



**Peak District National Park
Authority**

Local Plan 2026-2045

(Regulation 19)

**Statement of Compliance with the Duty
to Co-operate**

And

Statements of Common Ground

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Section 1: Introduction

1. The Duty to Co-operate (DtC) requires local authorities to co-operate with each other and with other prescribed bodies, on strategic matters that cross administrative boundaries.
2. This Statement of Compliance has been prepared by the Peak District National Park Authority ('PDNPA' 'the Authority') to demonstrate how it has met the requirements of the DtC in relation to the Peak District National Park Local Plan (2026 to 2045).

What is the Duty to Co-operate?

3. The DtC responsibility on local authorities was created in the 2011 Localism Act and amends the 2004 Planning and Compulsory Purchase Act. Section 33A of the Planning and Compulsory Purchase Act places a legal duty on local planning authorities in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The DtC is not a duty to agree but planning authorities are expected to make every effort to secure the necessary cooperation on strategic cross boundary matters before Local Plans are submitted for examination.
4. For the purposes of the DtC, a strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.
5. The National Planning Policy Framework 2024 states in paragraph 24 that 'In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.'
6. The Local Plan examination in public will test whether a local planning authority has complied with the DtC. The planning inspector can recommend that the Local Plan is not adopted if the duty has not been complied with. If the inspector is satisfied that the local planning authority has complied with the DtC the examination will proceed to consider whether the plan is sound.
7. To assist in the assessment as to whether a local planning authority has complied with the DtC, the Planning Inspectorate recommends that a Statement of Compliance with the duty be submitted, along with any Statement of Common Ground (SoCG).

Removal of the Duty to Co-operate

8. In November 2025, Government took the decision to not to 'save' the Duty to Co-operate, thereby removing this requirement for plans in the current system. Local Authorities are advised to continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'.
9. Inspectors will expect to see evidence of authorities maintaining effective co-operation in line with national policy requirements of the NPPF and producing robust evidence to demonstrate that effective co-operation on strategic matters of cross-boundary importance has been undertaken will still be relevant and the DtC Compliance Statement

(or similar) will likely remain key, as will the need to produce Statements of Common Ground with key stakeholders.¹

Duty to Co-operate Bodies

10. The DtC applies to local planning authorities, county councils in England who are not a local planning authority and number of 'prescribed bodies'. The Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended) identifies the prescribed bodies as follows:
- Environment Agency,
 - Historic Buildings and Monuments Commission for England (Historic England),
 - Natural England,
 - Mayor of London,
 - Civil Aviation Authority,
 - Homes England,
 - Clinical Commissioning Groups,
 - National Health Service Commissioning Board,
 - Office of Rail and Road,
 - National Highways,
 - Transport for London,
 - Integrated Transport Authorities,
 - Highway Authorities,
 - Marine Management Organisation
11. Local Economic Partnerships are identified in the regulations as bodies that those covered by duty 'should have regard to' when preparing local plans given their role in creating or improving the conditions for economic growth in an area. Local Nature Partnerships (LNPs) are also prescribed in the regulations as bodies which local authorities 'should have regard to' given their role in protecting and improving the natural environment.

Duty to Co-operate in a Peak District National Park context

12. The Peak District National Park presently has 11 constituent authorities and 4 combined authorities as shown on Figure 1 below:
- 2 county councils (Derbyshire and Staffordshire)
 - 3 district councils (Staffordshire Moorlands, North East Derbyshire, Derbyshire Dales)
 - 1 borough council (High Peak Borough Council)
 - 5 unitary authorities (Cheshire East, Oldham, Kirklees, Barnsley, Sheffield)
 - 4 combined authorities (East Midlands Mayoral Combined Authority, Greater Manchester Mayoral Combined Authority, South Yorkshire Mayoral Combined Authority, West Yorkshire Mayoral Combined Authority.)
13. The PDNPA is the Planning Authority for the area within the National Park, the constituent authorities are the plan-making bodies for the parts of their areas that lie outside of the National Park. As a whole, the combined and constituent authorities are responsible for a range of functions and services within the National Park itself, including housing, economic development, highways, flood risk, social care, education, waste disposal and transport.

¹ [Cooperating, Collaborating and Statements of Common Ground | Local Government Association](#)

14. As a Minerals Planning Authority the National Park Authority must also cooperate with the local authorities that comprise the East Midlands Aggregates Working Party. These are:

- Derbyshire County Council
- Leicestershire County Council
- Nottinghamshire County Council
- North Northamptonshire Council
- West Northamptonshire Council
- Rutland Council
- Lincolnshire County Council
- North Lincolnshire Council.

Existing mechanisms for engagement

17. Regular liaison on strategic planning issues occurs through a range of groups and forums as set out below.

Relevant forums/meetings

- Derbyshire Policy Officers Group (Policy and Communities Team Manager)
- East Midlands Combined Authority Nature and Biodiversity Task Force (CEO)
- Local Access Forum (NPA officers)
- Natural England Liaison Meetings (CEO)
- East Midlands Heads of Planning (Head of Planning and Conservation)
- National Park User Group (CEO)
- Planning Agents Forum (Head of Planning and Conservation)
- Stange Forum (NPA officers)
- Fire Operations Group (NPA officers)
- National Park Management Plan Partnership (NPA officers)
- Business Peak District (Head of Planning and Conservation)
- PDNPA/DDDC Housing Working Group (Policy and Communities Team Manager)
- Transport Liaison Groups (various) (Transport Policy Planner)
- Local Nature Recovery Strategy Partnerships (various) (NPA officers)
- Parishes Forum and Parishes Day (Policy and Communities Team Manager)

National Park Authority Governance

18. Membership is set out in legislation (Environment Act 1995) and includes Secretary of State appointed representatives and councillors from constituent local authorities and parish councils. The PDNPA usually has around 30 members. Their role is to: ensure the Authority fulfils National Park purposes; deliver efficient, effective and accountable governance and provide leadership, scrutiny and direction in pursuing the aim of sustainable development. Formal approval of the emerging plan for consultation and final adoption, and formal approval of other Local Development Documents such as the Statement of Community Involvement and the Local Development Scheme rests with the full Authority. Annual Monitoring Reports are taken to the Planning Committee.

19. The Local Plan Steering Group is a member group with delegated Authority to:

- oversee the process for reviewing the Local Plan and the progress made on individual work streams
- provide the core project team with a Member perspective on issues raised
- ensure integration/complementarity of the vision, objectives and policies of the Local Plan with those of the Corporate Strategy, the National Park Management Plan and Authority Policies
- advise on other key decisions on matters relating to Local Plan production including
 - resources, scope of documents, evidence base, identification of alternative
 - development options, content of the local development scheme, sustainability
 - appraisal/appropriate assessment, and consultation methods.

20. Parish, local authority and Secretary of State appointed members are represented on the Steering Group.

National Park Management Plan and Partnership

21. National park authorities are required by law to write a management plan and a local plan for their national park. A management plan sets out how a range of organisations will work together to achieve shared objectives. The PDNP Management Plan sets out a long-term Vision and the Aims and Objectives that the new local plan will help to deliver.²
22. The NPMP Partnership brings together many partner organisations including local authorities, landowners, farmers, businesses, local residents and community groups, voluntary organisations and interest groups and government organisations.

Recording DtC engagement and activities

23. The Authority, and the Policy and Communities Team responsible for plan preparation, have long established working relationships with many of the DtC bodies relating to the preparation and delivery of Local Plans, National Park Management Plans and other strategies, programmes and projects.
24. Co-operation on the development of the Local Plan (2025-40) has involved:
 - Duty to Co-operate meetings
 - Extensive informal and formal consultation
25. A summary timeline of the key engagement activities during the preparation of the local plan is shown in Appendix 1. The record of co-operation on strategic issues is provided in Section 2.

² [Peak District National Park Management Plan](#)

Section 2: Record of Co-operation

The tables below set out the record of co-operation between the PDNPA, its constituent local authorities and other relevant duty to co-operate bodies.

Strategic issues are identified and further explored in Section 3.

2021 informal stakeholder consultation on Topic Papers			
Prescribed Body	Issue	PDNPA response/action	Strategic issue to be addressed in Statement of Common Ground (Y/N)
Derbyshire Dales District Council			
Councillor	The need for affordable housing has nowhere near been met. The sustainability of many villages, as vibrant and thriving communities, is in question. More must be done to absorb some of the burden being inflicted on the towns and larger villages in the south of the District.	Ongoing consideration.	Y
Councillor	Market housing should be allowed.	Fully considered through plan-making process including through the <i>Economic Viability Assessment</i> .	N
Councillor	Definition of need is not appropriate.	Fully considered through plan-making process.	N
Officer	Need to consider the increase flows of water that travel down the Wye and Derwent.	Considered through the SFRA.	Y
Officer	Need policy on overnight camping for motorhomes.	Fully considered through plan-making process.	N
Officer	It is considered imperative that the first stage of Local Plan review should entail the identification of the scale of housing needed for the future of the National Park, then consideration of what is the best policy approach to delivering the future housing requirements. Whatever approach is taken the Local Plan must be able to show that it has identified the requirement and set out clearly how it is going to deliver the requirement. Either, for example, by identifying sites or having wider boundaries which	Fully considered through plan-making process including through the <i>Population Projection and Housing Needs Assessment</i> , the <i>Housing Need Assessment (Standard Method 3)</i> and the updated <i>Affordable Housing Needs Assessment</i> .	Y

	would in essence provides additional capacity. This needs to be documented as to how the requirement will be met.		
Officer	Climate change mitigation and adaptation measures should be integrated into all policies.	Fully considered through plan-making process.	Y
Officer	A relaxation of the 10-year local connection policy would be welcomed	Fully considered through plan-making process.	N
Officer	There are potentially cross boundary implications should the new Local Plan identify a nature recovery strategy which in turn identifies networks. There is the possibility that by increasing scope and range of protection of the landscape this in turn may impede development opportunities in the future.	Fully considered through plan-making process.	Y
Officer	The identification of 'Gateway' sites may have an impact on the communities of Derbyshire Dales, in terms of impact on transport, infrastructure and services. The concept of "Gateway" and the specific locations needs to be fully explained.	Fully considered through plan-making process. The concept is not carried forward into the draft plan.	N
Officer	Evidence to support economic development is out of date. The PDNPA evidence base is weak in this regard. The evidence base is also weak in mistaking agriculture and tourism as the 'main' industries in the National Park, when in terms of employment they are relatively minor.	Fully considered through plan-making process including through the <i>Economic Development Needs Assessment</i> .	Y
Officer	The District Council would welcome discussion regarding the location of larger scale renewable energy schemes, in particular with regard to landscape impact.	Fully considered through plan-making process including through the <i>Derbyshire Spatial Energy Study</i> and the <i>Settlement Character Analysis & Landscape Sensitivity Assessment</i> .	Y

2024 Regulation 18 <i>Issues and Options</i> consultation			
Prescribed Body	Issue	PDNPA response/action	Strategic issue to be addressed in Statement of Common Ground (Y/N)
Environment Agency	Plan should have a stronger focus on nature recovery.	New policy on nature recovery (Policy B4)	Y
	Spatial Objectives should include reference to nutrient neutrality, use of SuDS and focusing development to sewered areas.	Spatial objectives refer to floodplain landscapes, making space for water and sustainable locations. Policies refer to SuDS (Policy CC4).	Y
	Settlement strategy should consider existence of, and focus development towards, settlements that have foul sewerage systems and the requirement for nutrient neutrality.	Settlement strategy directs development to main settlements (Policy C8).	Y
	The Peak District National Park covers a substantial part of the Carboniferous Limestones, one of our Principal aquifers. The aquifer provides substantial volumes of flow to the Rivers Wye, Lathkill, and ultimately the Derwent; and provides part of the public water supply for Derbyshire. Policies DMC14 (Water) and DMC 15 (Contaminated Land), with supporting Plan paragraphs should be retained as indicated.	New policy requires risks posed by contaminated land to be addressed (Policy CC4 and C10).	Y
	Objective 8 should be more ambitious to not only encourage people to connect or enjoy the National Park but also to educate them.	Not a planning matter.	N
	Support for a policy that sets out the PDNPA's approach to carbon capture.	The Authority is deferring setting out its approach until full evidence is available.	Y
	If areas for energy generation are spatially defined they should not overlap with those marked in the Local Nature Recovery Strategy (LNRS) as high nature value or habitat expansion areas.	The Plan does not define the areas.	N

	The new local plan should set out in policy the sustainability measures expected for different types of development.	This is covered in Policy CC1.	N
	Embodied carbon should be considered as part of the requirement for high sustainability standards.	This is covered in Policy CC1.	
	Objective 3 should be more ambitious, not only focusing on reversing damage to nature but also enhancing its resilience to future climate change impacts. They support making 'flood prevention' its own objective, with an emphasis on Natural Flood Management techniques. The objective to 'support work to create and manage floodplain landscapes' should also incentivize making space for water. Additionally, they suggest adding water management as an objective, including promoting rainwater harvesting, sustainable building practices, and the use of SuDs and swales to achieve clean water and nutrient neutrality. The policy should also emphasize habitat connectivity, promote blue/green corridors, and consider improving the flood resilience of buildings for a low-carbon future.	Objective & policies fully addresses these issues.	Y
	Flood risk prevents a challenge to a range of cultural heritage assets within the Peak Park and including an objective to improve the resilience of these assets to flooding would be of benefit.	This is addressed in Objective 8.	Y
	The Peak District National Park should aim to be exemplary in its response to climate change and the new planning policies for biodiversity net gain should go beyond the 10% mandatory requirement.	This is addressed in Policy B4 – all development is required to contribute proportionately.	Y
	Landscape and nature recovery policies should make clear that any enhancement should also help achieve nutrient neutrality (in applicable catchments), reduce flood risk and contribute to the delivery of natural capital and green infrastructure strategies, including cross-boundary strategies. In addition, where it is proposed to include 'requirements for development falling outside mandatory BNG' in the new policy, this should include an expectation on development when the baseline units are zero to ensure that some environmental enhancement is delivered. The policy should also recognise	This is addressed in Policy C10	Y

	the importance of habitat connectivity in supporting nature recovery and promote blue/green corridors e.g. encouraging the removal of weirs		
	Objective 4 could be more ambitious by supporting nature to not only recover but also to be enhanced. It should make reference to delivering a minimum 10% BNG and have an objective linked to delivering measures identified in the LNRS. In terms of promoting healthy soil and clean water the objective could also promote farming best practises, e.g. Catchment Sensitive Farming techniques. The objective 'to promote' healthy soil, and clean air and water' could be enhanced by including an objective to protect the quality of groundwater and groundwater dependent features from pollution.	This is addressed in Policy B4 and CC4	Y
	If there are any areas of local importance which are not currently protected as a community recreation site or open space in a conservation area they may be better protected by being designated as a Local Green Space.	This is addressed in Policy S6	N
	GSP 2 should not only reference nature recovery but also climate change resilience.	This is addressed in Policy C2	Y
	The EA set out its policy position in regard to quarry development whereby local plan policies must protect groundwater.	Minerals and waste policies are prescriptive of requirements which must be met in regards minerals/waste disposal proposals.	N
	Foul sewage disposal is an important consideration regarding the redevelopment of isolated buildings and the development of camping and caravan sites.	This is addressed in Policy CC4	N
Historic England	Restoration and aftercare of minerals sites will need to consider its impact on the historic environment. Appropriate restoration principles will be required that protect the significance of heritage assets, including their setting. We would want to see what the impacts are for the historic environment and specific policy wording to protect the significance of heritage assets and their setting. These should also include policies for appropriate restoration principles.	This is addressed in Policy M4	N

	A policy for local stone supply could be useful.	This is addressed in Policy M3	Y
	Could heritage tourism be included withing the Spatial Objectives for Recreation and Tourism?	Not specifically addressed.	N
	The proposed approach to the conversion of isolated traditional buildings appears to be a positive response to a local issue and could be a welcome inclusion in the Local Plan.	This is addressed in Policy C5, CH1 and CH2.	N
	The methodology for determining non-designated heritage assets could further set out the implications of setting, the role of archaeology, the need for heritage impact assessment to accompany a planning application and what this should include, the need for archaeological assessments and the type of assessments and when, consideration of key views and landscapes within the National Park, how to deal with the demolition of a heritage asset, how to consider climate change and renewable energy generation in the context of the historic environment etc.	This is addressed in CH1 and CH2.	N
Natural England	Natural England would welcome a new minerals policy that would focus more strongly on nature recovery. We would like to see net gain achieved at each phase of mineral extraction and restoration. The restoration of minerals sites should integrate into the Nature Recovery Network (guided by the emerging LNRS) and be sympathetic to the local landscape character. We acknowledge that there is considerable scope for minerals sites to achieve a much greater outcome than the minimum of 10% provided that any higher policy requirement is achievable and evidence based. Evidence should justify the target proposed and demonstrate that development is deliverable	This is addressed in M4 which requires the highest feasible percentage of BNG.	Y
	The restoration Hope Cement Works should integrate into the Nature Recovery Network and be sympathetic to the local landscape character. Any such proposals should look to follow the mitigation hierarchy in which the development should seek to: Avoid impacts; Minimise impacts; Remediate/restore habitats affected by impacts; and as a last resort, compensate for any residual harm through habitat creation or restoration.	This is addressed in Policy HW1	N

	Would like to see net gain achieved at each phase of mineral extraction and restoration. The restoration of minerals sites should integrate into the Nature Recovery Network (guided by the emerging LNRS) and be sympathetic to the local landscape character and the wider setting of the site.	This is addressed in Policy M4.	Y
	The local plan should set out its position regarding new or expanded reservoirs which complement other local plan policies which seek to protect the special qualities of the National Park.	This is addressed in Policy U1.	Y
	New policy should protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes.	This is addressed in Policy T7	Y
	Active travel policy should be included in the policy to encourage walking and cycling and link with green infrastructure.	This is addressed in Policy T7	Y
	The new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas.	This policy is not adopted but the issues are addressed in Policy RT2.	N
	Do not wish to see a carbon capture proposal used to justify extension of life of Hope Works and unsure if the Authority should develop a policy. Any such proposals should look to follow the mitigation hierarchy.	The Authority is deferring setting out its approach until full evidence is available.	Y
	If areas for renewable energy development are identified spatially, it is crucial to consider the impact on protected landscapes, nature conservation sites, and soils, particularly peat areas. To assess these impacts, Landscape & Visual Impact Assessment (LVIA) and landscape sensitivity assessments should be conducted to evaluate how proposals would affect the landscape's character and views.	This approach is not adopted.	N
	Climate change and nature recovery should be central themes throughout the Plan. Additionally, they suggest incorporating positive policies to mitigate and adapt to climate change, acknowledging the interconnection between biodiversity loss and climate change. They also propose specific mention of	These issues area addressed throughout the Plan.	Y

	nature-based solutions like peatland restoration, river restoration, and tree planting, as well as addressing the impacts of climate change on protected sites, species, and habitats. They emphasize the need for sustainable drainage and water-sensitive design.		
	Whole Estate Plans (WEP) could be a positive approach and potentially assist with achieving a landscape scale approach to nature recovery.	This is addressed in Policy C8.	N
	We have concerns regarding the statement about proposals that aid agricultural activity under policy DMC 2 (development in the natural zone) may compromise the construction of the large fences that are going to be needed between the National Trust properties and the shooting estates if we are going to enable a grazing regime change to cattle.	This is addressed in supporting text to policy B1.	N
	Natural England advise that the policy may set out a percentage biodiversity net gain target greater than the statutory minimum of 10% that applies across the plan area or for specific parts of the plan area. Any higher policy requirement than 10% should be achievable and evidence based. Evidence should justify the target proposed and demonstrate that development is deliverable. The Local Plan should also encourage wider environmental gains, going beyond BNG to secure other natural capital benefits and benefits to people.	This is addressed in Policy B4	N
	Natural England agrees with the approach set out for nature recovery as it includes the key points to achieve a positive approach to nature recovery and incorporates recent changes to legislation such as Biodiversity Net Gain, Local Nature Recovery Strategies and Nutrient Neutrality. We welcome the fourth point i.e. that the right habitat should be created in the right place. We advise that the Plan should encourage woodland habitats where appropriate as Natural England is looking to increase tree cover over both the edge of the uplands and in the White Peak and the policy approach should support this approach. We suggest that Green Infrastructure could also be mentioned within this policy.	Nature recovery is addressed in Policy C1, C6 and B4. Green infrastructure is addressed in Policy C11, B4 and CC4.	Y

	Whilst Green Infrastructure is often considered within urban areas it is also relevant to rural areas. In a rural context it can refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.		
	Welcome the requirement to recover nature in accordance with the emerging Local Nature Recovery Strategies.	This is addressed in Policy B4.	Y
	Regarding sustainable travel: Active travel should be included in the policy to encourage focus on getting more people to walk and cycle for short journeys instead of relying on cars and public transport. This is a way of improving the health and fitness of communities and improving air quality by reducing congestion and carbon emissions. Transport proposals, including walking and cycling, should link with policies on Green Infrastructure and ecological networks to support access to nature. Transport proposals can also offer opportunities to create new habitats and/ or connect habitats for example railway embankments and highway verges. In addition, commonly encountered air quality impacts on designated sites are associated with emissions from increased road traffic resulting from new development and transport schemes. The impact of increased emissions should be fully considered and mitigated where there is potential to impact designated sites.	Sustainable travel is addressed in Policy T1 and Policy T7. Wildlife severance is addressed in Policy T16. Green infrastructure is addressed in Policy C10, C11, B4 and CC4. Air quality is addressed in C2.	Y
	Agree that there is 'additional local benefit' to be gained by designating Local Green Space in and on the edge of Peak District settlements. These areas should connect with the wider Green Infrastructure Network.	This is addressed in Policy S6	N
	Green Infrastructure should be a specific policy within the new Local Plan Review. A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in paragraph 181 of the NPPF. Green Infrastructure should be incorporated into the plan as a	Green infrastructure is addressed in Policy C10, C11, B4 and CC4.	Y

	strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery.		
	Natural England agrees with the Special Quality Key features that have been set out.	This approach is not adopted.	N
	Flood risk management and river restoration. Flooding is addressed in CC5 but there could be greater consideration of flood risk management including policy on the value of river restoration and promoting natural flood risk management.	This is addressed in Policy C10 and CC3	Y
	Air quality. We note that the adopted policy DMC14 Pollution and disturbance is not being reviewed. However, we suggest this policy could be extended to include the provision of on farm waste/ slurry management infrastructure which has been an issue for Natural England particularly the siting and height of covered slurry stores.	Air quality is addressed in C2 and C10. Management of farm waste is addressed in Policy E7.	Y
	Habitat regulations. Natural England agrees with the screening report's conclusion that all protected sites located within the Peak District National Park boundary are screened in and will be further considered through an Appropriate Assessment.		Y
	Particularly welcome the inclusion of blue and green infrastructure and the objective to promote nature recovery. Plan should take a strategic approach this including biodiversity net gain and improving connectivity.	Green infrastructure is addressed in Policy C10, C11, B4 and CC4	Y
Homes England	No response		
NHS	No response		
Rail Regulator	No response		
Highways Agency	No response		
Integrated Transport Authorities	See response from county and combined authorities.		
Highway Authorities	See response from county and combined authorities.		
Derbyshire County Council	Building stone - need to explain why reference to small-scale would be removed		
	Need to explain that local Mineral Planning Authorities (MPAs) determine aggregate provision in their area through the reparation	The description at 14.7 is misleading and is addressed in line with the responder's comment.	Y

	an annual Local Aggregate Assessment, taking account of guidance in the NPPF and PPG. The LAA is then submitted to the Aggregates Working Party (AWP), an advisory body made up of MPAs and mineral operators across the region, for consideration and scrutiny. The work of MPAs and AWP across the country is overseen by a National Aggregate Co-ordinating Group (NACG), the main role of which is to monitor the overall provision of aggregates in England and provide advice to AWP and the Government.		
	New road schemes must fully incorporate safe, convenient, and accessible Active Travel options to ensure they support and encourage sustainable and healthy travel choices.	This is addressed in Spatial Outcome 9 and Policies C10, C12, RT1, RT2 and travel and transport policies.	
	The respondent highlights: - The value of the current use and the White Peak Loop. The deficit in benefits from reopening the railway The inability for the Trail and rail to coexist on the same route The impact of reintroduction of rail on the Wye Valley including its SAC and SSSI. The response favours a change in policy, this option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.	Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose.	Y
	Holistic approach needed to visitor parking, working with local authorities and promoting alternatives to car-borne journeys. Supportive of the current approach but notes parking management can have unintended negative impacts.	This is addressed in Policies C8Dvb Development Strategy, RT1, RT2, T9 and T12.	Y
	Support objectives for travel and transport.	Noted.	Y
	Housing requirement welcome in principle but a key consideration and potential concern is a danger that PDNPA will be put under more pressure to put in place	The Authority is required to set a Housing Requirement.	Y

	similar processes that other non-National Park Local Planning Authorities to monitor their delivery of new housing against a housing 'target', particularly the need to continually update and demonstrate a five-year housing land supply.		
	Supports defining Recreation Hubs and attractions on maps and developing specific policies.	The approach regarding defined Recreation Hubs and Attractions is not taken forward. Policy RT1 concerns recreation development in settlements and RT2 concerns recreation development in the open countryside.	Y
	Not sure if agree with spatial objectives for recreation and tourism. concern in relation to directing recreation development towards settlements and certain existing recreation attractions and hubs. The respondent favours an approach of more even distribution and relieving pressure at entry points.	The spatial objectives set out in <i>Issues and Options</i> are amended to remove reference to hubs and refer instead to existing sites and other locations) where there is environmental capacity and significant overall benefit can be delivered.	Y
	Unsure whether CCS should be supported through policy.	The Authority is deferring setting out its approach until full evidence is available	N
	It would be useful to produce a framework for what would constitute an acceptable location (or conversely a non-acceptable location) for low carbon and renewable energy development.	This is set out in C8 and CC2.	Y
	Supports the inclusion of embodied carbon as part of the requirement for high sustainability standards.	Noted.	N
	Local Plan spatial objectives for climate change and sustainable building should include reference to battery storage.	Policy CC2 includes energy storage.	N
	Supportive of Whole Estate Plans.	Noted. Policy C8 Dva refers to Whole Estate Plans.	N
	Management of the NZ should also lead to an enhancement of the PDNP.	This is set out in supporting text to Policy B1.	N

