

Appendix 1 – PDNPA Comments on first draft WEP

1. Introduction

- 1.1. The Peak District National Park Authority (PDNPA) welcomes the opportunity to comment on the draft Chatsworth Whole Estate Plan (WEP). These comments are the collective, informal view of officers from different specialisms across the Authority including Planning, Ecology Cultural Heritage, Access and Rights of Way and Transport. The focus of our response is on how the WEP addresses national park purposes.
- 1.2. The PDNPA is the body charged with the achievement of national park purposes in the Peak District National Park, as set out in the 1995 Environment Act. These are:
 - To conserve and enhance natural beauty, wildlife and cultural heritage
 - To promote opportunities for the public understanding and enjoyment of our special qualities.
- 1.3. The Authority also has a duty, in perusing these purposes, to seek to foster the economic and social well-being of its local communities.
- 1.4. Our [Management Plan](#) (Objective 5 LNR.4) commits us to ‘pilot and agree one whole estate plan that addresses socio-economic issues as well as high environmental gains for a specific area to inform future ways of working’.
- 1.5. The review of the [Local Plan](#) will consider options for planning policy that could give weight to ‘endorsed’ WEPs. The process for ‘endorsement’ is yet to be determined, however it is expected that an endorsed WEP would demonstrate how multiple benefits in line with the purposes and special qualities of the National Park would be delivered.
- 1.6. The Landscape Strategy 2023 sets out what is special about the PDNP, provides descriptions of the national character areas including ‘landscape character types’ and provides guidance for future management and enhancement.
- 1.7. The WEP should also take into account the emerging Peak District Nature Recovery Plan and be able to respond positively to future Local Nature Recovery Strategies.

2. General Comments

- 2.1. We welcome the high level focus on sustainable business growth that addresses climate change and delivers ecosystem services alongside nature recovery. A ‘3-bottom line’ of ‘people, planet and sustainability’ would still facilitate profit-making for reinvestment, but with a more explicit conservation ethic.
- 2.2. Although not explicitly stated, it is welcomed and readily apparent how the WEP ‘Vision’ and ‘Aims’ align with national park purposes because they are to be

achieved within the context of the Estate’s landscape, natural beauty and cultural heritage. However at the level of ‘Objectives’, it is less easy to see how the WEP aligns with national park purposes. This is particularly apparent with regard to the following national park purposes:

- **Conservation and enhancement of wildlife.** WEP Aim Two is that ‘natural capital, biodiversity and ecosystem services are *significantly enhanced*’ (our emphasis). This is welcomed. However the Objectives that support this aim appear less ambitious. These are: (i) ‘find the optimum *balance* between the management of land for production, nature and access’; (ii) ‘optimise ecosystem services’ and (iii) ‘share learning’. The text under Objective 3 (pg 14) says that ‘we will continue to manage our land to achieve *balance*’. If the Objectives were to match the ambition of the Aims (and align with National Park purposes to conserve and enhance wildlife) the balance would need to change rather than be ‘continued’ (maintained). Chatsworth could lead on, and be at the forefront of nature recovery in the Peak District. Alongside this, ecotourism/nature tourism could be developed to build on the already significant cultural heritage offer. There is more detail on this in the ‘Ecology’ section.
- **Conservation and enhancement of natural beauty.** The WEP should clearly set out the overall ambition for the landscape, including the setting of Chatsworth House, and demonstrate how (other) Aims and Objectives can deliver positive outcomes for landscape. For example Aim Five is to ‘work towards net zero . . . and contribute to material change and improvements in the operation of a sustainable visitor economy’. Aim Six is to increase the positive impact on the economy while ‘reducing the environmental impact of day visits’. The shift in focus towards sustainable travel and from day to overnight visits, alongside different management approaches, could bring about improvements to the landscape and the setting of Chatsworth.

2.3. Some of the Aims have a time frame and other don’t – is this deliberate?

2.4. There seems to be no reference to Inheritance Tax Exemption or the Management Plan. This may be deliberate following discussions with the NE adviser. However there are obvious benefits for a Whole Estate Plan to refer to these in summary and set out how they would operate together. If this is not possible, a statement to explain why would be useful.

