



Habitats Regulations Assessment
of the
Peak District National Park Authority
Draft Local Plan
June 2026
Prepared by PDNPA

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Contents

1. Introduction – page 3
2. The development of the Draft Local Plan – page 6
3. The Draft Local Plan – page 6
4. Methodology – page 11
5. Protected Sites – page 12
6. The Likely Significant Effects (LSE) – page 13
7. Screening of Protected Sites – page 14
8. Screening Draft Local Plan Outcomes and spatial strategy, and policies – page 18
9. Stage One conclusion – page 18
10. Stage Two – Appropriate Assessment – page 18
11. In Combination – page 19
12. Stage Two discussion and conclusion – page 20

APPENDICES

- Appendix One: Map of Protected Sites
- Appendix Two: Description of Protected Sites screened out
- Appendix Three: HRA screening
- Appendix Four: HRA Appropriate Assessment
- Appendix Five: In Combination Assessment

1. Introduction

1.1 The Peak District National Park (PDNP) is a nationally protected landscape. Approximately one third of the PDNP is designated as part of a protected site. Most areas that are of importance for wildlife or geology are covered by more than one of the legislative designations that come under the protection of the Habitat Regulations; government policy that protects ecological sites from harmful development.

1.2 Requirements to undertake a Habitat Regulations Assessment

1.3 The Habitat Regulations, also known as The Conservation of Habitats and Species Regulations, 2010, places a duty on the competent authority to protect and conserve natural habitats and species of European importance. These designated areas of European importance together form a network of sites called Natura 2000. The Habitat Regulations were amended in 2017 and 2019 to address the changes required to legislation following the departure of the UK from the European Union (EU). In summary, the sites that were known as Natura 2000 sites (sites of special areas of conservation (SACs) and special protection areas (SPAs) and which formed part of the EU Natura 2000 ecological network, remain protected and form the UK National Site Network¹ (NSN).

UK National Site Network

The UK national site network objectives are to:

- maintain or, where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status (FCS)
- contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive

The appropriate authorities must also have regard to the:

- importance of protected sites
- coherence of the national site network
- threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs

The network objectives contribute to the conservation of UK habitats and species that are also of pan-European importance, and to the achievement of their FCS within the UK.

[Changes to the Habitats Regulations 2017 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/changes-to-the-habitats-regulations-2017)

1.4 Ramsar sites, which are sites of international wetland importance and protected by the Ramsar Convention (1975) are not part of the NSN but are subject to the HRA.

¹ [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/habitats-regulations-assessments-protecting-a-european-site)

1.5 It is a requirement of the Local Plan to protect wildlife from any adverse impact of development and where appropriate seek to provide improvements as part of the development for wildlife to flourish. As such, the purpose of the Habitat Regulations Assessment (HRA) is to determine whether policies within the Peak District National Park Authority Local Plan (currently at Draft Plan Stage, Regulation 19²) are likely to have an impact on protected sites. The impact could be on a protected site, near a protected site, or some distance away a protected site but affect it by causing air, water, or noise pollution, or the impact could be on a site that is used by a species located on a protected site.

1.6 The protected sites considered for the purposes of the HRA

1.7 Sites are:

- Special Areas of Conservation (SACs)
- Special Protection Areas (SPAs) are protected sites classified in accordance with Article 4 of the EC Birds Directive.
- Ramsar sites (wetlands of international importance)

1.8 Areas secured as sites compensating for damage to a European site

1.9 Also covered by Habitat Regulations are sites that are proposed to be any of the above listed sites.

1.10 As the competent Authority, the PDNPA has a duty to help protect, conserve and restore sites. The process of determining planning applications is based on weighing up the impact of a proposed development using policies within the Local Plan. In turn, these decisions might affect a protected site.

1.11 The Levelling Up and Regeneration Act (LURA, 2023)

1.12 In addition to the Habitat Regulations, the Levelling Up and Regeneration Act (LURA, 2023) brought in new legislation regarding nutrient or phosphorous nutrient neutrality from agricultural runoff and development. LURA Schedule 15, amends the Habitat Regulations with regulation 85A; an assumption that wastewater plans will meet the relevant nitrogen or phosphorous pollution standard by the relevant date. Advice from the Chief Planner states that mitigation relating to high pollution levels is required until 2030, after which mitigation is required with respect to lower levels thereafter. It is a matter for the Secretary of State to disapply the assumption in consultation with the EA and NE³.

1.13 Parts of the Peak District Dales Special Area of Conservation (SAC), the River Wye within the Wye valley component of the SAC have been found to have phosphorus concentrations exceeding targets. As the competent Authority, we need to be satisfied that adequate mitigation is in place to ensure no overall adverse effect on the integrity of the SAC.

² [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

³ [Habitats Regulations advice for LPAs | Local Government Association](#)

1.14 The Conservation Objectives for the Peak District Dales SAC state that ‘the natural nutrient regime of the river should be protected, with any anthropogenic enrichment above natural/background concentrations should be limited to levels at which adverse effects on characteristic biodiversity are unlikely’. The maximum phosphorus concentration for the River Wye is set at 15ug/l.’⁴

1.15 Stages to the Habitat Regulations Assessment (HRA)

- **Stage 1 - Screening**

Identify the risk or possibility that an issue and/or option of the local plan will have a significant likely effect on a protected site, which could undermine the achievement of a site’s conservation objectives. If a risk or possible risk is identified, further consideration of objective information is made and if the proposal is not considered to have a likely significant effect (LSE) no appropriate assessment will be needed and the proposal can be screened out. For proposals to be screened out, a conclusion must be reached whereby it is ‘beyond reasonable scientific doubt’ that the issue/option will not have an LSE on the protected site or its qualifying features.

The Habitat Regulations requires the competent authority to consider the likely significant effects of the plan in combination with any other plan or proposal or reasonably foreseeable proposals, which may be planning applications or schemes in the process of being determined or at pre-application stage. The impact of the plan itself may be ‘de minimis’ but in combination with another plan or proposal may result in a likely significant effect.

If a risk or possible risk is identified further detailed examination will be required through an appropriate assessment in Stage 2.

- **Stage 2 – Appropriate Assessment**

A more detailed assessment will take place of what the likely significant effects are on the conservation objectives of one or more protected sites, and whether they can be avoided or minimised. The assessment should be appropriate for the nature and complexity of the proposal.

If the proposal is still considered to have a significant effect on the conservation objectives of one or more protected sites, move on to Stage 3.

- **Stage 3 – Assessment of Alternatives**

Assess the alternative policy options and whether they would avoid or minimise (mitigate) the significant effect on conservation objectives of protected sites and therefore provide a more favourable outcome.

- **Stage 4 – Assessment where no alternatives are available (derogation)**

If a policy cannot be amended or an alternative approach taken to avoided or minimise significant effect on the conservation objectives of one or more protected sites, the policy

⁴ [Peak District Dales Special Area of Conservation - Evidence Pack - TIN192 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/peak-district-dales-special-area-conservation-evidence-pack-tin192)

will be assessed against 3 legal tests (below) and notification made to DEFRA and Natural England:

1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site.
2. The proposal needs to be carried out for imperative reasons of overriding public interest.
3. The necessary compensatory measures can be secured.

2. The development of the Draft Local Plan

2.1 The Plan that is the subject of this HRA is the PDNPA Draft Local Plan (2025-45) for the Local Plan Regulation 19 stage⁵. This HRA report is part of the suite of documents that are subject to this final formal consultation stage of the plan-making process before the Authority submits the Draft Local Plan to the Secretary of State for examination.

2.2 Early consultations and events on key planning themes and the overarching direction from the PDNPA Management Plan (2023-2028)⁶ helped shape the Issues and Options report in 2024 with supporting evidence from topic papers written in 2021, annual monitoring reports, and commissioned work (Population Projections and Housing Needs Assessment, 2023). The Issues and Options document was formally consulted on (Regulation 18 stage) during October – November 2024.

2.3 The consultation on the Issues and Options document helped shape the Preferred Approach Regulation 18 stage consultation. Further evidence was commissioned to support the policies and policy directions set out in the Preferred Approach, including updated topic papers, an updated housing need assessment, an economic viability assessment, and an employment development needs assessment. All evidence documents are located on the Authority website⁷.

2.4 The Preferred Approach was subject to public consultation during November-December 2025. Consultation responses to the document, together with further evidence including a landscape and settlement sensitivity assessment, and updated housing need assessment have shaped the Draft Local Plan, Regulation 19 stage.

