 | 97 | New paragraph / section between Parking and Business Parking, to replace existing paragraph 9.47 – this would mean that paragraph | <p>To provide clarity</p> <p>9.48 <u>9.47</u> Parking is covered by three policies within this document in line with the three main types of parking associated with development in the National Park;</p> <ul style="list-style-type: none"> • Business Parking, • Residential Parking, • Visitor Parking. <p><u>Peak District National Park Parking Standards</u></p> <p>9.47 <u>9.48</u> Clarification on the expected levels of parking provision for new developments is provided within the Peak District National Park Parking Standards in Appendix 10 <u>9</u>. These standards follow national guidelines, but at a scale in keeping with the National Park, and the scale of development that might be reasonably expected. <u>All references to Parking Standards within the following policies are derived from the Peak District National Park</u></p> | <p>For clarification</p> <p>Responder Number 23 – 23.116</p> |

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| | | 9.48 would become 9.47 and vice versa. | <u>Parking Standards.</u> | |
| M9.11 | 97 | 9.50 | The adequate provision of parking facilities is a key consideration for business developments. This provision includes parking associated with the smooth running of the business otherwise known as operational parking; and that which is that used by members of staff and visitors to the business (non-operational parking). | Grammatical correction Responder Number INT3 – INT3.4 |
| M9.12 | 97 | 9.56 | The overall approach is in keeping with the National Planning Policy Framework (para 39), which stipulates that planning policies <u>should</u> take account of ‘the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles.’ | Grammatical correction Responder Number INT3 – INT3.5 |
| M9.13 | 98 | 9.59 | Core Strategy Policy T7C states that non-residential parking ‘will be managed to ensure that the location and nature of car and coach parking does not exceed environmental capacity’. The Policy goes on to add that ‘new non-operational parking will normally be matched by a reduction of related parking spaces elsewhere’. Policy DMT6A then clarifies the conditions against which the assessment of the requirement for new visitor parking will be judged. | Grammatical correction Responder Number INT3 – INT3.6 |
| M9.14 | 98 | 9.60 | The road network within <u>inside</u> the National Park, both within settlements and across the wider countryside is an indication of its historic origins with often narrow roads and with limited off-street parking provision. In some locations, the requirement for vehicles to be parked on-street <u>on-street</u> is visually intrusive and / or damaging to verges, although it can add traffic calming benefits. Therefore, Policy DMT6B stipulates that where additional non-operational off-street parking is permitted, it will normally be as a replacement for existing on-street parking. This approach diverts on-street parking to a more suitable location. | Grammatical correction Responder Number INT3 – INT3.7 |
| M9.15 | 98 | 9.62 | The overall approach is in keeping with the National Planning Policy Framework (para 39), which stipulates that planning policies <u>should</u> take account of ‘the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles.’ | Grammatical correction Responder Number INT3 – INT3.8 |
| M9.16 | 98 | 9.64 | Possible clarification with regard to recreation hubs and visitor parking The National Park Authority in keeping with its second purpose and Defra’s 8 Point Plan for National Parks is keen to ensure that appropriate facilities for visitors to the National Park, including parking provision are provided at those locations best suited to their use and the setting of the National Park. To this end it is intended to bring forward further planning guidance in the form of a Supplementary Planning Document to inform development, <u>including for visitor parking at recreation hubs.</u> | Amended as per NT request Responder Number 33 – 33.13 Responder Number 50 – 50.27 Responder Number 69 – 69.15 |

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| M9.17 | 98 | 9.63 | <p>Over recent years there have been many calls for new or improved car parks at popular visitor destinations, including villages and within the wider countryside. The general approach is to first ensure that there is a genuine need for additional capacity; <u>in most cases this may be triggered by evidence of the impact of either unofficial overflow parking or in some cases inappropriate parking.</u> Where there is a need for additional parking, in some cases, this need can be met within the footprint of existing car parks, without detriment to the location or the National Park's special qualities. <u>Alternatively, there may be a need for a newly created car park to address demand for visitor access to a particular location.</u> In either case, we would expect to see a demonstration of local benefit from <u>the removal of on-street or inappropriately parked vehicles to support the application for additional off-street parking.</u> However in some cases, demand is restricted to busy summer weekends. In these cases the General Permitted Development Order permits the use of land for parking without the requirement for planning permission. This can include the use of fields for parking for busy weekends such as for well dressings or carnivals; this approach can be undertaken on other busy days for up to 28 days per year. However, care should be taken to identify sites that can be accessed safely, without impacting on the highway network.</p> | <p>Responder Number 23 – 23.114</p> <p>New wording to paragraph and a split into two paragraphs see M9.18</p> |
| M9.18 | 98 | 9.63/9.64 | <p><u>In some cases, demand for visitor parking is restricted to busy summer weekends. In these cases the General Permitted Development Order permits the use of land for parking without the requirement for planning permission. This can include the use of fields for parking for busy weekends such as for well dressings or carnivals; this approach can be undertaken on other busy days for up to 28 days per year. However, care should be taken to identify sites that can be accessed safely, without impacting on the highway network.</u></p> | <p>Responder Number 23 – 23.114</p> <p>Split of paragraph 9.63 into two with some minor changes to improve readability.</p> |
| M9.32 | 99 | 9.66 | <p>Core Strategy Policy T7B sets the strategic principle that residential parking should be set at the 'minimum required for operational purposes', whilst having regard to environmental constraints and any future requirements. Policy DMT7A directs developers to provide off-street parking for residential developments unless the provision of on-street parking meets highway and amenity standards. The Policy then goes on to provide minimum parking standards for residential development, <u>derived from the Peak District National Park Parking Standards (Appendix 9), which also sets maximum standards for residential and other parking provision.</u> The provision of car free development will be viewed favourably, but will require reasonable alternative parking to be available. Finally Policy DMT7B offers protection to off-street parking provision within a development, where its loss would have negative impacts on local traffic flow.</p> | <p>INT3 – INT3.29</p> |
| M9.33 | 99 | 9.69 | <p>Policy DMT7 sets minimum parking standards for residential developments. Whilst our overall approach is to discourage use of the private car in favour of more sustainable means of transport where possible, it is important that sufficient parking is provided in order to reduce the visual, <u>environmental, amenity</u> and other impacts of overspill parking particularly within, but not restricted to historic village centres. There may be circumstances whereby additional parking could be considered to be of benefit, particularly in those villages where the availability or practicality of on-</p> | <p>INT3 – INT3.20</p> |

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| | | | street parking is limited, or where alternative forms of transport are either limited or unavailable. However, such provision should be in keeping with the size, scale and location of the development. | |
| M9.19 | 99 | DMT6A | <p>Possible additional wording to DMT6A</p> <p>A. New or enlarged car parks will not be permitted unless a clear, demonstrable need, <u>delivering local benefit</u>, can be shown.</p> | <p>Possibly a bit clumsy?</p> <p>Responder Number 23 – 23.114</p> |
| M9.20 | 99 | DMT6B | <p>Change to wording to improve the clarity of the policy</p> <p>B. For visitor car parking additional off-street parking will normally only be permitted where it replaces equivalent on-street parking spaces. <u>Where new or additional off-street visitor parking is permitted, an equivalent removal of on-street parking will usually be required.</u></p> | <p>Provides clarity and makes the policy more legible.</p> <p>Responder Number 23 – 23.115</p> |
| M9.21 | 99 | 9.66 | <p>Additional wording to provide clarity</p> <p>9.66 Core Strategy Policy T7B sets the strategic principle that residential parking should be set at the ‘minimum required for operational purposes’, whilst having regard to environmental constraints and any future requirements. Policy DMT7A directs developers to provide <u>sufficient</u> off-street parking for residential developments unless the provision of on-street parking meets highway and amenity standards. The Policy then goes on to provide minimum parking standards for residential development. <u>These standards are the minimum that developers are expected to meet to ensure adequate provision. In locations where the availability of on-street parking is scarce, or the impacts of on-street parking on amenity an issue, the parking standards allow for greater provision up to a maximum number of spaces as detailed in Appendix 10.</u></p> <p><u>9.67</u> The provision of car free development will be viewed favourably, but will require reasonable alternative parking to be available. Finally Policy DMT7B offers protection to off-street parking provision within a development, where its loss would have negative impacts on local traffic flow. <u>This protection could extend to the removal of permitted development rights to maintain appropriate levels of off-street parking.</u></p> | <p>Provides clarity</p> <p>Responder Number 11 – 11.6</p> <p>Responder Number 23 – 23.116</p> <p>Responder Number 23 – 23.118</p> |
| M9.22 | 99 | 9.68 | <p>The overall approach is in keeping with the National Planning Policy Framework (para 39), which stipulates that planning policies <u>should</u> take account of ‘the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles.’</p> | <p>Grammatical correction</p> <p>Responder Number INT3 – INT3.9</p> |
| M9.23 | 100 | DMT7A | <p>A. Off-street car parking for residential development should be provided unless it can be demonstrated that on-street on-street parking meets highway and amenity standards and <u>does not negatively impact on the visual and other amenity of the local community</u>. This should be either within the curtilage of the property or allocated elsewhere, normally at the following levels:</p> | <p>Grammatical correction</p> <p>Responder Number INT3 – INT3.10</p> |

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| M9.24 | 100 | 9.70 | The Peak District National Park does not have any established <u>take-off and landing</u> sites associated with powered flight, although there is the long established Lancashire and Derbyshire Gliding Club at Camphill near Great Hucklow, which has been in existence at this location since 1935. | For clarification in keeping with the modification to DMT8A Responder Number INT3 – INT3.11 |
| M9.25 | 100 | 9.71 | Over the past 30 years there has been a growing trend for the use of ad-hoc sites for <u>the take-off and landing</u> of small aircraft such as microlights and helicopters, with the latter often using the car parks of public houses and hotels, to provide recreational flights. Whilst powered flight in this context offers quick business travel or enjoyable recreational experiences, the development of landing sites is not in keeping with the quiet enjoyment of the National Park. Negative impacts arising from such activities can include noise pollution and disturbance to bird populations. | Grammatical correction Responder Number INT3 – INT3.12 |
| M9.26 | 100 | 9.73 | Policy DMT8A makes the presumption against the development of aircraft <u>take-off and landing</u> sites within the National Park. In relation to powered flight, the policy restricts developments where they are likely to affect the National Park’s valued characteristics or its amenity. The policy adds clarity with regard to what is meant by powered flight, with the inclusion of model and drone aircraft as well as those carrying people. | For clarification in keeping with the modification to DMT8A Responder Number INT3 – INT3.13 |
| M9.27 | 100 | 9.74 | The Peak District National Park is also a popular location for non-powered flight. In addition to the Derbyshire and Lancashire Gliding Club, the area is popular with hang-gliders, para-gliders and pilots of non-powered or electrically powered model aircraft. Whilst these aircraft do not have the noise impact of conventional powered flight, they can adversely impact nesting birds and other wildlife or compromise other special qualities of the National Park. Policy DMT8B stipulates that where such uses require planning permission, the activities may be restricted as a result of adverse impacts on the Valued Characteristics <u>valued characteristics</u> of the National Park. | Grammatical correction Responder Number INT3 – INT3.14 |
| M9.28 | 100 | DMT8A | Additional wording to Policy DMT8A to provide clarification A. Aircraft <u>take-off and landing</u> sites will not normally be permitted. Developments related to helicopter or other powered flights will not be permitted where they will adversely affect the valued characteristics or amenity of the area. Powered flights include, but are not exclusive to, model aircraft and drones. | For clarification Responder Number INT1 – INT1.126 |
| M9.29 | 100 | DMT8B | B. Where planning permission is required, regular non-powered flights including but not exclusive to hang-gliders, para-gliders and model aircraft, may also be restricted if they have an adverse impact on bird and wildlife populations or other Valued Characteristics <u>valued characteristics</u> of the National Park. | Grammatical correction Responder Number INT1 – INT1.127 |