	It is considered appropriate that PDNP look to go over and above the 10% mandatory BNG.	Nature recovery is addressed in Policy C1 and B4.	N
	Outline clear support for home-working	This is addressed in Policy E8.	N
	Strategic transport policy must reflect Highway Authority priorities, responsibilities, and sovereignties and avoid unintended consequences of: congestion in towns just outside the Park, especially at rail stations and bus hubs; increased footfall in villages and towns around key entry points to the National Park; higher levels of parking in neighbouring areas.	<p>The National Park Authority takes a pro-active approach in working with partners. However, it must be recognised that the National Park is covered by more than one highway authority and achieving a perfect synergy with the aims and desires of all of our constituent authorities may be difficult.</p> <p>It should also be borne in mind that the traffic passing from and through neighbouring areas also contributes to the congestion, carbon emissions, airborne pollution and other disbenefits experienced within those neighbouring areas. Our ultimate aim is for as many people as possible to make their journey to the National Park by public transport and / or active travel.</p>	Y
	If development boundaries are drawn up there is a worry that all of the area within the boundary has the green light for development.	Development boundaries are not taken forward.	N
	It is considered and supported that in the context of National Park purposes, only those settlements in the top tiers should have allocated sites and elsewhere the exceptions approach would still apply.	Site allocations are not taken forward.	N

	Spatial objectives for sustainable development in a national park should include stronger reference to climate change resilience - to heat, drought, wildfire etc.	Spatial Objectives under Outcome 1 refer to climate change mitigation and adaptation.	Y
Staffordshire County Council	<p>The most recent Local Aggregate Assessment (LAA) for Derbyshire, Derby and the Peak District National Park indicates the importance of crushed rock supply from the Peak District to other regions including the West Midlands (based on data from the national Aggregates Survey 2023). Paragraph 14.10 of the consultation document anticipates that the landbank for crushed rock aggregate may be sufficient to meet the requirements to 2045 but the certainty of this landbank provision needs to be assessed in terms of the maintenance of production capacity beyond 21 February 2042 at quarries within the National Park.</p> <p>Furthermore, the policy to substitute provision from quarries in Derbyshire (outwith the National Park) also needs to be assessed.</p> <p>The consequence of the 2042 limit on aggregate provision from the National Park should be considered in the context of alternatives available to maintain that provision, particularly where quarries in other areas may be similarly restricted by the 2042 end date.</p>	The Authority acknowledges that existing reserves form part of the current landbank and any proposal to preclude extensions of time at sites with remaining reserves in 2042 and the impact this would have on the steady and adequate supply of minerals and potential for demand to be satisfied from elsewhere would have to be factored into the final decision.	Y
	New policy should not restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Need clarity on what would meet the exception criteria. Visitor accommodation offer is evolving and new forms are entering the market. Policies should be flexible enough to consider these. Policy should be positively worded.	This is set out in Policy RT5.	N
	Unsure of support for proposed Local Plan spatial objectives for recreation and tourism. Require on-going dialogue.	The spatial objectives set out in <i>Issues and Options</i> are amended to remove reference to hubs and refer instead to existing sites and other locations) where there is environmental capacity and	Y

		significant overall benefit can be delivered.	
	New local plan should outline sustainability measures for different types of development. They note that current national policies are insufficient to achieve net-zero targets by 2040	The approach regarding sustainability measure for different types of development is not taken forward. Policy CC1 sets out a proportionate approach for all development.	N
	Embodied carbon should be considered as part of the requirement for high sustainability standards but readily available information for these calculations must be incorporated and monitored. New policy should address the loss of smaller homes.	This is addressed in Policy C3 and Policy H10.	N
	Agrees with the proposed Local Plan spatial objectives for climate change and sustainable building.	Noted.	N
	Agree with the proposed policy approach to nature recovery that all development regardless of scale should align to local priorities and strategies, while seeking to conserve and enhance valued landscapes and special qualities.	Noted. Nature recovery is addressed in Policy C1, Policy C6 and Policy B4 Delivering nature recovery.	Y
	We would support an aspirational transport strategy that aligns with our emerging LTP4 to be published in 2025, which may help inform amendments to policy T1.	This is addressed in Policy T1.	Y
Staffordshire Moorlands District Council	The respondent does not agree with the proposed local plan spatial objective for utilities. The respondent states that 'The Council does not support a blanket ban on larger scale renewables in the Peak Park.' The respondent goes on to express concern that the lack of local grid capacity will be used as a reason to stifle development.	Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024.	Y
	The Council supports the protection of the Manifold Trail from development that conflicts with its current purpose.	This is addressed in Policy T7.	Y

	The Council agrees that the Peak District National Park Authority should be promoting sustainable travel.	This is addressed in Policy T1.	Y
	SMDC support the spatial objectives for the rural economy.	Noted.	Y
	SMDC support the spatial objectives for shops, services and community facilities.	Noted.	N
	SMDC do not support a size restriction on new affordable homes.	The Authority is taking a size policy forward. This is set out in Policy H16 and Policy H8.	N
	Reduce the housing local connection requirement for first occupation to 5 years as the current policy is too restrictive.	Policy H3 and Policy H5 together establish the flexibility for second and subsequent occupation. First occupation remains at 10 years as set out in Policy H3 and Policy H4.	N
	Eligibility for social housing should be based on 'housing need' rather than parish boundaries and cascade mechanisms. The introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities. Eligibility criteria for privately owned and managed affordable should be the same as social housing.	Policy H2 sets out the relevant criteria.	N
	A park-wide permanent residence clause is supported. There is clearly a need for homes for local people.	This is addressed in Policy H17.	N
	The Council supports the tourist economy as well as recognising there can be issues which may necessitate the removal of permitted development rights.	Noted.	N
	Support development of a policy supporting CCS. This will be beneficial to industry in the Staffordshire Moorlands and adjoining authorities and the Council supports a policy position which would not hinder the implementation of this scheme.	The Authority is deferring setting out its approach until full evidence is available	N
	The Council considers that it would be appropriate for new policy to give greater clarity by defining 'small scale' (e.g. air source heat pumps, residential solar	Supporting text to Policy CC2 sets out that the Climate Change and Sustainable Building	Y

	panels, small-scale wind turbines). The use of a policy map to define areas where renewable energy development is more likely to be acceptable is also welcomed.	Supplementary Planning Document (or successor) should be used. The Policies Map defines for 23 Peak District settlements their <i>Local Landscape Character Areas</i> (LLCAs). The sensitivity to development of each LLCA is set out in the Local Plan Appendix.	
	SMDC is supportive of any measures to reduce the District's carbon footprint.	Noted.	N
	Support development boundaries for key settlements. For consistency with regard to cross-boundary settlements. Waterhouses within Staffs. Moorlands District has a development boundary but the part on the Peak Park side does not. Sustainable development could potentially be accommodated here and a development boundary would help to define where this could take place.	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement Character Analysis and Landscape Sensitivity Assessment</i> .	N
	Support site allocation in key settlements. Will make the process of delivering housing where it is needed more straightforward and create more certainty as to exactly where development will take place. This will assist registered providers to determine whether a site and what scale of development is likely to be acceptable. Council would also like to see housing allocations in Tier 2 settlements (larger settlements with key services).	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement Character Analysis and Landscape Sensitivity Assessment</i> .	Y
	Support a different settlement strategy with more tiers. Allow for a finer grain analysis of settlements to allow an appropriate level of development.	This approach is not carried forward but Policy C8 identifies settlements where wider housing need could be addressed where necessary.	Y

	<p>Provides guidance and clarification on which settlements, sites and scale of development is likely to be acceptable.</p> <p>Agree that appropriate levels of development in 'split' settlements such as Waterhouses should be considered on a case-by-case basis.</p>		
	<p>The Council has some concerns about sustaining communities within the Peak District National Park. It is considered that there is a lack of well-paying jobs in the area as tourism does not pay well. In this context, the Council is also concerned about the closure of quarries as these are amongst the better paying employers and alternate job offer in the area.</p>	<p>Employment is supported by Policy C8, E1 and M1.</p>	Y
<p>North East Derbyshire District Council</p>	<p>It is noted that the consultation proposes to continue to protect the Natural Zone and to enhance/extend it in accordance with the priorities of Nature Recovery Strategies. The council supports this general approach and draws attention to the Derbyshire Local Nature Recovery Strategy and the council's 'Plan for Nature' which are currently in preparation to inform the review of its own Local Plan. These strategies will aim to set priorities for nature recovery outside the National Park and provide important evidence in helping to plan where wildlife corridors or 'stepping stones' between the National Park and urban areas beyond the Park's boundary can be most effective.</p>	<p>Nature recovery strategies are referenced in Policy C1, Policy C6 and Policy B4.</p>	
	<p>This is the first formal stage of consultation on the review of the Peak District National Park Local Plan and the council welcomes the opportunity to make comment. However, the council has previously engaged informally with the National Park Authority on the local plan review under the Duty to Co-operate.</p> <p>Through these discussions no concerns have been raised regarding any cross-boundary issues that could impact on North East Derbyshire.</p> <p>The part of North East Derbyshire area within the National Park is characterised as the Eastern Moors Landscape Character Area. It is very sparsely populated with no settlements or hamlets of any size located within it. Given its very rural character the area has</p>	<p>Noted.</p>	Y

	no role to play in helping the PDNP authority to meet its housing and other development needs and vice versa.		
Derbyshire Dales District Council			
	If it anticipated that there will be new or expanded reservoirs in the plan area and or the plan period then some form of policy/allocation should be considered appropriate.	This is addressed in Policy U1.	Y
	Agrees with the spatial objective for utilities. Suggest an exception clause to allow for infrastructure that has some beneficial importance might outweigh any statutory purposes.	Large scale utilities development would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024.	Y
	Prefer approach whereby aircraft take-off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters.	This is addressed in Policy T13.	N
	It is considered that new road building should only be brought forward where it supports the overall objective of delivering thriving and sustainable communities, otherwise it has the potential for increasing CO2 emissions from traffic and transport	Policy T4 sets out the criteria under which remedial road safety or environmental improvement schemes would be supported. Policy T3 sets out that new roads for cross-Park travel will not be supported and major alterations to an existing road will not be permitted unless specific circumstances apply.	Y
	The District Council's formal view as agreed at Council in March 2021 supports those of the National Park and Derbyshire County Council which have previously raised concerns about the reinstatement of the railway line on the Monsal Trail, as this is an important part of the strategic cycling network for Derbyshire. However the District Council consider that for the purposes of the National Park Local Plan the approach that should be is one that	Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose.	Y

	allows the continued use of the Monsall Trail for recreation purposes but also allowed for the potential re-instatement of the railway line or other form of public transportation to connect Matlock with Buxton.		
	Current approach should be retained. Visitor parking should be provided where there is a justified reason, be it for economic development purposes or for community use. In this regards it is considered that Option1 is the most appropriate. However alongside it is considered that appropriate traffic management arrangements should be put in place and the powers used where appropriate to restrict car parking outside of formal car parks to resident only as occurs in Lake District National Park – thereby seeking to persuade visitors to think about their mode of transport.	The approach to visitor parking is set out in Policies C8Dvb Development Strategy, RT1, RT2, T9 and T12.	Y
	Agree with the proposed spatial objectives for travel and transport. It's imperative that the Plan support the delivery of sustainable and thriving communities, where opportunities to access services and employment opportunities are close to where residents live.	Noted.	Y
	Does not support ownership retained by the primary business when redundant farm buildings are converted as it may stifle economic development. There would appear to be no land use planning reason for it when other measures can control the activities that take place in such buildings.	Policy E6 requires that any new business use will remain ancillary in function and operation to the agricultural operation of the farm.	N
	The conversion of farmsteads provide opportunities for the reuse of buildings for a beneficial use for the local economy. However farmsteads are vary in location, and size, and just because they are a little way from existing development does not means that they are inappropriate for conversion. The suitability of each for conversion should be taken on its merits otherwise the potential benefits to the local economy will be limited. A flexible approach should therefore be taken	Policy E6 establishes the principle of conversion and Policies CH1 and CH2 set the criteria for assessing the impact on and for the conversion of any heritage asset.	N
	The policy approach to extension to existing businesses needs to support economic development in the National Park in order to meet the statutory duty of social and economic well-being,	Policy E3 supports the extension, alteration, or intensification of existing employment or business	N

	as well as the aims and aspirations of the National Park Management Plan. Where existing Economic Development in situ it is considered better to support expansion (of correct scale) rather than potentially support new development in sensitive locations.	space in accordance with specific criteria.	
	Support for the rural economy spatial objectives. The objectives provide encouragement for economic development across the National Park, however it is imperative that the supporting policies in the Local Plan do not have the effect of restricting development important for the local economy by way of for example imposing additional costs due to the design, and materials of construction.	Noted.	Y
	The Plan needs to determine whether Bakewell is a location that should be the focus for new development given its status as a Market Town and inherently more sustainable than other settlements across the NP. It is not clear why there should be a 'character' focus on Bakewell when it not being applied elsewhere - this should be justified and used consistently elsewhere across the plan area. This suggests that this policy approach is being used to actually limit development in Bakewell when it is actually the most sustainable settlement in the National Park.	Policy C8 sets out that Bakewell should address appropriate wider housing needs if necessary.	Y
	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, as they align with the principles of sustainable development. However, they suggest there should be more cross-referencing with the objectives of the Management Plan to ensure thriving communities.	Noted.	N
	No to retaining a size restriction. The ability of people to afford the rents and equity stakes of affordable housing are driven by other factors. The size of an affordable home provided by an RP is not one of the main considerations. The Nationally Described Space Standard (NDSS) is the standard method for ensuring those who have the least housing choices are provided with a minimum standard that promotes a healthy family home where families can eat together and children can grow and study in quiet	Policy H16 sets housing size to align with the Nationally Described Space Standard. Policy H8 restricts the new dwelling to a maximum total internal habitable floorspace of 97sqm when the dwelling is to meet one's own need.	N

	<p>spaces within the home. Relying on fixed floor areas is an outdated way of trying to manage the affordability of social housing and does not reflect the needs of modern families. NDSS also has more categories of sizes.</p>		
	<p>Support to reduce 10-year local connection. Reducing the local connection is vital for the longevity of social housing in the PDNPA and the continued interest of RPs who might consider developing in the PDNPA area.</p>	<p>Policy H3 and Policy H5 together establish the flexibility for second and subsequent occupation. First occupation remains at 10 years as set out in Policy H3 and Policy H4.</p>	<p>N</p>
	<p>Support to widen eligibility for RSL and private managed affordable homes. This is the single biggest issue for social landlords and their prospective tenants. Creating a separate set of criteria linked to employment would create an administrative burden for housing staff who would need to assess and consider employment information alongside their normal housing investigations. The simplest and most reliable method would be to reduce the local connection to 5 years. This should also be applied retrospectively to all previous affordable housing schemes. The parish first approach is a real issue for some communities and social landlords. Some adjoining villages have very little affordable housing present and so a cascade that involves those villages, significantly disadvantages people waiting for the cascade period to move to the next cascade. Any new system of eligibility ought to be based on housing need rather than geography or parish boundaries. DDDC/HPBC and SMDC all share the same allocation policy and so there is a common approach to assessing housing need that PDNPA can rely upon to appropriately manage the allocation of scarce resources</p>	<p>Policy H2 defines eligible housing need and Policy H3 sets the local connection criteria.</p>	<p>N</p>
	<p>Support permanent occupancy clause applied either park wide or to specific settlements.</p>	<p>Policy H17 establishes that all new housing including the conversion of buildings to residential use will be subject to a primary occupancy condition unless certain criteria are met.</p>	<p>N</p>

	In light of the revisions to the NPPF in respect of housing requirements, it is possible that the spatial objectives for housing may well need revising. It is suggested that this requirement should be kept under review pending further advice from the Government. It is considered that in order to achieve sustainable development across the National Park that there should be an increased level of development supported over the plan period. The evidence published suggests that this is the approach being heeded, however, in light of the NPPF proposals this level may not be sufficient.	The Housing Requirement is set in accordance with the 2024 NPPF.	Y
	Regarding the proposed restrictions to Static caravans, lodges and other permanent structures, any restrictions on development that could have a beneficial effect to the local economy within the National Park should be proportionate otherwise the social and economic wellbeing that all authorities are required to work towards will not be delivered.	Policy RT 5 sets out that static caravans, chalets, lodges and other structures designed or intended to be used for holiday accommodation will not be permitted except for specific structures listed.	Y
	Unsure about the approach to Recreation Attractions and Hubs. They should only be defined on a Policy Map if they are likely to be deliverable during the defined plan period. If there are no definitive proposals likely to come forward during the plan period then criteria that would support their development should be set in the policies in the event that they do come forward.	This policy is not adopted but the issues are addressed in Policy RT2.	Y
	Unsure if policy on carbon capture should be developed. Should not include a policy unless certain such proposals would come forward in plan period.	The Authority is deferring setting out its approach until full evidence is available.	Y
	Regarding low carbon and renewable energy development, instead of setting specific criteria directly in the Local Plan, similar evidence to what has been prepared previously should be gathered. This would help determine the appropriate criteria and locations for renewable energy development across the entire Plan Area, which could then be presented in the Local Plan.	The Policies Map defines for 23 Peak District settlements their <i>Local Landscape Character Areas</i> (LLCAs). The sensitivity to development of each LLCA is set out in the Local Plan Appendix.	Y
	Agrees in principle that the new local plan should set out sustainability measures for different types of development but	Supporting text to Policy CC2 sets out that the Climate Change and	N

	highlights the constraints posed by the Written Ministerial Statement, which limits the ability to apply energy efficiency targets.	Sustainable Building Supplementary Planning Document (or successor) should be used.	
	Embodied carbon should be considered for high sustainability standards. However this must be balanced with the Written Ministerial Statement, which restricts local energy efficiency policies. As embodied carbon is being reviewed as part of the 2025 Building Regulations this as the appropriate framework for assessment. The National Park Authority's expertise in evaluating embodied carbon in planning applications should be taken into account.	Noted. The approach to replacement dwellings as set out in Policy C3 and Policy H10 is predicated on the assumption that existing buildings should be re-used. A calculation of embodied carbon is not required.	N
	If there is a justification for a local list of non-designated heritage assets, then the process of setting the criteria and identifying what assets would appear on the list should be undertaken outside the Local Plan process, and where appropriate those designated would appear on the Policy Maps, and to which policies in the Local Plan would apply.	The Authority is not taking forward a Local List.	N
	It is suggested that the local plan will set out a methodology for deciding the value of local heritage assets. This should be done outside of the Local Plan process and then the Local Plan would then just identify those to which it would apply. The same approach would apply for Local List status.	The methodology for heritage assets is set out in supporting text to Policy CH1.	N
	Unsure about inclusion of reference to Whole Estate Plan. Whilst supported in the Management Plan, they do not have any formal status in planning unless brought into the Local Plan and subject to public consultation. This should be the way forward if WEP are required.	Policy C8 sets out that WEPs must be approved by the Local Planning Authority. Supporting text sets out circumstances in which WEPs would be most beneficial.	N
	Current policy (DMC2) correctly sets out the exceptional circumstances for development in the Natural Zone. The current exceptional circumstances appear to be reasonable, and there does not seem to any obvious additional or alternatives.	Noted.	N
	Biodiversity net gain should not go beyond the 10% mandatory requirement. In the National Park, where there are already significant Biodiversity opportunities, establishing evidence to	Policy B4 requires proposals not exempt from statutory Biodiversity Net Gain to enhance biodiversity	Y

	justify this may be difficult. Secondly National Park policies already result in additional costs for development- more than 10% BNG may further exacerbate viability/development costs to the point where it might threaten the viability of development coming forward. Finally as BNG is post application all the LP is likely to be able to do identify this as an aspiration rather than be a policy determinant.	by 10% or greater compared to the pre-development situation.	
	Proposed approach to nature recovery this seems appropriate - development should seek to contribute towards nature recovery as this is the principle enshrined in Biodiversity Net Gain. However, care must be taken to ensure that the delivery of nature recovery where not related to development sits outside of the Local Plan process.	Noted.	Y
	Any public transport service must dovetail in with existing and proposed new development. It should also be deliverable, viable and sustainable i.e. one that endures beyond any limited 'trial' period. If necessary such services should be subsidised.	Noted.	Y
	Unsure about additional local benefit to designating local green spaces. There will always be local areas of green space within communities that have some 'value'. If there is a reasoned justification for protecting additional areas of open space for transparency firstly the plan should set out the criteria and secondly set out what criteria the site is considered to be judged against.	Policy S6 designates Local Green Spaces (LGS) that hold particular significance for local people. The Authority and the majority of stakeholders believe there is additional benefit because designation can indicate to decision-makers which open spaces are particularly significant to local people.	N
	Support for the establishment of development boundaries for key settlements.	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement Character Analysis and Landscape Sensitivity Assessment</i> .	N
	Support for site allocations in 'Tier One' settlements as it would give greater clarity about the extent and scale of development likely to be acceptable	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement</i>	N

		<i>Character Analysis and Landscape Sensitivity Assessment.</i>	
	Support for tiered settlement strategy. Similar to DDDC approach. Would allow level of development proportionate to the settlement. Makes clearer which settlements are suitable for development and at what scale. It is considered appropriate that affordable housing should be permitted wherever a local need arises.	This approach is not carried forward but Policy C8 identifies settlements where wider housing need could be addressed where necessary.	N
	The National Park authority has not identified the right policy issues with regard to delivering national park purposes. Objectives do not adequately consider management plan objectives or social and economic well-being. Objectives do not adequately address affordable housing delivery in the context of sustainable development.	Draft spatial objectives are framed by legislation that sets out the Authority's duty to foster social and economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage).	Y
	Does not agree with the spatial objectives for sustainable development. Development of sustainable communities appears subservient to statutory purposes and does not align with the National Park Management Plan (NPMP) Aim 4. Objectives should have more focus on sustainable communities and refer specifically to NPMP.	We recognise that sustainable development has economic and social objectives but the draft spatial objectives are also framed by legislation that sets out the Authority's duty to foster social and economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage).	Y
High Peak Borough Council	With regard to the broad policy principles to guide restoration and redevelopment at Hope Cement Works, The Peak District National Park Authority could be more ambitious with the reuse of the site by considering the potential for accommodating housing. It is agreed that the economic and social wellbeing of local communities together with consideration of landscape, wildlife and cultural heritage is significant.	This is addressed in Policy HW1.	N

	The Council does not support a blanket ban on larger scale renewables in the Peak Park. The Council is concerned that the lack of local grid capacity will be used as a reason to stifle development.	Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024.	Y
	The Council supports the option to continue to safeguard the Monsal Trail for future rail use whilst retaining active travel along the route.	Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose.	Y
	The Council agrees that the Peak District National Park Authority should be promoting sustainable travel, in particular from the Hope Valley to Buxton.	Sustainable travel is addressed in Policy T1 and Policy T7.	Y
	The local connection for affordable homes should be reduced from 10 years to 5 years. Local connection should be the same as social housing, suggest 5 years would be an appropriate local connection period. The Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10. There should be no other exceptions to the local connection. The current 10-year local connection requirement is too restrictive and should be reduced. Eligibility for social housing should be based on 'housing need' rather than parish boundaries and cascade mechanisms. The introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities. Eligibility criteria for privately owned and managed affordable should be the same as social housing.	Policy H3 and Policy H5 together establish the flexibility for second and subsequent occupation. First occupation remains at 10 years as set out in Policy H3 and Policy H4.	Y

	A parkwide permanent residence clause is supported. There is clearly a need for homes for local people (as explained in the consultation document) so a park-wide permanent residence clause would help to address this issue.	This is addressed in Policy H17.	N
	The Council supports housing development in appropriate locations and notes that the proposed development levels (the Requirement) will make a valuable contribution towards High Peak's development requirements.	Noted.	Y
	The Council suggests that it would be appropriate to mention nutrient neutrality within bullet 3 of the Spatial Objectives for Recreation and Tourism as this is linked to overnight stays and these stays could have an adverse impact on the Peak District Dales Special Area of Conservation (SAC) which would require mitigation measures if the accommodation (including campsites) falls within the catchment area.	Policy C2 sets out that sustainable development includes that which conserves the quality and quantity of natural resources, including water, air, soils, biodiversity and geodiversity. Policy C10 requires all development to prevent or minimise pollution to soil, air and water including by the achievement of nutrient neutrality where applicable.	Y
	Support a policy position that would not hinder the Peak Cluster Project as it would be beneficial to industries in High Peak and adjoining Authorities.	The Authority is deferring setting out its approach until full evidence is available.	Y
	The Council considers that it would be appropriate for new policy to give greater clarity by defining 'small scale' (e.g. air source heat pumps, residential solar panels, small-scale wind turbines). The use of a policy map to define areas where renewable energy development is more likely to be acceptable is also welcomed.	Supporting text to Policy CC2 sets out that the Climate Change and Sustainable Building Supplementary Planning Document (or successor) should be used. The Policies Map defines for 23 Peak District settlements their Local Landscape Character Areas (LLCAs). The sensitivity to development of each LLCA is set out in the Local Plan Appendix.	Y