3. The Draft Local Plan

3.1 The new PDNPA Local Plan will guide development up to 2045. It will replace the current Local Plan which consists of the Core Strategy (2011) and the Development Management Policies (2019). The Vision for the PDNPA Draft Local Plan comes directly from the Management Plan and is

3.2 'By 2045 the Peak District National Park is exemplary in its response to climate change and nature recovery. Its Special Qualities and resilience as a living landscape have been significantly enhanced. It is a welcoming place where all are inspired to care and communities thrive.'

3.3 The Draft Local Plan describes the special qualities of the National Park and three main landscape character areas. It sets out the spatial portrait for each of the chapter areas; biodiversity, nature recovery and geodiversity; cultural heritage; recreation and tourism; housing; the rural

⁵ <https://www.legislation.gov.uk/uksi/2012/767/contents>

⁶ <https://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/national-park-management-plan>

⁷ <https://www.peakdistrict.gov.uk/planning/policies-and-guides/the-local-plan/supporting-evidence>

economy; shops and community facilities; climate change, flood risk and sustainable drainage; travel and transport; minerals and waste; and utilities, and reflects on their respective challenges and opportunities over the lifetime of the Plan.

3.4 The Draft Local Plan outcomes align (from a planning perspective) with those in the Management Plan. Spatial objectives set out how the Draft Local Plan, through planning policies will contribute to delivering these Authority wide outcomes.

3.5 Core Policies set the overarching policy approach to each of the chapter areas and the Development Strategy explains how the Authority will direct development to the most sustainable locations; namely Bakewell and named settlements.

3.6 Securing National Park purposes will continue to form the basis of all we do, and the Draft Local Plan sets out our approach to the key environmental issues of biodiversity net gain and nature recovery. The intention is that biodiversity net gain is delivered on site, however there will be opportunities to contribute to improvements off site, and sites within the National Park may be recipients of biodiversity net gain as a result of development outside the National Park.

3.7 In supporting the socio-economic wellbeing of our communities (our National Park duty), we wrote and adopted our definition for 'thriving and sustainable communities'⁸(2021) in consultation with the Peak Park Parishes Forum. This was to ensure that our duty is a key theme that influences all areas of the Local Plan. We know from the economic strategies of our constituent authorities that there is potential for growing knowledge-based, creative and digital industries, as well as the more traditional industries of tourism and farming. We need to support existing and new businesses to prosper and grow in a way that is compatible with National Park purposes. The Peak District landscape is the prime economic asset and should be conserved or enhanced by the businesses that operate within it.

3.8 We have an ageing population that has been a characteristic of the National Park residential population for some time but the decline in population to the extent that has occurred over the last 10 years has raised concerns. A key issue is how we try to minimise the decline and support thriving and sustainable communities in a sustainable manner. Our focus is to address local housing need within the context of a protected landscape.

3.9 Being more environmentally responsible is another key theme of the Draft Local Plan. Reducing consumption, promoting nature recovery, carbon sequestration, managing flood risk, and supporting improved linkages for wildlife to thrive are all addressed in Draft Local Plan policy.

3.10 Tourism can have an impact on protected sites. Managing tourism and educating visitors on the importance of following designated pathways and taking their litter home is a crucial aspect of habitat protection, creation, restoration and enhancement. Our second purpose is to promote the enjoyment of the National Park and our aim is to direct tourism development towards settlements and existing recreation sites.

3.11 Traffic flows within the Peak District have steadily increased over the lifetime of the current Plan. There are significant cross traffic flows through the National Park as well as visitor traffic and resident traffic within the National Park. Both traffic pollution and noise from traffic have an impact on nature and our approach is to support a reduction in car-borne journeys by resisting proposals that would increase cross-park traffic. To support people's enjoyment of the National Park, Draft Local Plan policy protects strategic multi-use trails and protects existing routes for walking, cycling and horse-riding and considers the creation of new ones.

⁸ [Microsoft Word - @FINAL Thriving and Sust Def JUL21.docx \(peakdistrict.gov.uk\)](#)

3.12 Quarrying is one of the main industries in the National Park. Draft Local Plan policy will continue to manage the Peak District's mineral resource in a way that is appropriate in a National Park and to manage waste in a way that delivers significant long-term landscape enhancement and makes a significant contribution to nature recovery.

3.13 The development of the Local Plan is now at Regulation 19 stage; the final stage of plan-making before it is submitted to the Secretary of State for examination. This report is an HRA assessment of the Draft Local Plan.

3.14 The Draft Local Plan has been developed and refined through Issues and Options Regulation 18 Stage and the Preferred Approach, a second Regulation 18 Stage. Policies and Policy Directions from the Preferred Approach have been refined and developed into full policies and there are policies that have been brought forward from the current Local Plan and some new policies too that have not been previously screened as part of new Draft Local Plan HRA process. Policies have been developed taking into account consultation responses, recommendations from the Preferred Approach Sustainability Appraisal and HRA, and new and/or updated evidence.

3.15 This report has screened the outcomes and spatial objectives, Core policies and development strategy, and policies on the following topics:

- Biodiversity, nature recovery and geodiversity
- Cultural heritage
- Recreation and tourism
- Climate change, flood risk and sustainable drainage
- Housing
- Rural economy
- Shops, other town centre uses, community services and facilities
- Minerals and waste
- Travel and transport
- Utilities

3.16 The results of the HRA screening of the Draft Local Plan are set out in Appendix Three. The commentary includes references to the results of the Preferred Approach HRA so that readers can understand how the policies have evolved through the plan-making process and HRA assessment. The results of the Issues and Options HRA are available on the Authority's Local Plan Review supporting evidence webpage, to refer back to if required.

3.17 Table One below lists all the outcomes and spatial objectives, core policies, and policies (thematic) in the Draft Local Plan that have been subject to the HRA screening.

3.18 Table One: Draft Local Plan outcomes and spatial objectives, core policies and policies

Draft Local Plan Outcomes and Spatial Objective, Core Policies and policies	
Outcomes and spatial objectives	
Outcome 1	A sustainable level of development where the Peak District's Special Qualities and resilience as a living landscape have been significantly enhanced
Outcome 2	The Peak District National Park is a resilient landscape in which nature, beauty, and cultural heritage are significantly enhanced
Outcome 3	The Peak District is a place where nature recovers and biodiversity flourishes

Outcome 4	Cultural heritage and the built environments of the National Park are conserved and enhanced as part of an every-changing landscape
Outcome 5	The Peak District is a welcoming place where all are inspired to enjoy, care for and connect to its special qualities
Outcome 6	Peak District National Park communities are thriving and sustainable places where all generations can live healthy and fulfilled lives
Core Policies	
C1	Securing National Park purposes (strategic policy)
C2	Sustainable development (strategic policy)
C3	Enhancing the National Park (strategic policy)
C4	Landscape character and Special Qualities (strategic policy)
C5	Conservation and enhancement of the landscape (strategic policy)
C6	Biodiversity and nature recovery (strategic policy)
C7	Cultural heritage assets of archaeological, architectural, artistic or historic significance (strategic policy)
C8	Development strategy (strategic policy)
C9	Settlement capacity and limits
C10	Development management principles
C11	Design, siting, layout and landscaping
C12	Local infrastructure and developer contributions
Biodiversity, Nature Recovery and Geodiversity	
B1	Protecting and managing the Natural Zone
B2	Protecting and enhancing sites, species and networks
B3	Protecting irreplaceable habitat, trees, woodlands and hedgerows
B4	Delivering nature recovery
Cultural Heritage	
CH1	Assessing the impact of development on designated and non-designated heritage assets and their setting
CH2	Conversion of a cultural heritage asset
CH3	Listed Buildings
CH4	Conservation Areas
CH5	Registered parks and gardens
Recreation and Tourism	
RT1	Recreation, environmental education and interpretation in and on the edge of settlements (strategic policy)
RT2	Recreation, environmental education and interpretation in the countryside (strategic policy)
RT3	Hotels, bed and breakfast and self-catering accommodation (strategic policy)
RT4	Holiday occupancy of self-catering accommodation
RT5	Caravans and camping (strategic policy)
RT6	Holiday occupancy of camping, campervan and caravan sites
RT7	Facilities for keeping and riding horses
Statement of Authority approach.	Aires for motorcaravans (campervans) in car parks. (Not policy. May be referred to as RT8 in supporting documents)
Climate Change, Flood Risk and Sustainable Drainage	
CC1	Sustainable design and carbon reduction (strategic policy)
CC2	Low carbon and renewable energy development (strategic policy)
CC3	Flood risk (strategic policy)
CC4	Sustainable drainage (strategic policy)
Housing	