Chapter 10: Utilities

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmr etc For clarification Typographical error</i> |
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| M10.1 | 101 | 10.1 | Under policy GSP1 of the Core Strategy, the National Park aims to support exemplary sustainable development, pursuing the two statutory purposes to conserve and enhance the natural beauty of the National Park and to promote opportunities for enjoyment whilst seeking to foster the economic and social wellbeing of local communities. This justifies, in many cases, requiring developers to consider how they will conserve and enhance the National Park's nationally significant landscapes including for example sharing telecommunications masts, undergrounding electricity <u>and telecommunications</u> cables, using sustainable urban drainage and fully justifying the need for new development. | Provides clarity as per FoPD suggestion Responder Number 28 – 28.21 |
| M10.2 | 101 | 10.2 | Core Strategy policies GSP1, DS1 and GSP3 enable utility infrastructure provision in settlements and in the countryside outside the Natural Zone in the context of National Park purposes. Supporting text to policy GSP1 reminds developers that the National Parks and Access to the Countryside Act 1949 (as amended) <u>requires</u> all relevant authorities and public bodies (such as District Councils and utility companies) to take National Park purposes into account in their decisions and actions. | Typographical error Responder Number INT1 – INT1.128 |
| M10.3 | 101 | 10.6 | The National Park Authority will consult the utility providers and the Environment Agency on planning applications where service provision is likely to be an issue. Wherever possible, planning controls are used to enable service infrastructure to be improved rather than refuse the development. <u>This may include the necessity to coordinate the delivery of development with timing for the delivery of infrastructure improvements such as for surface water management and connection into the foul sewer network.</u> | Provides clarity as per the UU request. Responder Number 44 – 44.5 |
| M10.4 | 102 | DMU2 | A. Development of utilities infrastructure will not be permitted unless it is to improve or extend the service to the communities and businesses of the National Park, and can be provided without harm to the valued characteristics of the area or to other established uses. Infrastructure and ancillary works or buildings should be located, designed and landscaped so as to minimise their impact on the built and natural environment, and on any other established activities. | Grammatical correctness Responder Number INT1 – INT1.129 |

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| M10.5 | 102 | 10.11 | Around transmission pipelines, the Executive recommend 'Building Proximity Distances', within which normal domestic occupation should be avoided. British Gas high pressure transmission pipelines within the National Park are listed below with their corresponding Building Proximity Distances (BPD) and Consultation Distances (CD). The location <u>locations</u> of these pipelines are indicated on the Policies Map. | Typographical error Responder Number INT1 – INT1.130 |
| M10.6 | 102 103 | 10.11 / 10.12 | Table of pipelines either needs moving to be immediately below para 10.11 or the paragraph changed and a table reference added. | Provides clarity as per FoPD suggestion Responder Number 28 – 28.22 |
| M10.7 | 103 | Pipeline Table | Add the full text <u>Building Proximity Distance (BPD in m) & Consultation Distance (CD in m)</u> for clarity | Provides clarity as per FoPD suggestion Responder Number 28 – 28.22 |
| M10.8 | 103 | Between DMU3 and para 10.14 | Insert section heading <u>Telecommunications Infrastructure</u> | Typographical error Responder Number 10 – 10.121 |
| M10.12 | 103/ 104 | Footnote 79 | https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf https://www.gov.uk/government/consultations/proposed-changes-to-siting-requirements-for-broadband-cabinets-and-overhead-lines-to-facilitate-the-deployment-of-superfast-broadband-networks | Error Responder Number INT3 – 3.31 |
| M10.9 | 104 | 10.20 | Some businesses and public services are developing their own telecommunication networks either for operating and monitoring equipment or to improve their communications. It is considered that such systems are desirable to the industry rather than essential and therefore major infrastructure proposals such as masts or buildings should not be allowed to detract from the valued characteristics of the National Park. Shared use of existing infrastructure or the use of the public networks should be <u>used employed</u> instead. Exceptions may occur if there are strong public safety implications. Proposals for satellite dishes on dwellings should not be detrimental to the character <u>and</u> appearance of the building or its setting, <u>or those of</u> neighbouring buildings. They should always be designed and sited where they have the least visual impact, avoiding principal elevations or street frontages. | Grammatical correctness and clarification. Responder Number INT3 – INT3.15 |
| M10.10 | 104 | 10.21 (Bullet 2) | <ul style="list-style-type: none"> the outcome of consultations with organisations with an interest in the proposed development in particular where a mast is to be installed near a school or college, <u>or</u> within a statutory Safeguarding zone surrounding an aerodrome or technical site | Grammatical correctness and clarification Responder Number INT3 – INT3.16 |

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| M10.11 | 105 | New section before DMU5 | <p><u>Restoration of utility and telecommunications infrastructure</u></p> <p><u>10.22 Utility infrastructure often needs to be located in open countryside locations where permission for other types of development would be refused. Similarly, the alteration of a buildings character and appearance may be acceptable, whilst the associated equipment is in use, but not otherwise.</u></p> <p><u>10.23 Developments in technology, particularly in relation to telecommunications infrastructure have occurred quite quickly over the life of the Core Strategy. This can mean that the lifespan of infrastructure can be limited, with relatively new technology becoming quickly obsolete. It is important that where this occurs, that the infrastructure is removed once it no longer addresses any operational need. The removal of such obsolete equipment will form a condition for approval of new sites.</u></p> <p><u>10.24 In addition to the removal of obsolete utility or telecommunications infrastructure, developers will be required to return the site to either its original condition, or to a previously agreed alternative. This restoration will be required to be undertaken within a set time period agreed as part of the original development consent, following the cessation of operational use.</u></p> <p><u>10.25 Where water supply infrastructure is related to severe weather events such as drought or high rainfall, this policy will not apply, provided that the long-term requirement of the infrastructure is established.</u></p> | <p>For clarification</p> <p>Responder Number INT3 – INT3.17</p> <p>Responder Number INT3 – INT3.18</p> <p>Responder Number INT3 – INT3.19</p> <p>Responder Number INT3 – INT3.20</p> <p>Responder Number INT3 – INT3.21</p> |
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Chapter 11: Minerals and waste

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmt etc For clarification Typographical error</i> |
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| M11.1 | 106 | 11.1 | The Core Strategy Policies MIN1 to MIN4 set out the overall strategic context for minerals development (winning and working of minerals and related development) in the National Park. <u>The NPPF requires that when determining planning applications, local planning authorities should, as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks.</u> The general direction of <u>core strategy</u> policy is therefore to continue to enable progressive reduction in mineral working in the National Park. | Clarification |

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| M11.3 | 106 | 11.1 | The policies in this DPD provide a further level of policy detail for all minerals and waste related developments are applicable alongside the Core Strategy policies. Applications that are acceptable in principle with core strategy policy will need to be sequentially assessed against these DMP policies. but only become relevant if an application is acceptable in principle when considered against the core strategy policy. | Clarification – text deleted. |
| M11.4 | 106 | 11.4 (insert under this para) | Applicants should are encouraged to undertake consultation with Statutory Consultees and the local community before applying for any new scheme, any extension to an existing scheme, any proposal for new phasing, or any other amendment to an existing scheme of mineral working involving an area of 1 hectare or more major minerals or waste development. The application should then outline: <ul style="list-style-type: none"> i. What consultation has been undertaken; and ii. Who has been consulted; and iii. How the applicant has responded to the results of consultation; and iv. How the application responds positively to the views expressed by the local community. | Clarification – moved, and slightly amended text, from 11.13 |
| M11.5 | 106 | 11.5 | Minerals development approved under MIN1 of the Core Strategy is only permitted where the working is properly justified and as demonstrating exceptional circumstances applying the major development tests as set out in paragraph 116 of the National Planning Policy Framework. Fluorspar proposals approved under MIN2 of the Core Strategy are only permitted where extraction of proven deposits takes place underground and extraction is environmentally acceptable. Local small-scale building and roofing stone proposals will only be permitted under policy MIN3 of the Core Strategy where they meet a demonstrable need within the National Park, which cannot be satisfied from existing permissions inside or outside the National Park; and the stone will be confined to local use only on buildings and structures within the National Park; and the individual and cumulative impacts of working on the environment, amenity and communities can be appropriately mitigated. In both these cases considering proposals for any minerals or and development involving waste management development facilities the following evidence is required: | Clarification |
| M11.6 | 107 | DMMW1 | DMMW1 - The justification for minerals and waste development | Grammatical |
| M11.7 | 107 | DMMW1 | (iii) Evidence of the proximity of the mineral extraction to the end-user market or the proximity of the waste operation to the supply-chain; (iv) Evidence by way of suitable geological and other information on the quality, availability and volume of the mineral reserves, ensuring that high quality materials are retained for appropriate end uses; (v) Evidence of the durability and aesthetic qualities of building the stone/roofing stone together with precise details of its compatibility with any the repair or restoration project it is proposed to supply. | Grammatical correction clarification |

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| M11.8 | 107 | 11.8 | Planning obligations will be sought to address matters which cannot be dealt with by means of planning conditions, including where the extinguishment of existing planning permissions is appropriate and necessary. | Grammatical correction |
| M11.9 | 108 | DMMW2 | <p>The Impact of Minerals and Waste Development on Amenity</p> <p>A. Mineral development or the development of waste management facilities will only be permitted where the adverse impacts on amenity can be reduced to an acceptable level or eliminated, <u>particularly</u> in relation to:</p> <p>(i) Nuisance and general disturbance resulting from transport, including number of vehicles, access arrangements, preventing transfer of mud onto roads and routes proposed for use to and from the site;</p> <p>(ii) Noise, including noise of a level, type, <u>frequency</u> and <u>duration</u> hours of operation likely to have negative impacts on areas of tranquillity;</p> <p>(iii) Vibration;</p> <p>(iv) <u>Dust</u></p> <p>(v) Fumes and <u>smell</u> odour;</p> <p>(vi) Water run-off and flooding;</p> <p>(vii) Visual impact;</p> <p>(viii) The potential effects of land instability arising from the development;</p> <p>(ix) Effects on human health including effects of air pollution, smells, and fumes; and,</p> <p>(x) <u>Minimise Impacts</u> on recreation and public rights of way.</p> | Clarification and grammar |
| M11.10 | 108 | DMMW3 | A. Mineral development or the development of waste management facilities will only be permitted where the impacts of the development on the environment of the National Park are reduced to an acceptable level, or eliminated, <u>particularly</u> in relation to: | clarification |
| M11.11 | 108 | DMMW3 | <p>(viii) The efficiency and effectiveness of the proposed working scheme or operation including the phasing proposals and the likelihood of the development being carried out as proposed;</p> <p>(ix) The need to prevent unauthorised public access and/or stock ingress, and to ensure adjacent land can be appropriately managed;</p> | clarification |
| M11.12 | 109 | 11.12 | When devising working schemes and conditions, proposals considered under the Review of Mineral Permissions (ROMP) 81 will be generally assessed against the material considerations set out in this Plan. | Typographical error |
| M11.13 | 109 | 11.15 | The small and dispersed population <u>of the National Park</u> means that waste facilities would not be viable operations unless waste is imported from outside local communities. | clarification |
| M11.14 | 109 | 11.15 | Any proposal that are acceptable under the Core Strategy policies will needs to be assessed against these policies to ensure that the effects of the development can be reduced or mitigated. | Grammatical correction |

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| M11.15 | 110 | DMMW4 | In accordance with Policies Subject to conformity with policies CC3 or CC4 of the Core Strategy, waste management facilities should be located in accordance with the following sequential approach having regard where appropriate to the relevant Municipal Waste Management Strategy: | Clarification |
| M11.16 | 110 | DMMW4 (B) | (i) Be of appropriate scale, reflecting the needs of the local residents and business community to create and dispose of waste; and (vi) <u>Not involve land raising</u> | Clarification |
| M11.17 | 110 | 11.18 | Although mineral working and waste disposal <u>by landfill</u> are temporary, the permanent legacy is the restoration <u>restored site</u> . | Clarification Grammatical correction |
| M11.18 | | 11.18 | In restoration, including during progressive restoration, sites, can and should make a contribution to targets for biodiversity and to amenity and geodiversity in the National Park. | Typographical error |
| M11.19 | 111 | DMMW5 | A. Minerals development or the development of waste management facilities <u>disposal of waste by deposit or landfill</u> will only be permitted where the restoration and aftercare contributes to the enhancement of the National Park. | Clarification |
| M11.20 | 111 | DMMW5 | (v) Restoration will contribute to enhancement of:; biodiversity, geodiversity and amenity, and be acceptable within the context of the Landscape Strategy for the National Park; and | Grammatical correction |
| M11.21 | 111 | 11.20 | The valued characteristics of an area are many and varied and will therefore always be key material considerations when assessing applications for mineral further working. | Clarification |
| M11.22 | | | However, gradual industrialisation <u>the cumulative effects of such developments</u> can erode the very qualities of landscape biodiversity and cultural heritage that underpin National Park designation and erode the tranquillity and quiet enjoyment that residents and visitors experience. | |
| M11.23 | | DMMW6 | DMMW6 – the cumulative effect of minerals and waste development | |
| M11.24 | 111 | DMMW6 | Mineral development or the development of waste management facilities will only be permitted where the cumulative impact of the development is considered to be acceptable, taking into account: <ul style="list-style-type: none"> • existing operations on the site and in the locality; and • existing impacts from other existing <u>or planned</u> development; • its setting <u>both concurrently and successively</u>, including the; • the off-site impact of any utility or infrastructure improvements necessary to serve the development. | |
| M11.25 | 112 | DMMW7 | A selection of small individual areas for local small-scale buildings and roofing stone for conservation purposes is safeguarded from non-minerals surface development through the definition of a Mineral Safeguarding Area on the Policies Map. <u>The gritstone resource will be safeguarded from sterilisation by non-mineral surface development</u> | Soundness Representor 6, 14, 21, 33, 45, 69 Representation ID 6.6, 14.6, 21.10, |

