

Issue1

Spatial strategy: proposed Local Plan spatial objectives for sustainable development in a national park

To ensure development is managed in a way that:

- delivers the first purpose of a national park to conserve and enhance natural beauty, wildlife and cultural heritage
- delivers the second purpose of a national park to promote understanding and enjoyment of its special qualities
- is responsive to its distinctive landscape character and special qualities
- delivers significant enhancement
- reduces consumption of resources
- promotes nature recovery, carbon sequestration, blue and green infrastructure. ¹

To retain and enable the development of new homes, businesses and community facilities in accordance with the above and in locations that support thriving and sustainable communities, reduce the need to travel and enable travel by sustainable means (low carbon, public transport and active travel.) This will address the duty on national park authorities to seek to foster the economic and social well-being of local communities.

Question 1

- a. Do you agree with the proposed Local Plan spatial objectives for sustainable development?
 - b. What is the reason for your answer?
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Issue 2

Spatial Strategy: Delivering national park purposes

General Spatial Policies in the new local plan will continue to align with the purposes and duty of a national park, limit the scale and extent of development and give great weight to conserving and enhancing landscape, wildlife and cultural heritage.

New policies will respond to obligations arising from the Climate Change Act 2008 and the Environment Act 2021.

GSP 2 will include an additional reference to nature recovery, special qualities and the net zero target.

GSP 3 will include the requirement for Biodiversity Net Gain and reference the Peak District Design Code.

¹ Blue-green infrastructure refers to the use (for example as public space or for walking and cycling) of blue elements, like rivers, canals, ponds, wetlands, floodplains, and green elements, such as trees, forests, fields and parks, in urban and land-use planning and other public benefits such as clean air, water and flood prevention.

Question 2

- a. Have we identified the right policy issues with regard to delivering national park purposes?
 - b. What is the reason for your answer?
-

Issue 3

Spatial strategy: defining valued landscape character and special qualities

Individual elements of landscape and cultural heritage combine to give the National Park its unique and special quality. All our planning policies and decision-making depend on an agreed understanding of what we value; what we want to conserve, and what we want to enhance. Currently this is set out in the Landscape Strategy and in the Core Strategy list of 'valued characteristics'.

We think the local plan should better align with the Management Plan where the Peak District's Special Qualities are defined. We can do this by replacing the current list of Core Strategy 'Valued Characteristics' with a new list of Special Quality Key Features. Key Features are the individual elements that combine to create a Special Quality.

Key Features for each Special Quality are set out in Appendix 2.

Question 3

What additional elements should be included in a Special Quality Key Features list for the local plan?

Issue 4

The spatial strategy: settlement tiers

Currently we have a 2-tier policy. All settlements are classified according to whether in principle, new-build development for homes, business and community facilities is acceptable or not acceptable. In policy terms there is no difference between Hope and Castleton, or Tideswell and Endsor.

In reality we know that different forms and scales of new-build development are better suited to some settlements and not to others. Policy and decision-making do take this into account already, by looking at the need for development, and there are obvious market influences too. However we could change the policy approach to give residents and applicants more certainty about the scale and type of new-build development that is appropriate for different settlements.

If we think it should be changed, we can either retain the 2-tier approach and think again about which settlements are included, or we can create more tiers and direct different types and levels of development accordingly.

If we decide to change our approach, we will consult again on the criteria for deciding which settlements should go in which tier, and on the allocation of settlements to tiers.

Option 1

Retain the current approach – a ‘two-tier’ strategy of those settlements where new development is acceptable in principle, and the rest, where it is not.

There are 63 settlements where new development is acceptable in principle, and the rest, where it is not. The 63 villages are as shown in the table above.

The advantages of this approach are:

- it is appropriate for a protected landscape where there are many small settlements
- It has the potential to spread development evenly across all settlements.

The disadvantages of this approach are:

- it excludes some villages where the development of one or two self-build homes could be acceptable
- it is not responsive to the issues faced by housing authorities and housing associations that need planning certainty and economies of scale to deliver housing development.

Option 2

Retain a 2-tier strategy but review the list

We retain the principle that settlements fall in to 2 types - those where new development is acceptable in principle, and the rest, where it is not. But we review the list. Settlements may move into or out of the list as a result of the review.

Option 3

We have a more tiers and direct different types and levels of development accordingly. All settlements would feature somewhere within the tiers.

The proposal set out below is a five-tier strategy. Different types and levels of development can take place depending on the tier. All settlements would feature somewhere within the tiers.

Tier One - market town and larger settlements with good services that are well-located for public transport and active travel.

Development in principle is acceptable for:

- local needs affordable homes to address the housing needs arising from the Peak District National Park part of the relevant housing authority.² The current occupancy cascade policy would be changed for Tier One settlements (see Chapter 7 Issue 31).
- retail, business and community facilities of an appropriate scale to serve identified need and the settlement's visitor capacity
- local people in housing need building their own homes.

Tier One settlements will have the capacity for development assessed as part of the plan-making process. 'Capacity for development' means assessing whether, and at what scale, development can take place without harm to landscape character, or to a settlement's setting within the historic landscape, or to any other of the Peak District's special qualities.

² Housing authorities are district, borough or unitary authorities. There are several housing authority areas that cover the National Park.

This assessment would also take into account important open space and the views of the parish council.

Tier Two - larger settlements with key services.

Development in principle is acceptable for:

- local needs affordable homes to meet the housing needs of that parish and adjoining parishes within that local authority area
- small-scale retail, business and community facilities
- local people in housing need building their own homes.

Tier Three - smaller settlements with community services.

Development in principle is acceptable for:

- local need affordable homes to meet the housing needs of that parish
- small-scale retail, business and community facilities
- local people in housing need building their own homes.

Tier Four - hamlets and settlements with few or no services.

Development in principle is acceptable for local people from that parish in housing need building their own homes.

Tier Five - settlements split by national park boundary.

Each boundary settlement is different so one policy approach would not be appropriate. Local needs affordable housing may be acceptable depending on the circumstances.

The advantages of this approach are:

- No settlements are excluded
- It is proactive not reactive; a way for the planning authority and housing authority to work together to tackle housing need
- homes in Tier One settlements would be offered to eligible people from any parish within the Peak District part of the relevant district, so people living in parishes where no sites can be found are not disadvantaged (provided there is a reasonably close Tier One settlement.)