	HPBC is supportive of any measures to reduce the Borough's carbon footprint.	Noted.	N
	Agree with the proposed Local Plan spatial objectives for cultural heritage.	Noted.	N
	Agree with the proposed spatial objectives for landscape, biodiversity and nature recovery.	Noted.	N
	Agree with the proposed policy approach to nature recovery.	Noted.	Y
	Support establishment of development boundaries for key settlements. Some settlements in High Peak Borough (such as Hayfield and Tintwistle which cross over the Peak Park boundary) have a development boundary on the High Peak Planning side but not the Peak Park side. Such settlements are examples of where sustainable development could potentially be accommodated and a development boundary would help to define where this could take place. It is recognised that if this option is taken forward further consultation on which settlements would have a boundary and the precise detail of the boundary would be undertaken.	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement Character Analysis and Landscape Sensitivity Assessment</i> .	N
	The Council supports site allocations in 'Tier One' settlements. Will create straightforward process for housing delivery with more certainty over location and scale, assisting registered providers. Council would also like to see housing allocations in Tier 2 settlements (larger settlements with key services).	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement Character Analysis and Landscape Sensitivity Assessment</i> .	N
	The council supports the option to change the settlement strategy so that there are more tiers. Allows finer grain analysis leading to guidance and clarification on settlements, sites and scale of development likely to be acceptable. Agree that split settlements should be case-by-case.	This approach is not carried forward but Policy C8 identifies settlements where wider housing need could be addressed where necessary.	N
	The Council has some concerns about sustaining communities within the Peak District National Park. It is considered that there is a lack of well-paying jobs in the area as tourism does not pay well. In this context, the Council is also concerned	Employment is supported by Policy C8, E1 and M1.	Y

	about the closure of quarries as these are amongst the better paying employers and alternate job offer in the area.		
Cheshire East Council	No comments received.		
Oldham Council	Oldham Council support the objective at recreation attraction 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 at recreation attractions and hubs (such as Dovestones). Oldham Council support consideration of a policy which seeks to address car parking issues. We would welcome specific meetings / workshops with relevant officers regarding parts of Oldham within the PDNP, such as Dovestones, in relation to this policy.	The approach to visitor parking is set out in Policies C8Dvb Development Strategy, RT1, RT2, T9 and T12.	Y
	<p>Oldham Council notes Appendix 3 makes reference to:</p> <ul style="list-style-type: none"> • Dove Stone in the table listing 'Sites that are popular with visitors'; • Binn Green in the table for 'car parks and sites popular with visitors for the access that they provide into open countryside'; and • the A635 in the table for 'Informal parking facilities. <p>It may be useful to include column with the local authority / area that the sites / roads fall within. As this is a cross-boundary issue, we would welcome continued engagement with all relevant officers from Oldham on the development of any specific planning policies for recreation attractions and hubs that fall within Oldham Council. Whilst planning within the PDNP falls within the responsibility of the PDNPA this type of policy may also have implications for other services within Oldham Council, such as parking and highways. It will therefore be important to ensure all relevant services are engaged.</p>	<p>The Recreation Attractions and Hubs policy option and the related Appendix referred to are not carried forward.</p> <p>Policy RT1 and Policy RT2 set out the criteria for recreation development in settlements and in the open countryside respectively. The Appendix in the draft plan lists Dovestone as a 'site that is popular with visitors'. Binn Green is not listed.</p>	Y

	The Local Plan would benefit from having specific evidence to inform policy on non-designated assets and isolated traditional buildings, particularly in light of the potential impacts outlined in the plan, such as housing needs in settlements and farmsteads. They imply that clearer evidence could help shape better-informed decisions and policies.	The plan is informed by up-to-date housing need assessments.	N
	Would the guidance which sets out methodology for deciding whether a building is a non-designated heritage asset also include assets that are not buildings? E.g. bridges, gates etc. If so would it be useful to make this clearer.	The methodology criteria are set out in the Appendix and include criteria for 'non-commemorative buildings and structures'.	N
	Regarding the Spatial Objectives for cultural heritage and the built environment, the 3 rd Objective 'To identify opportunities for, and seek to deliver, significant enhancement' needs expanding to state what it is enhancing.	Noted. In the Local Plan enhancement refers to the first purpose Special Qualities of the National Park.	N
	Regarding the Spatial Objectives for landscape, nature and biodiversity, the objective should perhaps seek to protect as well as enhance biodiversity to ensure core habitat areas are protected as designations as well as enhanced. It might be helpful in the next draft to show a map of the PDNP and LNRS coverage.	Policy B2 gives specific protection to sites, species and networks.	N
	Policy on delivering national park purposes should include reference to nature recovery. Specific reference to relevant Local Nature Recovery Strategies (LNRS) should be made in relation to this.	Policy C1 refers only to National Park purposes. Core Policy C6 is the strategic policy for biodiversity and nature recovery. This requires development to contribute proportionately towards nature recovery in accordance with the Peak District Nature Recovery Plan (PDNRP). Supporting text to the policy sets out the relationship between the PDNRP and the 6 constituent LNRSs.	N
Kirklees Council	We would be keen to learn more about proposed options that could have implications for Kirklees. In particular, issue 4 - the potential change to settlement tiers, issue 5 - sites for housing	Policy options regarding settlement tiers, sites for housing development and development boundaries are not taken forward.	Y

	development and the potential to allocate housing sites in 'tier 1 settlements', issue 6 - development boundaries and issue 28 - proposed Local Plan spatial objectives for housing.	The Local Plan Spatial Objective 6 establishes the Housing Requirement.	
Barnsley Council	No comments received.		
Sheffield City Council Parks and Countryside Service	Agree with the proposed objectives for Travel and Transport. Additional to this there should be focus on connectivity into urban centres (Sheffield, Glossop, Derby etc) to provide realistic active travel options for visitors. Dedicated multi-user trails are needed to link with urban networks – requiring good collaborative planning with neighbouring planning authorities.	This falls under the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. Policy T1 on reducing the general need to travel and encouraging sustainable transport and Policy T2 which supports transport developments that reduce the amount of cross-Park traffic are also relevant to this issue.	Y
	The approach to accommodation in the NP sounds 'sound', but concerns of equity...who is attracted to this style of accommodation, and what would facilitate a more diverse audience - does the accommodation on offer suit a more diverse audience?	Hotels, bed and breakfast and self-catering accommodation is permitted under Policy RT3 and caravans and camping are permitted under RT5.	N
	More could be done on PROW and multi-user trails - providing connections into urban centres. Can the PDNPA make the Park more people rather than car friendly?	This falls under the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose.	Y
	The National Park urban & Sheffield fringe offers scope for visitor facilities that are gateway sites for recreation and	Noted. Policy T2 sets out that transport developments which	Y

	tourism that can also act as Park & Ride or active travel links into the NP.	reduce the amount of cross-Park traffic, including development associated with traffic management schemes, will be supported if they can be accommodated without adverse impact on the National Park's first purpose Special Qualities.	
	It would be beneficial for the PDNP to have a more progressive approach to renewable energy generation within the park – wind, hydro, solar. It would be useful to move away from what is considered acceptable to what is actually needed to deliver a carbon-free future. Can the Peak Park become an exemplar?	Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024. Policy CC2 sets out that proposals for renewable and low-carbon energy generation, energy storage and supporting infrastructure will be supported in principle if they are of a scale and design appropriate to their location.	Y
	Not in agreement with the need to protect open skylines – this feels at odds with the need for National Parks to play a much greater role in 30 by 30. The NP has a lower canopy cover than Sheffield – this does need to be addressed. Skyline views can be designed into wooded, habitat rich environments. Development which improves biodiversity should be encouraged. Natural zone areas have significant areas of low ecological value sheep farming – could these areas (or at least some) be considered for BNG? The NP has a great role to play in protecting neighbouring urban areas from extreme flooding events, and the development of Natural Systems for better managing this challenge should be much higher up the priority list than retaining open vistas. What are the canopy cover targets for the NP?	Local Plan Policy C4 sets out that Development must conserve and enhance valued landscape character, as identified in the Authority's Landscape Strategy, <i>Wooded Landscapes Plan</i> and Nature Recovery Plan; and the other first purpose Special Qualities of the National Park. Policy CC2 sets out that proposals for renewable and low-carbon energy generation, energy storage and supporting infrastructure will be supported in principle if they are	N

	<p>Renewable energy infrastructure does feel vital to the future of rural communities in the NP – your plan suggests that this will be at best incremental and piecemeal. There does look to be a lack of ambition for something that should be at the heart of the NP.</p> <p>Agree with nature recovery, carbon sequestration and flood prevention – again these should be at the heart of the NP.</p>	<p>of a scale and design appropriate to their location.</p>	
	<p>Regarding Spatial Objectives for landscape, biodiversity and nature recovery. The majority of this feels sound. The historic agricultural landscapes is something that does feel that needs more thought. There feels to be a need to look at what is actually needed from NP farming and in particularly upland farming for what is needed from a production perspective weighed against benefits for biodiversity, habitat expansion (including urban flood mitigation and water quality). Historically the landscape of the NP was not farmland – is there a more ‘hybrid’ future that is not about preserving the status quo (farming/land management and nature recovery working better together?)</p>	<p>Local Plan Policy C4 sets out that Development must conserve and enhance valued landscape character, as identified in the Authority's Landscape Strategy, <i>Wooded Landscapes Plan</i> and Nature Recovery Plan; and the other first purpose Special Qualities of the National Park.</p> <p>Spatial Objectives for biodiversity and nature recovery include ‘sustainable, profitable farm businesses delivering nature recovery.’</p>	N
Sheffield City Council	<p>Regarding the development of new or expanded reservoirs. Favour the current approach, with National Policies determining whether a reservoir should be built and local policies setting out scope for the NPA's response.</p>	<p>Policy U1 states that there will be a presumption against the development of water resource reservoir schemes (including expansions) except in exceptional circumstances. This includes schemes that fall within and outside the Planning Authority's control.</p>	Y
	<p>Support the continued protection of the Monsal and Longdendale Trails for existing recreational use, but would</p>	<p>Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine</p>	Y

	want the safeguarding to allow for future sustainable transport use including rail.	Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose.	
	Sheffield City Council support the proposed spatial objectives for travel and transport. Additional to the spatial objectives proposed there should also be a focus on connectivity into urban centres (Sheffield, Chesterfield, Glossop, Derby etc) to provide realistic active travel options for visitors. Dedicated multi-user trails are needed to link with urban networks – requiring good collaborative planning with neighbouring planning authorities. This issue has been examined as part of the draft Statement of Common Ground between Sheffield City Council and the Park Authority. The draft statement includes the improvement of sustainable travel options (including active travel routes). To ensure a connected network of multi-user trails are established from Sheffield into the National Park the Peak Park’s Local Plan must also support their delivery within its boundary.	This falls under the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose. Policy T2 sets out that transport developments which reduce the amount of cross-Park traffic, including development associated with traffic management schemes, will be supported if they can be accommodated without adverse impact on the National Park’s first purpose Special Qualities.	Y
	The new Local Plan should not retain a size restriction on new affordable homes. The current Local Plan size restrictions on new affordable homes are particularly restrictive in relation to single parent families, potentially providing an insufficient number of bedrooms to meet a family’s needs. This approach results in a home not being fit for purpose. For example, a 3-bed space home at a maximum 70sqm, would only provide 2 bedrooms, whereas its occupants could be a single parent with 2 children, who all need their own bedrooms. Removing the currently restrictive affordable housing maximum standard and instead applying the full minimum NDSS range to both social	Policy H16 sets housing size to align with the Nationally Described Space Standard. Policy H8 restricts the new dwelling to a maximum total internal habitable floorspace of 97sqm when the dwelling is to meet one’s own need.	N

	and private market homes will ensure all homes are built to a standard that is considered to be fit for purpose. However, consideration should be given to ensure that future residential development doesn't deliver in the excessive provision of overly sized homes and that sites are used efficiently (as required by paragraph 128 of the NPPF).		
	Support a widening in the eligibility for affordable housing to include those who work in the National Park or have an immediate family connection to maintain sustainable communities.	Policy H2 defines eligible housing need and Policy H3 sets the local connection criteria. Policy H3 and Policy H5 together establish the flexibility for second and subsequent occupation. First occupation remains at 10 years as set out in Policy H3 and Policy H4.	N
	Agree with the proposed Local Plan spatial objectives for housing.	Noted.	Y
	The plan would benefit from the identification of hubs/locations which attract significant visitor numbers to provide the evidence base for the inclusion of policies that manage development in these locations. In addition, given the variety of recreational activities / attractions, policy criteria should manage proposals outside these hubs. This flexibility would allow a range of recreational attractions (types and scale) in the locations they are required (subject to compliance with policies that deliver national park purposes and objectives in the NPPF). Sheffield City Council has no objection to the list in Appendix 3. However recreational development should not be limited to these locations. The Park authority should consider whether a distinction needs to be made between recreation in the natural zone versus outside of the natural zone, and/or the SAC/SPA. It would be helpful to clarify whether the plan will identify areas to be promoted for recreation/dog walking etc to reduce the	The recreation hubs policy option is not adopted but the issues are addressed in Policy RT2.	Y

	pressure on the most ecologically sensitive sites (suitable alternative natural greenspaces).		
	More flexibility in the location of recreational and tourist attractions may be appropriate, due to the variety of activities involved. Some may require a location outside a settlement and as such would not comply with the proposed approach directing recreation development to settlements and hubs. These would be refused in principle, whether or not they comply with other policies that protect the landscape and natural environment.	Policy RT1 concerns recreation development in settlements and RT2 concerns recreation development in the open countryside.	Y
	The approach to accommodation in the NP appears 'sound' – however it would be useful to understand the 'equity' of who is attracted to this style of accommodation, and what would facilitate a more diverse audience. It is important to consider the challenge of widening access to the National Park from a range of ethnically diverse groups. Is the National Park capturing this change – and what that could mean for accommodation provision as reflected in the objectives for recreation and tourism?	Hotels, bed and breakfast and self-catering accommodation is permitted under Policy RT3 and caravans and camping are permitted under RT5.	N
	In relation to PROW and multi-user recreational trails Sheffield City Council feel there is scope for improvement, if we are to see a step change in the way visitors access the National Park, and the impact of recreational pressure more widely. The objectives could encompass consideration of how multi-user trails can connect better into urban centres to provide meaningful active travel alternatives. The Council have indicated that we are committed to working with the PDNPA on a mitigation strategy in relation to impacts from recreation on SAC/SPA. Within the urban fringe of Sheffield (including in the National Park) there is greater scope to support visitor facilities that are 'gateways' to the National Park for recreation and tourism. There is scope within the objectives to encourage a focus on joint working with neighbouring authorities to support urban fringe 'gateways' – which may also act as 'park and ride' or	This falls under the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. Policy T7 sets out that the High Peak, Manifold, Monsal, Thornhill, Tissington and Trans Pennine Trails and other appropriate long-distance routes will be protected from development that conflicts with their current recreational and active travel purpose. Policy T2 sets out that transport developments which reduce the amount of cross-Park traffic, including development associated	Y

	park and active travel or urban active travel to a gateway site and into the National Park active travel network.	with traffic management schemes, will be supported if they can be accommodated without adverse impact on the National Park's first purpose Special Qualities.	
	Sheffield City Council support a positive approach to renewable and low carbon energy generation within the Park (biomass, wind, hydro, and solar). This could focus on expanding what is considered acceptable and how this can be promoted to meet what is needed to deliver a carbon-free future. The National Park could become an exemplar of delivering renewable energy technologies within protected landscapes.	Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024. Policy CC2 sets out that proposals for renewable and low-carbon energy generation, energy storage and supporting infrastructure will be supported in principle if they are of a scale and design appropriate to their location.	Y
	Sheffield City Council agree that embodied carbon should be considered as part of the requirement for high sustainability standards.	This is covered in Policy H10.	N
	Sheffield City Council agrees with the proposed Local Plan spatial objectives for climate change and sustainable building. However, they believe the plan could go further in promoting the sustainable use of natural resources, as mentioned in the National Park Management Plan's commitment to the climate emergency. The National Park plays a key role in protecting surrounding urban areas from flooding, and Sheffield City Council supports incorporating natural systems for better flood management. They also advocate for a more ambitious approach to renewable energy infrastructure. Additionally, Sheffield City Council supports the inclusion of nature recovery, carbon sequestration, flood prevention, and managing recreational pressures within the objectives. They suggest adding policies related to the sustainable use of resources, such as:	Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024. Policy CC2 sets out that proposals for renewable and low-carbon energy generation, energy storage and supporting infrastructure will be supported in principle if they are of a scale and design appropriate to their location.	Y

	<ul style="list-style-type: none"> • Water efficiency requirements, including rainwater harvesting and grey water recycling. • Design for Performance methods and Post Occupancy Evaluation tools to ensure energy performance matches design intentions. • A requirement for renewable energy provision and storage in new developments. 	<p>Policy C10 on design, siting, layout and landscaping and the supporting Appendix and Policy CC4 set out the requirements for on-site surface water retention through the use of porous surfaces and Sustainable Urban Drainage Systems.</p> <p>Policy CC1 sets out the standards for sustainable design and carbon reduction.</p>	
	No concerns about Whole Estate Plans, especially useful for giving weight to ecological considerations and linking to the BNG policy. However need to be cautious about giving weight to unwritten Whole Estate Plans.	Policy C8 sets out that development proposals that are part of a Whole Estate Plan that aligns with Local Plan policies and has been endorsed by the Local Planning Authority will be given positive regard.	N
	Development in the Natural Zone. Policy could be tightened, as evidenced by the Mickledon Edge enforcement and appeal. Suggest Sheffield City Council and Natural England will advise on wording.	Policy B1 sets out the exceptional circumstances in which development is permissible in the Natural Zone.	N
	Support going beyond 10% and sets out issues regarding the evidence that may be needed to justify this. May impact on viability.	Policy B4 requires proposals not exempt from statutory Biodiversity Net Gain to enhance biodiversity by 10% or greater compared to the pre-development situation.	Y
	Landscape and nature recovery. Approach is supported only in part because there should be greater emphasis on recovery (not just protection) of priority species.	Core Policy C6 is the strategic policy for biodiversity and nature recovery. This requires development to contribute proportionately towards nature recovery in accordance with the	Y

		Peak District Nature Recovery Plan.	
	Broadly agree with the spatial objectives for landscape, biodiversity and nature recovery but would wish to see how planning policy can support a move from upland farming into more hybrid uses that better support biodiversity, habitat expansion and flood mitigation.	Spatial Objectives for biodiversity and nature recovery include 'sustainable, profitable farm businesses delivering nature recovery.' Supporting text to Policy B1 on protecting and managing the Natural Zone sets out the relationship between farming and land management for nature recovery.	Y
	Sheffield City Council understand and support the Authority's option to allocate sites for housing on the edge of Tier One settlements (Option 1), however we would suggest considering whether rather than restricting site allocations to Tier One settlements this could be extended to Tier Two? Tier Two – larger settlements with key services are likely to be sustainable locations for limited housing and may have suitable sites that could be allocated for housing. Where there is a significant unmet need for affordable housing, the authority could also consider a tightly controlled policy that permits limited market housing where this addresses viability constraints.	This approach is not taken forward. Policy C9 instead requires consideration of the <i>Settlement Character Analysis and Landscape Sensitivity Assessment</i> .	N
	Given the understandable constraints when delivering affordable housing (as evidenced in the number of villages where no schemes have come forward), Sheffield City Council believe that the tiered approach (allowing non parish residents to access affordable housing in higher tier settlements) would be a sensible strategy for managing development. This would facilitate larger, viable developments in suitable sustainable locations.	This approach is not carried forward but Policy C8 identifies settlements where wider housing need could be addressed where necessary.	N
	Sheffield City Council understand the reasoning of aligning special qualities within the Management Plan with those identified (and protected) in the Local Plan. In doing so,	The Spatial Objectives under Outcome 1 include to take account of the Peak District National Park's	Y

	replacing the valued characteristics in the Core Strategy has however resulted in a focus on physical features or events and activities, and the removal of the recognition of the Park's "easy accessibility for visitors from surrounding urban area" and its "special value attached to the national park by surrounding communities" as valued characteristics (currently within the Core Strategy). These characteristics also include the flow of landscape character beyond the park boundary providing continuity and setting for the park. Whilst these are broad 'qualities' of the park, Sheffield City Council suggest these are re-instated as special qualities.	close proximity to, and two-way relationship with, nearby market towns and large conurbations, recognising that the National Park is an important place for adventure, escape, recreation and for promoting physical and mental health.	
	Sheffield City Council support the spatial objectives for sustainable development. However, they are generic and could be applied to any National Park. The overarching spatial strategy should recognise the Park's proximity to large urban conurbations and the relationships between them, for example the importance of the National Park to residents within these conurbations for recreation and leisure. Conversely, these conurbations provide important retail, leisure and employment opportunities for residents within the National Park. Managing these relationships and their effects is a key element of the plan, and this is evident in policies that manage new housing and recreational developments.	The Spatial Objectives under Outcome 1 include to take account of the Peak District National Park's close proximity to, and two-way relationship with, nearby market towns and large conurbations, recognising that the National Park is an important place for adventure, escape, recreation and for promoting physical and mental health.	Y
East Midlands Mayoral Combined Authority	No comments received.		
Greater Manchester Mayoral Combined Authority	Aggregates are essential to the delivery of sustainable growth opportunities across Greater Manchester. Whilst Greater Manchester does have quarries supplying crushed rock aggregate, these aggregates are understood to be of low quality and therefore higher specification aggregates are imported, including from quarries within the Peak District National Park. Whilst specific data for Greater Manchester is not available, the 2019 BGS survey suggests	Policy M1 sets out that proposals for extensions of time at aggregate producing sites that retain previously consented reserves that make a meaningful* contribution to the regional landbank at their existing end dates will be supported in principle.	Y

	<p>that in 2019 somewhere between 20-30% of the crushed rock consumed in the sub-region of Greater Manchester, Warrington, Halton and Merseyside came from the Peak District National Park.</p> <p>The consultation document explains that sites permitted for future limestone extraction within Derbyshire CC will be sufficient to meet the shortfall provision as quarries close in the Peak District National Park. However, it would be useful to understand what will happen if there are a number of quarries with a 2042 end date closing at the same time, and how this would be met by sites within Derbyshire CC. Further information should be provided to show how it is expected this will work in practice.</p>		
South Yorkshire Mayoral Combined Authority	No comments received.		
West Yorkshire Mayoral Combined Authority	No comments received.		