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| | | | <p><u>through the defined Mineral Safeguarding Areas on the Policies Map.</u></p> <p><u>When considering applications for major non-mineral surface development in these safeguarded areas outside of existing settlements and the areas immediately adjacent to existing settlements, the prior extraction of minerals should be undertaken ahead of the non-mineral surface development where possible to prevent mineral sterilisation. Where prior extraction is not practical or economically feasible, applicants will be required to demonstrate that either there is no mineral likely to be of current or future economic value that would be sterilised by the development, or that proceeding with the proposed development on that site would be of overriding importance in relation to the significance of the mineral resource.</u></p> | 33.12, 45.3, 69.12. |
| M11.26 | 112 | 11.25 | Ancillary mineral processing <u>development</u> | Clarification |
| M11.27 | 112 | 11.25 | Permitted development rights, under the GPDO 1995 <u>2015</u> , are excluded <u>removed</u> by condition in order to safeguard the special landscape of the National Park and to allow input into the design and siting of buildings, plant and machinery. | Correction Clarification |
| M11.28 | 113 | DMMW8 | <p>A. Ancillary mineral-related <u>development at mineral extraction sites</u> will be permitted provided that:</p> <p>(i) there are clear benefits in <u>is a close link between the ancillary development proposed</u> industrial and mineral-existing winning and working on the site developments because the material to be used <u>in the ancillary process is won and worked</u> produced mainly on-site; and</p> <p>(ii) when planning permission for mineral working expires (or if the plant becomes redundant before the completion of mineral working) all plant, buildings and machinery will be removed, and the site will be satisfactorily reclaimed to an agreed after-use. This will be achieved by a planning obligation or condition imposed at the time of the grant of planning permission.</p> <p><u>(iii) mineral related development (including processing, stocking, storage or sorting of minerals) will not be permitted on sites which are not operational mineral extraction sites</u></p> | clarification |

| Mod. No. | Page | Para. / Policy Number | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmt etc For clarification Typographical error</i> |
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| MA.1 | Appx | General | Amend font on all appendices to Arial, size 11 | Presentational improvement In response to rep 10.82 |
| MA.2 | Appx | General | Add page numbers to all appendices and a common lay out for title. | For clarification In response to rep 10.83 |
| MA.3 | Appx | General | Amend appendix numbers so all in sequence. | PDNPA rep |
| MA.4 | Appx | Appendix 1 & 4 | Combine Appendix 1 and 4 | For clarification In response to rep 10.84 |
| MA.5 | Appx | Appendix 1 | Historic Environment Records contact details at constituent authorities (<u>also available at http://www.heritagegateway.org.uk/gateway/chr/</u>): | Merged this data from section deleted in appx 4 |
| MA.6 | Appx | Appendix 2 | <p>9.17 Alongside the adopted Landscape Strategy, legislation¹ requires the National Park Authority to identify areas which it considers are particularly important to conserve. These areas are largely underpinned by Natura 2000² sites and for spatial planning purposes the Authority calls these areas the Natural Zone. To qualify for inclusion, areas must substantially include:</p> <ul style="list-style-type: none"> • a quality of ‘wilderness’; • relatively natural vegetation which is largely self sown; • few obvious signs of human influence such as field boundaries; • ‘open country’ which has particular importance for certain types of recreation associated with adventure and contact with nature; • high wildlife value; comprising habitats falling within the statutory Section 3 Map (or limestone dale) definition³; • natural beauty, which in the opinion of the National Park Authority, is particularly important to conserve. | For clarification In response to rep 10.85 and PDNPA1.142 |

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| | | | <p>¹ HMSO (1995) The Wildlife and Countryside (Amendment) Act</p> <p>² Natura 2000 is a network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive. The network includes both terrestrial and marine sites (Marine Protected Areas (MPAs)).</p> <p>³ The type of land eligible for inclusion on the Section 3 map is statutorily defined (Wildlife and Countryside (Amendment) Act, 1995) as “<i>areas of mountain, moor, heath, woodland, down, cliff or foreshore whose natural beauty it is, in the opinion of the authority, particularly important to conserve.</i>”</p> | | | |
| MA.7 | Appx | Appendix 3 | General typographical corrections | | | 10.86 |
| MA.8 | Appx | Appendix 3 | Bakewell | BAKEWELL | Ashford, Hassop, Over Haddon, Edensor, Nether <u>Haddon</u> | Typographical error In response to PDNPA1.144 |
| MA.9 | Appx | Appendix 3 | Beeley | BEELEY* | Baslow and Bubnell, Chatsworth, Rowsley+, Brampton+, Edensor, <u>Brassington+, Gratton</u> | PDNPA comments |
| MA.10 | Appx | Appendix 3 | Biggin | HARTINGTON NETHER QUARTER | Ballidon+, Eaton and Alsop, Hartington Town Quarter, Parwich, Brassington+, Middleton and Smerrill, <u>Gratton</u> | |
| MA.11 | Appx | Appendix 3 | High Bradfield | BRADFIELD+ | Derwent, Langsett+, <u>South Wortley+, Hathersage and Outseats</u> , Hope Woodlands, <u>Outseats</u> , Stocksbridge+ | |
| MA.12 | Appx | Appendix 3 | High Bradfield | BRADFIELD+ | Derwent, Langsett+, <u>South Wortley+, Hathersage and Outseats</u> , Hope Woodlands, <u>Outseats</u> , Stocksbridge+ | |
| MA.13 | Appx | Appendix 3 | Chelmorton | CHELMORTON* | Blackwell*, Hartington Middle Quarter*, Taddington, Flagg, King s Sterndale+, <u>Hartington Upper Quarter</u> | |
| MA.14 | Appx | Appendix 3 | Fenny Bentley | FENNY BENTLEY* | Lea Hall* <u>Lea Hall*</u> , Tissington <u>and Lea Hall*</u> , Thorpe* | |
| MA.15 | Appx | Appendix 3 | Foolow | FOLOW | Abney and Abney Grange, Great Hucklow, Grindlow, Wardlow, Eyam, Great Longstone, Highlow, <u>Stoney Middleton</u> | |
| MA.16 | Appx | Appendix 3 | Great Hucklow | GREAT HUCKLOW | Abney and Abney Grange, Hazlebadge, Litton, Wardlow, Grindlow, Little Hucklow, Tideswell, <u>Foolow</u> | |

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| MA.17 | Appx | Appendix 3 | Great Longstone | GREAT LONGSTONE | Ashford, Foolow, Little Longstone, Rowland, Wardlow, Grindlow, Little Hucklow, Tideswell , <u>Stoney Middleton, Calver, Hassop, Litton</u> | |
| MA.18 | Appx | Appendix 3 | Grindleford <u>and Nether Padley</u> | GRINDLEFORD | Baslow and Bubnell, Eyam, Hathersage, Holmesfield+, Stoney Middleton, Nether Padley , Calver, Froggatt, Highlow, Hallam+ | |
| MA.19 | Appx | Appendix 3 | Hathersage and Outseats | HATHERSAGE & OUTSEATS | Bamford, Offerton, Bradfield+, Grindleford, Highlow, Hallam+ <u>Derwent</u> | |
| MA.20 | Appx | Appendix 3 | Holme | HOLME VALLEY+ | Dunford+, Meltham+, Tintwistle+, Kirklees MC* , Saddleworth+ | |
| MA.21 | Appx | Appendix 3 | Parwich | PARWICH | Ballidon+ Hartington Nether Quarter, Newton Grange, Eaton and Alsop, Lea Hall* , Tissington <u>and Lea Hall*</u> | |
| MA.22 | Appx | Appendix 3 | <u>Peak Forest</u> | <u>PEAK FOREST+</u> | <u>Chapel en le Frith+, Edale, Castleton, Bradwell, Tideswell, Wheston, Wormhill+</u> | |
| MA.23 | Appx | Appendix 3 | <u>Stoney Middleton</u> | <u>STONEY MIDDLETON</u> | <u>Eyam, Grindleford, Calver, Great Longstone, Foolow</u> | |
| MA.24 | Appx | Appendix 3 | Thorpe | THORPE+ <u>_</u> | Blore with Swinscoe+, Ilam, Fenny Bentley* Tissington <u>and Lea Hall*</u> | |
| MA.25 | Appx | Appendix 3 | Tissington | TISSINGTON <u>AND LEA HALL</u> | Fenny Bentley*, Lea Hall* , Parwich, Ilam, Newton Grange, Thorpe*, <u>Bradbourne+, Ballidon+</u> | |
| MA.26 | Appx | Appendix 3 | <u>Parish Boundary lies on the National Park boundary *</u> <u>Parish is split by National Park boundary +</u> | | | Typographical error 10.86 and PDNPA1.143 |
| MA.27 | Appx | Appendix 4 | Historical <u>Historic</u> Environment Records (HERs) contain details..... | | | Typo in response to rep PDNPA1.145 |
| MA.28 | Appx | Appendix 4 | The contact details for the Historical Environment records for the National Park can be obtained for the six constituent authorities: - <u>Derbyshire</u> | | | Deleted as already outlined in appx 1 Clarification in response to rep PDNPA1.146 |

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| | | | <ul style="list-style-type: none"> - Nottinghamshire - Staffordshire - Cheshire - Greater Manchester - Sheffield (South Yorkshire) <p>using the Historic England Heritage Gateway. http://www.heritagegateway.org.uk/gateway/chr/</p> | |
| MA.29 | Appx | Appendix 4 | 1. Heritage Counts is the annual review of the state of the historic environment in England published by English Heritage produced by Historic England on behalf of the Historic Environment Forum (HEF) | Update |
| MA.30 | Appx | Appendix 4 | 2. www.pastscape.org.uk and www.english-heritage.org.uk www.historicengland.org.uk/archive | Update |
| MA.31 | Appx | Appendix 4 | 3. www.english-heritage.org.uk www.historicengland.org.uk/images-books/archive/collections/aerial-photos | Update |
| MA.32 | Appx | Appendix 4 | Appendix 4 - Point 6 reference to English Heritage – as it is now Historic England, change accordingly?6. Set up by English Heritage, the Historic Environment Local Management (HELM) Historic England provides accessible information, training and guidance to decision makers in local authorities, regional agencies and national organisations whose actions effect the historic environment: www.helm.org.uk www.historicengland.org.uk/advice/planning/localheritage/ | Clarification in response to rep PDNPA1.147 |
| MA.33 | Appx | Appendix 4 | 8. Listed Buildings Online is the List of Buildings of special architectural and historic interest online: www.english-heritage.org.uk 8. The National Heritage List for England (NHLE) is the only official, up to date, register of all nationally protected historic buildings and sites in England - listed buildings, scheduled monuments, protected wrecks, registered parks and gardens, and battlefields: https://www.historicengland.org.uk/listing/the-list/ | Update |
| MA.34 | Appx | Appendix 4 | 9. 9. Historic England's Heritage at Risk records and the annual Heritage at Risk register details heritage assets facing the greatest pressures and threats: www.english-heritage.co.uk www.historicengland.org.uk/advice/heritage-at-risk | Update |
| MA.35 | Appx | Appendix 4 | 16. www.english-heritage.org.uk www.historicengland.org.uk/research | Update in response to rep PDNPA1.149 |
| MA.36 | Appx | Appendix 4 | 20. For information on listing, conservation areas and registered parks and gardens: www.historicengland.org.uk/listing/what-is-designation/ | Addition in response to rep PDNPA1.148 |
| MA.37 | Appx | Appendix 4 | 21. The National Trust's Historic Buildings and Sites and Monuments Record (NT HBSMR) lists heritage assets within National Trust owned lands: https://heritagerecords.nationaltrust.org.uk/ | For clarification In response to rep 50.6 |
| MA.38 | Appx | Appendix 5 | Other material, notably photographs, additional details of parks and gardens, and details of archaeological sites and finds on the National Trust's estates, can be found in other sections of www.heritagegateway.org.uk or for National Trust sites specifically: https://heritagerecords.nationaltrust.org.uk/ | For clarification In response to rep 50.7 |