The disadvantages of this approach are:

- communities may not readily accept that their settlement should have higher levels of development than another
- individuals may not readily accept that their housing needs would be better met in a different parish
- it may make smaller communities less sustainable because fewer homes may be built

Question 4

- a. Which option do you prefer?
 - b. Do you think there is another option?
 - c. What are the reasons for your answers?
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Issue 5

Spatial strategy: sites for housing development

The current local plan does not allocate land for new housing. Instead we use an 'exceptions' approach because new homes are not permitted 'except' in the special circumstances set out in policy and on brownfield land. The exceptions approach is appropriate in a protected landscape. However we need to consider whether to allocate sites in some settlements. This approach works best with a tiered settlement strategy. Only those settlements in the top tier would have allocated sites and elsewhere the exceptions approach would still apply (see Chapter 2 Issue 4).

Site allocations are shown on a map. They indicate where, in principle, development is acceptable in planning terms and a landowner is willing to sell. Policy would specify that development must meet local affordable need.

Site allocations would not prevent applications coming forward and being permitted on other sites.

Option 1

Exceptions approach

We retain the current approach. We do not allocate sites in any settlement.

The advantages of this approach are:

- It is existing policy, understood and accepted by communities and developers
- it can help to keep land value lower
- it would not unduly delay the local plan
- it responds to local need and location at the time of application
- it is likely to favour smaller sites and smaller communities.

The disadvantage of this approach are:

- In practice, not enough sites are being delivered (but this may be due to a combination of factors, including funding) and some villages will still not have new homes
- It only responds to housing need at the time of application and cannot easily address local housing need over the long term.

Option 2

Exception sites plus site allocations in 'Tier One' settlements

The exceptions approach applies, but in addition, we allocate sites in those settlements that are the most suitable and sustainable locations for new development. We describe these as 'Tier One' settlements (see Chapter 2 Issue 4) being: 'the market town and larger settlements with good services that are well-located for public transport and active travel'. In all other settlements, and outside of the allocated sites, the exceptions approach would still apply. Policy would require housing development on allocated sites to meet local affordable need and be phased over the plan period to 2045.

Tier One settlements will have the capacity for development assessed as part of the plan-making process. 'Capacity for development' means assessing whether, and at what scale, development can take place without harm to landscape character, or to a settlement's setting within the historic landscape, or to any other of the Peak District's special qualities.

This assessment would also take into account important open space and the views of the parish council. A Strategic Housing and Employment Land Availability Assessment (SHELAA) would identify potential sites within this context.

The advantages of this approach are:

- It would enable a more detailed consideration of options and national park purposes, removed from the immediate pressure of seeking to meet a housing need.
- It would give more certainty to individuals, developers (Registered Social Landlords), the local community and decision-makers on whether a site was likely to be acceptable or not.
- Done well, it can bring a community together with a common purpose.
- It would create a supply of deliverable sites with landowner consent.
- In 'Tier One' settlements, the new homes would be offered initially to anyone in housing need from any parish within the Peak District part of the relevant district. This is an advantage for people in housing need living in smaller settlements where new homes are more difficult to develop.

The disadvantages of this approach are:

- It is likely to delay production of the plan.
- it can create tension and disunity within a community.
- It will put pressure on land values.
- In 'Tier One' settlements, the new homes would be offered initially to anyone in housing need from any parish within the Peak District part of the relevant district. This would be a departure from the long-established principle that new homes should first and foremost meet the needs of the parish, or adjoining parish, in which the development is located.

Question 5

- a. What is your preferred option?
- b. What is the reason for your answer?

Issue 6

Spatial Strategy: development boundaries

Development boundaries (shown on a map) and the associated policy, together define the development limits of a settlement. They can help to manage development pressure and avert speculative proposals for development on sites that are detached from a settlement. Only Bakewell and Bradwell (in the neighbourhood plan) have development boundaries. We need to decide whether development boundaries (and the associated policies) are still useful, and if so which settlements should have them.

Option 1

Retain current policy

We retain a development boundary for Bakewell. Any other parish council wishing to set a development boundary for other settlements can do so in a neighbourhood plan.

If this is the preferred option, we would consult again on detail and location, taking into account identified housing need (see Chapter 7 Issue 28) and any sites that may come forward for development (see Chapter 2 Issue 5).

Option 2

No development boundaries

No development boundaries are set in the local plan. Any parish or town council wishing to set a development boundary can do so in a neighbourhood plan.

Option 3

Change current policy - establish development boundaries for other key settlements

We extend the use of development boundaries so that as well as Bakewell, they are established for other key settlements.

If this is the preferred option, we would consult again on which settlements (linking to Issue 4) and on detail and location, taking into account identified housing need and any sites that may come forward for development (linking to Issue 5).

Question 6

- a. Which is your preferred option?
 - b. What is the reason for your answer?
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Issue 7

Spatial Strategy: protected open space and local green space

Development on green field sites is restricted overall in the Peak District but is allowed in order to keep communities thriving and sustainable. The greatest need is for affordable homes but community facilities and small-scale retail and business are also allowed.

How do we decide which open spaces to develop, and which should remain open? We can approach the issue by indicating where development can take place (see Chapter 2 Issues 5 and 6). We can also set out in policy those sites that have a greater degree of protection. We already protect community recreation sites, sport facilities, and important open spaces in a conservation area. We need to decide whether to also designate local green spaces (LGS).

LGS designation does not necessarily prevent development from taking place but it is the best way for a community to have its say about valued spaces and for this to be formally recognised in plan-making and decision-taking. Government Guidance says that 'if land is already protected by designation (for example it is in a protected landscape), then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.' (Paragraph: 011 Reference ID: 37-011-20140306.)

If we decide there is 'additional local benefit' to be gained by designating Local Green Space in the new Local Plan we will work with local residents to draw up a candidate list for future consultation.

Question 7

- a. Do you think that there is 'additional local benefit' to be gained by designating Local Green Space in and on the edge of Peak District settlements?
 - b. What is the reason for your answer?
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Issue 8

Spatial Strategy: sustainable travel

Other planning policies will ensure that new affordable homes, businesses and community services are well located to reduce the need to travel and make sustainable travel more likely. We need an aspirational transport policy to complement this approach. Currently this is Core Strategy T1 (above). Much has changed since this was written and it needs updating.