H1	Housing (strategic policy)
H2	Eligible housing need
H3	Local Connection Definition
H4	First Occupation of New Affordable Dwellings
H5	Second and Subsequent Occupation of Affordable Housing
H6	Residential dwellings to meet an essential need for a rural worker
H7	Gypsy, Traveller, and Travelling Show People
H8	Building and extending a dwelling(s) to meet a person's own housing need
H9	Subdivision of residential buildings to create multiple residential units
H10	Replacement Dwellings
H11	Ancillary accommodation
H12	Residential Gardens
H13	Provision of Affordable Housing
H14	Making effective use of land for housing (development density)
H15	Housing mix
H16	Housing size
H17	Primary Occupancy
H18	Householder development
Rural economy	
E1	Business Development (strategic policy)
E2	Safeguarded Employment Sites
E3	Extensions, alterations, or intensification of existing employment or business space
E4	Change of Use of employment/business sites
E5	Agricultural, forestry or rural enterprise land management operational development
E6	Farm Diversification
E7	Onsite farm anaerobic digestion and agricultural waste management
E8	Homeworking
Shops, other town centre uses, community services and facilities	
S1	Shops, other town centre uses, community services and facilities in settlements
S2	Shops and other town centre uses in the open countryside
S3	Impact assessment for shops, other town centre uses and community services and facilities
S4	Change of use of shops, other town centre uses, community services and facilities
S5	Provision and retention of community open space, sport and recreation sites and facilities
S6	Local Green Spaces
S7	Outdoor advertising
Minerals and waste	
M1	Minerals development (strategic policy)
M2	Fluorspar proposals (strategic policy)
M3	Building and roofing stone (strategic policy)
M4	Restoration and aftercare
M5	Mineral safeguarding (strategic policy)
W1	Waste Management (strategic policy)
HW1	Redevelopment of Hope Works
MW1	The justification for minerals and waste development
MW2	Waste management facilities
MW3	Impacts of minerals and waste development on amenity

MW4	Impact of minerals and waste development on the environment
MW5	Cumulative effects of minerals and waste development
MW6	Ancillary minerals development
MW7	Processing of building and roofing stone
Transport	
T1	Reducing the general need to travel and encouraging sustainable transport (strategic policy)
T2	Reducing and directing traffic (strategic policy)
T3	Cross-park roads (strategic policy)
T4	Local road improvements
T5	Managing the demand for freight transport (strategic policy)
T6	Railway, light railway and guided bus development (strategic policy)
T7	Routes for walking, wheeling, cycling and horse riding and inland waterways (strategic policy)
T8	Development affecting a public right of way
T9	Traffic Management
T10	Business parking
T11	Residential off-street parking
T12	Visitor parking (strategic policy)
T13	Air transport
T14	Electric Vehicle Charging Points
T15	Vehicular accesses to properties
T16	Transport related wildlife severance
Utilities	
U1	New or expanded water resource reservoirs (strategic policy)
U2	Development that requires new or upgraded service infrastructure
U3	New and upgraded electricity distribution networks (strategic policy)
U4	Water networks (supply, treatment and wastewater) (strategic policy)
U5	Development close to utility installations
U6	Telecommunications infrastructure (strategic policy)
U7	Restoration of utility and telecommunications infrastructure sites

4. Methodology

4.1 This HRA report has set out in the previous sections how the Draft Local Plan has developed through the plan-making process. Recommendations made in the HRA screening reports for the Issues and Options and the Preferred Approach have been incorporated into policies in the Draft Local Plan.

4.2 Due to the extensive areas of land across the National Park that are covered by Protected Site designations, a precautionary approach has been taken with regard to the LSEs the Draft Local Plan is anticipated to have on the Protected Sites. This precautionary approach has been applied at each stage of the plan-making process that has required an HRA.

4.3 Natural England has published advice on the distances of influence for potential to impact on protected sites and these are available on MAGIC MAP⁹.

⁹ <https://magic.defra.gov.uk/>

4.4 Once again, as with the Issues and Options and the Preferred Approach HRA assessments at Stage One, we have screened Protected Sites that fall within the PDNP boundary and those outside the boundary that could be affected by development within the PDNP.

4.5 We have screened at three levels; Impact Risk Zone (IRZ), 15km and 24.4km. The Natural England standard IRZs provide a basis for a rapid initial assessment for the impact posed by the Plan to protected sites.

4.6 We have made the decision to screen at 15km and 24.4km again based on the potential impact of water and air pollution (15km is EA guidance), and the distances that we can reasonably expect people to travel for recreation and tourism purposes. Like with the IRZs, these distances don't automatically mean there are no potential impacts on biodiversity or the wider natural environment. This still requires careful consideration by the Authority. In particular functionally linked land may be some km's away for protected species of birds that nest/overwinter/feed/stop over and have been listed as a reason for a designation.

4.7 The screening for recreational impacts has been influenced by a recent report on the 'Recreation use of South Pennines Moors and implications for strategic housing growth' by Footprint Ecology (27 March 2024) on behalf of Natural England, which suggests 75% of visitors to the South Pennine Moors SPA and SAC travel from up to 24.4km away. This "75th percentile" has become the standard way to define a zone of influence for the purposes of HRA 9 Magic Map Application (defra.gov.uk) assessments nationally. Whilst consultation responses from Natural England advised this was not necessary, we have continued to err on the side of caution and extended the area of influence for screening to 24.4km.

4.8 We have also screened the Draft Local Plan for its impact on nutrient neutrality. The water catchment area for the River Wye which flows through the Peak District Dales SAC has been identified as having an excess of nutrients flowing into it, harming the delicate ecosystem. This screening has been integrated into the HRA screening process.

4.9 In preparing the HRA screening reports for Issues and Options and the Preferred Approach, we consulted Natural England as the statutory government advisor who had no objections to the conclusions of those reports. We have consulted Natural England again for the Draft Local Plan HRA.

4.10 In all aspects of the HRA Report, we have taken a precautionary approach as advised by DEFRA and NE. The Protected Sites we have screened are listed in Table Two below and maps of these are in Appendix One.

5. Protected Sites

5.1 As mentioned above, designated Protected Sites cover extensive areas of land across the National Park. There are three Protected Sites within the National Park; two SACs and one SPA. These are named in table two below along with the names of 3 SACs, 1 SPA within a 15km distance of the National Park and a further SAC within a 24.4km distance of the National Park. There is one Ramsar site within 15km of the National Park and a further two within 24.4km of the National Park. Whilst Ramsar sites not part of the NSN they are subject to the HRA.

5.2 A map of the Protected Sites is in Appendix One. The Natural England description of each Protected Site inside the National Park is set out in section 7 and the descriptions of the Protected Sites outside of the National Park are in Appendix Two.

5.3 Table Two: Protected Sites Screened

Protected Sites Screened			
SACs	SPAs	Ramsar	Distance
South Pennine Moors Peak District Dales	Peak District Moors (South Pennine Moors Phase 1)		Within the PDNPA boundary
Bees Nest & Green Clay Pits (Derbyshire) Gang Mine (Derbyshire) Rochdale Canal Denby Grange Colliery Ponds		Midlands Meres & Moses Phase 1	
West Midlands Mosses	Midlands Meres & Mosses Phase 2 Rostherne Mere		Within 24.4km of the PDNPA boundary

6. The Likely Significant Effects (LSE)

6.1 The screening process has considered the main **sources** of effects, including effects in combination, on the protected sites that could occur as a result of the Draft Local Plan, including possible **pathways** to Protected Sites and the effects on possible sensitive **receptors** on the protected sites.

6.2 If there is a link between the source, pathway and a receptor it is likely that there will be a significant effect that will need an Appropriate Assessment.

6.3 If the Draft Local Plan were to be adopted, the possible sources and pathways for effects to protected sites arising from it are considered to include:

- Development (greenfield and brownfield)
- Agricultural practices and development
- Minerals extraction and transportation
- Development relating to highways
- Telecoms development
- Air pollution
- Noise disturbance
- Light pollution
- Human activity relating to public access and disturbance (sport, leisure and recreation)
- Recreation and tourism (e.g. increased people and vehicular pressure)
- Invasive species and disease
- Domesticated animals
- Barriers to species dispersal
- Water pollution (surface and groundwater)
- Ground water depression or flow interception
- Decrease in surface water run-off e.g. through interception in a void

- Increase in surface water run-off
- Effects on functionally linked land
- Changes to predator/prey relationships
- Erosion
- Fire risk

7. Screening of Protected Sites

7.1 Site descriptions, reasons for designation, conservation objectives and vulnerabilities are taken from Natural England¹⁰. Details of Protected Sites outside of the National Park are in Appendix Two.