2025 Regulation 18 Preferred Approach consultation			
Prescribed Body	Issue	PDNPA response/action	Strategic issue to be addressed in Statement of Common Ground (Y/N)
Environment Agency	Consultation Point: Policy 68 New or expanded reservoirs Where new or expanded reservoirs are delivered they will be required to provide the following: i The delivery of biodiversity net gain within the management area of the reservoir; and ii The delivery of landscape enhancement with suitable mitigation to ensure a net benefit to the landscape and <i>suggest add water relevant ecosystem services</i>	Clause C of Policy U1 requires new or expanded water resource reservoirs to provide water-relevant ecosystem services.	Y
	Consultation Point: Policy 50 Restoration and aftercare Suggest add to the draft policy 'Habitats that are adjacent to the redline boundary within the operators land ownership should be included in restoration proposals even if they were not directly effected (sic) by the minerals extraction'.	Could be considered on a case-by-case basis if appropriate and necessary to make the development acceptable, possibly caught by BNG requirement. Too prescriptive to include as policy. Not supported by NPPF.	N
	Consultation Point : Policy 44 Minerals development Add 'habitat' to restoration outcomes focus.	Addition to Policy M1 was considered but not included.	N
	Consultation Point: Draft Policy Direction 13 Sustainable drainage Good	Policy CC4.	Y

	Consultation Point: Policy 9 Protecting irreplaceable habitat, trees, hedgerows Good	Policy B3.	Y
	Consultation Point: Policy 8 Protecting sites, species and networks Good	Policy B2.	Y
	Draft Policy Direction 4 Development management principles Whole policy is welcomed.	Policy C10.	N
	<p>Consultation Point: Draft Policy Direction 1 Biodiversity and Nature Recovery</p> <p>Policy welcome particularly pleased that the PDNPA have decided to ask for 20% BNG.</p> <p>The first priority is to protect designated sites (SSSIs, SPAs and SACs), irreplaceable and Priority habitat, protected and priority species and features of geological/geomorphological importance.</p> <p>All development proposals will be required to contribute proportionately towards nature recovery in accordance with *design policy* and *development management principles Policy*.</p> <p>Do these already exist? Have/did the EA have a chance to input?</p>	<p>Policy C6 requires all development to contribute proportionately towards nature recovery in accordance with the Peak District Nature Recovery Plan.</p> <p>Policy B4 sets out that proposals not exempt from statutory Biodiversity Net Gain should enhance biodiversity by 10% or greater compared to the pre-development situation and be in accordance with the Peak District Nature Recovery Plan.</p> <p>The Preferred Approach Consultation set out Design and Development Management Principles as 'draft policy directions' rather than draft policies. The consultation document at page 8 set out that 'draft policy directions indicate aspiration and content of future policy but do not set out detailed criteria'.</p>	Y

		The relevant Local Plan Policies are: C11: Design, siting, layout and landscaping C10: Development management principles	
	<p>Consultation Point: Policy 3 Enhancing the National Park</p> <p>F. Development in settlements necessary for the permitted. In such cases significant overall enhancement for landscape, suggest add habitats, wildlife, cultural heritage and residential amenity, as relevant, must be demonstrated.</p>	<p>Policy C3 sets out that proposals intended to enhance the National Park must demonstrate that they offer significant overall benefit to the natural beauty, wildlife, cultural heritage and other first purpose Special Qualities of the area.</p> <p>Policy is specifically and deliberately related to national park purposes and first purpose Special Qualities.</p>	N
	<p>Consultation Point: Outcome 7: The Peak District has a flourishing economy</p> <p>Promote nature recovery and mitigation of environmental concerns. Promote suggests its optional, we would prefer stronger language, suggest replace with "embed requirements for...."</p>	<p>Spatial Objectives under Outcome 7 set out that we will support sustainable, profitable business, agriculture, forestry, land management, and rural enterprise that conserves and enhances the first purpose Special Qualities of the National Park and contributes to thriving and sustainable communities.</p>	N
	<p>Consultation Point: Outcome 2 Spatial Objectives for landscape</p> <p>Point 5 Promoting a more biodiverse landscape, where nature recovery is enhanced.</p> <p>The language is not quite right, habitats are enhanced or created to enable nature recovery, for nature recovery to be</p>	<p>Spatial Objectives under Outcome 2 set out that development will be managed so that the Peak District Nature Recovery Plan outcomes are delivered and the potential for biodiversity within development and the built environment is maximised.</p>	N

	enhanced it would need to already be implemented. Suggest replacing the word enhanced with enabled.		
Historic England	<p>Consultation Point: Policy 71 Telecommunications infrastructure</p> <p>Clause C should relate to the significance of heritage assets rather than built heritage.</p>	Policy U6 sets out that telecommunications infrastructure will be permitted provided that the landscape, heritage assets or other first purpose Special Qualities of the National Park are not harmed.	N
	<p>Consultation Point: Policy 68 New or expanded reservoirs</p> <p>HE would want to engage on any new sites for potential reservoirs as there can be harmful effects for the significance of heritage assets and their settings. Any policy being used to determine the location of a new reservoir should be clear that harm to the historic environment, the significance of heritage assets and their settings will be avoided or mitigated, where possible.</p>	<p>Policy U1 seeks to prevent the development of reservoirs in the National Park unless there are exceptional circumstances, governed by National Need.</p> <p>The Authority would not be the determining body for nationally significant infrastructure. However the policy requires that a record of, and appropriate conservation of affected heritage assets and archaeological features is provided.</p>	Y
	<p>Consultation Point: Policy 55 The impact of minerals and waste development</p> <p>We support a reference to heritage assets. Amend 'impacts' with 'harm'.</p>	Policy MW4 refers to the need to minimise harm on cultural heritage assets and their setting.	N
	<p>Consultation Point: Policy 46 Building and roofing stone proposals</p> <p>Recommend adding a clause about building stone suitable for heritage asset repairs etc. being available</p>	The supporting text to Policy M3 makes reference to the traditional stone materials in the National Park's built environment and the use of local materials and building	N

		methods giving each place its special vernacular characteristics.	
	<p>Consultation Point: Policy 44 Minerals development</p> <p>We recommend ensuring that any restoration principles conserve or enhance the significance of heritage assets and heritage landscapes.</p>	Clause C of Policy M1 states that restoration schemes outcomes will include recognition of cultural heritage and industrial archaeological features.	N
	<p>Consultation Point: Policy 19 Flood Risk</p> <p>We would be keen to see consideration of how these measures may impact the historic environment and the significance of heritage assets.</p>	Policy C7 sets out that other than in exceptional circumstances development will not be permitted where it is likely to cause unacceptable harm to the significance of any cultural heritage asset or its setting, including statutory designations or other heritage assets of international, national, regional or local importance or special interest.	N
	<p>Consultation Point: Policy 18 Low carbon and renewable energy development</p> <p>We support heritage references.</p>	Policy CC2.	N
	<p>Consultation Point: Draft Policy Direction 12 Energy efficiency and generation</p> <p>We are supportive of specific references to energy generation measures and the historic environment.</p>	Policy CC1.	N
	<p>Consultation Point: Policy 14 Conversion of a cultural heritage asset</p> <p>We are supportive of this policy and seek to ensure that the wording encourages appropriate conversion that conserves the significance of heritage assets. Not all conversion will be appropriate, and it may be that certain schemes are unsupported due to the level of harm on the heritage asset. We</p>	Policy CH2 sets out that conversion of a heritage asset will be permitted provided the benefits of conversion outweigh the harm. Supporting text sets out that it may not be appropriate to convert a building even if it has been identified as a non-designated	N

	are keen to ensure that heritage assets find a viable use to protect their future, which is why the policy is welcome.	heritage asset. This is because the benefit does not outweigh the harm (in accordance with Policy CH1) or because there is an unacceptable landscape impact (in accordance with Policies C4 and C5.)	
	Consultation Point: Policy 13 Registered parks and gardens What is the policy aiming to achieve? We consider the policy should be resisting harm to RPGs.	Policy CH5 refers to Policy CH1 so that harm is properly considered.	N
	Consultation Point: Policy 11 Listed Buildings A) i amend 'preserve' with 'conserve'. Relate the sentence to significance. D) Consider NPPF harm and also test for substantial harm. Consider impacts for locally listed buildings. Do you have a local list? Implications for listed buildings for shopfront/ advertisements. E) Any loss should be recorded and added to the Historic Environment Record (HER)	Policy CH3 on listed buildings is re-written to address these issues. The Authority is not creating a Local List.	N
	Consultation Point: Policy 10 Assessing the impact of development Clause C add in about a suitably qualified professional. Clause F is it relating to development of a heritage asset or development affecting the significance of a heritage asset, including its setting. Would consider rewording the clause, in relation to all sections of F.	Cluse C of Policy CH1 requires supporting statements to be prepared in accordance with national archaeological standards and guidance as set out by the Chartered Institute for Archaeologists and Historic England.	N
	Consultation Point: Draft Policy Direction 5 Siting, design, layout and landscaping We would recommend incorporating information for the historic environment in relation to design and what will be appropriate in this context. For example, dealing with shopfronts and	This is included in Policy C11.	N

	advertisements in the context of listed buildings and conservation areas, locally distinctive design and appropriate materials, height, scale and massing that are appropriate within a historic context and respect the significance of heritage assets, including their setting.		
	<p>Consultation Point: Policy 6 Conservation and enhancement of nationally significant landscapes</p> <p>We are supportive of appropriate reuse of heritage assets where the significance of heritage assets is not harmed. Additional detail may be required in the policy to ensure that the appropriate impact assessments and consents are sought.</p>	Policy C5 requires Where there is a wide-scale landscape impact a landscape impact assessment referencing the Landscape Strategy must be provided.	N
	<p>Consultation Point: Policy 5 Cultural heritage assets</p> <p>Clause A, amend to reflect the term 'heritage assets' in line with the NPPF. Rephrase the references to archaeological, artistic etc as elements of significance.</p>	<p>Policy C7 refers to the significance of heritage assets and their setting.</p> <p>Policy CH1 and the associated Appendix sets out how significance is assessed.</p>	N
	<p>Consultation Point: Policy 2 Sustainable development in the context of a national park</p> <p>We support this policy.</p>	Policy C2.	N
	<p>Consultation Point: Outcome 10 Outcome 10: the adverse impact of minerals and waste operations is reduced</p> <p>We would welcome a reference to appropriate restoration of mineral workings, for the historic environment. This would be in keeping with the aspirations for Nature Recovery but with consideration of what schemes may be appropriate within a historic landscape context and affecting the significance of heritage assets including setting.</p> <p>A reference to building stone being suitable for repairs to heritage assets would be welcome.</p>	<p>Spatial Objectives under Outcome 10 include:</p> <p>To allow building and roofing stone quarries of an appropriate scale, recognising the contribution this makes to the conservation of the local vernacular and heritage assets whilst supporting the local economy.</p> <p>To require site restoration that delivers significant long-term landscape enhancement (from</p>	N

		current position), including to the historic environment, and makes a major contribution to nature recovery.	
	<p>Consultation Point: Outcome 6 Outcome 6: Peak District National Park communities are thriving ...</p> <p>This needs consideration of what the potential harm is for the historic environment and the significance of heritage assets. There may be opportunities for appropriate conversion and reuse of heritage assets but this would require additional detail.</p>	Spatial Objectives under Outcome 6 are supported by a Settlement Character Analysis and Local Landscape Character Assessment.	N
	<p>Consultation Point: Outcome 5 Outcome 5: The Peak District is a welcoming place</p> <p>Add in 'appropriate' in relation to conversion of heritage assets.</p>	Policies will determine which heritage assets are appropriate.	N
	<p>Consultation Point: Outcome 4 Outcome 4: Cultural heritage and the built environment</p> <p>We welcome the inclusion of this objective in the Plan.</p>	Outcome 4.	N
	<p>Consultation Point: Outcome 2 Outcome 2: The Peak District National Park is a resilient landscape ...</p> <p>We support the references to cultural heritage. Consider including term 'heritage assets' to reflect National Planning Policy Framework (NPPF) terminology.</p>	Outcome 2.	N
	<p>Consultation Point: 2 Planning in a National Park</p> <p>We value the recognition of the role of heritage within the creation and preservation of the National Park. This section would benefit from additional facts relating to heritage assets including archaeology and non-designated heritage assets.</p>		N
Natural England	Consultation Point: Policy 50 Restoration and aftercare	Policy M4	N

	Natural England welcome point vi, the requirement for restoration schemes to follow the recommendations within the relevant Local Nature Recovery Strategy (LNRS) and to meet the BNG calculations.		
	<p>Consultation Point: Policy 40 On-farm anaerobic digestion of agricultural waste</p> <p>Natural England would wish to ensure that the impact of ammonia emissions from anaerobic digesters on natural habitats are fully considered. The impact of ammonia should also be considered within the HRA.</p>	Policy E7 sets out that applications for development associated with the appropriate and environmentally sensitive management of nutrients, slurry, manure and ammonia are supported.	N
	<p>Consultation Point: Draft Policy Direction 13 Sustainable drainage</p> <p>Natural England welcomes the point that requires the integration of Sustainable Drainage Systems with wildlife enhancement to create new green infrastructure.</p>	Policy CC4.	N
	<p>Consultation Point: Policy 9 Protecting irreplaceable habitat, trees, hedgerows</p> <p>Natural England welcomes the update of this policy in line with NPPF requirements.</p>	Policy B3.	N
	<p>Consultation Point: Policy 8 Protecting sites, species and networks</p> <p>Natural England welcomes the additional protection with this policy of important ecological networks, corridors and stepping stones and aligns with the guidance in the NPPF.</p>	Policy B2.	Y
	<p>Consultation Point: Policy 7 Protecting and managing the Natural Zone</p> <p>Natural England welcomes the strengthening of the Natural Zone policy.</p>	Policy B1.	N

	<p>Consultation Point: Draft Policy Direction 5 Siting, design, layout and landscaping</p> <p>Natural England recommends that reference should be made within a Design policy to the Natural England Green Infrastructure Planning and Design Guide 2023 GI Design Guide. This Guide provides details of what good GI design looks like linked to the ten characteristics of well-designed places as set out in the National Model Design Code and the National design guide. It provides evidence based practical guidance on how to plan and design good green infrastructure and can be used to help planners and designers develop local design guides and codes with multifunctional green infrastructure at the heart. This will help to inspire the creation of healthier, nature-rich, climate resilient and thriving places to live, learn, work and play.</p>	<p>Policy C11 sets out that all development must have regard to the principles set out in the Design and Placemaking Planning Practice Guidance and the Green Infrastructure Framework or successors. (At the time of writing the Design and Placemaking Planning Practice Guidance is available in draft following a public consultation.)</p>	<p>Y</p>
	<p>Consultation Point: Draft Policy Direction 4 Development management principles</p> <p>Natural England generally welcomes this policy particularly the requirement for nature friendly design and landscaping, and Biodiversity Net Gain. We also welcome the point on green and blue infrastructure, and we suggest that reference is made to Natural England’s Green Infrastructure Framework (GIF) when the detail of this policy is developed further. Ideally the Standards and Targets set out in the GIF should be used in developing and writing policy. The five Headline Green Infrastructure Standards are:</p> <p>S1: Green Infrastructure Strategy Standard S2: Accessible Greenspace Standard S3: Urban Nature Recovery Standard S4: Urban Greening Factor Standard S5: Urban Tree Canopy Cover Standard</p>	<p>Policy C11. The Green infrastructure framework is referenced in Policy C10.</p>	<p>Y</p>

	<p>These standards can provide the output measures so that developers have certainty over what green infrastructure is needed on site. They can be included as site specific and area-based requirements in site allocation policies. To help the GI standards to be delivered local authorities should set green infrastructure targets. These should include delivery levels over time. For instance, the % of people having good quality publicly accessible greenspaces within 15 minutes' walk from home by 2030.</p>		
	<p>Consultation Point: Draft Policy Direction 1 Biodiversity and Nature Recovery</p> <p>Natural England is generally supportive of this policy and welcomes the reference to Local Nature Recovery Strategies (LNRS). We reiterate our previous advice that the policy may set out a percentage biodiversity net gain target greater than the statutory minimum of 10%, however there should be evidence to justify the target proposed and demonstrate that development is deliverable.</p>	<p>Policy C6 requires all development to contribute proportionately towards nature recovery in accordance with the Peak District Nature Recovery Plan.</p> <p>Policy B4 sets out that proposals not exempt from statutory Biodiversity Net Gain should enhance biodiversity by 10% or greater compared to the pre-development situation and be in accordance with the Peak District Nature Recovery Plan.</p>	<p>Y</p>
	<p>Consultation Point:</p> <p>Policy 1 Securing National Park Purposes</p> <p>Natural England generally supports this policy however we suggest in point E, which covers the approach to decisions on major development, that the mitigation hierarchy should be followed i.e. avoid, mitigate, compensate, before it is permitted.</p>	<p>The reference to major development is removed as this repeats the National Planning Policy Framework.</p> <p>The mitigation hierarchy is referenced in Policy B2 on protecting and enhancing sites, species and networks</p>	<p>N</p>

	<p>Consultation Point: Outcome 3 Outcome 3: The Peak District is a place where nature recovers and biodiversity flourishes</p> <p>Natural England supports this outcome and welcomes the reference to the Local Nature Recovery Strategies covering the Peak Park.</p>	Outcome 3.	Y
	<p>3 Spatial Objectives and Strategic Housing Provision</p> <p>Natural England generally supports the Spatial Outcomes and considers that they cover our interests in terms of protection of the national landscape, enhancing biodiversity and nature recovery, ensuring sustainable land management, encouraging access to nature and mitigating for climate change. We do suggest however that Green Infrastructure should feature more prominently within the spatial objectives and throughout the Plan.</p> <p>Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery.</p> <p>Natural England's Green Infrastructure Framework (GIF) Green Infrastructure Home aims to support better planning for good quality GI and help target the creation or improvement of GI where it is needed most, to deliver environmental, economic, health and wellbeing benefits, for nature, climate, local and wider communities.</p>	<p>Green infrastructure is referenced in: Outcome 1; Policy C10 on development management principles; Policy C11 on design, siting, layout and landscaping; Policy C12 on local infrastructure and developer contributions; the supporting text to Policy B4 delivering nature recovery; the supporting text to Policy CC3 on flood risk and Policy CC4 on sustainable drainage.</p>	Y
	<p>Habitats Regulation Assessment of Preferred Approach</p> <p>Natural England welcomes the opportunity to provide comments on the HRA. We are satisfied that the Screening Report follows accepted methodology and is in line with appropriate legislation and guidance.</p> <p>As we noted in our previous response (our ref: 481877) to the Issues & Options consultation, that at paragraph 3.5 that the screening report has used the document "Recreation use of South Pennines Moors and implications for strategic housing</p>		

	<p>growth' by Footprint Ecology, to inform the area for screening by use of a 24.4km Zone of Influence (Zoi). Whilst we welcome the view that the screening report has taken to "err on the side of caution" in the use of this Zoi we would advise that the recreation study was limited in its scope and may be followed up to obtain more data and evidence to gain a better understanding of the scale and location of recreational impact.</p> <p>We acknowledge that the key issues that may have a Likely Significant Effect on a European Site have been identified with the table in Appendix 3. Whilst we generally agree with the decisions in this table, we would draw your attention to "Policy 40: On-farm anaerobic digestion and waste management" which has been screened out and would seek reassurance that any potential impact from ammonia pollution had been fully considered.</p> <p>We agree with the screening report's overall conclusions that all protected sites located within the Peak District National Park boundary will be subject to an appropriate assessment at the next stage of the plan-making process, including consideration of in-combination effects.</p>		
Homes England	No comments received.		
NHS	<p>Consultation Point: Policy 41 Provision and retention of community services</p> <p>Draft Policy 41 focuses on the provision of new community services and facilities and redevelopment of existing community services and facilities. Specifically, draft Policy Direction 20 concerns the change of use of buildings or sites which provide community services and facilities as existing, reflecting the criterion under Part B of draft Policy 41.</p> <p>NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to</p>	<p>Policy S4 on change of use of shops, other town centre uses and community services and facilities sets out at Clause C that the loss or change of use of existing public services, including 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.</p>	N

	<p>be effective in its current form with regards to the loss or change of use of existing community services or facilities.</p> <p>Where healthcare facilities are included within the Local’s Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS’s ability to ensure the delivery of essential facilities and services for the community.</p> <p>The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.</p>		
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	<p>Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information.</p> <p>To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (shown in bold) to Draft Policy 41 or supporting paragraphs to ensure the principle of alternative uses for NHS land and property will be fully supported:</p> <p>Proposed Modification to draft Policy 41: [...] "D. The redevelopment of a community recreation site or sports facility for other uses will not be permitted until a satisfactory replacement site or facility has been provided, or it can be demonstrated that the facility is no longer required.</p> <p>E. Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part B to C of the Policy will not apply."</p> <p>Proposed addition to supporting paragraphs of draft Policy 41: "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part B to C of the Policy will not apply."</p>		
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<p>Consultation Point: draft Policy Direction 20: Change of use of buildings or sites which provide community services and facilities.</p> <p>Proposed Modification to draft Policy Direction 20:</p> <p>“Strategic policy sets out that proposals to change the use of buildings or sites which provide community services and facilities to non-community uses must demonstrate that the service or facility is:</p> <ul style="list-style-type: none"> i. no longer needed; or ii. available elsewhere in the settlement; or iii. can no longer be viable; or iv. declared surplus to the operational requirements of the NHS or identifies as part of a published estates strategy or service transformation plan.” <p>“Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered as sufficient evidence to demonstrate the loss of an existing healthcare facility.”</p>	<p>Policy S4 on change of use of shops, other town centre uses and community services and facilities sets out at Clause C that the loss or change of use of existing public services, including 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.</p>	<p>N</p>
<p>Consultation Point: Policy 21 First occupation local needs homes</p> <p>Draft Policy 21 sets out the first occupation eligibility criterion which will be considered by the Council where new affordable housing is being delivered. We note that key workers are not included in the criterion (i to iii) which would be eligible to be considered for first occupation of affordable homes. In line with our comments for Draft Policy Direction 14 and as set out in</p>	<p>Eligibility criteria for first occupation are set by Policies H2, H3 and H4. Eligibility criteria for second and subsequent occupation are set by H2, H3 and H5.</p> <p>Essential workers are considered within Policy H3 and H5 for second and subsequent occupation.</p>	<p>N</p>

	<p>supporting paragraphs of the Policy 21, NHSPS request that the affordable housing need for key workers, including for NHS staff, be included within the eligibility criterion or clearly under exceptional circumstances when considering the first occupation of any delivered affordable housing. This should be determined following engagement with local NHS partners to consider where there is an identified need and factors such as the suitability/accessibility of the location of areas of new affordable housing.</p>	<p>First occupation remains restricted to: A person who is living in the Parish or the adjoining Parish within the National Park and has done so for the previous 10 years. Or, A person not now resident in the Parish but who has lived for at least 10 years out of the last 20 years in the Parish or an adjoining Parish inside the National Park and has retained a connection to their former National Park community. Or, A person who has an essential need to live close to another person who has lived in a Parish inside the National Park for the previous 10 years, the essential need arising from infirmity.</p>	
	<p>Consultation Point: Draft Policy Direction 14 New housing</p> <p>Draft Policy Direction 14 sets the Council's expectations and identifies the types of housing developments to be supported in the delivery of new housing. This includes support for tied accommodation for key workers in key service sectors under Point G, to include those within the emergency services, health and social care sectors as outlined in the supporting paragraph.</p> <p>NHSPS welcomes the support being demonstrated by the Council towards new housing developments for key workers within the health and social sector. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific</p>	<p>The Local Plan does not have a policy on tied accommodation. The issue of accommodation for key workers is instead addressed as set out above.</p>	<p>N</p>

	<p>workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people’s choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. In further undertaking work towards the delivery of affordable housing for key workers such as NHS staff, we recommend that the Council:</p> <ul style="list-style-type: none"> • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. 		
<p>Rail Regulator</p>	<p>No comments received.</p>		
<p>Highways Agency</p>	<p>Consultation Point: Draft Policy Direction 22 Reducing the general need to travel</p> <p>Summary of response</p>	<p>The response provides useful context around development, it’s likely impacts on the road network and how this can be managed and reduced.</p>	<p>Y</p>

	<p>The respondent advocates a vision led approach to planning as set out in National Highways' Planning for the Future guide.</p> <p>The respondent provides detail on a range of approaches within the guide including travel plans, the requirement for a development to reflect its end-user transport patterns, the provision of EV and SUDS infrastructure and the need for Construction Traffic Management Plans.</p>	<p>The information provided has been used to make changes to policy where this is applicable to national park purposes.</p>	
	<p>Consultation Point: Draft Policy Direction 7 Recreation attractions and hubs</p> <p>National Highways supports the Recreation Hubs concept and the cautious approach to new or enlarged visitor parking. We encourage transport packages at hubs, such as bus links, park-and-ride, and active travel connections, to avoid additional SRN car-trip generation. Where proposals could reassign traffic toward the SRN, early engagement with National Highways is requested so that any implications for A628/A616 safety and operations can be assessed and mitigated.</p>	<p>The policy option regarding recreation attractions and hubs is not taken forward in the draft local plan.</p> <p>Policies RT1 and RT2 set out the approach to recreation development and how this links to the associated development strategy Policy C8; visitor parking Policy T12 and traffic management Policy T9.</p>	Y
	<p>Consultation Point: Policy 60 Managing the demand for freight transport</p> <p>We welcome policies that encourage freight transfer to rail and the use of weight restrictions to manage HGV routing. For developments generating significant freight movements, we recommend that Freight Management Plans are conditioned to ensure routing via appropriate SRN sections outside the Park wherever possible, and to mitigate peak-time impacts.</p>	<p>Policy T5.</p>	Y
	<p>Consultation Point: Policy 59 Local road improvements</p> <p>National Highways supports the continued policy stance to resist capacity-enhancing road schemes and to confine interventions to safety, operational and environmental improvements. Where remedial works are required on the</p>	<p>Policy T4</p>	Y

	A628 or A616 for safety or asset resilience, we will engage early with the Authority. We also support the emphasis on Travel Plans, demand management, and modal shift to reduce visitor and freight pressures on sensitive corridors		
	<p>Consultation Point: Draft Policy Direction 2 Development Strategy</p> <p>Given the limited SRN coverage in the National Park, the proposed development strategy and settlement strategy are unlikely to have a material impact on the SRN, provided that housing and employment proposals remain proportionate and are accompanied by Travel Plans and construction traffic management measures. We recommend that the forthcoming Settlement Capacity and Landscape Assessments confirm that growth does not rely on increased cross-Park car trips via the SRN and that any cumulative effects on the A628 corridor are screened early.</p>	The development Strategy as set out in Policy C8 would not have a material impact on the SRN.	Y
	<p>Consultation Point: Outcome 9: residents, visitors and businesses can travel within and across the National Park</p> <p>National Highways acknowledges that the Plan identifies parts of the Strategic Road Network within the National Park, specifically the A616 and A628 trunk roads. We note that the Plan's spatial objectives and transport policies aim to deter cross-Park traffic, resist capacity-increasing road schemes, and promote sustainable and active travel. This approach aligns with our statutory responsibilities to operate the SRN safely and efficiently while supporting environmental protection in designated landscapes.</p>	Outcome 9.	Y
	<p>Consultation Point: 13 Travel and Transport</p> <p>Summary of response</p>	This response is useful in setting out the role of National Highways in regard to the development of the Local Plan and the requirements of	Y