Conserving and enhancing the National Park's Special Qualities will always be our primary consideration but what else should we consider?

Question 8

Thinking about current policy T1 (above), is there anything else we should include in an aspirational sustainable transport land-use policy?

Issue 9

Landscape, biodiversity and nature recovery: proposed Local Plan spatial objectives

To manage development through close consideration of special qualities, valued landscape character and nature recovery.

To significantly enhance biodiversity in accordance with the Lawton Principles³ and the statutory nature recovery strategies.

To protect the remoteness, wildness, open character and tranquillity of the hills, moorlands and dales.

To protect the distinctive and valued historic character of the settled agricultural landscapes.

To protect the Natural Zone and to enhance/extend in accordance with the nature recovery strategies.

To maintain and improve the darkness of night skies seen in the National Park.

To promote nature-based solutions to mitigate and that will permit adaptation to climate change and flooding.

To promote healthy soil, and clean air and water.

Question 9

- a. Do you agree with the proposed spatial objectives for landscape, biodiversity and nature recovery?
- b. What is the reason for your answer?

³ Lawton Report (more and bigger habitat that is in better condition and linked across the wider countryside)

Issue 10

Landscape and nature recovery

We think that new policy should:

- conserve and enhance special qualities
- maximise the potential for all development, even at the smallest scale, to contribute to nature's recovery.
- clearly set out the requirements for development falling outside mandatory BNG. It will set out the ecological information to be provided, and any mitigation or enhancement required.
- make clear that proposals should align to local priorities and strategies so that the right habitat is created in the right place.
- make clear that any enhancement should also help achieve nutrient neutrality (in applicable catchments), mitigate flood risk and contribute to the delivery of natural capital and green infrastructure strategies, including cross-boundary strategies.

Please note that statutory BNG is covered in the next section.

Question 10

- a. Do you agree with the proposed policy approach to nature recovery?
 - b. What is the reason for your answer?
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Issue 11

Biodiversity net gain

Our statutory purpose is to conserve and enhance wildlife. For this reason, we think new planning policy for biodiversity net gain should go beyond the 10% mandatory requirement. We will work with partners to establish a locally specific evidence base for this.

Question 11

- a. Do you agree that new planning policies for biodiversity net gain should go beyond the 10% mandatory requirement?
 - b. What is the reason for your answer?
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Issue 12

Development in the Natural Zone

We need to decide whether the 'exceptional circumstances' that justify development in the Natural Zone, as set out in current policy DMC2 above, are still correct.

Question 12

- a. Do you think that current policy (DMC2 above) correctly sets out the exceptional circumstances for development in the Natural Zone?
- b. What is the reason for your answer?

Issue 13

Whole estate plans

We need to decide whether the new local plan should have a policy for whole estate plans (WEPs). A WEP policy would give positive regard to development proposals that are part of a WEP that is endorsed by the Authority, and that align with other policies in the local plan.

(Separate to the local plan, the Authority would publish guidance to set out the criteria for endorsing the plans. This would cover for example, the standards of public consultation.)

Question 13

- a. Do you think the new local plan should have a policy for whole estate plans?
 - b. What is the reason for your answer?
-

Issue 14

Proposed Local Plan spatial objectives for cultural heritage and the built environment

To manage development through consideration of landscape character, cultural heritage, the distinctive character of settlements and the Peak District National Park's special qualities.

To conserve and enhance designated and non-designated heritage assets, including conservation areas, listed buildings and their setting and historic farmsteads and their setting.

To identify opportunities for, and seek to deliver, significant enhancement.

To conserve and enhance cultural heritage in the transition to a low carbon future.

Question 14

- a. Do you agree with the proposed Local Plan spatial objectives for cultural heritage?
 - b. What is the reason for your answer?
-

Issue 15

Heritage assets

The new local plan will clearly set out the methodology for deciding (i) whether a building is a non-designated heritage asset, and (ii) the significance of that asset.

Question 15

Please tell us about any issues or concerns you have about our approach to heritage assets.

Issue 16

Local list

The new local plan will clearly set out the methodology we use to determine whether a building is a non-designated heritage asset and its significance. We need to decide whether to create a Local List to supplement this.

A Local List is a register of non-designated heritage assets whose significance should be considered in development proposals. We would draft and agree selection criteria for inclusion on the list in consultation with local people.

However, a List is not conclusive and is resource intensive to draw up. It will provide a degree of certainty for heritage assets on the list but does not preclude other assets being identified at a future date.

Question 16

- a. Do you think that we should have a Local List of non-designated heritage assets?
 - b. What is the reason for your answer?
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Issue 17

The conversion of isolated traditional buildings

We are receiving an increased number of applications to convert isolated traditional buildings. This is partly because well-located redundant buildings - those that are in or on the edge of existing settlements - have already been converted.

Although conversions are acceptable in principle anywhere 'in the open countryside', this must be balanced by consideration of the harm that would be caused. Isolated barns and the open landscapes in which they sit are particularly susceptible to harmful change.

Current planning policy considers all heritage assets in the same way. We need to decide whether the new local plan should contain a specific policy on isolated traditional buildings to clearly set out the parameters for conversion and what uses may be acceptable.

Question 17

- a. Do you think the new local plan should contain a specific policy relating to isolated traditional buildings?
 - b. What is the reason for your answer?
-

Issue 18

Proposed Local Plan spatial objectives for climate change and sustainable building

To support the positive management of landscape change and adaptation to the changing climate, in a way that is responsive to the landscape's distinctive cultural character and special qualities.

To contribute to nature recovery, carbon sequestration and flood prevention.

To protect open skylines, long views and semi-natural moorland expanses.

To support work to create and manage floodplain landscapes.

To support work to protect and enhance peat.

To support design, construction and adaptation that enables transition to a low carbon future and respects the built tradition and character of settlements.

To support sensitively-sited, small-scale renewable energy infrastructure.

Question 18

- a. Do you agree with the proposed Local Plan spatial objectives for climate change and sustainable building?
 - b. What is the reason for your answer?
-

Issue 19

Replacement dwellings

Current policy Core Strategy CC1 aligns with the requirement to promote a radical reduction in greenhouse gas emissions and make the most efficient and sustainable use of land, buildings and natural resources. However current policy DMH 9 does not. DMH 9 allows dwellings to be replaced after considering only whether or not the original makes a 'positive contribution' to landscape or built environment character.