7.2 All protected sites located within the Peak District National Park boundary have been screened in and all protected sites located within 15km and 24.4km of the National Park boundary have been screened out.

7.3 The LSEs to the Protected Sites and functionally linked land likely to occur are considered to be a result of increased visitor pressure as a result of the new housing built within the National Park, recreation and tourism development from overnight stays and new housing, development of recreation hubs and attractions and increased visitor numbers, increased/changing agricultural practice and development, mineral development, development relating to highways, and telecoms development.

7.4 Special Areas of Conservation (SACs) within the National Park

7.5 South Pennine Moors SAC

7.6 The South Pennine Moors SAC is designated for:

- Northern Atlantic wet heaths with *Erica tetralix* for which the area is considered to support a significant presence.
- European dry heaths for which this is considered to be one of the best areas in the United Kingdom.
- Blanket bogs for which this is considered to be one of the best areas in the United Kingdom.
- Transition mires and quaking bogs for which the area is considered to support a significant presence.
- Old sessile oak woods with *Ilex* and *Blechnum* for which this is considered to be one of the best areas in the United Kingdom.

7.7 The South Pennine Moors SAC is vulnerable due to grazing and burning regimes, visitor access, and atmospheric pollution, which have led to large areas of eroded and de-vegetated peat.

7.8 Conservation objectives

7.9 To maintain and restore where appropriate the integrity of the site to favourable status.

In particular:

- The extent and distribution of the qualifying natural habitats

¹⁰ [Natural England Access to Evidence](#)

- The structure and function (including typical species) of the qualifying natural habitats, and,
- The supporting processes on which the qualifying natural habitats rely.

7.10 Screening of the Likely Significant Effects

7.11 The screening process of the Draft Local Plan has identified potential LSEs to the South Pennine Moors and functionally linked land from increased visitor pressure as a result of; new housing built within the National Park, increased recreation and tourism development from overnight stays, more intensive use of public footpaths or established routes, increased car parking, and further development of recreation hubs and attractions. There could also be potential LSEs from agricultural development through built development to support the farm operation and through intensification of grazing from increased stock, mineral development, development relating to highways, and telecoms development.

7.12 These sources and pathways could result in result in LSEs to the protected site and sensitive receptors characteristic of the site, including disturbance to flora and fauna from tourism and recreation activity, noise, erosion (trampling/car parking), the increased presence and impact of domesticated animals, vehicular related pollution and erosion, the spread of invasive species and disease, fire risk from BBQs, smoking and litter.

7.13 Peak District Dales SAC

7.14 The Peak District Dales SAC is designated for:

- European dry heaths
- Semi-natural dry grasslands and scrubland facies on calcareous substrates
- Alkaline fens
- Calcareous and calcshist screes of the montane to alpine
- Calcareous rocky slopes with chasmophytic
- Tilio-Acerion forests of slopes, screes and ravines
- *Austropotamobius pallipes*
- *Lampetra planeri*
- *Cottus gobio*

7.15 The potential LSEs are inappropriate grazing management, water quality and low flows, and introduced disease. The ideal management for the grassland habitats for nature conservation purposes - light grazing throughout most of the year, with a break in grazing during the spring and early summer - tends to conflict with today's agricultural regimes. The result is neglect & invasion by scrub, or overgrazing and the loss of the important vegetation communities. The woodland habitats are under significant threat from Ash Dieback, and are likely to undergo major changes over the next decade and more. Work is underway to increase species diversity and improve the resilience of these woodlands in the long term.

7.16 Crayfish Plague is a threat to the native White-clawed Crayfish and may already have eliminated it from the River Wye. Water quality, both from sewage treatment works and diffuse agricultural pollution is a threat with phosphate levels exceeded in the Wye, and low flow affects some rivers such as sections of the Lathkill.

7.17 Conservation Objectives

7.18 The conservation objectives are for the site to maintain and restore where appropriate the integrity of the site to favourable status. In particular:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species
- The distribution of qualifying species within the site.

7.19 Screening of the Likely Significant Effects

7.20 The screening of the Draft Local Plan has identified potential LSEs to the Peak District Dales and functionally linked land from increased visitor pressure as a result of; new housing built within the National Park, recreation and tourism development from overnight stays and increased visitor numbers, increased/changing agricultural practice and development, mineral development, development relating to highways, and telecoms development.

7.21 These sources and pathways could result in result in LSEs to the protected site and sensitive receptors characteristic of the site, including; disturbance to flora and fauna from tourism and recreation activity, noise, erosion (trampling/car parking), the increased presence and impact of domesticated animals, vehicular related pollution and erosion, the spread of invasive species and disease, smoking, and litter.

7.22 Agricultural management, including intensification through stock numbers, and development (including whole estate plans) may adversely impact on the protected site and its sensitive receptors especially in relation to agricultural pollution and impact on water quality and flows. The River Wye flows through this SAC and sections of the River Wye and its tributaries are designated nutrient neutrality areas as such any agricultural or residential development could adversely impact the SAC.

7.23 Special Protected Areas (SPAs) within the National Park

7.22 Peak District Moors SPA (South Pennine Moors Phase 1)

7.24 The Peak District Moors (South Pennine Moors Phase 1) are designated for:

- Merlin Falco columbarius,
- Golden Plover Pluvialis apricaria
- Short-eared Owl Asio flammeus

7.25 The site is an extensive tract of moorland and moorland-fringe habitat. It includes most of the unenclosed moorland areas of the north, eastern and south-western Peak District, where it also extends into enclosed farmland of wet rushy pasture, hay meadows and small wetlands in the valley bottoms. The moorland habitats include extensive tracts of blanket bog and dry heath, which together with wet heath, acid grassland, small flushes, gritstone edges and boulder slopes, streams and moorland reservoirs, fringing semi-natural woodland and enclosed farmland, represents the full range of upland vegetation characteristic of the South Pennines. The site supports several important species assemblages, including higher plants, lower plants and insects, as well as breeding birds. Many physical features are of geological interest.

7.26 The Peak District Moors SPA is vulnerable due to grazing and burning regimes, visitor access, and atmospheric pollution.

7.27 The potential LSEs are inappropriate grazing management, water quality and low flows, and introduced disease. The result is neglect & invasion by scrub, or overgrazing and the loss of the important vegetation communities.

7.28 Agricultural management, including intensification through stock numbers, and development (including whole estate plans) may adversely impact on the protected site and its sensitive receptors especially in relation to agricultural pollution and impact on water quality and flows.

7.29 Sources and pathways that could result in result in LSEs to the protected site and sensitive receptors characteristic of the site, include; disturbance to flora and fauna from tourism and recreation activity, noise, erosion (trampling/car parking), the increased presence and impact of domesticated animals, vehicular related pollution and erosion, the spread of invasive species and disease, smoking, and litter.

7.30 Conservation Objectives

7.31 The conservation objectives are for the site to maintain or restore where appropriate and ensure the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

7.32 Screening of the Likely Significant Effects

7.33 The screening process of the Draft Local Plan has identified potential LSEs to the Peak District Moors and functionally linked land from increased visitor pressure as a result of; new housing built within the National Park, increased recreation and tourism development from overnight stays, more intensive use of public footpaths or established routes, increased car parking, and further development of recreation hubs and attractions. There could also be potential LSEs from agricultural development through built development to support the farm operation and through intensification of grazing from increased stock, mineral development, development relating to highways, and telecoms development.

7.34 These sources and pathways could result in result in LSEs to the protected site and sensitive receptors characteristic of the site, including disturbance to birds, flora and fauna from tourism and recreation activity, noise, erosion (trampling/car parking), the increased presence and impact of domesticated animals, vehicular related pollution and erosion, the spread of invasive species and disease, fire risk from BBQs, smoking and litter. Indirect pressure could result in habitat degradation.

7.35 Protected Sites within 15km and 24.4km of the National Park boundary

7.36 All protected sites outside of the National Park boundary have been screened out.

7.37 The housing requirement is estimated at 1580 dwellings over the Plan period, which breaks down to 79 dwellings per annum split between the White Peak (52 dwellings per annum), Dark Peak (16 dwellings per annum), and South West Peak (10 dwellings per annum). These are estimates and not targets as the National Park is not a suitable location for unrestricted housing.

7.38 It is considered that the Protected Sites that may experience LSEs from house building, are those located outside rather than inside the National Park given the recreation and tourism 'pull' that the National Park has.