3. Detailed Comments

Planning

3.1. It is not the intention of this consultation response to give detailed comments on the proposals. The various aspirations for buildings and sites will be subject to appropriate planning approvals and/or listed building consents, as necessary.

- 3.2. The Estate Office building is grade II* listed and the Park Rangers House is grade II listed.

Ecology

- 3.3. The Plan contains many excellent and ambitious aims relating to biodiversity, natural capital and ecosystem services, and we strongly welcome those. Most comments below relate to the detail of how these might be achieved. It may also be helpful to refer to the contribution that the Plan might make towards the Government's [25 Year Environment Plan 2018](#) and the subsequent [Environmental Improvement Plan](#).
- 3.4. Page 6 (Vision and Values) - We welcome the references to natural capital, protecting and enhancing the natural heritage, making more space for nature, nature recovery and "embedding a nature friendly approach in all we do".
- 3.5. Page 10 (Aims & Objectives) - The Aim of significantly enhancing natural capital, biodiversity and ecosystem services is welcome. We feel that the wording of Objective 3 could perhaps better reflect that Aim. This refers to "finding an optimum balance between the management of land for production, nature and access", but does not give any indication of where that "optimum balance" might lie. It is the only Objective which refers to balance, whereas in practice all of the Objectives will require balancing between them. Consequently, there is no Objective which fully reflects the bold Aim of significantly enhancing biodiversity. We would therefore welcome consideration of wording which better reflects the Aim, for example along the lines of "to adopt and encourage nature-friendly land management across the Estate to deliver nature recovery".
- 3.6. Page 12 (Objective 1) - We note the reference to restoration of the River Derwent to its 18th century line. We presume that this refers primarily to the reinstatement of the river meander north of Chatsworth House, referred to on page 70, and involves restoration to a more natural serpentine route. If that is the case we would, in principle, very much welcome this subject to more detailed consideration of the landscape, biodiversity, geomorphology, water quality and water flow/flood risk impacts. We would also welcome consideration of the incorporation of other measures to enhance the environmental quality of the river as part of any realignment, such as the incorporation of varied river morphology, provision of exposed riverine sediment, woody debris etc. as part of the habitat improvements referred to on page 70.
- 3.7. Conversely if this refers to restoration to a less natural and more "landscaped" line, we would have significant concerns about the environmental impact and would welcome further discussion with the Estate about achieving an appropriate balance between historic landscape considerations and contemporary/future environmental considerations.
- 3.8. Pages 14-15 (Landscape and Nature) - We strongly welcome the ambition to significantly enhance natural capital, biodiversity and ecosystem services, and the references to helping deliver the PDNP's Landscape Strategy and Nature Recovery Plan.
- 3.9. The text rightly recognizes the need to ensure viability and profitability of the Estate's land management activities. At present, however, this reads as something of a constraint, tempering expectations on delivery of the overall Aim. Whilst

recognizing the economic realities, we wonder whether there is scope to frame this more positively, with the Estate seeking more positively and proactively to align environmentally friendly land management with new and developing economic/financial opportunities such as ELM, Biodiversity Net Gain, Carbon Credits, conservation covenants, eco-tourism etc. We would welcome the Estate having an ambition to play a leading role locally in pursuing and demonstrating opportunities for aligning such financial and environmental opportunities.