We need to decide whether new policy on replacement dwellings should be changed to take into account embodied carbon and the benefits of retaining smaller, non-traditional dwellings.

Question 19

- a. Do you agree that embodied carbon should be considered as part of the requirement for high sustainability standards?
 - b. What is the reason for your answer?
 - c. Do you think the criteria in current policy DMH9A (above) are correct?
 - d. What is the reason for your answer?
 - e. Should new policy specifically address the loss of smaller homes?
 - f. What is the reason for your answer?
-

Issue 20

Avoiding carbon emissions in development

The National Park Management Plan says that the National Park should be 'net zero by 2040' and that one way to achieve this is to 'adopt Local Plan policies that strengthen carbon reduction in new buildings and refurbishment of existing buildings.' The general nature of the existing policy requirement is insufficient to deliver this ambition. Therefore we need to determine whether new policy should set out the sustainability measures we expect for different types of development. For example, new or extended:

- homes
- farm buildings
- business development

Question 20

- a. Do you think that the new local plan should set out in policy the sustainability measures we expect for different types of development?
- b. What specific measure are most appropriate for homes?
- c. What specific measure are most appropriate for farm buildings?
- d. What specific measure are most appropriate for business development?

- e. What is the reason for your answer?
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Issue 21

Low carbon and renewable energy development

New policy will continue to require that low carbon and renewable energy development does not adversely affect landscape character, cultural heritage assets, special qualities or other established uses of the area. We need to decide whether new policy could give greater clarity by defining 'small scale' and mapping areas where renewable energy development is more or less likely to be acceptable.

Question 21

What criteria could we use to identify areas (on a policy map) where renewable energy development is more likely to be acceptable?

Issue 22

Carbon capture and storage

CCS proposals affecting the National Park may come forward during the next plan period. The National Park Authority would not make the decision, but would be consulted. We need to decide whether to set out our agreed position on CCS in the new local plan and, if supportive in principle, to set out other policy criteria that should be met.

Question 22

- a. Do you think that the new local plan should set out in principle policy support for Carbon Capture and Storage?
 - b. What is the reason for your answer?
-

Issue 23

Proposed Local Plan spatial objectives for recreation and tourism

To direct recreation development towards settlements and certain existing recreation attractions and hubs.⁴ At these places development will be focussed on new or improved facilities that promote understanding and enjoyment of the National Park, sustainable travel and significant enhancement of the National Park's special qualities.

To support the change of use of traditional buildings (heritage assets) for visitor accommodation, primarily on farmsteads.

To support temporary overnight tourist accommodation that is well-suited to it's location.

To support work that maintains and enhances the rights of way network.

To safeguard the multi-user recreational trails, and to expand this network.

⁴ Recreation attractions are the sites or features that are the focus of the public's enjoyment of the National Park. They may include walking and cycling trails and sites of cultural heritage interest. Recreation hubs are sites at popular locations from which people access the open countryside for recreational purposes. Some places can be both.

Question 23

- a. Do you agree with the proposed Local Plan spatial objectives for recreation and tourism?
 - b. What is the reason for your answer?
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Issue 24

Recreation attractions and hubs

Recreation attractions and hubs are visited by millions of people each year. This can create an adverse impact (for example on local communities and on the environment) and lead to pressure for development (for example for visitor facilities), often in remote and sensitive locations. Stakeholders want us to be clearer about the kind of development that is or is not acceptable. We can do this by defining areas on a map where the recreation and visitor pressure is most acute, alongside planning policies specific for each area.

This approach would enable us to ensure that planning policy and area management work together, for example by supporting sustainable transport solutions.

This issue should be considered alongside any new approach to visitor car parking (see Chapter 12 Issue 41).

Question 24

- a. Do you think that the new local plan should define 'Recreation Attractions' and 'Recreation Hubs' on a map and develop specific planning policies for those areas?
 - b. Which areas/sites do you consider to be Recreation Attractions and Hubs?
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Issue 25

Temporary camp sites

New policy will continue to support small touring camping and caravan sites. We need to decide whether to apply for an 'Article 4 Direction' to remove permitted development rights (whether to remove entirely or to revert to 28 days) for temporary camping and caravan sites, and if so, for which area or areas.

Question 25

- a. Do you think that we should apply for an Article 4 Direction to remove permitted development rights for temporary camping and caravan sites?
 - b. If yes:
 - Should the permitted development right be removed entirely or revert to 28 days as previously?
 - What areas should they be removed from?
 - c. What problems are being caused by the 60-day permitted development right?
-

Issue 26

Touring camping and caravan sites

We support the provision of new touring camping and caravan sites but think that there should be some restrictions because:

- the landscape impact of tents and caravans is greater in winter months
- communities may welcome the ‘respite’ from visitor pressure
- sites are not suitable for full-time residential use.

Current policy sets out the requirement for occupancy restrictions on touring camping and caravan sites, but it does not set out seasonal restrictions. We need to decide whether new policy should set out seasonal and occupancy restrictions, taking into account business need and wider considerations such as landscape impact.

Question 26

- a. Do you agree that operation of touring camping and caravan sites should be restricted to certain months of the year in order to address the increased landscape impact in the winter months?
 - b. What is the reason for your answer?
 - c. Do you agree that touring camping and caravan sites should be restricted to no more than 28 days per calendar year by any one person?
 - d. What is the reason for your answer?
-

Issue 27

Static caravans, lodges and other permanent structures

New policy will retain a restrictive approach to all types of permanent structures used as holiday accommodation. This is the only approach that aligns with national park purposes.

We need to decide whether new policy should clarify the exceptions to this principle, taking into account the following issues and questions.

- Other non-traditional permanent structures are already on the market (such as ‘yurts’), or may come onto the market. Shepherd’s huts and camping pods are not traditional in the Peak District so we need to be clear about the rationale for making an exception just for these. Could (for example) yurts or other structures be acceptable ‘close to the facilities of a farmstead’ and ‘in woodland locations’?
- ‘Small and simple’ is not defined in policy. We could include that there should be no associated development, as stated in the supporting text to Policy DMR1.
- There may be other locations, as well as farmsteads and woodlands, where they are acceptable.
- If the harm/impact is negligible, is it reasonable to restrict structures ‘close to the facilities of a farmstead’ to one in number?