	<p>The respondent sets out the role of National Highways and the context for their response. The response also sets out their approach to the regulatory 'Duty to cooperate' role. The respondent explains the relative duties of National Highways and the National Park Authority under DfT Circular 01/2022 The Strategic Road Network (SRN) and the delivery of sustainable development.</p> <p>The respondent then advises on the requirement for a robust evidence base, particularly in assessing impacts on the Strategic Road Network.</p> <p>The respondent sets out the National Highways approach to Traffic Assessment and modelling; and its role in assessing the impact of development on the SRN.</p> <p>The response sets out the requirement for delivering on the Net Zero Carbon transition through the Local Plan.</p> <p>Finally, the respondent sets out the context of the SRN within and adjoining the Peak District National Park.</p>	<p>both parties through the Duty to Cooperate.</p> <p>In relation to future development and its impact on the SRN, draft Local Plan does not allocate land for development.</p> <p>The Peak District National Park boundary does not include many settlements adjacent to the SRN or through which the SRN travels. Both Langsett and Tintwistle are partially contained within the National Park and are traversed by the SRN. It is possible that small local needs housing schemes or enhancement sites will come forward during the life of the Plan at either settlement, within the National Park boundary. Should this be the case, then early engagement with National Highways will be undertaken.</p>	
Integrated Transport Authorities	See response from county and combined authorities.		
Highway Authorities	See response from county and combined authorities.		
Derbyshire County Council	<p>Consultation Point: Draft Policy Direction 24 Minimising the adverse impact of motor vehicles</p> <p>Consultation Point: Draft Policy Direction 22 Reducing the general need to travel</p>	<p>Policy T9 on traffic management supports traffic management schemes and park and ride schemes. As a whole the transport policies address the issues raised to the extent that is possible via land-use policies in a national park.</p>	Y

	Draft Policy Directions 22 and 24 aim to minimise the adverse impact of motor vehicles and manage demand for car and coach parking. These policies should include a clearer link to transitioning trips to rail and local bus services. Promoting bus and rail travel from surrounding urban conurbations and market towns can be an effective way to reduce traffic and alleviate parking pressures within the National Park.		
	<p>Consultation Point: Policy 60 Managing the demand for freight transport</p> <p>Policy 60 highlights the need to manage demand for freight transport. Heavy freight vehicles place significantly greater stress on road infrastructure compared to lighter vehicles. To mitigate these impacts, weight restrictions should be considered on routes that are vulnerable or structurally sensitive. The A57 Snake Pass provides a useful example, where challenging topography, limited structural resilience, and high maintenance costs required temporary measures to protect the route.</p>	Policy T5 sets out that except for quarries or other businesses with site specific operational requirements, developments requiring access by Large Goods Vehicles must be located on the Strategic or Secondary Road Network or be readily accessible to it. Routing agreements will be delivered through planning conditions.	Y
	<p>Consultation Point: Policy 59 Local road improvements</p> <p>Policy 59 focuses on ensuring the safe operation of the highway network, but it should also address network resilience to maintain functionality during adverse conditions or unexpected events.</p>	Policy T4 would not preclude development related to these issues.	Y
	<p>Consultation Point: Policy 48 Waste management</p> <p>Derbyshire County Council and Derby City Council are currently preparing a Review of the Derbyshire and Derby Minerals Local Plan that was previously adopted in 2005. The Local Plan Review is at a relatively early stage and has yet to have undergone any formal public consultation. However, officers are currently assembling the evidence base to support</p>	Policy W1 is compatible with the emerging policy approach in the DDWLP Review.	Y

	<p>the Plan, particularly an up-to-date Waste Needs Assessment which is currently being procured.</p> <p>The WNA will consider future waste needs that arise in both the County Council's area and the National Park, as appropriately identified in the Preferred Approach under Policy 48 below, that recognises that 'the National Park Authority is a Waste Planning Authority but Derbyshire County Council undertakes waste disposal for the majority of the National Park. The Strategy for Dealing with Derbyshire's Waste identifies that National Park designation and geography mitigate against local provision of facilities'.</p> <p>Using the evidence provided through the WNA, the Derbyshire and Derby Waste Local Plan Review will, where necessary, seek to identify new sites for larger scale waste disposal facilities in the County for both domestic and commercial and industrial waste streams, to meet identified need arising both in the County and National Park. Given the early stage of the DDWLP Review, it is intended that the Plan will be taken forward under the new Government's Local Plan Making Regulations within a 30-month timescale. To meet these requirements, the County and City Council anticipate that they will be likely to publish a first consultation on the Waste Local Plan Review in the summer of 2026 and as part of that process, the County and City Council's will ensure that the PDNPA is fully engaged in the consultation process.</p> <p>In the context of the above, Policy 48 set out in the Preferred Approach is supported in principle as being likely to be compatible with the emerging policy approach in the DDWLP Review.</p>		
	<p>Consultation Point: Policy 44 Minerals development</p> <p>Summary of response Having reviewed Policies 44 and 49 in the Preferred Approach, the County Council considers that there may be sufficient</p>	<p>Policy M1 on minerals development and Policy MW1 on the justification for minerals and waste development is compatible</p>	<p>Y</p>

	<p>‘flexibility’ in the policy approach to ensure that the requirements of the NPPF for MPAs to demonstrate 10 year land banks for crush rock can be met in the National Park in the event that the compensatory policy approach in the DDMLP in Policy SP8 is ultimately deleted from the Plan as required by the Inspectors for soundness reasons and NPPF compliance. This ‘flexibility’ appears to be accounted for in both policies 44 and 49, that recognise that proposals for new minerals extraction or extensions to existing minerals operations will not be permitted other than in exceptional circumstances and where evidence is provided for the need for the minerals; and that proposals for extensions of time at aggregate producing sites that retain previously consented reserves that make a meaningful* contribution producing sites that retain previously consented reserves that make a meaningful* contribution to the regional landbank at their existing end dates will be supported in principle.</p> <p>On the basis of the above, the County Council supports the policy approach in policies 44 and 49 in principle. However, the County Council would welcome the opportunity to engage in further discussions with officers at the PDNPA to secure a mutually agreeable position that can be carried forward in the DDMLP and Preferred Approach which ensures that both MPAs are able to meet their 10-year land bank requirements set out in the NPPF.</p>	<p>with the Derbyshire County Council’s approach.</p>	
	<p>Consultation Point: Policy 53 Safeguarding gritstone resource</p> <p>From a landscape perspective, Policy 53, which seeks to safeguard the gritstone mineral resource, appears somewhat unusual given that much of the National Park is underlain by gritstone geology. While we recognise the broader principle of preventing the sterilisation of mineral resources, similar to</p>	<p>The National Park Authority takes a mineral-by-mineral approach to safeguarding. The principle of safeguarding is a long-term planning policy which embeds a sustainable approach whilst preventing the unnecessary</p>	<p>Y</p>

	<p>policies for coal measures in East Derbyshire, the practical application here is unclear. It is difficult to envisage how gritstone could realistically be extracted prior to non-mineral development to avoid sterilisation. In this context, the necessity of such a policy is questionable, as any development within the Dark Peak would, by its nature, affect this resource.</p>	<p>sterilisation of irreplaceable mineral resources. Safeguarding may be of limited value in areas like the National Park because little surface development is anticipated that would sterilise minerals and therefore the long-term risk to the availability of mineral resources is not great. The minerals identified for safeguarding match the overall strategy for further extraction in the National Park, taking account of the economic importance of the minerals, together with the evidence of them being a proven resource. The Mineral Safeguarding Areas have been defined in accordance with the guidance set out in the BGS Guide to Mineral Safeguarding.</p>	
	<p>Consultation Point: Policy 43 Local Green Spaces</p> <p>From the perspective of the County Council's Landscape Architect, Policy 43 (page 142) seeks to protect important local green spaces, which is supported in principle. However, the current list of designated spaces does not appear to be comprehensive and includes areas, such as churchyards, that are highly unlikely to face significant development pressure. Conversely, there are large areas of open space that would be desirable to protect but are not included, such as the recreation ground at the heart of Great Longstone. It is recommended that the policy be reviewed to ensure that all key local green spaces are appropriately identified and safeguarded.</p>	<p>The green spaces listed in Policy S6 are either those identified by local people as having most significance for them or already identified as important spaces in a conservation and in both cases also meeting the NPPF criteria. The local plan also identifies and protects community recreation sites and sports facilities under Policy S5.</p>	N
	<p>Consultation Point: Policy 32 New outbuildings</p> <p>We confirm our agreement.</p>	<p>Policy H8 addresses building and extending a dwelling(s) to meet a person's own housing need (for</p>	N

		people in eligible housing need meeting the local connection criteria.) Policy H11 deals with ancillary accommodation. Policy H18 on householder development deals with extensions, alterations and outbuildings for non-local needs dwellings.	
	Consultation Point: Policy 34 Residential gardens We confirm our agreement.	Policy H12.	N
	Consultation Point: Policy 33 Replacement dwellings We confirm our agreement.	Policy H10.	N
	Consultation Point: Policy 31 Extensions and alterations We agree that extensions should be subject to demonstrable need but suggest that Clause B should include the same exceptional circumstances outlined in Policy 30, Clause A.	Policy H8 addresses building and extending a dwelling(s) to meet a person's own housing need (for people in eligible housing need meeting the local connection criteria.) Policy H18 on householder development deals with extensions, alterations and outbuildings for non-local needs dwellings.	N
	Consultation Point: Policy 30 Housing size Largely support Policy 30 on housing size; however, we recommend that one-bedroom units be slightly larger at 45m ² to allow for adaptations, storage of mobility aids, and flexibility for changing circumstances, such as accommodating a sleep in carer. We feel the proposed 39m ² may not adequately address these needs.	Policy H16 sets out that a 1 bed maisonette or house should be within the gross internal habitable floor area of 39-58 m2.	N
	Consultation Point: Policy 29 Housing mix	Policy H15.	N

	We endorse Policy 29 on housing mix.		
	<p>Consultation Point: Policy 27 Housing development on brownfield land</p> <p>Consultation Point: Policy 28 Housing development through conversion</p> <p>We support Policies 27 and 28, which encourage brownfield development and conversions that meet eligible local needs.</p>	<p>Policy H1 establishes the principle for the development of housing where it is required in order to achieve conservation and enhancement, including of a heritage asset.</p> <p>Policy H13 sets out the requirements for the provision of affordable housing.</p>	N
	<p>Consultation Point: Policy 25 Sub-division of dwellings</p> <p>Consultation Point: Policy 26 Ancillary dwellings</p> <p>We agree with Policies 25 and 26, which propose that ancillary and subdivided accommodation should be subject to checks to ensure they do not undermine the main building and remain in keeping with the landscape.</p>	<p>Policy H9 deals with subdivision of residential buildings to create multiple residential units.</p> <p>Policy H11 deals with ancillary accommodation</p>	N
	<p>Consultation Point: Policy 24 Assisted housing</p> <p>For Policy 24, we support widening the definition of assisted housing to include anyone requiring this type of accommodation, regardless of age.</p>	Supporting text to Policy H1 sets out that assisted accommodation is the provision of 24-hour care that cannot be provided in a normal domestic residential setting.	N
	<p>Consultation Point: Policy 23 Essential Worker Dwellings</p> <p>We endorse this policy. We believe this approach will help younger adults remain in the area, improve affordability, and foster thriving communities rather than those dominated by holiday lets or second homes. This is particularly important given the current difficulty in sourcing care workers due to housing unaffordability.</p>	<p>Policy H6 sets out the criteria for the development of residential dwellings to meet an essential need for a rural worker.</p> <p>Policies H2, H3 and H5 set out the approach to other essential workers.</p>	N
	Consultation Point: Policy 22 Second and subsequent occupation	Policies H2, H3 and H5 address this issue.	N

	<p>We endorse this policy. We believe this approach will help younger adults remain in the area, improve affordability, and foster thriving communities rather than those dominated by holiday lets or second homes. This is particularly important given the current difficulty in sourcing care workers due to housing unaffordability.</p>		
	<p>Consultation Point: Policy 21 First occupation local needs homes</p> <p>We endorse this policy. We believe this approach will help younger adults remain in the area, improve affordability, and foster thriving communities rather than those dominated by holiday lets or second homes. This is particularly important given the current difficulty in sourcing care workers due to housing unaffordability.</p>	<p>Policies H2, H3 and H4 address this issue.</p>	N
	<p>Consultation Point: Draft Policy Direction 17 Tied accommodation</p> <p>Regarding Direction 17, we recommend broadening the definition of key worker accommodation to include care workers.</p>	<p>The Local Plan does not have a policy on tied accommodation.</p> <p>Policies H2, H3 and H5 set out the approach to other essential workers.</p>	N
	<p>Consultation Point: Draft Policy Direction 16 Making effective use of land</p> <p>For Direction 16, we support the minimum density requirement of 25–30 dwellings per hectare, as this is likely to concentrate housing around local amenities.</p>	<p>Policy H14 sets out that new housing sites are expected to meet a gross minimum density of 30 dwellings per hectare.</p>	N
	<p>Consultation Point: Draft Policy Direction 14 New housing</p> <p>From the perspective of Derbyshire County Council’s Adult Care team, we support the proposed directions and policies relating to housing provision. In relation to Direction 14, we agree that new housing should address local need and strongly advocate for all new accommodation to be built to M4(2) accessibility standards.</p>	<p>Policy C11 on design links to the <i>Peak District Design Vision Principles</i> Appendix that requires construction to M4(2).</p>	N

	<p>Consultation Point: Draft Policy Direction 6 Planning conditions and developer contributions</p> <p>From the perspective of County Planning Policy, we welcome the publication of the Economic Viability Assessment 2025 prepared by Three Dragons, which forms part of the evidence base for the Local Plan review. From the County Council’s perspective, and in accordance with its Developer Contributions Protocol, all housing developments comprising 10 or more dwellings (whether market or affordable) are assessed for potential requirements for new infrastructure and associated developer contributions. Contributions are typically sought for dwellings of two bedrooms or more, as affordable housing developments in particular are likely to be occupied by families with school-age children, necessitating the provision of additional school places. Where there is insufficient capacity at existing schools, the County Council will seek developer contributions to fund the expansion of existing schools and, in the case of very large developments, the provision of new schools.</p> <p>Across the County, Derbyshire County Council is increasingly encountering viability challenges in securing contributions for County-level infrastructure and services. While it is acknowledged that previous Section 106 (S106) requirements within the Peak District National Park have reflected its protected status, concerns remain regarding the allowance for general S106 contributions factored into the 2025 Assessment – specifically, the figure of £2,700 per unit referenced in paragraph 4.25 and Table 4.7. Contributions per dwelling could be much</p>	<p>The Authority will fully consider the viability issues raised in the development of policy and continue to work with the County Council.</p> <p>Policy C12 on local infrastructure and developer contributions includes: affordable housing and other forms of restricted occupancy housing; health and social care; education; open space, sports and recreation facilities; digital connectivity; transport and transport infrastructure, including for public transport, walking and cycling; green infrastructure, including for the maintenance and enhancement of access routes and the ecological network.</p>	<p>Y</p>
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	<p>higher than this, particularly in settlements where the normal school is at capacity. Some settlements within the 'Town and Larger Villages' category, such as Hope, Calver, Taddington, and Stoney Middleton, may experience capacity constraints based on the attached data. If helpful, we would be happy to run some scenarios to produce example calculations for developments of 10 dwellings or more to illustrate potential contribution levels.</p> <p>It is noted that affordable housing requirements are often prioritised over other obligations, which can significantly affect the level of contributions available for County infrastructure. The Viability Assessment 2025 acknowledges that Greenfield sites are unlikely to deliver 100% affordable housing without grant funding. However, the Preferred Approach document indicates that Greenfield sites will be 100% affordable housing. Clarification is sought as to whether this implies that grant funding will always be available to support such provision. On page 63, from a County Policy perspective, it should be recognised that obligations and legal agreements may be required to secure contributions for County infrastructure to ensure developments are acceptable in planning terms, in line with national requirements. Similarly, page 113 should acknowledge the national position that S106 agreements may be necessary to make a development acceptable in planning terms.</p>		
	<p>Consultation Point: Draft Policy Direction 13 Sustainable drainage</p> <p>Strongly supported in principle. However, it is important that sustainable drainage solutions respond to the specific characteristics of the landscape. For example, open water features are not typically associated with the free-draining landscapes of the White Peak, where infiltration basins may represent a more appropriate solution. It is recommended</p>	<p>Policy CC4 sets out that SuDS must be integrated with biodiversity enhancement and multifunctional green infrastructure and explained within the Design and Access Statement. All development must be in accordance with Policy L1 that requires development to conserve and enhance valued</p>	<p>N</p>

	<p>that the policy include wording to ensure drainage design is informed by local landscape characteristics.</p> <p>Paragraph 3.17 and Table 3.2 of the Sustainability Appraisal clearly state that adaptation to climate change requires consideration of overheating and drought. For example: “Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures.”</p> <p>However, in the Preferred Approach document, references to climate change adaptation do not include overheating and drought. For instance, Section 8, “Climate Change, Flood Risk and Sustainable Drainage”, focuses primarily on flooding and drainage, implying these are the only considerations. It would be beneficial for the document to acknowledge that other risks such as overheating and drought can be addressed through effective design in both newbuild and retrofit developments. Draft Policy Direction 12, titled “Energy Efficiency and Generation in Buildings (Development Management Policy)”, already includes requirements around adaptation and could be strengthened to explicitly reference these additional risks.</p>	<p>landscape character, as identified in the Authority’s Landscape Strategy, Wooded Landscapes Plan and Nature Recovery Plan.</p> <p>Policy CC1 on sustainable design and carbon reduction sets out that all development must in a proportionate manner integrate measures to address climate change adaptation, <i>including overheating risk</i>, water efficiency, sustainable drainage and biodiversity enhancement.</p>	
	<p>Consultation Point: Policy 17 Facilities for keeping and riding horses</p> <p>The County Council’s Landscape Officer has reviewed Policy 17 (page 89), which relates to facilities for keeping and riding horses. While the policy identifies several design considerations for this land use, it does not specifically address the temporary fencing (often taped boundary fences) commonly associated with pony paddocks and horsiculture. Such fencing can have a notable impact on landscape character, particularly within the more open</p>	<p>Policy RT7 sets out that development should not have a negative impact on first purpose Special Qualities.</p>	<p>N</p>

	<p>landscapes of the White Peak. It is recommended that additional text be incorporated into the policy to mitigate this impact and ensure appropriate measures are in place to protect landscape character.</p> <p>The County Council's Strategic Transport Team has highlighted the opportunity for this policy on Recreation and Tourism to explicitly reference the integration of active travel infrastructure.</p> <p>Furthermore, the inclusion of recreational hubs within wider mobility hub networks, both within the Peak District National Park and connecting to neighbouring nodes, would strengthen the policy's commitment to reducing traffic impacts and promoting sustainable travel options.</p>		
	<p>Consultation Point: 4 Core Policies and Development Strategy</p> <p>The County Council's Landscape Officer has reviewed Policy 6 (page 58), which currently states: "Any development proposal with a wide-scale landscape impact must provide a landscape assessment referencing the Landscape Strategy." It is recommended that the term "referencing" be replaced with "informed by", as assessments should actively apply the requirements of the Landscape Strategy rather than merely cite it. This change would strengthen the wording and ensure that landscape assessments are robust and aligned with strategic objectives.</p>	<p>Policy C5 sets out that where there is a wide-scale landscape impact a landscape impact assessment informed by the Landscape Strategy must be provided.</p>	N
	<p>Consultation Point: 2 Planning in a National Park</p> <p>Councillor comments: It is astonishing to see that only 36 dwellings per annum would realistically be brought forward over a 20-year plan period. Houses for young people and families are needed but they must be compatible with the aims of the Peak District National</p>	<p>The Housing Requirement is set out in Outcome 6. It sets out an indicative provision of 87 dwellings per annum for the whole National Park to 2045. The majority of this is expected to be delivered in Derbyshire.</p>	Y

	<p>Park. They must have the highest standards in relation to appearance and energy efficiency. I would urge the National Park to directly engage with the first tiers of elected representation in their areas. Parish Councils are directly aware of housing needs in their areas and also any land that could be utilised, whether that be empty houses, disused premises or redundant farm buildings as I believe these should be utilised in the first instance.</p> <p>I strongly support the Preferred Approach’s focus on sustainable transport and ask that Policy T1 (and supporting text) is significantly strengthened to require all major tourism and recreational developments – including those just outside the National Park boundary – to deliver and fully fund high-quality, direct cycle routes and demand responsive public transport links (e.g. shuttle buses or on-demand services from nearby rail stations and towns). This would enable visitors to reach accommodation and attractions without relying on private cars, dramatically reduce traffic on narrow rural lanes, protect the tranquillity and landscape setting of the National Park, and help deliver the Plan’s ambitious targets for active travel and net-zero carbon emissions.</p> <p>Officer Comments The PDNP Preferred Options document is a very well thought out document, presenting many complex policies in a clear and transparent manner. Derbyshire County Council is supportive of the protected status of the Peak District National Park and is pleased that conservation and enhancement remain key themes running through the document.</p>		
<p>Staffordshire County Council</p>	<p>Draft Policy Direction 23 Reducing and directing traffic</p> <p>Draft Policy 23 Policy could read:</p>	<p>Policy T2 sets out that a Transport Assessment or Transport Statement will be required if a proposed development is likely to</p>	<p>Y</p>

	<ul style="list-style-type: none"> Resist developments rather than resist transport developments Require <u>Transport Assessments</u> and Travel Plans for appropriate developments Could also include text around encouraging travel by sustainable forms of transport - both visitors and local residents. 	<p>increase traffic flows on the surrounding highway network.</p> <p>Other transport policies address the other issues identified.</p>	
	<p>Consultation Point: Outcome 9 Outcome 9: residents, visitors and businesses can travel within and across the National Park</p> <p>This outcome could consider including something around reducing visitor traffic by private motor vehicle. EV charging could be mentioned here and in relation to infrastructure provision</p>	<p>Outcome 9 refers to the adverse impacts of vehicular traffic and support for facilities and infrastructure for the switch to low/zero carbon transport.</p>	Y
	<p>Consultation Point: Policy 60 Managing the demand for freight transport</p> <p>Policy 60 C. Could include driver welfare facilities and HGV parking D. Could include HGV routing agreements</p>	<p>Policy T5 refers to routing agreements.</p>	Y
	<p>Consultation Point: Policy 63 Development affecting a public right of way</p> <p>Policy 62 Routes for walking, cycling and horse riding, and waterways</p> <p>Policies could include wheeling</p>	<p>Policy T8 on development affecting a public right of way and Policy T7 on routes for walking, wheeling, cycling and horse riding and inland waterways (strategic policy) both refer to wheeling.</p>	Y
	<p>Consultation Point: Policy 61 Railway construction</p> <p>Add 'transport of bulk goods and materials' to the justifications.</p>	<p>The justification for Policy T6 refers to the sustainable transport of large numbers of people and freight.</p>	Y
	<p>Consultation Point: 12 Minerals and Waste</p>	<p>The importance of maintaining a supply for crushed rock from the</p>	Y

	<p>The most recent Local Aggregate Assessment (LAA) for Derbyshire, Derby and the Peak District National Park indicates the importance of crushed rock supply from the Peak District to other regions including the West Midlands (based on data from the national Aggregates Survey 2023). We have previously raised that the landbank for crushed rock aggregate needs to be assessed in terms of the maintenance of production capacity beyond 21 February 2042 at quarries within the National Park. Furthermore, the policy to substitute provision from quarries in Derbyshire (outwith the National Park) also needs to be assessed. The consequence of the 2042 limit on aggregate provision from the National Park should be considered in the context of alternatives available to maintain that provision, particularly where quarries in other areas may be similarly restricted by the 2042 end date.</p>	<p>National Park to other regions is acknowledged.</p> <p>Policy M1 seeks to maintain supply beyond 2042 by allowing in principle extensions of time to major aggregate producing sites. This will ensure capacity remains beyond the plan period to serve existing and future demand from other regions.</p>	
	<p>Consultation Point: Draft Policy Direction 10 Caravans and camping</p> <p>With regard Draft Policy Direction 10, section A the reference to ‘small touring and camping sites’ is unclear as ‘small’ is not defined and relative. The second element of the Policy and protecting conditions seemingly provide sufficient control against unsuitable development and still leaves scope for varying size of touring and camping sites to come forward providing they do not lead to these negative impacts. The restriction to small is likely to compromise the economic viability of any new proposal.</p> <p>In part B the negatively phrased language around “static caravans, chalets, lodges and other structures designed or used for holiday accommodation” is very heavy handed and we would recommend this policy is switched into one which encourages and supports sustainable, high quality design, modular holiday accommodation proposals that still affords the high level of protection of the landscape all year round. We are aware that the National Forest has implemented a sustainable</p>	<p>Policy RT5 defines small touring camping, motorcaravan (campervan) and caravan sites as up to 30 pitches and small extensions to existing sites as up to 30 pitches in total.</p> <p>Policy RT5 retains a restrictive approach to static caravans, chalets, lodges and other structures designed or intended to be used for holiday accommodation.</p> <p>The Policy justification sets out that this approach aligns with national parks' second purpose and socio-economic duty (by permitting small touring sites and camping pods and shepherd's huts in specific locations) and with national parks'</p>	<p>Y</p>