- 3.10. We welcome the ambition to establish a monitoring programme of flora and fauna. We would be happy to discuss whether the Authority could help play a useful role in the design and/or implementation of this, should the Estate wish to explore that further.
- 3.11. Re Objective 3, please see comments on Page 10 above. It would be helpful to provide a little more information on how the Aim of significantly enhancing natural capital, biodiversity and ecosystem services would be implemented. It would be helpful to refer to the 4 principles referred to in the Government's '[Making Space for Nature](#)' of: (i) Better (improving the quality of existing sites); (ii) Bigger; (iii) More (reviewing opportunities to increase the area of priority habitat, especially to expand on existing habitat); and (iv) Joined-up (incorporating nature-friendly measures within the wider fabric of the Estate). In particular we would welcome a commitment to the following:

Better

- Achieving and Maintaining Favourable Condition on all SSSI land within the Estate.
- Maintaining and where possible enhancing all existing areas of Priority Habitat, and those areas identified in the Inheritance Tax Exemption Management Plan as of ecological importance (Moor & Heath, Ancient Woodland, Dedicated Woodland, Non-dedicated woodland of conservation interest, Ancient Parkland and Areas notified as of possible conservation interest).
- Maintaining a continuity of veteran trees and dead wood habitats for which the parkland is so important, and enhancing associated habitats.

Bigger and More

- Reviewing opportunities for habitat creation across the Estate, in particular where they may expand on or complement existing habitat. Work that we are currently doing on the Peak District Nature Recovery Plan may help identify such opportunities, and we would be pleased to share this work with the Estate in due course.
- Restoration of any Plantations on Ancient Woodland Sites to more semi-natural native woodland cover.

Joined up

- Implementing and encouraging nature-friendly land management measures across the wider Estate, in particular to link existing habitats.

- 3.12. We note and welcome the intention to use both a “land sparing” and “land sharing” approach. The concept of “Rewilding” has gained considerable traction in recent years and the Estate may wish to consider whether you would wish to refer to Rewilding as part of a “land sparing” approach. Rewilding can vary from more or less full withdrawal of management and reliance on natural processes, to a reduction in management intensity to varying degrees.
- 3.13. We welcome the commitment to deliver ecosystem services and align habitat creation with this, as set out in Objective 4, and to the shared learning in Objective 5.
- 3.14. Pages 21-23 (Sustainability) - We welcome the Estate’s commitment to working towards Net Zero.
- 3.15. Page 70 (Water Courses) - See comments on page 12 regarding management of the River Derwent.
- 3.16. Page 71 (Garden) - We suggest this would benefit from including a reference to maintaining the historic nature of the Capability Brown lawn and its considerable associated ecological interest.
- 3.17. Page 76 (Biodiversity) - Reference to protected, BAP and Red List species is unfortunately now outdated. Black Grouse and Twite are now no longer present, the former being extinct in the Peak District and the latter being very rare and confined to a handful of locations. Nightjar are referred to twice, and Tree Pipit should correctly be Tree Pipit. This section currently focuses on the larger fauna and we suggest it could usefully include reference to the outstanding insect and other invertebrate life, particularly associated with the deadwood and veteran tree resource of the park; the rich lichen and fungus flora associated with the park and grasslands; and the botanical diversity of the moorland, woodland and grassland habitats.
- 3.18. We note and welcome the intention of the Estate to appoint a Nature Conservation Manager, and would very much welcome the opportunity to work with them to help deliver nature recovery across the Estate.
- 3.19. Page 90 (Farming) - We strongly welcome the move towards more regenerative farming, cessation of fertilizer use and sustainable and diversified grazing. We would welcome encouragement of such measures across the tenanted farmland, capitalizing on the increasing financial opportunities to adopt nature-friendly farming methods.
- 3.20. Page 91 (Forestry) - We welcome the adoption of continuous cover forestry where possible; of minimal intervention areas; and of measures to safeguard water quality and construct woody debris dams.

Access

- 3.21. We are pleased that public access is noted in the plan as being integral to recreation and tourism, and welcome working with the estate in partnership on access and rights of way. We would welcome involvement in the [Peak District Proud](#) campaign.
- 3.22. At a time of greater public awareness and demand for access, such a partnership approach is particularly important. We will continue to work together on statutory duties and designations and develop proactive partnerships. For example the excellent recent work of the estate and national park officers in delivering

enhanced access at Thor's Cave in Staffordshire through Farming in Protected Landscape funding.