Question 27

- a. Do you agree that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation?
- b. What exceptions should we make to this principle?
- c. What criteria should we use to ensure that the structures permitted as an exception to this principle, do not harm the National Park's special qualities?
- d. What is the reason for your answer?

Issue 28

Proposed Local Plan Spatial Objectives for housing

In the whole National Park, to support the provision of between 960 and 2000* new homes by 2045, distributed across the 3 landscape areas as follows**:

- between 625 and 1,302 in the White Peak (Derbyshire Dales)
- between 199 and 414 in the Dark Peak (mostly High Peak which has by far the biggest population, but also including Barnsley, Kirklees, North East Derbyshire, Oldham, Sheffield)
- between 136 and 284 in the South West Peak (Staffordshire Moorlands, Cheshire East)

To support new uses for valued vernacular and listed buildings, and other buildings that are heritage assets, primarily in settlements and farmsteads.

To support the development of new-build affordable local needs homes in the best locations, taking into account the Peak District's landscape character and special qualities, housing authority boundaries, settlement pattern, settlement population, access to services and the potential for public transport and active travel.

*The rationale for this is:

- The lower figure is enough to reverse the population and labour force decline but has least impact on the National Park's special qualities. It is based on Scenario I (dwelling-led, 48 dwellings per annum over a 20-year plan period) of the Population Projection and Housing Needs Assessment.⁵
- The higher figure aligns with the Government's Standard Methodology.
- It is compatible with past delivery rates. Past delivery rate averaged 72 dwellings per year. Proposal is for between 48 and 100 per year.

**This is an indicative spread based on existing population and may change depending on the preferred spatial strategy.

⁵ This was undertaken by consultants (Nathaniel Litchfield & Partners) based on prescribed Government methodologies but in addition using 'dwelling-led' scenarios to determine the effect on population of different levels of house building. The proposed range for public consultation was discussed and agreed by the local Plan Review Member Steering Group and presented to Authority Forum.

SPATIAL AREA	CONSTITUENT LOCAL AUTHORITY	% OF POPULATION	INDICATIVE LEVEL OF HOUSING DELIVERY TO 2045 (TOTAL NUMBER)	INDICATIVE LEVEL OF HOUSING DELIVERY TO 2045 (DWELLINGS PER ANNUM OVER 20 YEAR PLAN PERIOD)
Peak District		100%	960 - 2000	48-100
White Peak	Derbyshire Dales	65.1	625 - 1,302	31-65
Dark Peak	Barnsley High Peak Kirklees NE Derbyshire Oldham Sheffield	20.7	199 - 414	10-20
South West Peak	Cheshire East Staffordshire Moorlands	14.2	136 - 284	1-4

It is important to note that these figures include conversions as well as new-build homes. Over a thousand (1,237) new homes have been built in the Peak District since 2006; around two-thirds (66%) of these are converted buildings and a quarter (22%) are new-build local needs homes on green field sites. In the next plan period our policies will continue to support conversions and new-builds.

Question 28

- a. Do you agree with the proposed spatial objectives?
- b. What is the reason for your answer?

Issue 29

Holiday homes and permanent homes

Many visitors stay in holiday homes to explore the National Park. They can be a source of income and a form of farm diversification. However, it is widely acknowledged that where there are high concentrations of holiday homes there is an adverse impact on the availability and affordability of homes to buy or to rent for local people and on the sustainability of communities more broadly.

To address concerns about the number of holiday homes in the National Park we could impose a permanent residence clause on new residential properties located within or on the edge of settlements. Their sole use would be for permanent residential use, preventing them from being used as holiday homes.

We think the issue relates specifically to properties within or near to settlements. Properties in the open countryside may be more suitable as holiday homes because the use is less intensive and there are not the same amenity requirements. For example, there is less need for formal gardens and outdoor residential paraphernalia.

This issue refers only to new open-market dwellings as all affordable dwellings are already restricted using permanent residency clauses in S106 agreements.

Option 1

No policy change

Any open-market dwelling can be either a permanent home (as long as it is suitable to be a permanent home) or a holiday home.

Option 2

Policy change - Park-wide permanent residence clause

We impose a permanent residence clause on new residential properties located within, on the edge of, or close to settlements. Their sole use would be for permanent residential use, preventing them from being used as holiday homes.

This does not apply to holiday homes that support farm diversification, converted buildings that are not suitable as a permanent residence, and some buildings that are located in the open countryside.

Option 3

Policy change - permanent residence clause applied to specific settlements

We impose a permanent residence clause on new residential properties located within, on the edge of, or close to those settlements where the concentration of holiday homes is high (percentage to be determined). Their sole use would be for permanent residential use, preventing them from being used as holiday homes.

This does not apply to holiday homes that support farm diversification, converted buildings that are not suitable as a permanent residence, and some buildings that are located in the open countryside.

Question 29

- a. Which is your preferred option?
- b. What is the reason for your answer?

Issue 30

Affordable housing eligibility

Current policy allows new affordable homes to be occupied by:

- local people currently living in accommodation which is overcrowded or otherwise unsatisfactory (including young people and others forming a household for the first time)
- non-residents with local roots wishing to return to the Peak District (as long as they are in housing need, ie their current accommodation is overcrowded or unsatisfactory)
- people with an essential need to care for a local person.

We need to decide whether this is still the right approach. Are there other local circumstances that should be taken into account? If we change the approach, should it apply to both RSL and private development?

For example, we could consider people currently living in housing need (ie currently in accommodation which is overcrowded or otherwise unsatisfactory) who:

- work in the National Park. This could be employment generally, or employment that responds to a specific role for example, the emergency services or a care provider. It would be subject to conditions such as, but not restricted to: a permanent contract; number of hours in work; length of time already spent in the role.
- have an immediate family connection. This could be parents or children who can demonstrate they have lived within the National Park for a certain period of time.

Widening eligibility criteria will contribute to our management plan aim to support sustainable communities⁶ and increase the pressure to build on green field sites.

Question 30

- a. Do you think that the eligibility criteria for occupation of RSL managed affordable housing (as set out in Policy DMH2) should be widened?
- b. What is the reason for your answer?
- c. Do you think that the eligibility criteria for privately owned and managed affordable homes (as set out in Policy DMH2) should be widened?
- d. What is the reason for your answer?
- e. Do you think we should explore new policy on tied accommodation?⁷
- f. What is the reason for your answer?