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|-------|------|----------------------|--|---|
| MA.39 | Appx | Appendix 6 | Delete Appendix 6 (added in link to access data in modification | For clarity in response to rep 10.87 |
| MA.40 | Appx | Appendix 7 | Appx 7 Last section of Intro: 'Some CA appraisals are on the website': needs to say 'PDNPA website' and give website address. Some Conservation Area Appraisals are on the Peak District National Park Authority website http://www.peakdistrict.gov.uk/looking-after/living-and-working/your-community/ca/caa (those with dates of designation shown in the list below). | For clarification In response to rep 10.88 |
| MA.41 | Appx | Appendix 8 | Created 'Parish survey' appendix on its own <u>If you are a developer, or an individual, proposing to build affordable housing then a community housing need would have to be proven by conducting a survey similar to this below across the whole parish.</u> | For clarification In response to rep 10.89 and 10.132 |
| MA.42 | Appx | New appendix | Created 'Home Options' as a separate appendix <u>If you are an individual or a family in housing need then you should register with Home Options who will ask you to provide the following information in order that the housing authority can assess whether you are in housing need for the purposes of allocating social housing.</u> | For clarification In response to rep 10.89 and 10.132 |
| MA.43 | Appx | Appendix 10 | ' <u>Peak District National Park</u> ' added to the title | For clarification in response to rep 10.90 |
| MA.44 | Appx | Appendix 11 | Biodiversity Action Plan (BAP): Work to identify local priorities and to determine the contribution they can make to the delivery of the UK BAP. <u>A plan that sets objectives and actions for the conservation of biodiversity, with measurable targets, following the UK Biodiversity Action Plan.</u> | For clarification In response to rep 10.91 |
| MA.45 | Appx | Glossary Appendix 11 | Constituent Council: A local authority which shares some of its geographical <u>geographical</u> area with the National Park | Typographical error Suggested by rep 10.134 |
| MA.46 | Appx | Appendix 11 | Cultural Heritage Significance: 'Significance' in this context means the value of a heritage asset to this and future generations because of its heritage interest (former PPS5 and NPPF). <u>(That interest, as defined by the NPPF Glossary, may be archaeological, architectural, artistic or historic).</u> | For clarification in response to rep PDNPA1.152 |
| MA.47 | Appx | Appendix 11 | DS1 Settlement: A town or village in which a range of types of development may be granted planning permission in principle. There are 63 such places listed in DS1 of the Core Strategy and Appendix 3 to this plan. They range in size from towns to very small villages and contain a range of services and facilities. In areas outside DS1 settlements development is more restricted even if a development is proposed for a village or hamlet not named in policy DS1 | For clarification In response to rep 10.135 |
| MA.48 | Appx | Appendix 11 | Economic development: Development, including those within the B Use Classes*, public and community uses and main town centre uses (but excluding housing development). * https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use | For clarification In response to rep 10.136 |
| MA.49 | Appx | Appendix 11 | Ecosystem services: The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation. <u>Ecosystem services: The benefits provided by ecosystems that contribute to making human life both possible and worth living. Examples of ecosystem services include products such as food and water, regulation of floods, soil erosion and disease outbreaks, and non-material benefits such as</u> | For clarification Suggested by rep 10.137 and PDNPA1.153 |

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| | | | <u>recreational and spiritual benefits in natural areas. The term 'services' is usually used to encompass the tangible and intangible benefits that humans obtain from ecosystems, which are sometimes separated into 'goods' and 'services'.</u> | |
| MA.50 | Appx | Appendix 11 | Edge of centre: For retail purposes, a location that is well connected and up to 300 metres of <u>from</u> the primary shopping area. | For clarification In response to rep 10.138 |
| MA.51 | Appx | Appendix 11 | English National Parks and the Broads Vision and Circular <u>2010</u> | For clarification in response to PDNPA1.154 |
| MA.52 | Appx | Appendix 11 | Heritage Statement: A Heritage Statement outlines the significance of a heritage asset and the likely impact of proposed development upon that significance <u>and how it will be mitigated.</u> | For clarification in response to PDNPA1.155 |
| MA.53 | Appx | Appendix 11 | Historic environment record (HER) <u>Historic Environment Record (HER)</u> | For clarification in response to PDNPA1.156 |
| MA.54 | Appx | Appendix 11 | Local Transport Plan (LTP): Produced by every transport authority, setting out five yearly priorities for transport and the actions it will take to pursue them. The LTP is a suite of documents including a Bus Strategy, an Accessibility Strategy and a Rights of Way Improvement Plan. Current LTPs run from 2006 – 2011, but future LTPs will run for a longer period of time to be determined by the transport authority. <u>Local Transport Plan (LTP): Highway Authorities are required to produce Local Transport Plans to guide their investment over the short to medium term. Unlike the previous two sets of plans which each covered five years, for Local Transport Plan 3, Authorities were given some flexibility as to the life of the Plan. However, they were expected to produce a longer term Strategic document either as their Local transport Plan or in support of it. For example the Derbyshire County Council Local Transport Plan incorporates the Transport Strategy and was published in April 2011 and has a fifteen year lifespan through to 2026.</u> | For clarification in response to rep 10.139 |
| MA.55 | Appx | Appendix 11 | Major Development: c)i. the number of dwelling houses to be provided is <u>10 or</u> more | Typographical error In response to rep 10.140 |
| MA.56 | Appx | Appendix 11 | Planning Acts: This means ostensibly the Town and Country Planning Act 1990..... | For clarification In response to rep 10.142 |
| MA.57 | Appx | Appendix 11 | Planning benefits:They can be referred to a <u>as</u> levies.... ...They are also used to secure non-financial planning gain such as occupancy of affordable houses, worker housing or holiday accommodation by <u>an</u> eligible person in perpetuity. | Typographical error In response to 10.143 |
| MA.58 | Appx | Appendix 11 | Primary shopping area: ...In the context of plan, and in planning term <u>terms</u> the only settlement with a defined shopping area is Bakewell which retains a central shopping area. | Typographical error In response to 10.143 |
| MA.59 | Appx | Appendix 11 | Planning unit: remove asterisk at end of sentence. | Typographical error In response to 10.144 |
| MA.60 | Appx | Appendix 11 | Safeguarding zone: needs its own sub header to separate from Safeguarding Zone (Drinking Water) | Typographical error In response to rep 10.145 |
| MA.61 | Appx | Appendix 11 | Setting of <u>an a</u> heritage asset: The "setting of a heritage asset" is defined..... <u>The setting of a heritage asset is defined...</u> | Typographical error in response to rep PDNPA1.157 |

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| MA.62 | Appx | Appendix 11 | Special Area of Conservation (SAC) | For clarification In response to rep10.91 |
| MA.63 | Appx | Appendix 11 | Special Protection Area (SPA) | For clarification In response to rep 10.91 |
| MA.64 | Appx | Appendix 11 | Major Development: In the context of planning in National Parks, recent legal advice indicates that it can be appropriate for National Park Authorities to determine that development at any scale can be considered major if it is considered that the impact would be harmful to the National Park objectives derived from national park purposes to conserve and enhance their wildlife cultural heritage and natural beauty.* * https://www.southdowns.gov.uk/wp-content/uploads/2015/01/Guidelines-on-Significance-for-SDNP-Planning-Applications-%E2%80%93-NPPF-Complaint-July-2014.pdf <i>NB * to be amended to next available footnote number</i> | PDNPA comments |

Policies Map

| Mod. No. | Page LS = Landscape Sheet IM = Inset Map | Para. / Policy Number/Map Sheet | Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>) | Reason <i>Eg Grammatical correction In response to soundness point (major) In response to updates from gvmt etc For clarification Typographical error</i> |
|----------|--|---------------------------------------|---|--|
| MPM. 1 | All | | Amend web address reference to interactive map | For clarification General amendment |
| MPM. 2 | LS | Landscape Sheet 9 | Proposed amendment to NZ at Brow Top Farm | Update requested by landowner |
| MPM. 3 | IM | All | Amend OS background on maps | Presentational improvement General amendment |
| MPM. 4 | IM | Alsop en le Dale | Deleted Community Recreation Area around church | For clarification in response to rep PDNPA1.120 |
| MPM. 5 | IM | Alstonefield | Deleted Community Recreation Area around church and two green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 6 | IM | Bakewell | Removed Castle Hill, front of Aldern House, Site on Burton Close Drive and site south of Monyash Road as Community Recreation Areas | For clarification |
| MPM. 7 | IM | Bamford North | Deleted Community Recreation Area around two churches | For clarification in response to rep PDNPA1.120 |
| MPM. 8 | IM | Baslow | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |

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| MPM. 9 | IM | Beeley | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 10 | IM | Biggin | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 11 | IM | Birchover | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 12 | IM | Bradwell | Deleted Community Recreation Area around a church and two green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 13 | IM | Butterton | Deleted Community Recreation Area around two green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 14 | IM | Calton | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 15 | IM | Calver | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 16 | IM | Castleton | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 17 | IM | Chelmorton | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 18 | IM | Cressbrook | Deleted Community Recreation Area around a church and two green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 19 | IM | Danebridge | Deleted Community Recreation Area around a church and a graveyard Added a Community Recreation Area around a school | For clarification in response to rep PDNPA1.120 |
| MPM. 20 | IM | Earl Sterndale | Deleted Community Recreation Area around a church and two green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 21 | IM | Edale (Grindsbrook) | Deleted Community Recreation Area around a church, a graveyard and five green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 22 | IM | Edale (Upper and Barber Booth) | Deleted Community Recreation Areas at three green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 23 | IM | Elton | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 24 | IM | Eyam | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 25 | IM | Fenny Bentley | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 26 | IM | Flash | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 27 | IM | Great Hucklow & Grindlow | Deleted Community Recreation Area around two churches and three green spaces | For clarification in response to rep PDNPA1.120 |

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| MPM. 28 | IM | Great Longstone | Deleted Community Recreation Area around a church, graveyard and seven green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 29 | IM | Grindleford | Deleted Community Recreation Area around a church and three green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 30 | IM | Grindon | Deleted Community Recreation Area around a church and two green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 31 | IM | Heathcote | Deleted Community Recreation Area around a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 32 | IM | High Bradfield | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 33 | IM | Hope | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 34 | IM | Ilam | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 35 | IM | Little Hucklow | Deleted Community Recreation Area around four green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 36 | IM | Little Longstone | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 37 | IM | Litton | Deleted Community Recreation Area around two churches and thirteen green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 38 | IM | Litton Mill | Deleted Community Recreation Area around a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 39 | IM | Longnor | Deleted Community Recreation Area around a church and graveyard | For clarification in response to rep PDNPA1.120 |
| MPM. 40 | IM | Meerbrook | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 41 | IM | Monyash | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 42 | IM | Onecote | Deleted Community Recreation Area around a graveyard | For clarification in response to rep PDNPA1.120 |
| MPM. 43 | IM | Over Haddon | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 44 | IM | Parwich | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 45 | IM | Peak Forest | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 46 | IM | Pott Shrigley | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. | IM | Rowsley | Deleted Community Recreation Area around a church | For clarification in response to rep |