7.39 Whilst there may be a small number of National Park residents who visit protected sites outside of the National Park, it is not considered that the proposed levels of new housing would increase this number, and therefore there are no LSEs.

7.40 A description of protected sites outside of the National Park boundary are in Appendix Two.

8. Screening of the Draft Local Plan outcomes and spatial objectives, and policies

8.1 The Draft Local Plan outcomes and spatial objectives, and policies (see 3.18 Table One for the list) were all screened for their potential LSEs on Protected Sites, a total of 6 Outcomes and 71 Policies.

8.2 Each outcome and objective, or policy was screened with reasoning provided for whether it was screened in or out. For each one screened in, sources and pathways were listed. The screening process also included details were appropriate setting out what the screening conclusions were for the Preferred Approach HRA to assist the reader in understanding the Local Plan review HRA process up to this point. General comments were made, where appropriate. Please refer to Appendix Three for details and the results of the screening.

9. HRA Stage One conclusion

9.1 All protected sites located within the Peak District National Park boundary have been screened in and all protected sites located within 15km and 24.4km of the National Park boundary have been screened out for the reasons set out in section 8 of this report.

9.2 In summary, the LSEs to the Protected Sites and functionally linked land likely to occur are considered to be a result of increased visitor pressure as a result of the new housing built within the National Park, recreation and tourism development from overnight stays and new housing, development of recreation hubs and attractions and increased visitor numbers, increased/changing agricultural practice and development, mineral development, development relating to highways, and telecoms development.

9.3 The screening of the Draft Local Plan, a total of 6 Outcomes and 71 Policies, identified 52 policies that were screened in for an appropriate assessment. This was mainly because of integral mitigation within the policies. Under the ECJ Case C-323/117 (2018) case law, integral capacity checks or cross-policy environmental safeguards cannot be used to screen out these risks at the screening stage; therefore, those policies were taken to the appropriate assessment stage in order to ensure the assessment process was robust.

10. HRA Stage Two - Appropriate Assessment

10.1 An appropriate assessment is Stage 2 of an HRA. It is a more detailed policy assessment of what the likely significant effects are on the conservation objectives of one or more protected

sites, and whether they can be avoided or minimised. The assessment carried out is appropriate for the nature and complexity of the Draft Local Plan.

10.2 If, following the appropriate assessment, the Draft Local Plan is still considered to have a significant effect on the conservation objectives of one or more protected sites, the HRA will move to Stage 3.

10.3 The HRA screening identified 52 policies that were taken forward to a Stage 2 Appropriate Assessment.

10.4 The Appropriate Assessment is set out in Appendix Four. Each policy has been taken through the Appropriate Assessment with reasoning as to what the potential LSE is as a result of the policy. The LSE is then reviewed against mitigation measures set out either within the policy itself or set out in other relevant policies within the Draft Local Plan.

11. In Combination

11.1 In accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended), this Habitats Regulations Assessment (HRA) evaluates whether the Peak District National Park Local Plan will result in an Adverse Effect on Site Integrity (AEOI) either alone or in combination with other plans, policies, and projects.

11.2 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.

11.3 The National Park is geographically surrounded by urban and industrial administrative areas therefore, the European sites within the National Park boundary are uniquely vulnerable to cross-boundary, cumulative pressures.

11.4 While individual small-scale developments under various chapters of this plan might have negligible effects on their own, their total combined pressures arise from multiple pathways. The screening process of the Draft Local Plan has identified potential LSEs increased visitor pressure as a result of; new housing built within the National Park, increased recreation and tourism development from overnight stays, more intensive use of public footpaths or established routes, increased car parking, and further development of recreation hubs and attractions. There could also be potential LSEs from agricultural development through built development to support the farm operation and through intensification of grazing from increased stock, mineral development, development relating to highways, and telecoms development.

11.5 The Peak District National Park presently has 11 constituent authorities and 4 combined authorities as shown on Figure 1:

- 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.)

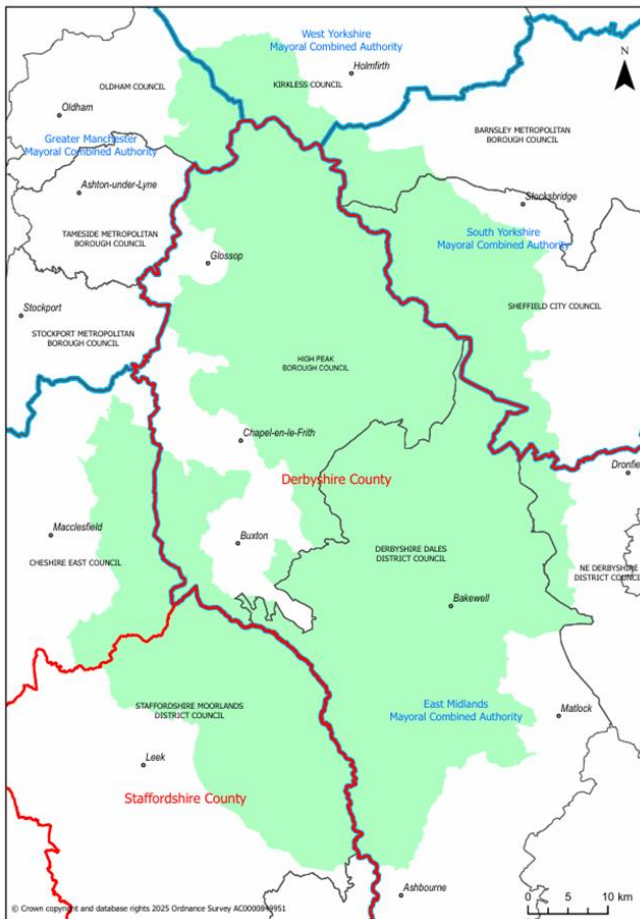
11.6 In addition the authorities listed above, the National Park shares a border with:

- Stockport Metropolitan District Council
- Tameside Metropolitan District Council

11.7 Other authority areas that are may have a potential impact are:

- Calderdale
- Chesterfield
- Manchester City Council

11.8 Figure One: Constituent and neighbouring Local Authorities



11.9 It can be concluded that all other plans, policies, and projects detailed within Appendix Four have appropriate mitigation in place and will not result in any adverse effect on the integrity of any internationally protected sites, either alone or in combination with the Draft Local Plan.

11.10 A residual risk for North East Derbyshire District Council (NEDCC) remains given the target of 12000 units. To secure a finding of No Adverse Effect on Site Integrity (NAOSI), it is recommended that the emerging NEDCC framework must include modifications that elevate standard green infrastructure into dedicated Suitable Alternative Natural Greenspaces (SANGS)

and mandate formal Strategic Access Management and Monitoring (SAMM) developer tariffs to absorb the regional recreation footprint.

11.11 It is considered that provided this mitigation is adopted, there will be no Likely Significant Effects on the protected sites.

12. Stage Two discussion and conclusion

12.1 It can be concluded that all policies detailed within this HRA report will not result in any adverse effect on the integrity of any internationally protected sites, either alone or in combination with other plans or projects. As such, the HRA concludes at Stage Two with no requirement to move to Stage Three.