- 3.23. We particularly welcome the estate's ongoing proactive involvement with the Peak District Local Access Forum. The input of estate staff and the discussions they generate are of great value and interest to all who wish to make the countryside more accessible and promote responsible access.
- 3.24. We are also pleased to be a partner in ongoing works involving the estate and local highway authorities, with schemes such as the improvements to the unclassified road at Edensor and the current work at Beeley Hill Top.

Cultural Heritage

- 3.25. The 'Vision and Values' section defines heritage as 'built' and 'natural'. We feel 'cultural' rather than 'built' is better as this encompasses also: archaeological heritage; parkland and gardens; historic landscape; archives, artefacts and collections and other intangible aspects of heritage.
- 3.26. Objective 1 - the language has a very 'built heritage focus' – words such as 'repair', 'maintain' and 'restore'. All the project examples are very built heritage focussed. Could the objectives and projects aimed at research or greater understanding of the heritage of Chatsworth also be considered? For example it's archaeological heritage, the evolution of the landscape, and its archives. Investigative and research projects could bring the lost aspect of Chatsworth heritage and history to life (much like the virtual reality headsets and the inflatable 'great conservatory' at the first RHS show).
- 3.27. Could Chatsworth's world class archives be invested in? For example a programme of digitisation to allow greater access and interpretation. This would link to the 'digital estate' of Objective 9.
- 3.28. Could further partnerships with universities be developed to attract investigative and research projects? Research and innovation appears to be an objective within Landscape and Nature but not within the Heritage objectives. There is a real opportunity here. This is demonstrated on page 108 but it could also set out more clearly in the Objectives.
- 3.29. Aim 2 - cultural heritage is missing from this landscape aim [heritage is mentioned in the longer narrative, but is missing from the shorter Objective descriptions in Table 1]. Cultural capital is already a recognised part of ecosystem services.
- 3.30. Objective 3 should include cultural heritage in the mix.
- 3.31. Objective 4 needs to include 'cultural capital'. It is important that cultural heritage is not simply referred to as a constraint – it is not - heritage can be an empowering contributor to nature recovery and other broader aims. Understanding how humans have adapted landscapes in the past can help us inform future change and management.
- 3.32. Aim 5 - there is an opportunity within Aim 5 for more radical thinking about the performance of historic buildings. This is a well-researched field and the performance of historic buildings can be enhanced without harming their significance and character. Chatsworth should be an innovative exemplar – for example linked to the idea for a new Conservation, Study and Creative Centre. It would be worth considering under this Aim becoming zero plastic.

Transport

- 3.33. Page 19, Objective 8 – the proposed link to the Monsal Trail and White Peak Loop is positive. The possible provision of a small mountain biking course is also positive, if it can be achieved without any negative impacts.
- 3.34. Page 20, Objective 9 – the proposal to extend engagement via digital means is positive. However, traditional means of engagement are likely to still be required for some time. There are opportunities here for partnership working with the Authority as it develops new ways of engaging with visitors.
- 3.35. Page 21, Aim 5 Sustainability – this aim could include reference to aspirations around sustainable travel. The Estate is a Peak District EQM Award Holder – more could be made of this with perhaps an aspiration for estate tenants to achieve the award as well.
- 3.36. Page 22, Objective 10 – the aspiration for increasing the efficiency of journeys is positive, as are options for viable public transport. It's important that there is some tie-in with the Travel Plan submitted in support of the car park and access road application.
- 3.37. Visitor dispersal is also a positive approach if it can be achieved without negative impacts on the alternative sites. This will depend on sensitivity and susceptibility.
- 3.38. Aim 6 Business & Enterprise – The 'days to stays' approach is positive, if it can be achieved without negative impacts on the heritage of the estate. There may be issues for new development.
- 3.39. Objective 12 – this is positive, but the policy principles regarding shepherds huts and pods will apply.
- 3.40. Under 'Environmental impacts arising from travel' – there is a reliance on carbon offsetting, whilst recognising that it currently falls short. Carbon capture is positive, but it really needs to be combined with reducing car journeys, or the length of those journeys. This should be Park & Ride if possible.