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| 47 | | | | PDNPA1.120 |
| MPM. 48 | IM | Sheen | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 49 | IM | Sheldon | Deleted Community Recreation Area around a church and four green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 50 | IM | Stanton in Peak | Deleted Community Recreation Area around a church and graveyard | For clarification in response to rep PDNPA1.120 |
| MPM. 51 | IM | Stoney Middleton | Deleted Community Recreation Area around a church, a graveyard and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 52 | IM | Taddington | Amended Community Recreation Area around church to Protected Open Space. | For clarification in response to rep 19.3 and PDNPA1.120 |
| MPM. 53 | IM | Taddington | High Well Recreation Ground added as Community Recreation Area Play area added as Community Recreation Area | For clarification in response to rep 19.4 |
| MPM. 54 | IM | Tideswell | Added Community Recreation Area around school and allotments | For clarification in response to rep PDNPA1.120 |
| MPM. 55 | IM | Tissington | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 56 | IM | Warslow | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 57 | IM | Waterfall | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 58 | IM | Wetton | Deleted Community Recreation Area around a church and a green space | For clarification in response to rep PDNPA1.120 |
| MPM. 59 | IM | Wildboardclough | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 60 | IM | Winster | Deleted Community Recreation Area around a church, graveyard and six green spaces | For clarification in response to rep PDNPA1.120 |
| MPM. 61 | IM | Youlgreave | Deleted Community Recreation Area around a church | For clarification in response to rep PDNPA1.120 |
| MPM. 62 | IM | Youlgreave | Amend Youlgreave to Youlgrave | For consistency |
| MPM. 63 | IM | Bakewell | Modify development boundary to align with neighbourhood plan. NB – following further discussion (AM/BT email 12.09.17) development boundary to remain as existing. | Update not required due to aligning DMP process progress of with neighbourhood plan in response to rep INT5.1 |
| MPM. 64 | Mineral s | Minerals key | Amend policy reference in key to Building and Roofing Stone to DMMW7, instead of DMMW1 | Typographical error in response to reps 14.7 and 14.9 |
| MPM. | Mineral | Minerals Key/ | Amend in key and on map title from 'Mineral Safeguarding Areas' to 'Limestone Safeguarding | For clarification in response to rep |

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|---------|-----------------|--------------------------|---|---|
| 65 | s | Mineral Safeguarding map | Areas' | 14.9 |
| MPM. 66 | Mineral s | Building Stone | For Building Stone Safeguarding Areas merge National, Intermediate and Local into one safeguarding area. Delete: Further Investigation, Drift or Peat Covered, Nominal | For clarification in response to rep 69.27 |
| MPM. 67 | Mineral s | Roofing Slate | For Roofing Slate Safeguarding Areas delete Further Investigation | For clarification in response to rep 69.27 |
| MPM. 68 | Mineral s | Building/Roofing | Due to the streamlining of Building and Roofing maps as outlined in previous 2 rows possibility of merging this data onto one map. | Possible presentational amendment |
| MPM. 69 | Mineral s | | Include the location of safeguarded railhead | For clarification in response to rep 21.10 |
| MPM. 70 | Interactive Map | | The following amendments are required to the interactive map before it goes live again: <ul style="list-style-type: none"> - Ensure that building and roofing stone layers are shown - Amend Mineral Safeguarding Area to Limestone Safeguarding area to avoid confusion - pop up details for the mineral layers needs to be checked - Add Neighbourhood Plan layer | For clarification in response to rep 14.7 and 14.9 and rep 33.28 |
| MPM. 70 | Cover sheet | | Within the text make a statement regarding Important Open Spaces within Conservation Areas and reference to any existing Neighbourhood Plans | PDNPA |

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10. MARKET SUPPLEMENT POLICY

1. Purpose of the report

The purpose of this report is to seek approval from the Authority to adopt the Market Supplement Policy set out in Appendix 1 and the Market Supplement Application and Review Procedure set out in Appendix 2 of this report.

Key Issues

- **An employer can increase the reward for a post to attract and retain people when there is a proven difficulty to recruit, but it creates a risk of an equal pay claim under the "equality of terms" provisions of the Equality Act 2010.**
- **Market supplements which are paid separately as an 'off spine' payment have the potential to compromise a pay and grading structure.**
- **The proposed policy and procedure reflects Standing Orders Part 7 Delegation to Officers B-2 (c) to authorise the payment of market supplements and recruitment incentives where there is proven recruitment difficulty in accordance with the agreed principles.**

2. Recommendations(s)

The Authority approves the Market Supplement Policy, set out in Appendix 1, and the Market Supplement Application and Review Procedure, set out in Appendix 2, to ensure fairness and transparency across the Authority and minimise potential equal pay claims.

How does this contribute to our policies and legal obligations?

3. With regard to ensuring equality in employment and compliance with the Equality Act 2010, the Authority endeavours to ensure that all employment actions and decisions affecting present and potential employees are made on fair objective grounds without personal prejudices or discrimination.
4. Equal pay is assured by the fair evaluation of posts through the Local Government Job Evaluation scheme developed through the Single Status Agreement in 2000. Further the Authority ensures that any related reward or recognition schemes are developed and applied without discrimination.

Background Information

5. In 2016 the National Joint Committee Job Evaluation Technical Working Group produced a Technical Note on the payment of market supplements. The note expands Part 4.9 (para. 25) guidance in the National Agreement on Pay and Conditions of Service (the 'Green' book) and recommends 'organisations should have a formal policy on the use of market supplements, if one is not already in place'. This recommendation was recently reinforced by the Local Government Association (LGA) workforce consultancy team who have been engaged to undertake a review of the Authority's approach to pay and reward.
6. The Technical Note also recommends organisations devise a standard application form for the payment of a market supplement for use by managers. This helps ensure that a consistent approach is taken in regard to the qualifying criteria for payment and the

supporting evidence that will be required for the approval of applications.

Proposals

7. An initial draft Market Supplement policy was provided by the LGA and has been revised following consultation with members of the Senior Leadership Team, Operational Leadership Team and the staff who are currently in receipt of a market supplement.
8. The Policy, set out in Appendix 1, outlines that a market supplement is awarded for 2 years or less. The current practice is for 3 years or less; the LGA recommends 12 months. The 2 year time period proposed in the policy aligns with the recent pay protection arrangements agreed with Unison moving from 3 to 2 years effective from April 2018.
9. The Policy, Appendix 1, outlines the Authority will calculate the market supplement by subtracting the total reward applicable to a post from the comparable market pay. The comparable market pay will be the median remuneration level within the relevant labour market survey. The current practice is that at a Resource Management Meeting a percentage rate of a given point in the range of 8-15% will be determined dependant on the market circumstances.

Are there any corporate implications members should be concerned about?

Financial:

10. Market supplements are temporary and subject to review. They should be considered in exceptional circumstances and only for a small number of posts when there is a need to increase the reward for a post to attract or retain people when there is proven difficulty to recruit and/or significant specialist skills shortages in the labour market.

Risk Management:

11. The payment of a market supplement is an equal pay claim risk. Introduction of the application and review form ensures that any indirect discrimination, for example where the practice is detrimental to a larger proportion of women than men, it can be objectively justified, that is, it will show that it is a proportionate means of meeting a legitimate aim.

Sustainability:

12. Market supplements are short term and subject to review.

Equality:

13. Any impact on equality by the Market Supplement Policy will be monitored annually by the HR service as part of the Gender Pay Gap Reporting Regulations.

14. Appendices

Appendix 1 - Market Supplement Policy

Appendix 2 - Market Supplement Application and Review Procedure

Report Author, Job Title and Publication Date

Theresa Reid, Head of Human Resources, 27 September 2017
theresa.reid@peakdistrict.gov.uk



Market Supplement Policy

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| 4. The Authority's Commitment to Equal pay | 2 |
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| 6. What is a Market Supplement? | 3 |
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| 8. Principles – Applying a Market Supplement | 4 |
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| Appendix 1 – Procedure Flow Chart | 8 |

1. Purpose

Peak District National Park Authority (“the Authority”) appreciates the need, in exceptional cases, for greater flexibility in remuneration packages where market conditions cause recruitment and / or retention difficulties. Market supplements are made in addition to salary and benefits for a specific individual post or a group of posts and are time limited. They can be considered for any post and may also be applied to temporary and fixed term appointments. This Policy sets out when such supplements may be paid and the Guidance Notes outlines the process by which these cases are considered and approved, and the conditions applied to them.

2. Scope and Aim of Policy

This Policy covers all prospective and existing employees of the Authority.

The Policy aims to ensure that the Authority is able to attract and retain highly skilled employees by offering competitive packages.

It aims to provide a fair and transparent system for considering payment of a market supplement where a recruitment and or retention problem has been identified, which relates to a lack of competitiveness between the remuneration levels within the Authority and the relevant labour market for the particular job role.

It aims to ensure that the Authority meets the requirements of equal pay legislation.

3. Legislation

It is lawful under the Equality Act 2010 to apply a market supplement to a role only where there is evidence to justify that market conditions are a 'material factor' for the post attracting a higher rate of pay than other posts graded similarly.

4. The Authority's Commitment

The Authority is committed to the principles of equal pay for work of equal value and operates two Job Evaluation schemes to measure the relative value of all jobs. These are the National Joint Scheme (NJS) for employees up to and including grade M and the Local Government Association Senior Managers' Job Evaluation Scheme for Chief Officers.

It is acknowledged that on occasion the total reward package determined by the Authority pay and grading structure may not be consistent with reward packages offered for comparable posts in the wider labour market, and this may lead to recruitment and retention difficulties.

In such circumstances where there is a clear business need supported by objective market data and other measures have proved ineffective, the Authority will consider offering a market supplement payment in addition to the normal reward package for the post.

It is the policy of the Authority to make such payments only in exceptional circumstances and to follow a clear and consistent framework for the determination of any market supplement payment which:

- Makes sure that the Authority meets its obligations under equal pay legislation and maintains the overall integrity of its pay and grading structure
- Allows market supplements to be considered only where a clear and demonstrable business need exists
- Makes sure that other non-pay issues are fully explored before a market supplement payment is considered
- Permits market supplements payments where an objective assessment of appropriate evidence supports this approach and a rationale is recorded
- Sets out the process by which cases can be considered and the conditions that will be applied
- Requires all market supplement payments to be reviewed on a regular basis and varied or removed where necessary
- Includes a process for all payments to be monitored and also makes sure that they are included in equal pay audits

5. Roles and Responsibilities

Heads of Service / Directors will: -

- Review recruitment activity in line with the Market Supplement procedure where posts within their department are proving difficult to fill
- Consider alternative ways of managing the recruitment and retention difficulties or assess whether services can be delivered in a different way.
- Gather the documentary evidence for justifying market supplements
- Assess the need to retain particular post holders on the basis of their essential skills and experience, the loss of which would have a detrimental impact on service delivery and the availability of these skills on a wider market basis
- Apply the provisions of this procedure fairly and consistently in line with current legislation, best practice and equal pay principles
- Liaise with HR when circumstances arise which may impact on payment of a Market Supplement
- Keep the payment of supplements under review and regularly update the documentary evidence

HR will:-

- Check for similar roles in other departments
- Check the grade for the role is appropriate by re-evaluation if necessary
- Conduct a review of salary survey data to establish where the role is paid in the market
- Where no useful data can be established, seek comparators in other relevant organisations
- Submit applications for the payment of market supplements to the Resource Management Meeting (RMM) for approval
- Review payments every two years to ensure payments are still appropriate
- Report the payments of market supplements to Senior Leadership Team on an annual basis
- Advise on particular recruitment and retention issues as appropriate, including the impact on other individuals / groups
- Advise on the appropriateness of any recruitment campaign or specific retention issues
- Monitor equality and produce annual gender pay reports
- Communicate levels of payment and adjustments to relevant employees

6. What is a Market Supplement?

A market supplement is an addition to salary and benefits for a specific individual post or group of posts. It is paid only in exceptional circumstances where higher rates offered by other employers (the market rate) prevent the Authority from being able to recruit or retain staff on the salary indicated for their role. The total reward package (basic salary plus all other benefits e.g. pension contributions, annual leave) will be considered when making comparisons.

Such payments apply to posts on a temporary basis only and will be subject to review. Where there ceases to be an organisational need or market justification for a supplement, the post holder(s) will be given notice that the payment will be withdrawn. No less than 3 months written notice will be given to withdraw the market supplement.