12.2 Implications for Conservation Objectives

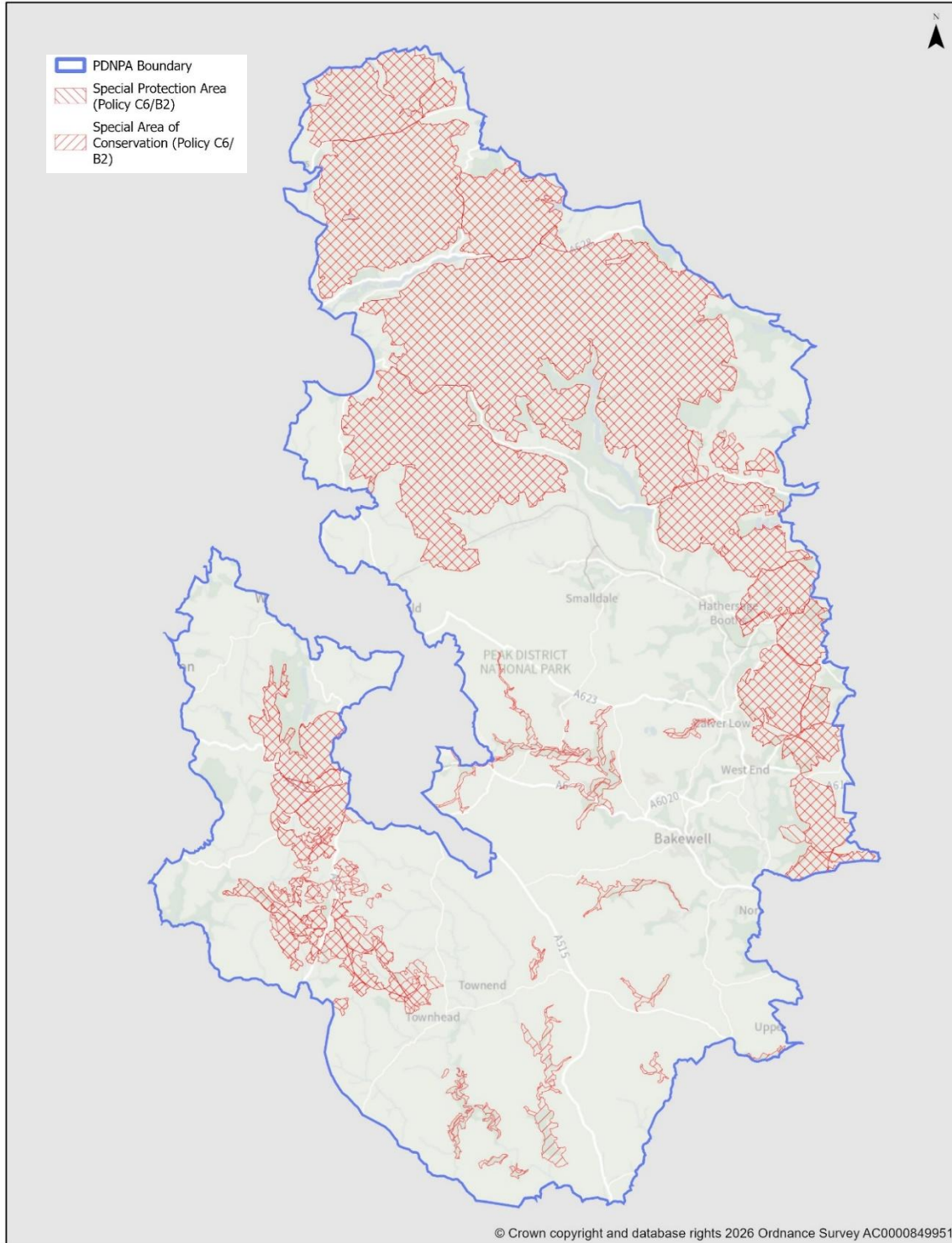
12.3 Details of the conservation objectives for each of the relevant Protected Sites and qualifying features scoped into the assessment are provided in section 7 of the report.

12.4 Without mitigation measures, detrimental impacts to the conservation objectives of the relevant Protected Sites, as a result of the policies identified in the Appropriate Assessment, cannot be entirely discounted. These could negatively affect the integrity of the Protected Sites in such a way that they are unable to achieve or maintain favourable conservation status of their qualifying features. Mitigation measures are detailed in Appendix Four.

12.5 Conclusions on Site Integrity

12.6 This Habitats Regulations Assessment has evaluated all policies and supporting text within the Peak District National Park Draft Local Plan. The screening stage identified potential risk pathways from physical local housing, economic extensions, rural land management, transport, and recreation and tourism provisions. These have been subjected to an Appropriate Assessment both individually and cumulatively, and an in-combination assessment.

Appendix One: Map of Protected Sites



APPENDIX 1: PROTECTED SITES

For further details please refer to www.peakdistrict.gov.uk/planning/policies-and-guides

Scale at A4: 1:250,000

Date: 26/06/2026



Appendix Two: Description of Protected Sites

Special Areas of Conservation within 15km of the National Park boundary

Bee's Nest and Green Clay Pits (Derbyshire)

The Bee's Nest and Green Clay Pits is designated for:

- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco Brometalia). (Dry grasslands and scrublands on chalk or limestone)
- Great crested newts *Triturus cristatus* occur in a number of ponds on site, which vary in size, profile and vegetation cover.

The site encompasses a series of silica sand pits supporting a complex mosaic of acidic and calcareous grassland, with small areas of heathland communities. There are also areas of open water, flushes and communities of disturbed ground.

Gang Mine (Derbyshire)

The Gang Mine (Derbyshire) is designated for:

- Calaminarian grasslands of the *Violetalia calaminariae*. (Grasslands on soils rich in heavy metals)

Gang Mine supports the richest anthropogenic Calaminarian grasslands of the *Violetalia calaminariae* (grasslands on soils rich in heavy metals) in the UK that have colonised a large area of mine workings and spoil heaps on limestone. Of note are metallophyte (metal tolerant) species like spring sandwort *Minuartia verna* and alpine penny-cress *Thlaspi caerulescens*. In the more closed grassland turf mountain pansy *Viola lutea*, the small fern moonwort *Botrychium lunaria* and lichens become more prominent. The more established turf has a calcareous grassland character including the uncommon limestone bedstraw *Galium sternerii* and unusually for this habitat dyer's greenweed *Genista tinctoria*. Many of these species are likely to be distinct genotypes adapted to soils rich in heavy metals.

Rochdale Canal

The Rochdale Canal is designated for:

- Floating water-plantain *Luronium natans*

The Rochdale Canal contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce floating water-plantain *Luronium natans*. The site also supports a diverse assemblage of aquatic flora, in particular nine species of pondweed *Potamogeton* spp. The plant communities found in the Rochdale Canal are characteristic of mesotrophic water bodies, i.e. those which are moderately nutrient-rich.

Denby Grange Colliery Ponds

The Denby Grange Colliery Ponds are designated for:

- Great crested newt *Triturus cristatus*.

This water body in Yorkshire, created by coal-mining activity, has consistently yielded high counts of great crested newt *Triturus cristatus* in recent years. The pond is surrounded by replanted ancient woodland, with adjacent anthropogenic habitat associated with the previous mining activities. A large new pond was created recently to help support the population, which was previously reliant on a single breeding site.

Within 24.4km of the National Park boundary

West Midlands Mosses

The West Midlands Mosses are designated for:

- Natural dystrophic lakes and ponds; Acid peat-stained lakes and ponds H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface.

The West Midlands Mosses comprise four sites supporting large basin mires which have developed as quaking bogs, known as Schwingmoors, together with a variety of associated hollows and pools showing various types and stages of mire development. This complexity of habitats gives rise to a diverse assemblage of associated plants and invertebrates of national significance, in particular at Clarepool Moss where the water quality is unusual for this type of site in being base-rich.

Special Protected Areas (SPAs)

Within 15km of the National Park boundary

South Pennine Moors Phase 2

The South Pennine Moors (Phase 2) are designated for:

- A098 *Falco columbarius*; Merlin (Breeding)
- A140 *Pluvialis apricaria*; European golden plover (Breeding)
- Breeding bird assemblage

Ramsar Sites ¹¹

Within 15km of the Peak District National Park boundary

Midlands Meres & Moses Phase 1

The Midlands Meres & Moses Phase 1 is designated for:

- The site comprises a diverse range of habitats from open water to raised bog
- Supports a number of rare species of plants associated with wetlands including five nationally scarce species together with an assemblage of rare wetland invertebrates (three endangered insects and five other British Red Data Book species of invertebrates).

Within 24.4km of the Peak District National Park boundary

¹¹ [Ramsar Sites | JNCC - Adviser to Government on Nature Conservation](#)

Midlands Meres & Mosses Phase 2

The Midlands Meres & Mosses Phase 2 is designated for:

- The site comprises a diverse range of habitats from open water to raised bog.
- Supports a number of rare species of plants associated with wetlands, including the nationally scarce cowbane *Cicuta virosa* and, elongated sedge *Carex elongata*.

Rostherne Mere

Rostherne Mere is designated as:

- One of the deepest and largest of the meres of the Shropshire-Cheshire Plain. Its shoreline is fringed with common reed *Phragmites australis*

Birds Species currently occurring at levels of national importance: Species with peak counts in winter: Great cormorant, *Phalacrocorax carbo*, Great bittern, *Botaurus stellaris*, Water rail, *Rallus aquaticus*.

Appendix Three: Results of the Draft Local Plan screening process

Following the Preferred Approach Screening of draft local plan policies and policy directions, further screening was undertaken of all the Draft Local Plan Outcomes and spatial objectives, core policies and policies. The screening conclusion identified the requirement for further policies to be assessed within the Appropriate stage. This was mainly because of integral mitigation within the policies. Under the ECJ Case C-323/117 (2018) case law, integral capacity checks or cross-policy environmental safeguards cannot be used to screen out these risks at the screening stage; therefore, those policies were taken to the appropriate assessment stage in order to ensure the assessment process was robust.