⁶ Objective 10: To support sustainable communities by improving opportunities for affordable housing and connection to services

⁷ Tied accommodation is provided by an employer. Tenants have different rights depending on whether occupation is a condition of employment.

Issue 31

Affordable housing - local connection

Please note, this issue applies specifically to new-build affordable homes built predominantly on green field sites.

Imposing a local connection for first, second and subsequent occupants is essential, otherwise affordable homes would be lost to the open market. The local connection requirement is currently:

- minimum period of 10 years permanent residence in the parish or adjoining parish
- not now resident in the parish but having lived for at least 10 years out of the last 20 years in the parish or an adjoining parish

We need to decide whether to change the local connection definition, and if so, whether to apply the changes to just to RSL development, or to include people wishing to build their own homes.

Widening local connection criteria will contribute to our management plan aim to support sustainable communities⁸ and increase the pressure to build on green field sites.

Question 21

Please note, these questions apply specifically to new-build affordable homes built predominantly on green field sites.

- a. Do you think we should retain or reduce the 10-year local connection requirement for first occupation of RSL homes?
- b. What is the reason for your answer?
- c. Do you think we should retain or reduce the 10-year local connection for private developers, including people building their own homes?
- d. What is the reason for your answer?
- e. Do you think we should redefine 'local connection' for people wishing to return to the Peak District? If so, what criteria should we use?
- f. Do you think there should be any exception to the requirement for a local connection? (For example, no local connection is needed for new homes that are needed to support farming, forestry and other rural enterprises.)

Issue 32

Affordable housing - house size

Current policy restricts the size of affordable homes because this is one way of making them more affordable in the long term. We need to decide whether this principle should be retained in the new local plan, and if so what thresholds should apply. We also need to consider whether a different approach is needed for local people building their own home.

⁸ Objective 10: To support sustainable communities by improving opportunities for affordable housing and connection to services

Question 32

Do you think that the new Local Plan should retain a size restriction on new affordable homes?

- a. What is the reason for your answer?
 - b. Should the same standards be applied to RSL and privately developed homes?
-

Issue 33

Proposed spatial objectives for shops, services and community facilities

To support businesses and the provision and retention of community services and facilities in locations that support thriving and sustainable communities, reduce the need to travel and enable travel by sustainable means (low carbon, public transport and active travel.)

Question 33

- a. Do you agree with the proposed spatial objectives?
 - b. What is the reason for your answer?
-

Issue 34

The retention of shops, services, community facilities and businesses

We need to protect, to the extent that it is possible within planning policy, the services and businesses that are valued by communities. Applicants seeking to change any of these uses would need to demonstrate that it was no longer needed, available elsewhere in the settlement, or no longer viable. Policy would also require that wherever possible the new use should meet another community need and that any market dwellings should be permanent homes (in accordance with any new policy on permanent homes - see Chapter 7 Issue 29). We need to decide whether to expand the current list of uses we seek to retain to also include:

- shops (in addition to local convenience shops)
- cafes/restaurants
- offices and light industry (suitable for residential areas).

Question 34

- a. Do you agree with our proposal to expand the list of protected community services and facilities as described above?
 - b. What is the reason for your answer?
-

Issue 35

Protection of Bakewell's special character and setting

The new local plan will list the special quality key features of the whole national park alongside new planning policy requiring their conservation and enhancement. We need to ensure that the individual qualities that make up Bakewell's special character are properly included in the new list. There are questions about this in Chapter 1 Issue 3.

We need to decide whether the new Local Plan should include a Bakewell specific policy on landscape setting and special character or whether this can be adequately conserved by general policies that apply to the whole National Park.

Question 35

- a. Should the new local plan include a Bakewell specific chapter that would include policy on landscape setting and special character?
 - b. What is the reason for your answer?
 - c. Are the qualities that make up Bakewell's special character properly included in the list of Special Quality Key Features shown in Appendix 2?
 - d. If not, what else should be included?
-

Issue 36

Proposed spatial objectives for the rural economy

To support business development that conserves and enhances the Peak District's Special Qualities through:

- farm diversification
- the re-use of traditional buildings (heritage assets)
- new development in or on the edge of key settlements.

To support businesses that enhance Bakewell's role as an agricultural market town and tourist hub.

To protect existing employment sites that are well-located, and enable them to expand.

Question 36

- a. Do you agree with the proposed spatial objectives?
 - b. What is the reason for your answer?
-

Issue 37

Extensions to existing businesses

Piecemeal business development in the open countryside can harm the National Park's landscape and special qualities. This has happened in some places. We need to decide whether policy should set clearer limits to piecemeal business development, especially in the open countryside, and if so how best to do this.

This issue does not relate to business expansion on safeguarded employment sites where there is capacity to do so.

Question 37

- a. What other tests (other than those listed in current policy DME7 B above) should we apply to ensure that the piecemeal expansion of businesses does not harm the landscape and the special qualities of the National Park?
- b. What is the reason for your answer?

Issue 38

Conversion of whole farmsteads to new uses

As a result of changes in farming practices we are starting to see whole farmsteads coming out of farming use. Without maintenance and appropriate new uses they may disappear from the landscape. But equally, poor conversion can pose a threat to the landscape character and special qualities of the National Park.

Business use and residential use may be acceptable in principle on whole farmsteads in or on the edge of settlements or in locations that are physically well related to a settlement or can be made more sustainable, with direct and close access to a main road.

For isolated whole farmsteads low intensity uses that do not impact on the landscape character and special qualities of the National Park, for example holiday accommodation or low intensity recreational use may be acceptable.

For all applications to convert whole farmsteads to new uses we will continue to seek enhancement, including the removal of existing modern agricultural buildings.

Question 38

- a. Do you agree that the conversion of whole farmsteads (that are no longer in farming use) for business or residential use should only take place if the farmstead is:
 - in or on the edge of settlements
 - physically well related to a settlement
 - in a sustainable location with direct and close access to a main road?
 - b. What is the reason for your answer?
 - c. Do you agree that the conversion of whole farmsteads (that are no longer in farming use) that are located in the open countryside and away from settlements, is only acceptable for low intensity uses, for example holiday accommodation?
 - d. What is the reason for your answer?
-

Issue 39

Primary business

Current policy requires the primary land management business (usually a farm business) to retain ownership and control of a site and building when redundant farm buildings are converted for business use.