7. Calculation of Market Payment

The Authority will calculate the market supplement by subtracting the total reward applicable to a post from the comparable market pay. For the purposes of the policy and procedure total reward is the combination of financial and non-financial rewards appropriate to a post and is split into three component parts: -

- Basic pay established from the pay and grading structure
- Additional visible payments such as allowances, overtime and employer pension contributions
- Employee benefits such as sick pay, maternity leave, holidays, flexible working, work life balance arrangements and job security. This list is not exhaustive and there will be an element of judgment in assessing the value of other non-financial benefits.

Market supplements will be calculated as a fixed cash amount, the value of which will be reviewed every 2 years. This may result in the supplement being varied or withdrawn. The appropriate level of a supplement will be determined by calculating the difference between the Authority total reward pay rate (including the value of any allowances and benefits) and the market rate for similar posts as determined by evidence from appropriate sources.

8. Principles - Applying a Market Supplement

- a) Where significant difficulties are experienced in recruiting or retaining staff in a role, or there is evidence that this will be the case, the procedure can be used to assess whether a market supplement payment is justified for a role(s).
- b) A key requirement is that market supplements will only be considered once all other ways of improving recruitment and retention have been exhausted and market pay is evidenced to be the main issue.
- c) For recruitment purposes, payments made under the scheme will only apply to posts which have been advertised at least twice without a successful appointment.
- d) Where it is a new post, an exercise may be conducted prior to the request for approval to establish a new post.
- e) For retention purposes, payments made under the scheme will only be made where the Team Manager/Head of Service/ Director can demonstrate difficulties in replacing staff that will cause essential skills shortages that will prevent effective business operations.

- f) It is not designed to reward individual performance. .
- g) Any case for the payment of a market supplement must be properly justified, with supporting evidence of pay-related recruitment and retention difficulties against a range of indicators, e.g.:-
- Abnormally high turnover rate for the role
 - Number of responses to job advertisements
 - Qualitative assessment of applicants
 - Effective use of appraisal / exit interview feedback
 - Only be used after other recruitment initiatives have been explored/exhausted (e.g. innovative / targeted advertising, promoting the advantages of living and working in the Peak District, promoting non-pay benefits)
 - Only be used after other retention initiatives have been explored/exhausted (e.g. learning and development opportunities, promoting non-pay benefits)
 - Use is essential to maintain adequate staffing levels in order to ensure service delivery requirements are met
 - Exploration of the use of other measures, e.g. changes to organisational / working arrangements
 - Consideration of the impact on both cost implications and on other existing staff within the defined job group
- h) In addition to the criteria above, account should be taken of the wider employment context applicable to the occupational group and whether the payment of a Market Supplement will address the particular issues underlying the recruitment/retention difficulties, or whether alternative / additional actions are required. For example:-
- Are the difficulties an indicator of other issues of concern within the service / occupational group which can be more appropriately resolved by other management action and/or non-pay measures?
 - Is there a specific, regional or national shortage for which new / alternative training schemes would be a more appropriate solution?
 - Are there more appropriate ways of resourcing / delivering the service rather than through an in-house workforce?
- i) The level of the Market Supplement should be proportionate and assessment should include:
- Market-based salary comparisons with competing local or regional employers (public and / or private sector as appropriate) – ensuring that there is a valid comparison between the post concerned and the posts identified in other organisations, i.e. are they the same in terms of duties and responsibilities, or broadly similar in terms of the required knowledge, skills and responsibilities, and whether there are any differences in conditions of employment/ overall reward package

- j) The median remuneration level within the relevant local labour market survey should be used as the indicator of the market rate for the post.
- k) It is important to note that if salary information is not readily available there may be a cost to the Authority to source. A decision to proceed with this must be authorised by the Head of HR and the Director of Corporate Strategy & Development.
- l) The payment will be reviewed by HR at least every two years and if the market rate is comparable with the evaluated rate for the post the payment will cease with 3 months written notice. Where the market rate is not comparable with the evaluated rate for the post the payment of the Market Supplement will either be preserved or varied. Where a vacancy arises within 12 months of a review the market supplement will be applied to the recruitment process. When a vacancy occurs after 12 months, updated market data would be sought and adjusted in the advert as appropriate. On successful recruitment to the post, existing employees in receipt of related supplement would be given 3 months' notice on any change to the market supplement.
- m) The Market Supplement will cease with immediate effect if circumstances change including:-
 - Sick pay entitlement ends
 - Change of job
 - Change of grade
 - Commencement of a Specific Improvement Plan
 - Receipt of any Formal Warning
- n) Where pay protection following job evaluation is applicable an employee will either receive pay protection or a market supplement but not both. The higher level payment will apply.
- o) Fixed Rate payments where applicable will be based on the basic pay and not on the Market Supplement pay level e.g. shift enhancements
- p) There is no right of appeal regarding decisions taken to offer, refuse, vary or withdraw a market supplement (although this does not affect any statutory rights).

9. Related Policies and Procedures –

- Recruitment & Selection Procedure
- Equality Policy
- Market Supplement Application and Review Procedure
- Job Evaluation Process Guidance

10. Equality Monitoring and Policy Review

Data on all market supplement payments will be compiled and reviewed annually by HR for equal opportunities monitoring purposes. Supplements will also be included in any Equal Pay Audits that the Authority undertakes.

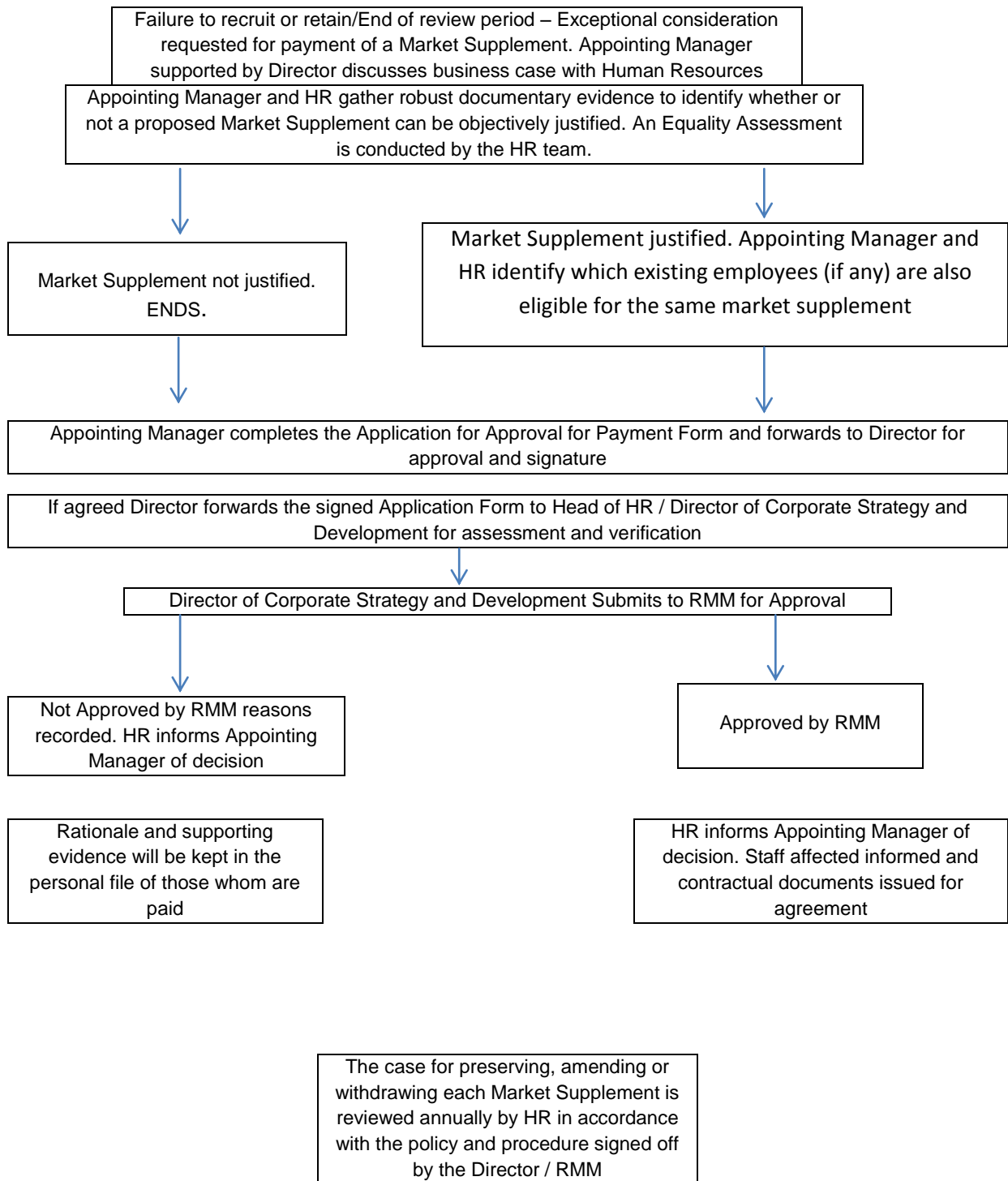
A quarterly report will be produced to monitor the Market Supplement payments made by each directorate and an annual report produced for Senior Leadership Team (SLT).

The policy will be reviewed at least once in every three years and more frequently if the need arises as a result of a change of regulation or legislation, misuse of the policy or changes in circumstances at the Authority.

The review will be carried out in accordance with the established procedures agreed and include engagement and consultation with all appropriate stakeholders.

The policy will be compliant with the requirements of the Equality Act 2010 to advance equality of opportunity and eliminate discrimination. The Authority's recruitment process will continue to be used to instigate positive action where applicable. All casework and intelligence gathered in respect of the market supplement posts and appointments will be analysed for its impact at least annually.

Market Supplement Procedure – Flow Chart





Guidance Notes

Market Supplement Application and Review Procedure

These Guidance Notes to be read in conjunction with the Market Supplement Policy.

Introduction

All new employees must be appointed to the appropriate point on the Authority's pay scale. This should be at the bottom of the evaluated grade for their job. This is to ensure that all employees can progress in their job. In exceptional circumstances, this pay may not be sufficient to recruit employees with the required skills and consideration needs to be given to the payment of a supplement.

A market supplement is an addition to salary for a specific post, or group of posts. It will be paid where a post(s) has been identified as 'hard to fill' and the Authority is prevented from being able to recruit or retain staff on the salary determined by the relevant job evaluation grading scheme.

Where a market supplement is agreed for a member of staff in a post, others within the post are also eligible for the same payment.

Payments will: -

- Only be used in exceptional circumstances
- Take account of any equal pay / equal value considerations, in order to avoid / minimise the potential for challenge on this point
- Be paid as a clearly identified supplement, with properly documented supporting reasons
- Be subject to regular monitoring and review and will be withdrawn when the market factor(s) no longer applies

Conditions: -

The market supplement will be:

- Paid in monthly instalments
- Subject to a biennial review, and may be withdrawn when the need for a market supplement no longer applies
- Paid at pro rata rate for part time staff in 'hard to fill posts'
- Paid in addition to the individuals normal salary but will be subject to the normal income deductions of tax and national insurance and pension contributions if applicable

- Based on research of the market rate for the job which will be conducted by HR
- Cessation or in some cases a reduction in their market supplement in the following circumstances: -
 - A period of long term absence (more than 4 weeks) except where sickness absence relates to disability
 - Change of job
 - Change of grade
- If the employee in post becomes subject to protection of earnings for any reason the market supplement payment will not be included in the protection arrangements
- Market supplements will be calculated as a fixed cash amount, the value of which will be reviewed every 2 years.
- Except as discussed with the employee, the market supplement payment will not be disclosed for mortgage or loan applications purposes, based on the fact that it is a temporary payment subject to review.

Approval Process

It is important to consider all possible options and issues which can contribute to recruitment and retention problems. Where it is anticipated that there could be potential difficulties in hiring or retaining a specific post, or group of posts, the appointing manager supported by the Director should discuss this matter with HR in the first instance.