Spatial outcomes and spatial objectives		Screened In (includes NN)	Reason for Screened In	Sources and pathways	Screened Out (includes NN)	Reason for Screened Out	General comments
Outcome 1	A sustainable level of development where the Peak District's Special Qualities and resilience as a living landscape have been significantly enhanced				Y	Together the Local Plan outcomes allow for a sustainable level of development that supports nature recovery, and conserves and enhance where possible the Special Qualities of the National Park which includes Protected Sites.	
Outcome 2	The Peak District National Park is a resilient landscape in which nature, beauty, and cultural heritage are significantly enhanced				Y	The Local Plan seeks to protect and support nature and biodiversity. The Outcome has been amended to include reference to Wooded Landscape Plan.	

Outcome 3	The Peak District is a place where nature recovers and biodiversity flourishes				Y	The Local Plan seeks to protect and support nature and biodiversity.	
Outcome 4	Cultural heritage and the built environments of the National Park are conserved and enhanced as part of an every-changing landscape				Y	This outcome refers specifically to the built environment.	
Outcome 5	The Peak District is a welcoming place where all are inspired to enjoy, care for and connect to its special qualities				Y	This outcome refers specifically to people but acknowledges the need to care for the Special Qualities of the National Park which include wildlife and nature.	
Outcome 6	Peak District National Park communities are thriving and sustainable places where all generations can live healthy and fulfilled lives				Y	Together the Local Plan outcomes allow for a sustainable level of development that supports nature recovery, and conserves and enhance where possible the Special Qualities of the National Park which includes Protected Sites.	
Core Policies							
C1	Securing national park purposes (strategic policy)				Y	If development cannot achieve this overarching spatial objective, it shouldn't take place.	

C2	Sustainable development (strategic policy)				Y	If development cannot achieve this overarching spatial objective, it shouldn't take place.	
C3	Enhancing the National Park (strategic policy)				Y	If development cannot achieve this overarching spatial objective, it shouldn't take place.	
C4	Landscape character and Special Qualities (strategic policy)				Y	If development cannot achieve this overarching spatial objective, it shouldn't take place.	
C5	Conservation and enhancement of the landscape (strategic policy)				Y	<p>The Preferred Approach screened this policy in for the following reasons: Landscape sensitivity testing has been carried out with regards to settlement capacity however this did not include reference to biodiversity. Therefore, until ecological sensitivity testing has been completed the impact is unknown, therefore we take a cautious approach and screen in.</p> <p>This is a strategic environmental and landscape protection policy. It sets out criteria to conserve and enhance the Peak District's landscape character and "Special Qualities." It does not allocate land, authorize new</p>	

						development types, or promote growth. Because it lacks any mechanism to cause physical harm or generate environmental pressures (such as traffic or emissions), a Likely Significant Effect on any internationally protected site can be ruled out.	
C6	Biodiversity and nature recovery (strategic policy)				Y	Policy C6: Biodiversity and nature recovery requires development to conserve and enhance the National Park's ecological network including any sites, features or species of biodiversity importance, including their significance for nature recovery.	
C7	Cultural heritage assets of archaeological, architectural, artistic or historic significance (strategic policy)				Y	This policy is specifically about the heritage significance of a building. If development cannot achieve the overarching spatial objectives, it shouldn't take place.	
C8	Development strategy (strategic policy)	Y	Whilst this policy must be read with policy C6: Biodiversity and nature recovery it is screened in.	Development (greenfield and brownfield) Agricultural practices and development Air pollution Noise disturbance Light pollution Human activity relating to public access			Screened in following PA stage.

			<p>This strategic policy establishes the principle for physical development (housing, retail, business, and community facilities) within or on the edge of named settlements and hamlets. These activities generate clear pathways for potential significant effects on the South Pennine Moors SAC, Peak District Dales SAC, Peak District Moors (South Pennine Moors Phase 1) SPA or Peak District Moors (South Pennine Moors Phase 2) SPA. Under the ECJ Case C-323/117 (2018) case law, integral capacity</p>	<p>and disturbance (sport, leisure and recreation) Recreation and tourism (e.g. increased people and vehicular pressure) Invasive species and disease Domesticated animals Water pollution (surface and groundwater) Ground water depression or flow interception Decrease in surface water run-off e.g. through interception in a void Increase in surface water run-off Effects on functionally linked land Changes to predator/prey relationships Erosion Fire Risk</p>		
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			checks (Criterion B) or cross-policy environmental safeguards cannot be used to screen out these risks at this stage.			
C9	Settlement capacity and limits		.		Y	<p>C9 functions as a spatial control mechanism over potential settlement growth areas named in C8. Function is regulatory and lacks mechanism to cause a Likely Significant Effect.</p> <p>Screened in during PA stage but out following PA stage.</p>
C10	Development management principles				Y	<p>Previous screening at Regulation 18 stage raised the following concerns: Policy is screened in as the proposed direction has removed current policy DMC3 A and ii and iii, and reference to the requirement for a nature recovery plan in the development management policy. It is not clear how Policy Direction 1 cascades down into development management policies for biodiversity.</p> <p>The Draft Local Plan has addressed these concerns in C6, C10. A5,6,7 and 8, and B2.</p> <p>Core Policy C6 resists development that would have a harmful impact on biodiversity. Policy B2 protects and enhances sites, species and networks with reference to the mitigation hierarchy</p>

							<p>Policy C10 A.5 Address any risks posed by contaminated and unstable land.</p> <p>C10 A.6 Be water efficient and protector enhance the functionality of flood water storage and surface water conveyance corridors, in particular through the use of sustainable drainage systems.</p> <p>C10.A7 Prevent or minimise pollution to soil, air and water including by the achievement of nutrient</p>
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							<p>neutrality where applicable. C10.A8 Include nature friendly design and landscaping referring to the Peak District Nature Recovery Plan.</p> <p>In combination these policies address concerns raised.</p> <p>Regulatory policy to reduce environmental impact of development.</p>
C11	Design, siting, layout and landscaping				Y	Previous screening at Regulation 18 stage raised the following concerns:	

						<p>Policy is screened in as the proposed direction has removed current policy DMC3 A and ii and iii, and reference to the requirement for a nature recovery plan in the development management policy. It is not clear how Policy Direction 1 cascades down into development management policies for biodiversity.</p> <p>The Draft Local Plan has addressed these concerns in C6, C10. A5,6,7 and 8, and B2.</p>	
C12	Local infrastructure and developer contributions				Y	<p>Policy C12 covers all S106 agreements including those required for biodiversity/nature recovery.</p>	<p>C12. V(ii) green infrastructure, including for the maintenance and enhancement of access routes and the ecological network viii mitigation of recreational impacts on protected areas</p>

Biodiversity, Nature Recovery and Geodiversity							
B1	Protecting and managing the Natural Zone	Y	Criterion A(i) permits development for overriding interest. Therefore, a Likely Significant Effect cannot be ruled out. Under the ECJ Case C-323/117 (2018) case law, integral capacity checks or cross-policy environmental safeguards cannot be used to screen out these risks at this stage.	Direct habitat loss, fragmentation, localised construction disturbance to SPA birds, hydrological impacts.		The policy generally restricts development in the NZ and consequently Protected Sites. Any impact would be dealt with on a case by-case basis.	Screened in following PA stage.
B2	Protecting and enhancing sites, species and networks				Y	The policy generally restricts development and an HRA would be required.	
B3	Protecting irreplaceable habitat, trees, woodlands and hedgerows				Y	Reg 18 screened this out for the following reasons: Generally restricting development and an HRA would be required is a planning application was submitted. Agree with this reason.	