We need to decide whether this is still appropriate in all circumstances.

Question 39

- a. Do you think we should continue to require in all circumstances the primary business to retain ownership and control of the site and building when redundant farm buildings are converted for business use?
- b. What is the reason for your answer?
- c. If we decide that a stand-alone business is acceptable, what are the risks associated with this?
- d. If we decide that a stand-alone business is acceptable, what constraints should be applied?

Issue 40

Proposed spatial objectives for travel and transport

To deliver a pattern of development for homes, businesses and community facilities that reduces the need to travel and enables travel by sustainable means (public transport and active travel).

To resist proposals, including for new roads, that would lead to an increase in cross-park traffic.

To support facilities and infrastructure for the switch to low/zero carbon transport.

To safeguard and extend the existing strategic multi-user trails.

To protect existing, and create new routes for walking, cycling, wheeling and horse-riding.

At recreation attractions and hubs, to work with highway authorities, landowners and residents to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on Special Qualities, is reduced.

Question 40

- a. Do you agree with the proposed spatial objectives?
 - b. What is the reason for your answer?
-

Issue 41

Visitor car parking

New planning policy for visitor parking will:

- continue to require that there is a demonstrable need for new car parking
- ensure that provision would not adversely affect the special qualities of the National Park
- align to any new approach for designated recreation attractions and hubs.

In this context we need to decide whether overall, policy for visitor parking should be more restrictive than it is currently, less restrictive, or stay the same? We can do this by redefining 'demonstrable need' and whether to consider new and enlarged car parks, or just enlarged car parks.

- Current policy supports new or enlarged car parks so long as there is 'demonstrable need, delivering local benefit'. Local benefit means for example improving amenity for residents, or enhancing the built environment of a settlement.
- A more restrictive policy would allow existing car parks to be expanded, but would not allow any new car parks.
- A less restrictive policy would allow new or enlarged car parks as long as there was a 'demonstrable need, delivering local benefit or wider environmental benefit'. Wider environmental benefit means for example on landscape, visitor management and the safe and efficient operation of the highway.

Option 1

Retain current policy

Current policy supports new or enlarged car parks so long as there is 'demonstrable need, delivering local benefit'. Local benefit means for example improving amenity for residents, or enhancing the built environment of a settlement.

Option 2

More restrictive policy

A more restrictive policy would allow existing car parks to be expanded, but would not allow any new car parks.

Option 3

Less restrictive policy

A less restrictive policy would allow new or enlarged car parks as long as there was a 'demonstrable need, delivering local benefit or wider environmental benefit'. Local benefit means for example improving amenity for residents, or enhancing the built environment of a settlement. Wider environmental benefit means for example on landscape, visitor management and the safe and efficient operation of the highway.

Question 41

- a. Which option do you prefer?
 - b. What is the reason for your answer?
-

Issue 42

Safeguarding and protecting multi-user trails on former railway routes

The Manifold, Tissington and High Peak Trails, and other long-distance routes, are protected from development that conflicts with their purpose (Current Policy Core Strategy T6). We need to decide whether the Monsal and Longdendale Trails should be similarly protected, or whether to continue a 'safeguarding' policy for future rail use.

It is important to note that the effect of these different approaches is the same (protection from prejudicial development) but the current safeguarding policy implies support for future rail use. It is highly unlikely that we would support future rail use on either of these routes because it is major development and contrary to national park purposes.

Option 1

New policy will continue to safeguard the Monsal and Longdendale Trails for future rail use

Option 2

New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes.

Question 42

- a. What is your preferred option?
- b. What is the reason for your answer?

Issue 43

Road building schemes

New planning policy will continue to:

- support road building when it is needed for new business or housing development, road safety and road maintenance
- resist new roads and major alterations to existing roads for cross-Park travel unless there are exceptional circumstances as set out in Policy DMT1 (shown above).

We need to decide whether new policy should support schemes where the primary purpose is local capacity enhancement. Local schemes would also potentially be major development and therefore could only be supported if there were exceptional circumstances. But these may be different to the exceptional circumstances set out in Policy DMT1 (shown above.)

Question 43

- a. Do you think new policy should support road-building schemes where the primary purpose is local capacity enhancement?
 - b. What is the reason for your answer?
 - c. What are the exceptional circumstances that might justify this?
-

Issue 44

Overnight parking for campervans

We need to decide whether we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. The new policy would not apply to small car parks in remote or environmentally sensitive locations.

Question 44

- a. Do you think we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes?
 - b. What is the reason for your answer?
-

Issue 45

Air transport

Current policy does not permit aircraft take-off and landing sites, including for drones. Within the plan period it is possible that commercial drones could be used to deliver goods to the Peak District. We need to decide whether new policy should be changed to permit this.

Drones may fly across the Peak District whether or not we permit take-off and landing. Therefore we may also wish to map no-fly zones to protect environmentally sensitive areas, for example the Natural Zone where there are important nesting sites.

We may wish to allow for a bespoke take-off and landing sites for emergency helicopters to operate from whilst on stand-by.

Options 1

Aircraft take-off and landing sites will not normally be permitted.

Option 2

Aircraft take-off and landing sites will not normally be permitted, with the exception of commercial drones and stand-by sites for emergency helicopters.

Question 45

- a. What is your preferred option?
 - b. What is the reason for your answer?
 - c. Do you think that the National Park Authority should map 'no-fly' zones for commercial drones to protect the environmentally sensitive areas of the National Park (these are likely to encompass the Natural Zone?)
-

Issue 46

Proposed spatial objectives for utilities

That new or upgraded utilities infrastructure does not adversely affect the Peak District's Special Qualities.

Question 46

- a. Do you agree with the proposed local plan spatial objective for utilities?
- b. What is the reason for your answer?

Issue 47

New or expanded reservoirs

We need to decide whether the new local plan should contain a new policy to say that no new reservoirs will be permitted.

Options 1

Continue with our current approach. National policy would determine whether or not a new reservoir should be built. Local plan policies would be used to consider issues such as landscape, cultural heritage, biodiversity and recreation.

Option 2

Write a new policy that says no new reservoirs will be permitted. National policy would still determine whether or not a new reservoir should be built. However a new policy would clearly set out our agreed position and would be used alongside other local plan policies that considered landscape, cultural heritage, biodiversity and recreation.