The appointing manager should then complete the Application for Approval form at Appendix 1 and submit to their Director ensuring that they have gathered and can supply all the relevant documentary evidence including:-

- Number / range of vacancies
- The effect on services by not filling the post(s)
- The attempts to recruit to the post(s) (type of adverts, media used, frequency, timing etc.)
- Consideration of reorganising the work or delivering the services in a different way (e.g. in partnerships)
- Succession or longer term workforce planning initiatives to show how the recruitment and retention difficulties are being addressed e.g. trainee schemes, career grades
- Benchmarking pay data at local, regional or national level and public and private sector as appropriate
- How the market supplement will be kept under review

This application should be approved and signed by the appropriate Director and forwarded to the Head of HR and or Director of Corporate Strategy & Development for assessment.

The application will then be assessed and verified by the Head of HR and or Director of Corporate Strategy & Development before submitting to the Resource Management Meeting for final approval.

The costs of payments will be met by the employing department from within existing resources.

Payments will be made through payroll and will be subject to the appropriate statutory deductions. They will however be clearly identified as a separate payment from the substantive salary.

Review Process

Market supplement payments will be formally reviewed on a regular basis appropriate to the post using the same approval process (Appendix 1). A further assessment of the market conditions and organisational requirements will take place to determine whether the payment should be preserved, varied or withdrawn.

In the event of a review not taking place within the specified period, payment will be stopped.

Any continuation of the market supplement will be for a fixed period of time specified at the outset depending on the circumstances of the post, and any further extension will be considered during the review process.

Post holders will receive written confirmation of the outcome of the review.

MARKET SUPPLEMENT PROCEDURE

APPLICATION FOR APPROVAL FOR PAYMENT

1. POST DETAILS

| | |
|---|--|
| Post Title | |
| New / Existing Post | |
| Post Number | |
| Number of Staff in Post | |
| Department | |
| Job Evaluation Grade/Pay Band/Job Family | |
| Salary | |
| Total Amount of Market Supplement Payment requested | |
| Period for which payment is sought (months/years) | |
| Is this an application for approval of a new market supplement or continuation of an existing one? | |
| Source of Funding | |
| Date of Application | |

To be completed by the appointing manager, signed by the Head of Service and Director and forwarded to Head of HR and / or Director of Corporate Strategy & Development for submission to RMM

2. JUSTIFICATION FOR PAYMENT

The application for a Market Supplement must be fully supported and evidenced by completing the following: -

| |
|--|
| <p>1. Describe the job or group of jobs for which a payment is proposed, or already in existence. Include</p> <ul style="list-style-type: none"> ➤ Post title ➤ Brief outline of responsibilities (Attach job description, person spec and organisation chart) |
| <p>2. Please confirm that the evaluation of the post/s has been checked recently to ensure it is up to date and correct</p> <p>Confirmed (please tick)</p> <p>(NB: This check must be carried out prior to making an application for approval of payment)</p> |

| |
|---|
| <p>3. What evidence is there of pay related recruitment and / or retention difficulties?</p> <ul style="list-style-type: none"> ➤ Number of times the post has been advertised – including dates of adverts ➤ Number of responses to job advertisements ➤ Assessment of the quantity of responses e.g. inadequate, satisfactory ➤ Assessment of the quality of responses e.g. below required standard, satisfactory ➤ Turnover rates in the particular occupational group ➤ Supporting data from exit interviews, staff surveys or other feedback ➤ Articles in professional bodies journals/websites, press etc re skill shortages and / or evidence from national surveys (LGA surveys, for example) |
| |
| <p>4. What evidence is there that pay (and not some other factor) is causing the recruitment / retention problems being experienced?</p> |
| |
| <p>5. Is the job recruited locally or nationally? Sector – Public, Private, Both?</p> |
| |
| <p>6. What other recruitment / retention initiatives have been explored / exhausted? (e.g. changes in methods / types of advertising; changes to information for potential job applicants)</p> |
| |
| <p>7. What other measures have you explored? e.g. changes to organisational / working arrangements such as development opportunities</p> |
| |
| <p>8. How is the payment essential to maintaining adequate staffing levels to ensure service delivery requirements are met? (Include any legal implications and how long post/s have been vacant)</p> |
| |
| <p>9. Has the impact the payment will have on other staff been considered and how do you intend to deal with this?</p> |
| |

10. Has the wider employment context and whether the payment of a market supplement will address the particular issues underlying the recruitment/retention difficulties been considered?

For example: -

- Are the difficulties an indicator of other issues of concern within the service / occupational group which can be more appropriately resolved by other management action and /or non-pay measures?
- Is there a regional / national shortage for which new / alternative training schemes would be a more appropriate solution?
- Are there more appropriate ways of resourcing / delivering the service rather than through an in-house workforce?

11. Market Data – what appears to be the ‘going rate’ for the job?

- Obtained from advertisements, survey data / pay databases and direct from other local organisations – local/regional/national
- Posts must be matched in terms of duties and responsibilities, and the terms and conditions and total reward package
- Information should be provided for comparable posts in at least three relevant organisations (please provide copies)

12. What steps have been taken to address the issue of recruitment and retention longer term?

Any other Comments?

3. PAYMENT AMOUNT AND TYPE

How will this be paid?

| | |
|--------------------------------|---|
| Total Amount | £ |
| Instalment Amount | |
| Frequency – quarterly, monthly | |

4. SIGNATURES

a. APPOINTING MANAGER'S SIGNATURE

I agree that a market supplement is appropriate in this instance and that all other avenues as per the scheme have been explored appropriately.

| | |
|----------------------|--|
| Signature of Manager | |
| Date | |
| Post | |

Once you have completed the Application Form and attached supporting evidence, pass it to your Head of Service and Director for approval and signature.

b. HEAD OF SERVICE / DIRECTOR'S SIGNATURE

I agree that a market supplement is appropriate in this instance and that all other avenues as per the scheme have been explored appropriately.

| | |
|------------------------------|--|
| Signature of Head of Service | |
| Date | |
| Signature of Director | |
| Date | |

Once you have completed this form and attached details as requested, pass it to the Head of HR and or Director of Corporate Strategy and Development for approval and signature.

c. HR AGREEMENT TO MARKET SUPPLEMENT

I agree that a market supplement is appropriate in this instance and that all other avenues as per the scheme have been explored appropriately.

| | |
|--|--|
| Signature of Head of HR | |
| Date | |
| Verified by Director of Corporate Strategy & Development | |
| Date | |

5. APPROVAL AT RESOURCE MANAGEMENT MEETING

| | |
|--|----------|
| Date of RMM | |
| Agreed | Yes / no |
| If no - reason | |
| Details of any amendment and the reason for that amendment | |
| Signed RMM Minute Number | |

6. HR ADMINISTRATION

| | |
|---|--|
| Date Manager informed of decision | |
| Effective date of payments (if applicable) | |
| Names of staff affected and date they are informed of decision including contractual conditions | |
| Review Date | |

Note: At the review the whole procedure must be followed.

11. MEMBER LEARNING AND DEVELOPMENT ANNUAL REPORT

1. Purpose of the report

This report sets out the Member learning and development framework and the proposals for the next annual programme of Member learning and development events (January – December 2018).

[Click here to enter text.](#)

2. Recommendation(s)

- 1. That the proposed Member learning and development framework (Appendix 1) and the events programme for January to December 2018 (Appendix 2) be agreed.**
- 2. That Member learning and development activities continue to be recorded in terms of hours and include personal learning and development by Members outside of events organised by the Authority, with the target of 20 hours per Member in every 12 months.**

3. How does this contribute to our policies and legal obligations?

This work contributes to achieving the corporate strategy for 2016 – 2019 as part of the 4 Cornerstones to building a solid foundation: Cornerstone 3 Our Organisation – Developing our organisation so we have a planned and sustained approach to performance at all levels.

The Authority aims to enable Members to develop appropriate skills, knowledge and behaviours to improve effectiveness and fulfil their role as a Member of the Authority and to ensure that processes are in place to support this within a framework of good governance and continuous improvement.

4. Background

Member training and development has evolved over the past few years and has included the introduction of targets per Member for learning and development, personal development plans, annual self-assessments and a 'buddy' scheme for new Members. The Authority also signed up to working towards the achievement of the East Midlands Regional Member Development Charter.

Full details of the current Member training and development practices and current performance are presented as a framework document and this is attached at Appendix 1. This framework pulls together initiatives and arrangements previously agreed by the Authority.

An annual learning and development programme is produced each year and the sessions included within it aim to support Members in meeting their learning and development responsibilities. The programme is split into the following 3 sections:

- Essential and desirable learning and development
- New Member induction
- Optional learning and development choices

At the annual Authority meeting in July this year Cllr Andrew McCloy was appointed as Member Representative for Member Learning and Development. Cllr McCloy has been consulted on this report.

5. Proposals

Member Learning and Development Framework

The current proposed Member learning and development framework is attached at Appendix 1 for Members to agree current practices and performance levels.

The framework sets out the arrangements we have in place for developing Authority Members. It also highlights the tools we use to capture learning and development needs and make sure that they are included in the annual programme. These include:

- Personal Development Plans
- Annual Self-Assessments
- Biennial Members' Survey

The section on performance demonstrates the take up of these tools is limited with only 27% of Members having a personal development plan and 43% completing a self-assessment although 82% completed the 2016 Members' Survey (an increase of 22% from 2014). This section also shows that just 14% of Members were able to demonstrate that they met the target of 20 hours learning (a decrease of 10% from last year).

In approving the framework and this years learning and development plan Members are encouraged to make full use of these tools so we can develop an informed programme.

Learning and Development Programme

The proposed learning and development programme for 2018 is attached at Appendix 2 for Members to agree.

The programme includes a list of optional learning and development opportunities that can be delivered in a variety of ways. Members are encouraged to choose 2 options from this list that they are interested in pursuing during the forthcoming year. In choosing from the programme Members are asked to have regard to issues identified in their self-assessment and their personal development plan, while being realistic about what is achievable in a year and the Corporate targets for Member Learning and Development.

Members are requested to submit their optional choices to the Democratic and Legal Support Team by 1 December 2017. Arrangements for providing the optional elements will then be considered and progressed.

The Leadership Team, Head of Law and the Democratic Services Manager have all been consulted on this report.

Are there any corporate implications members should be concerned about?

- 6. Financial:**
Member development costs are funded by the Democratic Services budget and includes funding for all training including attendance at National Parks UK conferences and workshops and the external facilitation of Member personal development plans.
- 7. Risk Management:**
The main risk is failure to enable Members to develop appropriate skills, knowledge and behaviours to improve effectiveness and fulfil their role. The Authority has provided development opportunities for Members for many years. The proposals in

this report are part of continuous improvement in our approach but proportionate to the future resources available.

8. Sustainability:
There are no issues to highlight.

9. Equality:
There are no issues to highlight.

10. Background papers (not previously published)
None.

Appendices

Appendix 1 – Member Learning and Development Framework

Appendix 2 – Proposed programme of Member learning and development events for January – December 2018.

Report Author, Job Title and Publication Date

Ruth Crowder, Democratic and Legal Support Team Leader, 28 September 2017
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PEAK DISTRICT NATIONAL PARK AUTHORITY

MEMBER LEARNING AND DEVELOPMENT FRAMEWORK

1.0 Introduction

- 1.1 The Peak District National Park Authority is committed to investing in lifelong learning and development for all its Members. The Authority recognises the contribution that such an investment can make in supporting Members in their roles as leaders within the organisation and the wider community. The ongoing development of Members is a key element of the organisational development of the Authority.
- 1.2 The Authority has therefore signed up to the East Midlands Regional Member Development Charter and is working towards achieving the standards required. In recent years progress in achieving the full award has been restricted due to budget pressures limiting the amount of staffing resource available to support the programme, however the Authority has continued to maintain the standard and use opportunities to improve when they arise.

2.0 The East Midlands Regional Member Development Charter

- 2.1 The East Midlands Development Charter for Members was developed around a national template adapted to reflect the culture of the region and the needs of the local authorities within it. The Charter sets out a process for accreditation and a framework of standards of good practice for Authorities to achieve.
- 2.2 The aim of the Charter is to make sure that members have the knowledge, skills and attributes to fulfil their roles now and in the future in line with the Authority's corporate outcomes. The purpose of the Charter is therefore to act as a vehicle to improve the corporate performance of the Authority through the development of its members.
- 2.3 A summary of the current Member Development Charter Standards is set out in Appendix 1.