	<p>design guide, which sets out the standards they wish to see rather than arbitrary justification from a non-descript set of characteristics and setting.</p> <p>The requirement not to need a connection to fresh or foul water is highly restrictive to off grid accommodation, which has a relatively narrow market. Also, materials are evolving and the emphasis would better be focused on sustainability and regenerative tourism and design. The modern pod/cabin structures are, in the main, modular and temporary (from a moveability perspective) and often represent the highest level of design which is keeping to high quality guest experiences due to a light touch on the landscape but wholly immersive in their setting. These would be in keeping with the landscape of a national park and should be encouraged whilst always affording the standard policy wording for protection of the landscape.</p>	<p>first purpose (by restricting the type and location of permanent structures so that negative impact on valued landscape character is minimised).</p> <p>Policy T5 acknowledges the evolving market by setting out the scope for the development of other single, small-scale, simple structures designed for or intended to be used as holiday accommodation.</p>	
	<p>Consultation Point: Draft Policy Direction 9 Holiday occupancy</p> <p>On Draft Policy Direction 9, the 28-day holiday occupancy rule is, in our opinion, outdated for self-catering accommodation. We understand the purpose is to prevent permanent residential occupancy, but this can impede the commercial viability as considered by lenders and therefore restrict financing. We strongly recommend “tourist use only, cannot be used as a main or permanent residence” - noting that Tourist use includes business tourism whereas holiday does not. This helps broaden the tourist market, reducing seasonality, strengthening the economic impact all year round which benefits the local community. A tourism occupancy condition and register can adequately control use and prevent permanent residential.</p>	<p>Policy RT4 maintains the 28-day rule.</p>	
	<p>Consultation Point: Draft Policy Direction 8 Hotels, bed and breakfast</p>	<p>The local plan policy approach is responsive to constituent authorities’ tourism objectives</p>	<p>Y</p>

	<p>The policies as drafted are too restrictive to allow Staffordshire County Council to realise its ambitions for the delivery of visitor accommodation, within Staffordshire. Whilst we appreciate the need to work within a framework that is consistent with the National Park’s special purposes, we believe it is still too restrictive and as it stands is likely to constrain the development of overnight visitor accommodation and therefore the wider visitor economy and the benefits this can bring. The documents make some reference to tourism and visitor accommodation strategies, but this is incomplete in terms of not reflecting hotel and visitor accommodation potential and destination aspirations. The strategy landscape is changing with new Visit Derbyshire and Peak District and regional tourism strategies coming on stream that won’t be reflected. Also specific hotel/visitor accommodation strategies, including Staffordshire’s, available to inform and underpin policy are not referenced as evidence.</p> <p>The wording for Draft Policy Direction 8 could be softened/drafted in a more encouraging form with language such as “Proposals for hotels, bed and breakfast and self-catering accommodation would be supported/favoured provided they …..” instead of the strict set of conforming principles.</p>	<p>consistent with national park purposes and the Sandford Principle which has established that the first purpose takes priority where there is an irreconcilable conflict. Overall the local plan:</p> <ul style="list-style-type: none"> • promotes the Peak District as a welcoming place where all are inspired to enjoy, care for and connect to its special qualities (Outcome 5) • gives scope for hotels, bed and breakfast and self-catering accommodation (Policy RT3) • gives scope for caravans and camping (Policy RT3) • permits new or improved facilities for recreation (Policies RT1 and RT2) • permits business development for example through farm diversification (Policy E1) • permits shops and other town centre uses in settlements and certain locations in the wider countryside (Policies S1 and S2). 	
	<p>Consultation Point: 6 Cultural Heritage</p> <p>The Cultural Heritage Policies, i.e. Policies 10-14 seem suitably comprehensive and in line with national policy, and it is welcome that Policies 10-13 make it clear that the impact of development on the setting of heritage assets needs to be</p>	<p>The Authority will continue to collaborate with constituent authorities on cultural heritage.</p>	<p>N</p>

	<p>considered. The PDNPA have their own Historic Environment and Archaeology Team, and they are best placed to advise further on historic environment issues in their Local Plan. However, particularly with regards to the potential impact of proposals on the setting of heritage assets in Staffordshire, outside of the PDNP, and indeed any opportunities for cross working, we welcome continued engagement under the Duty to Cooperate.</p>		
	<p>Consultation Point: Policy 9 Protecting irreplaceable habitat, trees, hedgerows</p> <p>Policy 9 is welcomed. However, it refers only to trees and wooded habitats and there are other habitats that can be considered irreplaceable in the Peak District. In fact, many of these habitats contribute to the uniqueness of the area. Reference should be made to Calaminarian grassland, blanket bog and CHEGD grassland (grasslands with waxcaps and allied species.)</p>	<p>Justification for Policy B3 defines irreplaceable habitat and refers to calaminarian grassland.</p>	<p>N</p>
	<p>Consultation Point: 4 Core Policies and Development Strategy</p> <p>The Core Policies and Development Strategy are supported. In particular, Policy 4 – Landscape Character and Special Qualities and Policy 6 – Conservation and Enhancement of the Landscape provide appropriate criteria for protecting and enhancing landscape character and guiding development to avoid adverse impacts. This approach is consistent with the National Planning Policy Framework’s requirement to conserve and enhance valued landscapes. Continued engagement under the Duty to Cooperate is welcomed to ensure alignment with Staffordshire’s landscape policy objectives and to address any cross-boundary implications. Policy 8 is welcomed.</p>	<p>Noted.</p>	<p>Y</p>

Staffordshire Moorlands District Council	<p>Consultation Point: Draft Policy Direction 1 Biodiversity and Nature Recovery</p> <p>The Council is aware that there is a suggestion of recreational disturbance relevant to HRA and this issue may have been raised by the Peak Park Authority in relation to neighbouring authorities plans. We would appreciate clarification as to the status of this issue and how it is being addressed in relation to development within the Peak Park Local Plan, especially development affecting the South Pennine Moors SAC Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA.</p>	<p>The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.</p>	Y
	<p>Consultation Point: Policy 18 Low carbon and renewable energy development</p> <p>The consultation statement indicates that mapping suitable areas for renewable energy development has been considered but deemed too inflexible. A flexible content-based approach is deemed more appropriate. However, the Council supports mapping of suitable areas for renewable energy development across the whole district, including areas covered by the PDNP.</p> <p>There is no indication in this consultation plan that large scale renewables will be acceptable in the PDNP. The Council considers that in some circumstances large scale renewables could be appropriate so a blanket ban is not supported.</p>	<p>Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024.</p> <p>Supporting text to Policy CC2 sets out that the Climate Change and Sustainable Building Supplementary Planning Document (or successor) should be used.</p> <p>The Policies Map defines for 23 Peak District settlements their Local Landscape Character Areas (LLCAs). The sensitivity to development of each LLCA is set out in the Local Plan Appendix.</p>	Y
	<p>Consultation Point: Policy 35 Safeguarded employment sites</p>	<p>Upper Hulme Mill is not taken forward as a safeguarded site.</p>	N

	<p>The Council is concerned over rural employment, the lack of which is surely a driver for the aging population etc. and as such supports the safeguarding of Upper Hulme Mill as stated.</p>		
	<p>Consultation Point: Draft Policy Direction 17 Tied accommodation</p> <p>The Council considers that in respect of the introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities.</p>	<p>This policy option is not taken forward in the draft local plan.</p> <p>Policy H6 permits residential dwellings to meet an essential need for a rural worker.</p> <p>Policies H2, H3 and H5 set out the scope for housing related to other essential local workers.</p>	N
	<p>Consultation Point: Outcome 8 Outcome 8: The Peak District National Park is more resilient and net-zero by 2040</p> <p>The PDNPA's consultation statement recognises the benefits of a clear definition of small-scale renewable energy and this would be supported by the Council. There appears to be no such definition in this consultation version of the plan.</p>	<p>Supporting text to Policy CC2 sets out that the Climate Change and Sustainable Building Supplementary Planning Document (or successor) should be used.</p>	
	<p>Consultation Point: Policy 69 New and upgraded utilities services</p> <p>It is noted that 'Peak Cluster' is not mentioned in the Reg 18 Plan. The consultation statement indicates that a future Local Plan may consider including a policy setting out the Authority's position on carbon capture but implies that it is too early to include such a policy in this Local Plan. The Council does not agree.</p> <p>The Council is concerned with the wording in point 'A' of Policy 69 - that no utilities may be provided within the Park except to service park residents. This is a very wide-ranging statement with potentially significant consequences. Would exclude Peak Cluster as well as power, gas, water, fibre routes from crossing any part of the Park unless directly serving park residents.</p>	<p>The Authority is deferring setting out its approach to the Peak Cluster proposals until full evidence is available.</p> <p>Clause A of Policy U3 sets out that there is a presumption against the development of new strategic electricity distribution networks that fall outside of the Planning Authority's direct jurisdiction, except in exceptional circumstances.</p> <p>Distribution networks that cross the National Park will also serve</p>	

	<p>Could this impact MoD / NATS etc</p>	<p>National Park residents. In those cases where there is an impact of delivering networks, without benefit to the National Park or its residents, an alternative route, bypassing the Park should be assessed and discounted prior to development occurring within the National Park.</p> <p>This approach is in keeping with the National Planning Policy Framework, which directs major development away from National Parks unless there are exceptional circumstances.</p>	
	<p>Consultation Point: Policy 21 First occupation local needs homes</p> <p>In terms of affordable housing eligibility, the Council considers that the current 10-year local connection requirement is too restrictive and should be reduced to 5 years for first occupation.</p> <p>The Council considers that eligibility for social housing should be based on 'housing need' rather than parish boundaries and cascade mechanisms.</p> <p>To help sustain communities, the Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10.</p>	<p>Policies H4 and H3 establish the requirement for 10-years residency for first occupation.</p> <p>Policies H5 and H3 establish lower requirements for second and subsequent occupation.</p> <p>Policies H2, H3, H4 and H5 establish the requirement for occupants of RSL owned and managed homes to be in housing need on first and subsequent occupation.</p> <p>Policies H2, H3 and H4 establish the requirement for occupants of privately owned and managed homes to be in housing need on first occupation.</p>	<p>N</p>

	Consider that there should be no exception to the requirement for a local connection.		
	<p>Consultation Point: Policy 22 Second and subsequent occupation</p> <p>The Council considers that eligibility for social housing should be based on 'housing need' rather than parish boundaries and cascade mechanisms.</p> <p>The Council considers that eligibility criteria for privately owned and managed affordable housing should be the same as social housing.</p> <p>The Council considers that local connection should be the same as social housing, suggest 5 years would be an appropriate local connection period.</p> <p>To help sustain communities, the Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10.</p> <p>The Council considers that there should be no exception to the requirement for a local connection.</p>	<p>Policies H2, H3, H4 and H5 establish the requirement for occupants of RSL owned and managed homes to be in housing need on first and subsequent occupation.</p> <p>Policies H2, H3 and H4 establish the requirement for occupants of privately owned and managed homes to be in housing need on first occupation.</p>	N
	<p>Consultation Point: Draft Policy Direction - Settlement Strategy, Town and Larger Villages</p> <p>The Council supports the settlement strategy and would like to see further details as to where development will be accommodated published at Reg 19 stage.</p>	This approach is not carried forward but Policy C8 identifies settlements where wider housing need could be addressed where necessary.	N
	<p>Consultation Point: Policy 30 Housing size</p> <p>The Council considers that Policy 30 is confusing and the Council is unsure how this would be implemented. The NDSS</p>	Policy H16 sets housing size to align with the Nationally Described Space Standard. Policy H8 restricts the new dwelling to a	N

	states: 2b3p =70 sqm, 2b4p =79 sqm, 3b4p =84 sqm, 3b5p =93 sqm, 97sqm is actually larger than a 3b5p dwelling. Is this a maximum house size? It doesn't provide any support when trying to achieve appropriately sized 2b4p units rather than 2b3p. In response to affordable housing size the Nationally Described Space Standards (NDSS) should be seen as the minimum standard acceptable not the maximum to ensure healthy living conditions in social housing. The Council considers that the same size standards should be applied to RSL and privately developed homes.	maximum total internal habitable floorspace of 97sqm when the dwelling is to meet one's own need.	
	<p>Consultation Point: Draft Policy Direction 11 Temporary campsites</p> <p>The Council is concerned about some of the implications relating to this - what about the temporary camps for scouts/DofE etc. - would they be affected? What about annual festivals/events?</p>	An Article 4 direction restricting temporary campsites to those with planning permission would not prevent camping associated with the type of events described.	N
	<p>Consultation Point: Outcome 6 Outcome 6: Peak District National Park communities are thriving and sustainable places</p> <p>The Council considers that the proposed housing numbers in relation to the Moorlands part of the PDNP are low considering the sustainable settlements within the Moorlands – such as Longnor, Warslow and Waterhouses and consider there is potential for more housing to be accommodated.</p> <p>Furthermore, with the right sort of affordable housing, this would help to address the real issues of an ageing and increasingly less economically active population - issues experienced across the Moorlands but especially so in the PDNP.</p>	<p>The Housing Requirement is set out in Outcome 6. It sets out an indicative provision of 87 dwellings per anum for the whole National Park to 2045.</p> <p>The majority of this is expected to be delivered in Derbyshire.</p> <p>Around 12 dwellings per anum is expected to be delivered in the South West Peak (Staffordshire Moorlands and Cheshire East.)</p>	Y
	<p>Consultation Point: Draft Policy Direction 15 Primary residence</p> <p>The Council supports a park-wide primary residence clause</p>	Policy H17.	N
	Consultation Point: Policy 62 Routes for walking, cycling and horse riding	Policy T7.	Y

	The Council agrees that the Peak District National Park Authority should be promoting sustainable travel and supports the approach taken to the Manifold Trail.		
North East Derbyshire District Council	No comments received.		
Derbyshire Dales District Council – Economic Development	Consultation Point: Policy 36 Change of use of non-safeguarded, unoccupied or under-occupied employment sites Significant enhancement to SQ with the site seems a high bar to set that may prevent reasonable development.	Enhancement would be proportionate but expected in a National Park in accordance with the requirement to further purposes.	N
Derbyshire Dales District Council – Economic Development	Consultation Point: Policy 35 Safeguarded employment sites Calver Garden Centre could be considered as a new safeguarded employment site.	Calver already has a safeguarded site and it was determined an additional site would be disproportionate to settlement's size. The site could be developed for employment purposes under Policy E1 A 3.	N
Derbyshire Dales District Council – Planning	Consultation Point: Outcome 6 Outcome 6: Peak District National Park communities are thriving and sustainable places where all generations can live healthy and fulfilled lives Consultation Point: Draft Policy Direction 2 Development Strategy Consultation Point: Draft Policy Direction 14 New housing Derbyshire Dales District Council generally welcomes the preferred approach and strategic objectives and policies as set out in the Plan for the period to 2045. However, there remains concerns and objections to the strategic approach to the	The <i>Thriving and Sustainable Communities'</i> definition refers to appropriate development within the context of a protected landscape. It does not refer to any particular number of homes that need to be built for a community to thrive and be sustainable. There are other planning policy mechanisms and non-planning mechanisms that play a part in supporting thriving and sustainable communities.	Y

	<p>provision for housing in the contents of the Draft Policy Direction 14 New Housing (Strategic Policy) as set out below.</p> <p>The definition of ‘Thriving and Sustainable Communities’ in the context of the Peak District National Park Management Plan includes “sufficient resources and infrastructure, including appropriate new development” and the “provision of a sufficient supply of safe, energy efficient homes in a mixture on tenures”.</p> <p>It is considered the provision of new homes in the review of the Local Plan is insufficient to meet these aspects of the achievement of thriving and sustainable communities. Whilst it is acknowledged that the character and appearance of settlements and special characteristics of the Peak District National Park should be protected, the Local Plan must deliver positive benefits for the social and economic wellbeing of communities. The Local Plan must provide a flexible set of planning policies which will ensure appropriate development is facilitated to deliver sufficient housing to meet local needs.</p> <p>Using the standard method for calculating housing need, the Consultation Document sets out that this is between 270 and 362 dwellings per annum. DDDC supports the acknowledgement on page 29 of the Preferred Approach Consultation document where it states “for the purpose of apportioning standard method housing need, the Authority accepts Derbyshire Dales District Council assessment of 158 dwellings per annum in the Derbyshire Dales part of the National Park. It is also noted that footnote 17 states that this figure is” slightly lower than the Authorities own analysis due to the methodology applied”.</p> <p>The Council notes that the consultation document sets out an alternative approach to calculating housing need using a locally derived method. Using this method gives an annual housing need of 95 dwellings per annum, of which 63 dwellings per</p>	<p>Spatial Objectives under Outcome 6 set out a Housing Need of 95 dwellings per annum (dpa) and a Housing Requirement of 87 dpa. The National Park Authority is able to substantially meet its own locally identified housing need but will not meet need as identified by the Standard Method.</p> <p>In Derbyshire Dales it is expected that around 57 dpa can be delivered, that 65% of these (37dpa) would be open market homes delivered through enhancement or conversion and around 35% (20dpa) would be local need affordable homes.</p> <p>The Housing Need and Housing Requirement are informed by up-to-date and comprehensive evidence regarding population, affordable housing need, site availability/suitability, past delivery rates and detailed local townscape and landscape sensitivity assessments of 23 of the Peak District’s largest, most sustainable settlements.</p> <p>Sustainability Appraisal of Housing Quantum Options for the Peak District National Park Local Plan has been undertaken for the Regulation 19 draft plan.</p>	
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	<p>annum relate to land within the Derbyshire Dales District Council area. The provision (dwellings per annum) 2025-2045 for Derbyshire Dales within the White Peak Area is set out in the Table presented on page 27 as part of Spatial Objective Outcome 6 of the PDNP consultation preferred approach document.</p> <p>The table shows a total housing provision of 52 dwellings per annum. This is 106 dwellings per annum less than the housing need when calculated using the standard method. If the Planning Inspectorate when examining the future Plan consider the housing requirement for the PDNP should be higher, DDDC expects PDNP to explore every opportunity to maximise delivery. Of those 52 dwellings, 39 are expected to be brownfield/enhancement/conversion, open market, affordable homes and intermediate homes and 13 dwellings per annum are expected to be new homes on greenfield sites in or on the edge of villages being restricted to market affordable and intermediate homes to meet local needs. As drafted the District Council contends there remains scope to deliver further housing within the Peak District National Park to deliver the Plans vision and aspirations and meet a greater proportion of housing need above that acknowledged in the Plan as currently prepared.</p> <p>DDDC supports the intention of the PDNPA (as set out in the supporting PDNPA housing topic paper) to continue its policy position regarding development required to achieve heritage objectives and development of self-build housing. It is however considered that the approach relating to the total level of housing provision has not been sufficiently justified. In particular, with respect to potential mixed development schemes where market homes enable affordable housing provision including exception sites.</p>		
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	<p>The Housing Need Assessment table on page 32 of the Preferred Approach Consultation document sets out that there is an affordable housing need in the PDNP between 88-112 dwellings per annum. Informed by the most recent evidence on viability assessment including subsidies and grants, Derbyshire Dales District Council consider that the meeting of local affordable housing needs should be explored further, particularly with respect to a more flexible approach to enabling development. Sites in Eyam and Hathersage, and settlement edge and other sites elsewhere within the Derbyshire Dales area, should be reviewed further in terms of suitability to accommodate mixed affordable and market housing developments in contributing to meeting local affordable needs over the plan period.</p> <p>We note that the accompanying Sustainability Appraisal considers that option 3 of the spatial options, more settlement tiers and different types and levels of development performs most positively. Whilst the Sustainability Appraisal has considered different spatial strategy options, it does not seem to have considered different levels of development, such as meeting objectively assessed housing needs in full.</p> <p>The Preferred Approach consultation document on Page 34 'Housing Provision' sets out that the housing provision is subject to a detailed Settlement Capacity and Landscape Assessment currently being undertaken by consultants. The PDNPA need to be clearer on the potential scale and location for future developments to deliver the Strategic Plan objectives and Policy direction as part of its overall vision to allow communities to thrive.</p> <p>The District Council respectfully requests that the evidence to demonstrate the delivery or otherwise of sites within settlements should be re-examined. There remains a high risk that if development is restricted in settlements where capacity</p>		
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	<p>issues have been identified development will be unable to meet the need for local housing, with associated implications for the ability of the Plan to meet the wider social and economic needs and its inherent vision and objective to create thriving and sustainable communities.</p> <p>The Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised, and comments provided above are fully addressed through revisions to the Plan prior to Regulation 19 stage of Plan preparation.</p> <p>As you will be aware the District Council is in the process of reviewing and preparing a revised Derbyshire Dales Local Plan and welcomes the opportunity to work continuously and collaboratively on cross boundary housing matters. We look forward to engaging with the Peak District National Park constructively to explore how we can collectively meet the housing needs of our communities and specifically any unmet local housing need which may arise through the District Councils own plan preparation process.</p>		
<p>Derbyshire Dales District Council– Estates</p>	<p>I refer to the proposed designation of Rutland Recreation Ground, Haddon Road, Bakewell, DE45 1AW as a Local Green Space (LGS). I write on behalf of Derbyshire Dales District Council as land owner of this site to confirm that, whilst we have no significant objections to its allocation as LGS, our only concern is that this would not curtail the limited non-commercial development on the site which may be required in the future commensurate to its use as a public park and sports recreation ground. An example of this would be the future replacement of structures on the site such as the Sports Pavilion, Splash Pad, Tennis Courts and Public Conveniences. I would be most grateful if this could be considered as part of the consultation.</p>	<p>Policy H5 designates Rutland Recreation Ground as a Local Green Space.</p> <p>Policy C9 on settlement capacity and limits requires that planning application in or on the edge of a settlement must take account of the significance of Community Open Space, Local Green Spaces and Open Spaces in Conservation Areas shown on the Policies Map.</p> <p>Neither Policy would preclude limited non-commercial</p>	<p>N</p>

		development on the site commensurate to its use as a public park and sports recreation ground.	
Derbyshire Dales District Council– Housing	<p>Consultation Point: Policy 21 First occupation local needs homes</p> <p>On the duration of the local connection required, we consider 10 years to be too long. A reduction to 5 years, subject to an impact assessment, would be welcome. A reduction to this period, and allowing a slightly greater number those working in the National Park to actually be resident in it, should support community vitality and the employment requirements of local businesses. It would also help to encourage the provision of much needed additional affordable housing by reducing the void risks to RPs, which are an important factor when assessing development viability.</p>	<p>Policies H4 and H3 establish the requirement for 10-years residency for first occupation.</p> <p>Policies H5 and H3 establish lower requirements for second and subsequent occupation.</p>	N
	<p>Consultation Point: Draft Policy Direction 17 Tied accommodation</p> <p>We consider the shift to allowing additional tied accommodation for key workers to be a positive move. However, insofar as this may rely on employers to provide or facilitate this tied accommodation, its impact may be limited. For example, schools, residential homes, smaller shops, tourist and leisure providers, may not operate on sufficiently large a scale to be able to provide tied accommodation. A more impactful change would be to allow employment location to be a factor in assessing compliance with local connection requirements, but for key worker employment types only. For example, being employed at a Fire Station does not qualify under current PDNPA criteria, though this would seem to be unnecessarily restrictive. We appreciate the need to safeguard against excessive new development on the grounds of location of employment, but</p>	<p>This policy option is not taken forward in the draft local plan.</p> <p>Policy H6 permits residential dwellings to meet an essential need for a rural worker.</p> <p>Policies H2, H3 and H5 set out the scope for housing related to other essential local workers.</p>	N

	believe this could be achieved by clearly limiting the employment types that qualify		
	<p>Consultation Point: Outcome 6 Outcome 6: Peak District National Park</p> <p>We would question the accuracy of the statement: “Our Spatial Objectives set out that if we plan for the provision of around 20 restricted market affordable and intermediate homes each year this will address housing need, support thriving and sustainable communities...etc”.</p> <p>The Preferred Approach acknowledges that the Park’s population is declining, and that this decline is most acute (around 5 times the overall average decline) amongst younger working age families. Part of the reason for younger working families falling in numbers is of course because many of them cannot access affordable housing and so must move away. Our own analysis, as previously shared with PDNPA, shows a need well in excess of 20 dwellings for just the DDDC part of the National Park. Whilst our analysis does not factor in the PDNPA local connection criteria, which we support in principle, it does show very high numbers in genuine housing need, standing at 216 households living inside the DDDC part of the Park at July 2025. We consider therefore that 20 dwellings per annum is inadequate to address any more than a small part of unmet need. Our view is therefore that additional changes to policy should be made to boost housing supply where there is a genuine, eligible need for it.</p>	<p>Spatial Objectives under Outcome 6 set out a Housing Need of 95 dwellings per annum (dpa) and a Housing Requirement of 87 dpa. The National Park Authority is able to substantially meet its own locally identified housing need but will not meet need as identified by the Standard Method.</p> <p>In Derbyshire Dales it is expected that around 57 dpa can be delivered, that 65% of these (37dpa) would be open market homes delivered through enhancement or conversion and around 35% (20dpa) would be local need affordable homes.</p> <p>The Housing Need and Housing Requirement are informed by up-to-date and comprehensive evidence regarding population, affordable housing need, site availability/suitability, past delivery rates and detailed local townscape and landscape sensitivity assessments of 23 of the Peak District’s largest, most sustainable settlements.</p>	
High Peak Borough Council	Outcome 6 Outcome 6: Peak District National Park communities are thriving and sustainable places	PDNPA will co-operate with HPBC in the development of an SPD or equivalent.	Y