Question 47

- a. What is your preferred option?
 - b. What is the reason for your answer?
-

Issue 48

Local plan spatial objectives for minerals and waste

To resist further proposals for the working of: aggregates; limestone and shale for cement manufacture; large scale roofing and building stone; and limestone for industrial and chemical products so that there is a continued gradual reduction.

To allow small-scale building and roofing stone quarries.

To require site restoration that delivers significant long-term landscape enhancement (from current position) and makes a major contribution to nature recovery.

To resist large scale waste management facilities.

To allow small-scale waste facilities that serve local communities.

Question 48

- a. Do you agree with the proposed local plan spatial objectives for minerals and waste?
 - b. What is the reason for your answer?
-

Issue 49

Limestone quarries - extending beyond the 'end date'

The Peak District National Park Authority's estimated landbank for crushed rock aggregates is 29 years. This means that in the next plan period (to 2045) no new permissions are necessary to satisfy the legal requirements. All quarries have an agreed end date, or an 'imposed' end date of 21st February 2042. Reserves may be exhausted before end dates at some quarries; at others the reserve will exceed the volume that can be extracted in the period available. Therefore we may receive applications for extensions of time. In effect we need to decide whether quarrying should continue at existing sites beyond the current end date.

In making this decision we need to consider that:

- active sites with viable reserves form part of the regional and national landbank that ensures a steady and adequate supply of minerals to meet the country's needs.
- landscape harm would not increase, but would perpetuate, and restoration would be delayed.
- it would constitute major development, which is not permitted in national parks except in exceptional circumstances.

Question 49

- a. Should mineral extraction at existing quarries with remaining reserves be allowed to continue beyond the agreed or imposed end dates?
 - b. Should this apply to specific quarries? If so, which ones?
 - c. What are the exceptional circumstances that would justify extensions of time for mineral extraction (as this would constitute major development in a national park)?
-

Issue 50

Limestone industrial uses

Proposals for quarrying limestone for industrial purposes may be capable of satisfying the strict tests that apply to major development in a national park. However there are permitted reserves in Derbyshire within and outside the National Park. Those outside the National Park are substantial, with long-life permissions. All the reserves use the same geological resource and therefore have the same required 97% purity. There is therefore no requirement in the forthcoming plan period for additional sites inside the National Park to meet the need for limestone for industrial and chemical purposes.

We need to consider whether this principle (that there is no requirement for industrial-use limestone to be supplied from inside the National Park) is set out as a policy in the new local plan or whether instead to seek a memorandum of understanding with neighbouring authorities.

Question 50

- a. Do you agree with the principle that that the future supply of industrial limestone should come from outside the National Park?
 - b. What is the reason for your answer?
-

Issue 51

The future of the Hope site

When we are more certain about the date of closure, we will work with the landowner, stakeholders and the local community to develop a Supplementary Plan for the future of the site. This will set out which areas are to be restored in accordance with any extant consents, and define brownfield areas that could be redeveloped.

Before then, the new local plan should state the broad policy principles for restoration and redevelopment. These principles must deliver:

- national park purposes for landscape, wildlife and cultural heritage
- national park purposes for the public's enjoyment and understanding
- our duty to foster the economic and social wellbeing local communities.

Question 51

Taking into account national park purposes, what broad policy principles should be set out in the new local plan, to guide restoration and redevelopment at Hope Cement Works?

Issue 52

Stone for building and roofing

Current policy for building stone only applies to small-scale sites where end-use of the product is restricted. Unlike the approach to the provision of construction aggregates, there is currently no agreement with other Mineral Planning Authorities to provide building stone.

We need to decide whether to change our approach, and if so whether any new policy should include defined areas of search.

Option 1

Retain current building stone policy MIN3

We retain current policy MIN3 (see above) so that end use of the stone is restricted for use in buildings and structures within the National Park.

This may make the National Park vulnerable to speculative applications, including for large sites, if a national need can be demonstrated and cannot be met elsewhere. It also means that the supply of stone for local use is more vulnerable, including stone used for the conservation and enhancement of the National Park's special qualities.

Option 2

No separate building stone policy (delete MIN3)

We could choose not to have a separate policy for building stone quarries. This would mean that building stone applications are dealt with in the same way as applications for limestone aggregates and limestone industrial uses. Proposals would not be permitted other than in exceptional circumstances set out in national policy. The major development test for national parks is set out in paragraph 183 and footnote 64 of the National Planning Policy Framework. 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 outside the designated area, or meeting the need for it in some other way; (iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

As with Option 1, Option 2 may make the National Park vulnerable to speculative applications, including for large sites, if a national need can be demonstrated and cannot be met elsewhere. It also means that the supply of stone for local use is more vulnerable, including stone used for the conservation and enhancement of the National Park's special qualities.

Option 3

New building stone policy (re-write MIN3)

A new building stone policy would be similar to current policy MIN3 (see above) but the reference to 'small-scale' and the requirement for within-Park end-use would be removed.

National planning policy and guidance suggests that Mineral Planning Authorities should recognise the small-scale nature and impact of building and roofing stone sites. It does not differentiate between building stone sites permitted to supply the open market and those that serve only a local need. Option 3 would bring our policy in line with the National position.

Option 4

New building stone policy (re-write MIN3) with allocated areas of search

As Option 3, and in addition we would allocate areas of search or preferred areas. The market would dictate if sites/applications are proposed but we could designate areas of search or preferred areas, for example where the landscape impact was less, and the stone most suitable for the National Park's buildings.

Question 52

- a. Which option do you prefer?
 - b. What is the reason for your answer?
-

Issue 53

Ancillary minerals development

We need to consider whether active quarries with ancillary processing facilities should be able to import stone from other quarries inside the National Park for processing.

Question 53

- a. Should sites with ancillary processing in the National Park be able to import stone from other quarries in the National Park for processing?
 - b. Are there other appropriate locations for the small-scale processing of stone won and worked in the National Park?
-

Issue 54

Restoration and aftercare

We need to decide whether new policy on restoration and aftercare should have a stronger focus on nature recovery. Should we require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes?

Question 54

- a. Should new policy on restoration and aftercare have a stronger focus on nature recovery?
- b. Should we require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes?
- c. What is the reason for your answer?