3.0 Our General Approach

- 3.1 One of the key principles for Member Learning & Development at the Authority is that Members are asked to take individual responsibility for their own training and development and identify their needs. The following tools are available to help Members do this:

A personal development plan for new Members

- 3.2 As part of the induction process all new Members are provided with the opportunity to meet with an external facilitator to identify their learning and development needs and produce a personal development plan.
- 3.3 Once completed the plan is considered by the Democratic and Legal Support Team who will consult with the individual Member on how to deliver their plan.
- 3.4 After their first year as a Member individual Members will take on responsibility for updating their plan as part of the annual self-assessment process.

Annual Self-Assessment

- 3.5 It is a requirement from Defra that the performance of all 'national' Secretary of State Members is measured and they complete a self-assessment. However Parish Members

and Local Authority Members are encouraged to complete their own self-assessment annually as this tool is useful in:

- Assisting individual members in developing and updating their personal development plan
- Helping officers to identify learning and development needs to inform the annual learning and development plan.

Members Survey

3.6 Once every two years the Authority carries out a survey of Members. The questions in the survey are structured around the following areas:

- Strategic and external leadership
- Governance and scrutiny
- Contributions and self-development
- Communication
- Community engagement

3.7 Once the survey has been completed the results are analysed and issues identified. In some cases the issues identified can be resolved through providing further learning and development opportunities. Where this is the case they will be incorporated into the annual learning and development plan.

4.0 Our current arrangements for Member Learning and Development

New Member Induction

4.1 The effective induction of new Members is a crucial element to making sure that all Members are able to contribute to the work of the Authority as soon as possible after their appointment. However we need to make sure that we strike the right balance of providing what is needed but avoiding an overload of information. We also have to recognise that Members also have other significant commitment outside of the Authority.

4.2 With this in mind the following induction arrangements have been agreed.

| a) Compulsory elements | | | |
|--|---|-------------------------------|-----------------|
| <i>Topic</i> | <i>Delivered by</i> | <i>Timescale</i> | <i>Duration</i> |
| Getting started as a member – An introduction to Democratic Services | Democratic Services Manager | Within 2 weeks of appointment | 3 hours |
| An introduction the National Park Authority (Strategy) | Chief Executive and Chair of the Authority | Within 4 weeks of appointment | 2 hours |
| Read the Introduction to Planning Information pack and complete the on-line knowledge test | Director of Conservation and Planning and Democratic Services Manager | Within 8 weeks of appointment | 4 hours |
| Observation of a meeting of Planning Committee | Director of Conservation and Planning and Democratic Services Manager | Within 8 weeks of appointment | 3 hours |

| b) Optional elements but highly recommended | | | |
|--|--|---------------------------------|--|
| <i>Topic</i> | <i>Delivered by</i> | <i>Timescale</i> | <i>Duration</i> |
| Allocation of an experienced “buddy” member | Facilitated by Democratic and Legal Support Team | Within 2 weeks of appointment | To be agreed by the new Member and their buddy |
| Produce a personal learning and development plan with assistance from an external facilitator. | Arranged by Democratic and Legal Support Team | Within 8 weeks of appointment | 2 hours |
| Attend a national new member induction event. | Bookings arranged by Democratic and Legal Support Team | Within 12 months of appointment | 2 days residential |

Annual Learning and Development Programme

4.3 In October each year the Authority will approve its Annual Learning and Development Programme. Taking the report to the October meeting of the Authority allows us to incorporate into the plan any issues identified in new Member learning and development plans and from the self-assessments completed by other Members.

4.4 The Learning and Development Plan will be divided into three sections:

| | |
|------------------------|--|
| Essential or Desirable | core events for all Members to attend |
| New Member Induction | events for new Members to attend |
| Development | optional learning and development topics for Members to choose from with delivery tailored to interest |

4.5 As there is a limit to the financial resources available for supporting Members in attending external courses and workshops individual requests for support will only be considered if it is clear that the event will help to meet needs identified in that Member’s self-assessment or learning and development plan.

Performance

4.6 The following aspects are measured to give us guidance on how these arrangements are working. These aspects are reported to the Chair and Deputy Chair of the Authority and the Member Representative for Learning and Development. They are also reported to the Authority meeting as part of the annual learning and development report.

| | 2016/17 | 2015/16 | 2014/15 | 2013/14 | 2012/13 |
|--|-----------|-----------|-----------|-----------|-----------|
| Member participation in essential training events | 54% | 50% | 62% | 61% | 67.2% |
| Members with a personal development plan in place | 27% | 44% | 44% | 44% | 44% |
| Members who completed a self-assessment form. | 43% | 64% | 55% | 38% | N/A |
| Members who felt objectives were met at L&D events | 72 – 100% | 72 – 100% | 72 – 100% | 72 – 100% | 72 – 100% |

| | | | | | |
|---|------------|------------|------------|------------|----------------------------------|
| Members who rated workshops as good | 70 100% | 70 100% | 70 100% | 70 100% | 70 100% (over 7 workshops) |
| Members who responded to Members Survey | 82% | | 60% | | 73% |
| Members feeling valued (Members Survey Response) | 57% | | 61.1% | | 47.7% |
| Members who feel developed by the Authority (Members Survey Response) | 74% | | 94% | | 81% |
| Target of 20 hours learning and development per Member obtained | 14% | 24% | 34% | 33% | 44% |

It is recognised that there are many ways that Members may be developed including training at other authorities and self-development such as personal research. These activities should be captured in individual self-assessments so that they can contribute towards the 20 hour target.

APPENDIX 1

East Midlands Member Development Charter Standards

1. Commitment to Member Development and Support

- 1.1 Political and managerial leadership is committed to the development of members and have strategies in place to improve Member and Authority performance.
- 1.2 Authority actively encourages people to become future community leaders and encourages under represented groups to take part.
- 1.3 Access to learning and development takes into account diversity of needs.
- 1.4 Designated budget for member development.
- 1.5 Officer support for member development.

2 Strategic approach to Member development

- 2.1 Member Development Strategy linked to the Authority's corporate and strategic objectives.
- 2.2 Individual Learning and Development Plans and a process for assessing.
- 2.3 Member roles are clearly defined
- 2.4 Political leadership and team development.
- 2.5 Corporate Member learning and development plan.

3 Learning and development is effective in building capacity

- 3.1 Investment in learning and development is periodically evaluated in terms of cost and benefits and impact
- 3.2 Learning shared with other members and where appropriate with officers and stakeholders
- 3.3 Improvements to learning and development activities are identified and implemented

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Dates have been set for the following learning and development events and attendance for all Members of the Authority is essential or desirable.

| ESSENTIAL & DESIRABLE LEARNING & DEVELOPMENT | | | | | | |
|---|-------------------|----------------------------|-----------------|------------------------------------|---------------------|---|
| Course Event/Title | Attendance | Date | Duration | Type | Current Lead | Notes |
| Access and Rights of Way Workshop | Desirable | 26/01/18 | 4 hours | Development | Sue Smith | |
| Annual Tour | Desirable | 22/6/18 | 5 hours | Development | Jason Spencer | |
| Strategic Corporate Planning Workshop | Essential | 21/09/18 | 5 hours | Progressing Business & Development | David Hickman | |
| Planning Training | Essential | 28/09/18 Or 26/10/18 | 4 hours | Progressing Business & Development | John Scott | All Members must attend one of the sessions to participate in decisions relating to planning matters and gain a better understanding of the development management and planning policy issues facing the Authority in its role as Planning Authority for the National Park. |
| Strategic Finance Workshop (1) | Essential | 19/10/18 | 3 hours | Progressing Business | David Hickman | |
| Strategic Finance Workshop (2) | Essential | 16/11/18 | 3 hours | Progressing Business | David Hickman | |

The following learning and development events are designed specifically for new Authority Members and form part of the Induction process

| NEW MEMBER INDUCTION | | | | | | |
|---|-----------------------------|---|-----------------|-------------|--|--|
| Course Event/Title | Attendance | Date | Duration | Type | Current Lead | Notes |
| An Introduction to the Peak district National Park Authority (Strategy) | Essential (for new Members) | 08/06/18 | 2 hours | Development | Chief Executive and Chair of Authority | |
| Getting started as a Member – An introduction to Democratic Services | Essential (for new Members) | 08/06/18 | 2 hours | Development | Jason Spencer | |
| National Parks UK New Members Induction | Desirable | 13-15 March 2018 (Broads) OR 11-13 Sept 2018 (New Forest) | 15 hours | Development | Jason Spencer | The same induction session is run twice per year, hosted by different National Parks, and all new Members are encouraged to attend one of these national induction sessions. |

The final section list areas for learning and development that have been identified by Authority Members as development needs. **Members are invited to look down the list and advise Democratic and Legal Support Team of any two that they would be interested in participating in by Friday 1 December 2017.** The method of delivery will depend upon the number of Members who express an interest, (in this section a date is only given where a session has already been organised).

| DEVELOPING SKILLS | | | | | |
|---|-------------------|---------------------------|-------------|---------------------|-----------------------------|
| Course Event/Title | Attendance | Estimated Duration | Type | Current Lead | Notes |
| Influencing/Persuading Skills | Optional | 3 hours | Development | Ruth Crowder | |
| Constructive Challenging Skills | Optional | 3 hours | Development | Ruth Crowder | |
| Managing Time/Speed Reading | Optional | 3 hours | Development | Ruth Crowder | |
| Chairing Skills | Optional | 2 hours | Development | Ruth Crowder | |
| Skills for Presentations and Public Speaking | Optional | 3 hours | Development | Ruth Crowder | |
| Using the internet and Member Portal as a source of information | Optional | 1 hour | Development | Ruth Crowder | |
| IT Skills | Optional | 1 hour | Development | Darren Butler | 3-1 meetings by appointment |

GOVERNANCE PERFORMANCE & SCRUTINY

| Course Event/Title | Attendance | Estimated Duration | Type | Current Lead | Notes |
|---|-------------------|---------------------------|-------------|---------------------|--------------|
| Code of Conduct and Role of Audit, Resources and Performance Committee | Optional | 2 hours | Learning | Jason Spencer | |
| The National Park Management Plan, Corporate Strategy and Business Planning | Optional | 2 hours | Learning | Emily Fox | |
| National Park Finance and Financial Planning | Optional | 3 hours | Learning | Philip Naylor | |
| Dealing with Complaints | Optional | 1 hour | Learning | Ruth Crowder | |
| National Park Authority Scrutiny | Optional | 3 hours | Learning | Jason Spencer | |

STRATEGIC & EXTERNAL LEADERSHIP

| Course Event/Title | Attendance | Estimated Duration | Type | Current Lead | Notes |
|------------------------------|-------------------|---------------------------|-------------|---------------------|----------------------|
| National Parks UK Workshop | Optional | 5 hours | Development | Jason Spencer | Date to be confirmed |
| National Parks UK Conference | Optional | 5 hours | Development | Jason Spencer | Date to be confirmed |

IMPROVING KNOWLEDGE OF THE WORK OF THE NATIONAL PARK AUTHORITY

| Course Event/Title | Attendance | Estimated Duration | Type | Current Lead | Notes |
|--|------------|--------------------|----------------------|---------------------------|--|
| Land Management | Optional | 3 hours | Learning | Suzanne Fletcher | May also involve the opportunity to accompany a farm adviser on a farm visit |
| Affordable Housing | Optional | 2 hours | Learning | John Scott/Brian Taylor | |
| Moors for the Future | Optional | 3 hours | Learning | Chris Dean | |
| Transport Issues in the National Park | Optional | 2 hours | Learning | Brian Taylor | |
| Access and Rights of Way | Optional | 2 hours | Learning | Mike Rhodes | |
| The Role of Rangers | Optional | 3 hours | Learning | Sarah Wilks | May involve shadowing opportunity |
| Approaches to Engaging Communities | Optional | 2 hours | Learning | Brian Taylor | |
| Approaches to Climate Change | Optional | 3 hours | Progressing Business | Emily Fox or Brian Taylor | |
| Archaeology in the National Park | Optional | 3 hours | Learning | Anna Badcock | Chance to accompany an Archaeologist on a regular site monitoring visit and may be possible to visit a future excavation |
| Natural Environment in the National Park | Optional | 3 hours | Learning | Rhodri Thomas | Learn about the key habitats, species and landscapes. |
| South West Peak Landscape Partnership | Optional | 3 hours | Learning | Karen Shelley-Jones | Learn about the landscape scale delivery of 18 different projects. |

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