	<p>Please note that this comment and all others from High Peak Borough Council are Officer level comments at this stage. The Council considers that the proposed housing numbers in relation to the High Peak part of the PDNP are low considering the sustainable settlements within High Peak – such as Bamford, Castleton and Hope and consider there is potential for housing to be accommodated at the Hope Cement Works site once operations cease, which would still be within the plan period for this plan which runs to 2045 (closure date for cement works 2042 at the latest).</p>		
	<p>Consultation Point: Draft Policy Direction 15 Primary residence</p> <p>The Council supports a park-wide primary residence clause.</p>	Policy H17	N
	<p>Consultation Point: Policy 22 Second and subsequent occupation</p> <p>The Council considers that eligibility for social housing should be based on 'housing need' rather than parish boundaries and cascade mechanisms.</p> <p>The Council considers that eligibility criteria for privately owned and managed affordable housing should be the same as social housing.</p> <p>The Council considers that local connection should be the same as social housing, suggest 5 years would be an appropriate local connection period.</p> <p>To help sustain communities, the Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10.</p>	Policy H3 and Policy H5 together establish the flexibility for second and subsequent occupation. First occupation remains at 10 years as set out in Policy H3 and Policy H4.	N

	<p>The Council considers that there should be no exception to the requirement for a local connection.</p>		
	<p>Consultation Point: Policy 21 First occupation local needs homes</p> <p>In terms of affordable housing eligibility, the Council considers that the current 10-year local connection requirement is too restrictive and should be reduced to 5 years for first occupation.</p> <p>The Council considers that eligibility for social housing should be based on 'housing need' rather than parish boundaries and cascade mechanisms.</p> <p>To help sustain communities, the Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10.</p> <p>Consider that there should be no exception to the requirement for a local connection.</p>	<p>Policy H3 and Policy H5 together establish the flexibility for second and subsequent occupation. First occupation remains at 10 years as set out in Policy H3 and Policy H4.</p>	N
	<p>Consultation Point: Draft Policy Direction 1 Biodiversity and Nature Recovery</p> <p>The Council is aware that there is a suggestion of recreational disturbance relevant to HRA and this issue may have been raised by the Peak Park Authority in relation to neighbouring authorities plans. We would appreciate clarification as to the status of this issue and how it is being addressed in relation to development within the Peak Park Local Plan, especially development affecting the South Pennine Moors SAC Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA.</p>	<p>The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.</p>	Y

	<p>Consultation Point: Policy 30 Housing size</p>		N
	<p>High Peak Borough Council considers that Policy 30 is confusing and the Council is unsure how this would be implemented. The NDSS states: 2b3p =70 sqm, 2b4p =79 sqm, 3b4p =84 sqm, 3b5p =93 sqm.</p> <p>97sqm is actually larger than a 3b5p dwelling. Is this a maximum house size? It doesn't provide any support when trying to achieve appropriately sized 2b4p units rather than 2b3p. In response to affordable housing size the Nationally Described Space Standards (NDSS) should be seen as the minimum standard acceptable not the maximum to ensure healthy living conditions in social housing. The Council considers that the same size standards should be applied to RSL and privately developed homes.</p>	<p>Policy H16 sets housing size to align with the Nationally Described Space Standard. Policy H8 restricts the new dwelling to a maximum total internal habitable floorspace of 97sqm when the dwelling is to meet one's own need.</p>	
	<p>Consultation Point: Policy 62 Routes for walking, cycling and horse riding</p> <p>In relation to safeguarding the Monsal Trail for its current use as a recreational trail, the Council accepts that this is appropriate for the Local Plan. This is because there is no realistic chance of a rail use being implemented on the trail within the plan period. Protecting the trail would leave open any opportunity for a rail use to be reinstated beyond the plan period.</p> <p>The Council also supports the safeguarding of the former railway between Buxton and Goyt Valley for a walking, wheeling, cycling and horse-riding route.</p>	<p>Addressed in Policy T7</p>	Y
	<p>Consultation Point: Draft Policy Direction 17 Tied accommodation</p> <p>The Council considers that in respect of the introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities.</p>	<p>The Local Plan does not have a policy on tied accommodation. The issue of accommodation for key workers is instead addressed in other housing policies.</p>	N

	<p>Consultation Point: Draft Policy Direction 10 Caravans and camping</p> <p>It is noted that nutrient neutrality is not mentioned in the context of overnight stays in this policy. There appears to be no explanation as to why in the consultation statement so the Council maintains its previous objection in this regard. (Overnight stays could have an adverse impact on the Peak District Dales Special Area of Conservation (SAC) which would require mitigation measures if the accommodation (including campsites) falls within the catchment area.)</p>	<p>Policy U2 requires that measures will be required to assess and prevent any impacts on nutrient neutrality resulting from the delivery of new sewer and wastewater connections.</p>	Y
	<p>Consultation Point: Policy 18 Low carbon and renewable energy development</p> <p>The consultation statement indicates that mapping suitable areas for renewable energy development has been considered but deemed too inflexible. A flexible content-based approach is deemed more appropriate. However, the Council supports mapping of suitable areas for renewable energy development in areas covered by the PDNP.</p> <p>There is no indication in this consultation plan that large scale renewables will be acceptable in the PDNP. The Council considers that in some circumstances large scale renewables could be appropriate so a blanket ban is not supported.</p>	<p>Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024.</p>	Y
	<p>Consultation Point: Outcome 8 Outcome 8: The Peak District National Park is more resilient and net-zero</p> <p>The PDNPA's consultation statement recognises the benefits of a clear definition of small-scale renewable energy and this would be supported by the Council. There appears to be no such definition in this consultation version of the plan.</p>	<p>Large scale renewables would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024.</p>	
	<p>Consultation Point: Draft Policy Direction - Settlement Strategy, Town and Larger Villages</p>	<p>Policy C8.</p>	Y

	<p>The Council supports the settlement strategy and would like to see further details as to where development will be accommodated published at Reg 19 stage.</p>		
	<p>Consultation Point: Draft Policy Direction 8 Hotels, bed and breakfast and self-catering accommodation</p> <p>It is noted that nutrient neutrality is not mentioned in the context of overnight stays in this policy. There appears to be no explanation as to why in the consultation statement so the Council maintains its previous objection in this regard.</p> <p>(Overnight stays could have an adverse impact on the Peak District Dales Special Area of Conservation (SAC) which would require mitigation measures if the accommodation falls within the catchment area.)</p>	<p>The respondent's concerns are noted. Draft Policy Direction 25 Development that requires new or upgraded service infrastructure (development management policy) deals with this general issue and includes the following accompanying statement: -</p> <p>"The current policy approach will be carried forward to the next plan with amendments suggested by the Environment Agency relating to nutrient neutrality and rainwater run-off."</p> <p>We will ensure that these concerns are dealt with where appropriate within the final version of the Plan</p>	
	<p>Consultation Point: Draft Policy Direction 22 Reducing the general need to travel and encouraging sustainable transport</p> <p>The Council agrees that the Peak District National Park Authority should be promoting sustainable travel, in particular from the Hope Valley to Buxton.</p>	Policy T1	Y
	<p>Consultation Point: Policy 69 New and upgraded utilities services</p> <p>It is noted that 'Peak Cluster' is not mentioned in the Reg 18 Plan. The consultation statement indicates that a future Local Plan may consider including a policy setting out the Authority's position on carbon capture but implies that it is too early to</p>	<p>The Authority is deferring setting out its approach to the Peak Cluster proposals until full evidence is available.</p>	Y

	<p>include such a policy in this Local Plan. The Council does not agree.</p> <p>The Council is concerned with the wording in point 'A' of Policy 69 - that no utilities may be provided within the Park except to service park residents. This is a very wide-ranging statement with potentially significant consequences. Would exclude Peak Cluster as well as power, gas, water, fibre routes from crossing any part of the Park unless directly serving park residents. Could this impact MoD / NATS etc?</p>		
	<p>Consultation Point: Draft Policy Direction 11 Temporary campsites</p> <p>The Council supports the removal of the 60-day permitted development right for the reasons mentioned in the plan and additionally as control over overnight stays will help to mitigate nutrient neutrality if the campsites fall within the catchment area. It is considered that this should be acknowledged in the plan.</p>		N
	<p>Consultation Point: Outcome 10 Outcome 10: the adverse impact of minerals and waste operations is reduced</p> <p>It is noted that the PDNPA's consultation statement reveals that the future of Hope Cement Works will be guided by a Supplementary Plan working with the landowner, stakeholders and the local community once the closure date is clearer. This consultation version of the plan does not appear to mention this and it is considered that the Reg 19 version of the plan should.</p> <p>It is at this point that HPBC will be able to take part in a detailed statutory process to determine how this site is restored. The Council welcomes this opportunity.</p>	Policy HW1	Y
Cheshire East Council	No comments received.		

<p>Oldham Council</p>	<p>HRA of the Preferred Approach</p> <p>At Issues and Options stage, the HRA stated: “All protected sites located within the Peak District National Park boundary are screened in and will be subject to an appropriate assessment at the next stage of the plan-making process, including consideration of In Combination effects.”</p> <p>A revised HRA has been undertaken to support the Preferred Approach consultation. However, the HRA has not included at this stage appropriate assessment for the screened in sites to assess the Likely Significant Effects (LSEs) to the protected sites which may arise because of the 36 outcomes or policies that have been screened in. The consultation again states:</p> <p>All protected sites located within the Peak District National Park boundary are screened in and will be subject to an appropriate assessment at the next stage of the plan-making process including consideration of In Combination effects.</p> <p>This contradicts the HRA undertaken at Issues and Options stage which gave assurances that an appropriate assessment would be undertaken at this stage, and which was taken in good faith.</p> <p>LSEs are identified and yet the HRA does not propose any mitigation and therefore the Local Plan at a Preferred Approach stage has not been able to consider and be informed by the HRA process so far. This is not considered to be appropriate. The SA and HRA should be an iterative part of the plan making process, informing the plan, and giving stakeholders the opportunity to make comment on any policy changes as a result of that assessment. Due to the HRA process for Places for Everyone (PfE), Policy JP-G5 ‘Uplands’ requires applicants within 2.5km of the SAC/SPA to</p>	<p>The Preferred Approach is a repeat Regulation 18 consultation and as such we have not reached the next stage of plan-making that is Regulation 19. An appropriate assessment will be undertaken to inform the Regulation 19 stage of plan-making, including mitigation and/or policy amendments as necessary and in consultation with Natural England. The revised HRA including appropriate assessment will be available as evidence to support the Regulation 19 consultation. We apologise if this was not clear in our assertions.</p>	
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	<p>screen for whether land is functionally linked. The criterion 7 states:</p> <p>7. Ensure that new development does not have an adverse impact on protected habitats of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA from urban edge effects, loss of and/or disturbance to functionally linked habitats and recreation disturbances. This will be implemented by:</p> <p>a. Within 400m of the SAC and SPAs boundaries, no development will be permitted, unless, as an exception, the development and/or its use would not have an adverse effect on the integrity of the SAC or SPAs;</p> <p>b. Within 2.5km of the SAC and SPAs boundaries, applications for new development should be accompanied by an assessment to determine if the development site provides foraging habitats for the qualifying bird species of the SPAs. If foraging habitats are found on site, appropriate avoidance and/or mitigation measures will be required;</p> <p>The South Pennie Moors SAC/SPA SPD provides further guidance. Given that functionally linked land is one of the LSEs noted in the HRA we would expect to see the PDNP Local Plan address this within a policy, perhaps with a consistent approach. The PDNP Preferred Approach does not mention functionally linked land, which seems to be an omission and perhaps if the HRA had included appropriate assessment this may have been built into the Local Plan.</p>		
	<p>Consultation Point: Policy 7 Protecting and managing the Natural Zone</p> <p>The policy needs to refer to where the Natural Zone can be viewed.</p>		
	<p>Consultation Point: Draft Policy Direction 4 Development management principles</p>		

	<p>The policy should reflect the need to avoid flood risk in the first instance. Some of the criteria need more detail or more detail included in the justification to be effective. For example, development must be water efficient – does this mean going beyond building regulations? And the highest standards for foul and surface water drainage. It's not clear what is meant.</p>		
	<p>Consultation Point: Draft Policy Direction 1 Biodiversity and Nature Recovery</p> <p>In terms of biodiversity hierarchy, the Special Area of Conservation (SAC) / Special Protection Area (SPA) should be listed before Sites of Special Scientific Interest (SSSI). It would be helpful for the justification to list the six relevant Local Nature Recovery Strategies (LNRS), of which the Greater Manchester LNRS is one, and perhaps show these on a map.</p>		
	<p>Consultation Point: Outcome 8: The Peak District National Park</p> <p>The supporting objectives refer to supporting work to protect and enhance peat. The objectives may wish to expand on this to clarify whether this is all peat or peat that is capable of restoration to support notable habitats.</p>		
	<p>Consultation Point: 3 Spatial Objectives and Strategic Housing Provision</p> <p>The vision is supported however the date stated is to 2043 whereas the rest of the plan refers to the plan period being until 2045.</p>		
Kirklees Council	No comments.		
Barnsley Council	No comments.		
Sheffield City Council	No comments		
East Midlands Mayoral Combined Authority	No comments		

Greater Manchester Mayoral Combined Authority	No comments		
South Yorkshire Mayoral Combined Authority	No comments		
West Yorkshire Mayoral Combined Authority	No comments		

Section 3: Key Strategic Matters

Conservation and enhancement of natural beauty, wildlife and cultural heritage.

1. The Peak District is a national park for all to enjoy. National park purposes are legally defined.³ The first purpose is to conserve and enhance natural beauty, wildlife and cultural heritage. The Government's National Planning Policy Framework (December 2024) says that landscape and scenic beauty in national parks have the highest status of protection. The scale and extent of development should be limited, and 'great weight' should be given to conserving and enhancing wildlife and cultural heritage. Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Major development should not take place unless there are exceptional circumstances and it is in the public interest. Whether or not development is 'major development' is a matter for the decision maker (the National Park Authority), taking into account its nature, scale and setting, and whether it could have a significant adverse impact on national park purposes.
2. The Levelling Up and Regeneration Act (LURA) 2023 mandated a strengthened duty on public bodies to further the purposes of a national park (previously they were only required to 'have regard' to these purposes.)

Nature Recovery

3. Government reports into the state of nature and protected landscapes are explicit about the crisis we face.⁴ ⁵ The UK is among the most nature-depleted nations in the world and national parks are not immune to this loss. Half of the Peak District is improved grassland for agriculture where management practices result in a poor environment for wildlife.⁶ Thirty percent (30%) of land cover is moorland. Efforts are being made to restore moorland habitats with great success, but restoring to a favourable condition takes a long time and over all they remain degraded.
4. The challenge for the next plan period is to deliver more enhancement with the new powers available to us from the 2021 Environment Act by aligning planning policy with statutory Nature Recovery Strategies and maximising net gain for biodiversity.

Recreation and tourism including impact on Special Qualities, protected areas, strategic recreation routes and hub sites

5. The second purpose of national parks is to promote opportunities for people to understand and enjoy the special qualities of the area. The LURA duty applies.

³ National Parks and Access to the Countryside Act (1949) as amended

⁴ <https://stateofnature.org.uk/>

⁵ [DEFRA - Landscapes Review - Final Report 2019](#)

⁶ [Home | State of the Park Report](#)

6. National parks are for everyone. Our challenges are: to support the provision of the right facilities, in the right place, so that everyone who visits can understand and enjoy the Peak District in a way that respects the environment and local communities; and to manage and mitigate impacts of recreation and tourism on the landscape, wildlife and local amenity. These include the impacts of car-borne travel.
7. The Peak District is a very popular location for visitors from a fairly local catchment surrounding the National Park. Historically, where visitor numbers have impacted on the setting or special qualities of popular location, the PDNPA has worked with partners to establish visitor management schemes. These focus on the provision of appropriate facilities whilst managing impact; principally the impact of private cars. Management schemes have focussed on the Goyt and Upper Derwent Valleys, the Roaches and Stanage / North Lees.
8. Since the Covid pandemic, visitor pressure has become more acute in some localities such as in the Winnatts Pass and Mam Nick area. The PDNPA has played a convening role in bringing together partners to trial an Area Management approach in the Mam Nick Area. If successful, this approach will be taken in other busy locations.
9. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.

Housing, settlements and community services

10. The National Park Authority has a duty in law to seek to foster the social and economic well-being of communities.
11. The National Planning Policy Framework requires the local plan to: set out the objectively assessed housing need (National Park Authorities may use their own methodology); establish the Housing Requirement (the number of homes to be delivered); and to contain positive policies that enable the delivery of the Housing Requirement. Local authorities must co-operate on unmet need.
12. The Peak District Local Plan establishes a Housing Need of around 95dpa to 2045. This addresses identified local population and housing issues. It also aligns with local residents' ambitions for thriving and sustainable communities as expressed in the PDNP Management Plan; with the National Park's Duty to have regard to the socio-economic well-being of local communities and with the sustainable development social objective set out in the National Planning Policy Framework (paragraph 8b).
13. The Housing Requirement (taking into account land availability, past delivery rates and environmental constraints) is set out in the Local Plan at 87dpa. Therefore the National Park Authority can meet its own housing need.⁷
14. The Sustainability Appraisal of the Local Plan has assessed the various options with regard to the quantum of housing to be delivered.
 - Option 1: Standard Method Housing Figure – 270-362 dwellings per annum (dpa)

⁷ The Standard Method Housing Need Assessment for the PDNP is calculated as between 270 and 362 dwellings per annum to 2045. The National Park authority will not meet Standard Method Housing Need. https://www.peakdistrict.gov.uk/data/assets/pdf_file/0030/149871/66287_02-PDNP-Housing-Needs-SM3-140225FINAL.pdf

- Option 2: Affordable Housing Need (prescribed methodology) – 99-125 dpa
 - Option 3: Locally derived housing need figure (medium population increase by around 4,247 during plan period) – 95 dpa
 - Option 4: Locally derived housing need figure (low population increase by around 1,1731 during plan period) – 48 dpa
 - Option 5: Locally derived housing need figure (maintain stable population around 35,897 during plan period) – 16 dpa
15. The Sustainability Appraisal assessment of these options concludes that that the higher housing options 1-3 would be more likely to have negative effects on the sensitive natural environment of the National Park. It sets out that ‘the higher scale of development associated with Options 1 to 3 in particular would result in the development of some greenfield land which would likely result in negative impacts on the local landscape. Although Options 2 and 3 would provide a similar amount of development, Option 2 would likely result in more development on greenfield land compared to Option 3 as Option 2 could technically allow for 100% of affordable homes on greenfield land. . . In all cases, the effects are uncertain as they will depend a lot on the specific location and design of individual housing developments.’⁸
16. Policies are responsive to this important area of concern and a precautionary approach is therefore adopted, including that:
- 65% of housing is expected to be delivered through enhancement or conversion (Spatial Outcome 6).
 - The development of greenfield sites is restricted to locally needed affordable homes and the need for development must be evidenced through up-to-date housing needs surveys (Policy C8).
 - All development is required to conserve and enhance valued landscape character and other first purpose special qualities (Policy C4).
 - Planning applications in or on the edge of a settlement must have regard to the Settlement Character Analysis and Landscape Sensitivity Assessment where available, and that the siting of the development should complement and not harm the character of the settlement and its landscape setting (Policy C9).
17. In addition the Local Plan settlement strategy gives scope for other appropriate development: for local needs affordable housing; community facilities; and small-scale retail and business premises in or on the edge of the settlements and hamlets at a proportionate scale.

Supporting businesses

18. In rural areas, national policy and guidance require Local Plans to be positive towards economic development that can occur in sustainable locations. Plans are required to provide suitable and appropriate land for economic development to meet current and future needs. The Local Plan supports economic development on brownfield sites in or on the edge of settlements. In the open countryside the focus of economic development is in support of farm diversification through the reuse of existing buildings, in particular heritage assets, in accessible location that deliver enhancement opportunities and where the scale and impact is acceptable within its rural location.

⁸ SA Draft report Table 4.1 pg 41.

Developer contributions and Green Infrastructure

19. The National Park Authority must work within constituent and neighbouring authority frameworks to ensure that new development is adequately supported by appropriate infrastructure. The Authority in particular will seek to support green infrastructure and active travel as identified in the *Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan*.⁹
20. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.

Transport

21. The Peak District National Park falls within the areas of 7 highway authorities and 6 transport authorities. In addition, the National Park is crossed or bounded by the A628 and A616 trunk roads that form part of the Strategic Road Network (National Highways). The Hope Valley railway linking Sheffield and Manchester also crosses the National Park from east to west.
22. The Peak District National Park is crossed by a number of strategic local roads providing links between the Park's urban catchment areas. The National Park's roads carry a mix of local, business and visitor traffic, with strategic routes carrying HGVs serving the quarries of the Wider Peak District area.
23. The PDNPA seeks to influence transport development within the National Park through collaboration with its constituent highway authorities. In some cases, this is reactive to remedial road schemes. In others, it is proactive as in the recent development of the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan.
24. National Highways has been proactive in engaging with the National Park Authority in relation to its various studies and schemes for the A57/A628/A616 corridor; including the A57 Links Road scheme and the Trans Pennine Connectivity Study. The PDNPA has also worked closely with Derbyshire County Council to influence DfT funded Safer Roads schemes within the National Park.
25. The PDNPA also seeks to influence future transport schemes within the National Park through responding to periodic consultations by our Transport Authorities on Local Transport Plans / Strategies.
26. The National Park contains a number of multi-user trails along former railways. In the case of the Longdendale (Trans Pennine Trail) and the Monsal Trails, there have been longstanding campaigns for rail reinstatement. Up until the current time, none of these campaigns have been led by any of the National Park's constituent transport authorities.

Minerals and waste (and nature recovery)

27. The PDNPA is a member of the East Midlands Aggregates Working Party (AWP) and is required to contribute to the strategic supply of aggregates to meet the national

⁹ [Active Travel Plan: Peak District National Park](#)

need. Given that the former national and sub-national guidelines in regards aggregate supply have expired (in 2020), there is currently no regionally defined apportionment figure. However, provision rates for each Mineral Planning Authority and the AWP as a whole are agreed through the Local Aggregate Assessment process and ratified through the AWP. The Aggregate Minerals Survey 2023 states that the PDNPA and Derbyshire consume aggregates and other minerals from other constituent East Midlands AWP member Authorities, albeit likely in low quantities in the National Parks case. However, it is necessary to reach agreement in principle that these Minerals Planning Authorities will be able to continue to supply these minerals to the National Park for the life of the Plan.

28. In addition, agreement is sought from the consistent MPAs that form the East Midlands AWP that they will continue to meet their rolling apportionment figures defined through the LAA process and ratified through the AWP for the Plan period. This is necessary to ensure confidence in the continuity of aggregate supply to meet the national need.
29. There is high potential for contributions to nature recovery to be made through the restoration, aftercare and potential after use of mineral extraction sites. Emerging policy seeks to ensure that restoration of sites contributes to biodiversity by linking to the relevant Local Authority Local Nature Recovery Strategy which in turn will inform the PDNPA's own Nature Recovery Plan. As such, a commitment will be required from the constituent Local Authorities to produce, monitor and update their own LNRs for the life of the Plan period.
30. There are limited waste disposal and management facilities within the PDNPA, and no household waste recycling facilities. Large scale waste development is considered incompatible with National Park purposes and facilities of such a nature would require significant importation of waste to be considered viable given the limited population, industry and rate of development within the Authority. As such, much of the waste generated in the National Park is managed and/or disposed of in neighbouring Local Authority areas. As such, agreement is sought from the respective relevant Waste Planning Authorities that they commit to maintain existing waste management capacity to cater for the needs of the National Park and its population.

Water resources

31. The Peak District National Park is an important area for regional water supply. The Authority recognises that existing water supply infrastructure will need to be upgraded and enhanced to maintain supply and ensure its structural integrity.
32. Climate change is already having a noticeable impact on weather patterns within the National Park. Since 2000, the area has had some of the wettest years on record. However, at the same time, there have been record temperatures recorded and over recent years examples of prolonged drought events.
33. In exceptionally wet periods, the ability to collect and store water is limited by reservoir capacity, with large volumes of water overspilling into watercourses and being lost, often with downstream flooding. During dry periods, measures are increasingly being taken to reduce water use, including reducing mains-water pressure and banning certain activities, such as the use of hose-pipes.
34. Severn Trent Water and Yorkshire Water recently put forward a scheme to increase reservoir capacity in the Upper Derwent Valley, by either raising the height of an existing dam wall or creating an additional reservoir. This scheme was withdrawn

following objections. However, with the move to a national and connected water supply system, it is likely that other schemes will come forward, aimed at ensuring national water security.

Climate change resilience and adaptation

35. The National Planning Policy Framework says that plans should take a proactive approach to mitigating and adapting to climate change (paragraph 162). New development should reduce vulnerability and help reduce greenhouse gas emissions reflecting Government national technical standards for buildings (paragraph 164). Plans should provide a positive strategy for energy from renewable and low carbon energy sources (paragraph 165) but major development should not take place other than in exceptional circumstances of national public interest (paragraph 190).
36. The Local Plan supports the positive management of landscape change including by carbon sequestration, making space for water and nature recovery. Sensitively-sited, small-scale renewable energy infrastructure is supported as well as building design, construction and adaptation that enables energy transition and generation. This must be achieved in a way that is responsive to the Peak District's distinctive cultural landscape character and other first purpose Special Qualities of the Peak District. Open skylines and long views are protected. The built tradition and character of settlements is respected.
37. The National Planning Policy Framework establishes the presumption against major development in National Parks unless there are exceptional circumstances and it is in the public interest. Whether or not development is 'major development' is a matter for the decision maker (the National Park Authority), taking into account its nature, scale and setting, and whether it could have a significant adverse impact on national park purposes. 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:
 38. 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
 39. the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way
 40. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Utilities

41. The location of the National Park between large urban areas means that desire lines for major utilities infrastructure often crosses the National Park. Traditionally, this has included high voltage power lines along the Woodhead Pass, transmitting power between the east and the west. Where possible, opportunities have been taken to reduce visual impact through the undergrounding of cables. This includes the locating of high voltage cables through the former railway tunnel between Woodhead and Dunford Bridge Stations.
42. The increased reliance on alternative means of electricity generation, coupled with higher demands as the nation decarbonises, means that there will be a requirement for new electricity distribution networks. The first local example of this is the development of a high voltage transmission network between Chesterfield (on the

eastern edge of the National Park) and Willesden, near Derby. Where schemes of this nature come forward, the National Park Authority is a statutory consultee.

43. The increase in dependence on electronic communication networks will also have an impact of the National Park. Ensuring that the emergency services can maintain connectivity with communication systems may lead to the need for additional or higher masts at or adjacent to open summit areas of the National Park. We will work with communications companies to maintain robust systems, whilst minimising / mitigating any visual or other impacts on special qualities.

Section 4: Duty to Co-operate Statements for Constituent Local Authorities

Derbyshire County Council	
Strategic matter	Summary of main duty to co-operate issues and agreements
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)	Involvement of Landscape Architect at a County level to ensure alignment to Derbyshire wide landscape characteristics.
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	Involvement of Conservation Officers at a County level to ensure the conservation and enhancement of the natural environment, particularly to ensure alignment to the Local Nature Recovery Strategy.
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)	Involvement of Heritage Officers at a County level to ensure the conservation and enhance of heritage assets in the PDNP.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	To align with the work in Sustainable Travel/countryside. Work with mobility hubs.
CIL and green infrastructure	As above.
Settlement Strategy and community services	Involvement with County Council Children and Adult Services to ensure alignment with County Council priorities for children's and adult's service provision.
Meeting housing need	Involvement with County Council Adult Services to ensure alignment with County Council priorities for older persons housing and specialist needs housing.
Meeting business need	Engagement with DCC's Economic Development and Regeneration Team to ensure compatibility of policies and priorities with the Emerging Derby, Derbyshire, Nottingham and Nottinghamshire Strategic Growth Strategy being led by EMCCA.
Renewable energy and climate change mitigation and adaptation	Engagement with County Council Climate Change Team to ensure compatibility with DCC's Climate Change Strategy and emerging policies for net zero and environment.
Minerals. Mineral supply and future provision.	Commitment to provide for the maintenance of landbanks of non-energy minerals outside of the National Park as far as is practical. Commitment to continue to supply minerals, including aggregates to the NP and meet annual aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.

	Maximise contributions to nature recovery through the restoration, aftercare and potential after use of mineral extraction sites.
Travel and transport, including new or improved road and rail links and park & ride facilities	As one of the National Parks Highway and Transport Authorities ¹⁰ .
Utilities including distribution networks and new reservoirs	Liaison with Derbyshire County Council (together with Derbyshire Dales District Council and High Peak Borough Council) on emerging proposals for the Peak Cluster Carbon Capture Project. To ensure consistency of approach to emerging Development Consent Order.
Provision of infrastructure	Securing contributions required for the provision of infrastructure eg school places.
Highways	As the Highway Authority in the consideration of impacts on the Highway and Highway safety.
Gypsy and Traveller	Engagement with DCC's Strategic Planning Team to ensure that policies reflect the conclusions and recommendations of the Derby, Derbyshire, Peak District National Park and East Staffordshire Gypsy and Traveller Accommodation Assessment 2023. Engagement with the Derby and Derbyshire Traveller Issues Working Group, which is chaired and coordinated by DCC.
Flooding	As the Flood Authority consideration of potential increase in flood risk and any associated mitigation measures.
Provision of waste management facilities	Commitment to continue to provide waste management facilities to serve the needs of the Derbyshire based population within the National Park.

¹⁰ As of early 2026, the role of transport authority for the Derbyshire part of the National Park has passed to East Midlands Combined County Authority.

Staffordshire County Council	
Strategic matter	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)	Co-operation consistent with the National Planning Policy Framework's requirement to conserve and enhance valued landscapes. Ensure alignment with Staffordshire's landscape policy objectives and to address any cross-boundary implications.
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	Co-operate with regard to Local Nature Recovery Strategies.
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)	Co-operate with regard to the potential impact of proposals on the setting of heritage assets in Staffordshire including outside of the PDNP.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	Co-operate with regard to Staffordshire Tourism Strategy.
CIL and green infrastructure	PDNPA to have regard to SCCs developer contributions strategy.
Meeting business need	PDNPA to have regard to SCCs economy strategies, including the Visitor Accommodation Strategy. <i>SCC and PDNPA do not agree with local plan policies give sufficient flexibility regarding forms of tourist accommodation.</i>
Renewable energy and climate change mitigation and adaptation	Co-operate with regard to provision in the National Park's setting.
Minerals	The most recent Local Aggregate Assessment (LAA) for Derbyshire, Derby and the Peak District National Park indicates the importance of crushed rock supply from the Peak District to other regions including the West Midlands (based on data from the national Aggregates Survey 2023). We have previously raised that the landbank for crushed rock aggregate needs to be assessed in terms of the maintenance of production capacity beyond 21 February 2042 at quarries within the National Park. Furthermore, the policy to substitute provision from quarries in Derbyshire (outwith the National Park) also needs to be assessed. The consequence of the 2042 limit on aggregate provision from the National Park should be considered in the context of alternatives available to maintain that provision, particularly where quarries in other areas may be similarly restricted by the 2042 end date.

Travel and transport, including new or improved road and rail links and park & ride facilities	As one of the National Parks Highway and Transport Authorities. Co-operate with regard to Staffordshire Transport Strategy.
Utilities including distribution networks and new reservoirs	Co-operate with regard to provision in the National Park and its setting.
Provision of waste management facilities	Commitment to continue to provide waste management facilities to serve the needs of the Staffordshire based population within the National Park.
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater.

Derbyshire Dales District Council	
Strategic matter	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)	Conservation and enhancement of the natural environment, landscape issues across Derbyshire Dales.
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	Conservation and enhancement of wildlife, biodiversity, green infrastructure and habitats across Derbyshire Dales. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)	Conservation and enhancement of cultural and historic environment, including designated and non-designated assets across Derbyshire Dales.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	Impact on visitor economy, businesses and residents across Derbyshire Dales.
CIL and green infrastructure	Green infrastructure issues across Derbyshire Dales and provision of appropriate infrastructure (if secured through CIL).
Settlement Strategy and community services	Appropriate development and settlement strategy to support thriving and sustainable communities in the Derbyshire Dales.
Meeting housing need	Delivery of / and meeting housing needs in Derbyshire Dales, effects on residents. <i>DDDC and PDNPA do not agree on the proportion of standard method housing need that should be delivered in the national park.</i>
Meeting business need	Delivery of and meeting business needs in Derbyshire Dales, effects on business (existing and prospective)
Renewable energy and climate change mitigation and adaptation	Ensuring appropriate response to climate change and renewable energy within the Derbyshire Dales.
Travel and transport, including new or improved road and rail links and park & ride facilities	Where links, routes or facilities extend into Derbyshire Dales planning authority area.
Utilities including distribution networks and new reservoirs	Where networks extend into Derbyshire Dales planning authority area.

High Peak Borough Council	
Strategic matter	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)	Protection of setting of PDNP and recognition of Park's statutory purposes.
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	<p>Recreational disturbance relevant to HRA and how this is being addressed in relation to development within the Peak Park Local Plan, especially development affecting the South Pennine Moors SAC Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA.</p> <p>The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.</p>
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)	Conservation and enhancement of cultural and historic environment, including designated and non-designated assets across High Peak.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	Some key tourist and recreation areas like Castleton and the Monsal Trail are within the Peak Park part of High Peak.
CIL and green infrastructure	Linkages with GI in the Peak Park and High Peak planning areas.
Settlement Strategy and community services	Appropriate development and settlement strategy to support thriving and sustainable communities in the High Peak.
Meeting housing need	<p>Planning and monitoring housing provision - Housing built in the High Peak part of the PDNP contributes towards the housing requirement in the High Peak Local Plan. Includes affordable housing and associated issues.</p> <p><i>PDNPA and HPBC do not agree on the proportion of standard method housing need that should be delivered in the national park.</i></p>
Meeting business need	Businesses in the High Peak part of the PDNP.
Renewable energy and climate change mitigation and adaptation	The Council supports the use of renewable energy and mitigation and adaptation in the High Peak part of the PDNP.

	<p>Co-operate with regard to provision in the National Park's setting.</p> <p><i>HPBC and PDNPA do not agree with regard to large scale renewables.</i></p>
Minerals	<p>In particular, the future of the Hope Cement Works site once it closes and opportunities for HPBC to have a say on future uses for the site.</p>
Travel and transport, including new or improved road and rail links and park & ride facilities	<p>Joint working on infrastructure planning. Promotion of sustainable travel, in particular from the Hope Valley to Buxton.</p>
Utilities including distribution networks and new reservoirs	<p>'Peak Cluster' carbon capture pipeline and its benefits to High Peak businesses as well as other utilities. The Council considers that Peak Cluster as well as power, gas, water and fibre routes crossing the PDNP in appropriate locations should be supported where they serve both National Park and neighbouring authority residents.</p> <p><i>The PDNPA is deferring setting out its approach until full evidence is available.</i></p>
Evidence Gathering	<p>Joint working on evidence gathering to inform future planning policy reviews and strategies.</p>
Neighbourhood Planning	<p>Support for Neighbourhood Plans that cover both Local Planning Authority areas.</p>
Nutrient Neutrality	<p>Overnight stays could have an adverse impact on the Peak District Dales Special Area of Conservation (SAC) which would require mitigation measures if the accommodation – including housing hotels, camping, holiday accommodation - falls within the catchment area. Part of the PDNP is within the catchment area.</p> <p>Co-operate on implementation of measures to assess and prevent any impacts on nutrient neutrality resulting from the delivery of new sewer and wastewater connections.</p>

Staffordshire Moorlands District Council	
Strategic matter	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)	Protection of setting of PDNP and recognition of Park's statutory purposes. Co-operate on the conservation and enhancement of the natural environment & landscape relevant to Staffordshire Moorlands.
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	Co-operate on the conservation and enhancement of wildlife, biodiversity, green infrastructure and habitats across Staffordshire Moorlands. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)	Conservation and enhancement of cultural and historic environment, including designated and non-designated assets across Staffordshire Moorlands.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	Co-operation with regard to key tourist and recreation areas like Ilam Hall and the Manifold Trail within the National Park part of the Staffordshire Moorlands.
CIL and green infrastructure	Co-operation with regard to linking Green Infrastructure.
Settlement Strategy and community services	Appropriate development and settlement strategy to support thriving and sustainable communities in the Staffordshire Moorlands.
Meeting housing need	Planning and monitoring housing provision - Housing built in the Moorlands part of the PDNP contributes towards the housing requirement in the Staffordshire Moorlands Local Plan. Includes affordable housing and associated issues. <i>PDNPA and SMDC do not agree on the proportion of standard method housing need that should be delivered in the national park.</i>
Meeting business need	Businesses in the Moorlands part of the PDNP.
Renewable energy and climate change mitigation and adaptation	The Council supports the use of renewable energy and mitigation and adaptation in the Moorlands part of the PDNP. <i>SMDC and PDNPA do not agree with regard to large scale renewables.</i>
Travel and transport, including new or improved	Joint working on infrastructure planning. Promotion of sustainable travel.

road and rail links and park & ride facilities	
Utilities including distribution networks and new reservoirs	<p>'Peak Cluster' carbon capture pipeline and its benefits to Moorlands businesses as well as other utilities. The Council considers that Peak Cluster as well as power, gas, water and fibre routes crossing the PDNP in appropriate locations should be supported where they serve both National Park and neighbouring authority residents.</p> <p><i>The PDNPA is deferring setting out its approach until full evidence is available.</i></p>
Evidence Gathering	Joint working on evidence gathering to inform future planning policy reviews and strategies.
Neighbourhood Planning	Support for Neighbourhood Plans that cover both Local Planning Authority areas.

Sheffield City Council	
Strategic matter	Summary of main issues
Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	Following adoption of the Sheffield Plan SCC will work with PDNPA on the development of a mitigation strategy to help protect the Peak Districts European Sites from likely recreation impacts resulting from Sheffield's future growth. This approach has been agreed between SCC and PDNPA as part of the Duty to Co-operate process and based on outcomes identified in Sheffield's Habitat Regulations Assessment.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	Following adoption of the Sheffield Plan SCC will work with PDNPA on the development of a mitigation strategy to help protect the Peak Districts European Sites from likely recreation impacts resulting from Sheffield's future growth. This approach has been agreed between SCC and PDNPA as part of the Duty to Co-operate process and based on outcomes identified in Sheffield's Habitat Regulations Assessment.
Provision of waste management facilities	Commitment to continue to provide waste management facilities to serve the needs of the Sheffield-based population within the National Park.
Transport	As one of the National Parks Highway Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

Kirklees Council	
Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Provision of waste management facilities.	Commitment to continue to provide waste management facilities to serve the needs of the Kirklees-based population within the National Park.
Transport	As one of the National Parks Highway and Transport Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

North East Derbyshire District Council

Conservation and enhancement of natural beauty

Co-operate with regard to LURA duty to further National Park purposes.

Conservation and enhancement of wildlife and nature recovery

Co-operate with regard to LURA duty to further National Park purposes.

The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.

Conservation and enhancement of cultural heritage

Co-operate with regard to LURA duty to further National Park purposes.

Barnsley Council

Conservation and enhancement of natural beauty

Co-operate with regard to LURA duty to further National Park purposes.

Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Provision of waste management facilities.	Commitment to continue to provide waste management facilities to serve the needs of the Barnsley-based population within the National Park.
Transport	As one of the National Parks Highway Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

Tameside Council

Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Provision of waste management facilities.	Commitment to continue to provide waste management facilities to serve the needs of the Oldham-based population within the National Park.

Transport	As one of the National Parks Highway Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

Stockport Council	
Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Provision of waste management facilities.	Commitment to continue to provide waste management facilities to serve the needs of the Oldham-based population within the National Park.
Transport	As one of the National Parks Highway Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

Oldham Council	
Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts

	on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Provision of waste management facilities.	Commitment to continue to provide waste management facilities to serve the needs of the Oldham-based population within the National Park.
Transport	As one of the National Parks Highway Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

Cheshire East

Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Provision of waste management facilities.	Commitment to continue to provide waste management facilities to serve the needs of the Cheshire East-based population within the National Park.
Transport	As one of the National Parks Highway and Transport Authorities
Flooding	To co-operate on the management of the risk of flooding from ordinary watercourses, surface water and groundwater

Greater Manchester Combined Authority

Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
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Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes. The National Park Authority will seek to understand the potential recreational impacts on protected areas that may result from increased population associated with housing requirements, as set out in the Peak District's own local plan and those of constituent and neighbouring authorities. Where appropriate the Authority will seek mitigation through developer contributions.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Transport	As one of the National Parks Transport Authorities

East Midlands Mayoral Combined Authority

Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Transport	As one of the National Parks Transport Authorities

South Yorkshire Mayoral Combined Authority

Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Transport	As one of the National Parks Transport Authorities

West Yorkshire Mayoral Combined Authority

Conservation and enhancement of natural beauty	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of wildlife and nature recovery	Co-operate with regard to LURA duty to further National Park purposes.
Conservation and enhancement of cultural heritage	Co-operate with regard to LURA duty to further National Park purposes.
Transport	As one of the National Parks Transport Authorities

Section 5: Duty to Co-operate Statements for other members of the East Midlands Aggregates Working Party (AWP)

Leicestershire County Council	
Strategic matter	Summary of main issues
<p>Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.</p>	<p>Commitment to continue to supply minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.</p> <p>As PDNP are a National Park, there will be limited minerals extraction, but this means that there is potential for minerals flows from LCC to PDNP (or elsewhere in the region or country) to make up for shortfalls but this is more likely to come from Derbyshire under PDNP’s agreed approach with DCC (as detailed in EMAWP Annual Report). The issue is also there is probably little further information on flows/sales/other data that this assumption can be based upon.</p> <p>There is not agreement from the EMAWP (specifically industry) as this is seen as ‘managed retreat’ and against NPPF. It was also debated during the DCC Minerals Local Plan EiP in May 2025 with the Inspectors suggesting the approach to be unsound on the basis of the lack of a specific overarching national policy steer for compensatory provision and on the basis of an Inspector’s decision in 2018 regarding the West Sussex Joint Minerals Plan, which covers part of the South Downs National Park</p> <p>Historically, as detailed in the latest Annual Report of the EMAWP, the Peak District has provided a considerable volume of mineral, including aggregates. It is however difficult to say where these go</p> <p>Derbyshire and PDNP is a significant net exporter of aggregate grade crushed rock to other areas, amounting to an average of around 9 million tonnes each year. LCC is the only adjoining authority which produces aggregate crushed rock to any significant extent</p> <p>It is noted that the current active working area for Tunstead Quarry is focussed on the Old Moor</p>

	<p>extension which is predominantly within the PDNP boundary. Minerals extracted from Tunstead are sold as either aggregates or are used to produce other products, including cement. Likewise, the current working area at Cemex’s Doveholes Quarry was located in the northernmost section of that site which is also in the PDNP. Both sites are rail – linked so are able to serve more than regional markets.</p>
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Nottinghamshire County Council

Strategic matter	Summary of main issues
<p>Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.</p>	<p>Commitment to continue to supply minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.</p> <p>Nottinghamshire County Council (NCC) is a constituent member of the East Midlands Aggregate Working Party along with PDNPA .</p> <p>We share and welcome the commitment of PDNPA to a continued or greater supply of aggregates from the MPA area as a contribution towards meeting future needs across the Region. We have not made formal representations on the Plan as it has not raised issues which require this.</p> <p>We understand that the formal Duty to Co-operate will be ending during 2026 but we are happy to support the Plan going forward in whatever way is deemed necessary.</p>

North Northamptonshire Council

Strategic matter	Summary of main issues
<p>Minerals - commitment to a continued supply of aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.</p>	<p>Commitment to continue to supply of minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.</p>

West Northamptonshire Council

Strategic matter	Summary of main issues
Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.	Commitment to continue to supply minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.

Rutland Council

Strategic matter	Summary of main issues
Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.	Commitment to continue to supply minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.

Lincolnshire County Council

Strategic matter	Summary of main issues
Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.	Commitment to continue to supply minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.

North Lincolnshire Council

Strategic matter	Summary of main issues
Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.	Commitment to continue to supply minerals including aggregates to the NP and meet aggregates apportionment as agreed by the East Midlands AWP for the length of the Plan period.

Section 6: Other duty to co-operate statements

Historic England
<p>Historic England can confirm that the Peak District Local Authority have engaged with Historic England, as a statutory consultee, in the Plan making process. We have made representation on the Local Plan consultation and are available to engage in a Statement of Common Ground with the Council, if it is deemed necessary at the time of submitting the Plan, for its Examination in Public.</p> <p>Parties will continue to co-operate with regard to the delivery of national park purposes.</p>

Natural England	
Strategic matter	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)	To seek a common understanding across the protected landscape of threats and opportunities and to support Local Plan policies and proposals that respond to the changes set out in the in LURA and the NPPF
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)	To seek the best possible solution to avoid or minimise impact of development on natural habitats and species and to enhance the Nature Recovery Network.
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)	To seek the best possible solution to the impact on protected sites from recreation and tourism resulting from increased development both within and outside the Peak District boundaries.
CIL and green infrastructure	To ensure there is sufficient GI evidence base and use this for policies and site allocations. This could include an authority-wide GI Strategy. The Plan should make use of the Green Infrastructure Framework (GIF)
Settlement Strategy and community services	To seek provision of green spaces and access to nature for local communities for benefits to health and well-being.
Renewable energy and climate change mitigation and adaptation	To ensure the plan recognises the role of or identifies nature-based solutions for climate mitigation and adaptation e.g. woodland creation or peatland restoration. To ensure the policies set out how development (and associated provision for onsite nature enhancement /landscaping etc.) will be climate resilient.
Minerals	To ensure that restoration of minerals sites provides maximum biodiversity net gain and enhances the protected landscape.

National Highways

National Highways and PDNP will continue to co-operate in regard to the development of the Local Plan and the requirements of both parties.

Environment Agency

The Environment Agency and PDNP will continue to co-operate in regard to the development of the Local Plan and the requirements of both parties.

Homes England

Homes England and PDNP will continue to co-operate in regard to the development of the Local Plan and the requirements of both parties.

NHS & NHS Integrated Care Boards

NHS & NHS Integrated care Boards and PDNP will continue to co-operate in regard to the development of the Local Plan and the requirements of both parties.

Rail Regulator

The Rail Regulator and PDNP will continue to co-operate in regard to the development of the Local Plan and the requirements of both parties.

Section 7: Duty to co-operate signatures

Duty to cooperate bodies

Prescribed Bodies	Constituent Authorities	Minerals Planning Authorities
<ul style="list-style-type: none"> • Environment Agency • Historic England • Natural England • Mayor of London • Civil Aviation Authority • Homes England • CCGs • NHS • Office of Rail and Road • National Highways • Transport for London • Integrated Transport Auths • Highway Authorities, • Marine Management Orgs 	<ul style="list-style-type: none"> • Derbyshire County Council • Staffordshire County Council • Staffordshire Moorlands District Council • North East Derbyshire District Council • Derbyshire Dales District Council • High Peak Borough Council • Cheshire East Council • Oldham Council • Kirklees Council • Barnsley Council • Sheffield City Council • East Midlands Mayoral Combined Authority • Greater Manchester Mayoral Combined Authority • South Yorkshire Mayoral Combined Authority • West Yorkshire Mayoral Combined Authority 	<ul style="list-style-type: none"> • Derbyshire County Council • Leicestershire County Council • Nottinghamshire County Council • North Northamptonshire Council • West Northamptonshire Council • Rutland Council • Lincolnshire County Council • North Lincolnshire Council

Signatures

The content of this Statement of Common Ground reflects the joint discussions and agreements reached between the Peak District National Park Authority and [Party 2]. Both parties agree that this statement represents an accurate record of the matters discussed and issues resolved regarding strategic issues in relation to the *Peak District National Park Local Plan Regulation 19 Version*.

For Peak District National Park Authority

Name:

Position:

Signature:

Date:

For [Party 2]

Name:

Position:

Signature:

Date:

Appendix 1: Timeline of key engagement activities

2020 online stakeholder survey

2020 online survey for schools and young people

2021 informal stakeholder consultation on Topic Papers

2021 stakeholder workshops

2022 parish council survey

2024 Regulation 18 *Issues and Options* consultation

2024 duty to co-operate meetings with constituent authorities

2025 Regulation 18 *Preferred Approach* consultation

2025 duty to co-operate Letter and Form to constituent authorities

ongoing duty to co-operate meetings with individual constituent authorities

Appendix 2: Duty to co-operate form

The PDNPA has identified the following strategic matters that require co-operation in the production of its new Local Plan 2026-2045. Please indicate those relevant to your authority that should be dealt with through a Duty to Co-operate Statement. Where possible please provide a brief summary of the main issues from your authority's perspective.

Please add any additional issues in the second table overleaf.

Abbreviations

Purposes = statutory purposes of a national park

[LURA duty](#) = Levelling-up and Regeneration Act 2023 duty on relevant authorities to seek to further the statutory purposes of Protected Landscapes

[Special Qualities](#) = Special Qualities of the Peak District National Park

Strategic matter	Relevant (y/n)	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)		
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)		
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)		
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)		
CIL and green infrastructure		
Settlement Strategy and community services		
Meeting housing need		
Meeting business need		
Renewable energy and climate change mitigation and adaptation		
Minerals		
Travel and transport, including new or improved road and rail links and park & ride facilities		
Utilities including distribution networks and new reservoirs		

Appendix 3: Duty to co-operate form (Minerals Planning Authorities)

The PDNPA has identified the following strategic matters that require co-operation in the production of its new Local Plan 2026-2045. Please indicate those relevant to your authority that should be dealt with through a Duty to Co-operate Statement. Where possible please provide a brief summary of the main issues from your authority's perspective.

Please add any additional issues in the second table overleaf.

Abbreviations

Purposes = statutory purposes of a national park

[LURA duty](#) = Levelling-up and Regeneration Act 2023 duty on relevant authorities to seek to further the statutory purposes of Protected Landscapes

[Special Qualities](#) = Special Qualities of the Peak District National Park

Strategic matter	Relevant (y/n)	Summary of main issues
Conservation and enhancement of natural beauty (Purposes, LURA duty & Special Qualities)		
Conservation and enhancement of wildlife and nature recovery (Purposes, LURA duty & Special Qualities)		
Conservation and enhancement of cultural heritage (Purposes, LURA duty & Special Qualities)		
Recreation and tourism including impact on Special Qualities, strategic recreation routes and hub sites (Purposes, LURA duty & Special Qualities)		
CIL and green infrastructure		
Settlement Strategy and community services		
Meeting housing need		
Meeting business need		
Renewable energy and climate change mitigation and adaptation		
Minerals - commitment to a continued supply of minerals including aggregates at equal to or greater than existing rates from the MPA area for the duration of the plan period to ensure there is a steady and adequate supply of minerals from the East Midlands AWP region.		
Travel and transport, including new or improved road and rail links and park & ride facilities		
Utilities including distribution networks and new reservoirs		