						Policy title now excludes walls. However, walls are classed as a landscape feature under B3. E and are also covered in Policy B2. A	
B4	Delivering nature recovery					<p>Y</p> <p>Screened out as the policy requires ecological enhancement to be delivered to benefit existing (which could be Protected Sites) and newly created habitats (which could include stepping stones for Protected Species). Development would have to accord with the Nature Recovery Plan, the respective LNRSs, the Landscape Strategy and the Wooded Landscapes Plan.</p> <p>Policy C6 is the strategic policy that supports B4 as it inherently mitigates against adverse impacts. Policy C2 B ii supports the protection of geodiversity.</p>	
Cultural Heritage							
CH1	Assessing the impact of development on designated and non-designated heritage assets and their setting					<p>Y</p> <p>Assessing the impact on development on designated and non-designated heritage assets and their setting is not relevant.</p>	

CH2	Conversion of a cultural heritage asset				Y	Determining whether a heritage asset is capable of conversion is not relevant.	
CH3	Listed Buildings				Y	Determining the impact of development on the significance of a Listed Building is not relevant.	
CH4	Conservation Areas				Y	Determining the impact of development on a Conservation Area is not relevant.	
CH5	Registered parks and gardens				Y	Determining the impact of development on the cultural heritage of Registered Park or garden is not relevant.	
Recreation and Tourism							
RT1	Recreation, environmental education and interpretation in and on the edge of settlements (strategic policy)	Y	Permits physical development on the edge of settlements generating potential impact pathways to South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and Peak District Moors (South Pennine Moors Phase 2) SPA and Peak	Increased recreational pressure, localised disturbance to SPA birds air quality (visitor traffic/parking, buildings on Greenfield land (localised construction impacts)			RT1 B iv addresses concerns raised in the Preferred Approach HRA which were: As written, the policy appears to be more permissive towards the second purpose of the National

			<p>District Dales (SAC)). Under the ECJ Case C-323/117 (2018) case law, integral requirement to assess likely effects on protected sites (Criterion B(iv) and manage visitor impacts constitute integral mitigation and can't be used to screen out.</p>			<p>Park. The policy needs strengthening with regards to first purpose and biodiversity.</p> <p>The policy is strengthened with regards to first purpose and biodiversity, but needs to go to AA because of inherent mitigation.</p>
RT2	<p>Recreation, environmental education and interpretation in the countryside (strategic policy)</p>	Y	<p>Under the ECJ Case C-323/117 (2018) case law, integral requirement to assess likely effects on protected sites (Criterion B(iii)(d) (likely effects on protected sites constitutes integral mitigation</p>	<p>Increased recreational pressure, localised disturbance to SPA birds air quality (visitor traffic/parking), localised construction impacts.</p>		<p>8.1 RT2 B iii d addresses concerns raised in the PA which were: Rec Hubs will be identified in the open countryside and support given to improved or expanded</p>

			<p>and can't be used to screen out.</p> <p>(Criterion C(i) states exceptional circumstances which could theoretically permit development and impacts on protected sites.</p>				<p>facilities is accepted in principle. Presumption in favour and impact unknown on Protected sites therefore we take a cautious approach and screen in.</p> <p>The policy is strengthened with regards to first purpose and biodiversity but needs to go to AA because of inherent mitigation.</p>
RT3	Hotels, bed and breakfast and self-catering accommodation (strategic policy)	Y	Supports physical growth and new commercial developments introducing direct	Traffic emissions, overnight recreational pressure wastewater volume (phosphates), (potentially			

			and indirect risk pathways	affecting the Peak District Dales (SAC))			
RT4	Holiday occupancy of self-catering accommodation	Y				Policy approach was screened out in the Preferred Approach.	Policy RT4.Ci covers first purpose Special Qualities and development would then be required to meet the policy requirements of C6 and B1 and B2 to make it acceptable, but required to go to AA because of inherent mitigation.
RT5	Caravans and camping (strategic policy)	Y	Supports physical growth introducing direct and indirect risk pathways. Under the ECJ Case C-323/117 (2018) case law, integral requirement to assess likely effects on nature	Traffic emissions, recreational pressure wastewater volume (phosphates), (potentially affecting the Peak District Dales (SAC)). Woodland fragmentation			Preferred Approach screened in this policy for the following reasons: Policy part A doesn't caveat National Park Special

			designations (A(v)) and nutrient neutrality (A(vii)) constitute integral mitigation and cannot be used to screen the policy out.				Qualities and there are concerns over the potential impact on nutrient neutrality. Required to go to AA because of inherent mitigation.
RT6	Holiday occupancy of camping, campervan and caravan sites				Y	The Preferred Approach screened out because the policy requires there to be no impact on National Park Special Qualities. Regulatory, providing restrictive framework.	
RT7	Facilities for keeping and riding horses	Y	Permits physical infrastructure and new commercial operations. Integral mitigation filters include Criterion v and Criterion vii. . Under the ECJ Case C-323/117 (2018) case law, integral	Recreational disturbance, habitat degradation, disturbance to nesting birds within SPA, nutrient enrichment and water quality (PD Dales)			The Preferred Approach HRA screened in this policy for the following reasons: Screened in as the policy lacks consideration of ecological

			<p>requirement to assess likely effects on nature designations constitute integral mitigation and cannot be used to screen the policy out.</p>				<p>impact therefore there could be impact on Protected Sites.</p> <p>The Draft Local Plan policy has addressed concerns raised and has been amended in RT7 v to state development must not have a negative impact on first purpose Special Qualities, protected sites, or neighbouring amenity. However, required to go to AA because of</p>
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							inherent mitigation.
Statement of Authority approach. Draft Local Plan section 8.8	Aires for motorcaravans (campervans) in car parks. (Not policy. May be referred to as RT8 in supporting documents)	Y	<p>Screened in. Although explanatory text it lays out a clear, targeted policy stance: the Authority explicitly recognises the value and supports creating overnight Aires for up to 48 hours.</p> <p>Concern about approach in section 8.8 due to increased overnight stays and impact on nutrient neutrality and Protected Sites. In particular paragraph 8.69 refers to an Article 4 Direction (A4D) if there is a negative impact on first purpose Special Qualities. The approach has no mitigation</p>	Water quality (chemical waste foul water disposal impacting rivers), recreational walking (including dogs) disturbance to SPA breeding birds, and light/noise pollution.			

			measures other than an A4D, which would only come into force once the negative impact has occurred and also the process of imposing an A4D is lengthy.				
Climate Change, Flood Risk and Sustainable Drainage							
CC1	Sustainable design and carbon reduction (strategic policy)				Y	<p>Policy was screened in for the Preferred Approach HRA for the following reasons: Screened in as there is concern about the impact of wind turbines, solar panels, ground source heat pumps etc.</p> <p>Screened out. Establishes mandatory design standards. Mechanism to regulate and improve energy efficiency of developments. No Likely Significant Effect.</p>	
CC2	Low carbon and renewable energy development (strategic policy)	Y	<p>Permits physical infrastructure generating potential impacts on protected sites.</p> <p>Include Criterion A (i) and A(ii) and</p>	Collision and other disturbance to birds of SPA, hydrological disturbance to watercourses, and habitat impacts through construction.		This policy was screened in for the Preferred Approach for the following reasons: There is a lack of reference to ecology and nature. As the impact is unknown.	Draft Plan Policy has addressed concerns in Policy CC2.Ai. which requires

			Criterion vii. Under the ECJ Case C-323/117 (2018) case law, integral requirement to assess likely effects on nature designations constitute integral mitigation and cannot be used to screen the policy out.				proposals to conserve and enhance biodiversity. However, required to go to AA because of inherent mitigation.
CC3	Flood risk (strategic policy)				Y	Policy was screened out for the Preferred Approach as the policy captures any risk to Protected Sites. This approach is maintained	
CC4	Sustainable drainage (strategic policy)	Y	Permits private sewage options creating risk pathway to protected sites. Integral mitigation required (B,C,D). Under the ECJ Case C-323/117 (2018) case law, integral requirement to assess likely effects on nature	Water quality, (phosphate loading), construction run off)		The Preferred Approach screened in this policy for the following reasons: Screened in. There is no reference to nutrient neutrality.	Although the policy is now screened out because Policy C10 A.vii states development must prevent or minimise pollution to soil, air and water including by the

			designations constitute integral mitigation and cannot be used to screen the policy out.				achievement of nutrient neutrality where applicable
Housing							
H1	Housing (strategic policy)	Y	Allows for new homes generating physical risk pathways to protected sites	Recreational pressure, urban edge disturbance (light/noise/predation) to SPA birds, and water quality (wastewater discharge)		The Preferred Approach HRA screened in this policy for the following reasons: Policy does not include consideration of impact on ecological impacts.	Required to go to AA because of inherent mitigation.
H2	Eligible housing need				Y	Screened out. Not relevant.	
H3	Local Connection Definition				Y	Screened out. Not relevant.	
H4	First Occupation of New Affordable Dwellings				Y	Screened out. Not relevant.	
H5	Second and Subsequent Occupation of Affordable Housing				Y	Screened out. Not relevant.	
H6	Residential dwellings to meet an essential need for a rural worker	Y	Permits physical construction. Potential impacts on protected sites.	Recreational pressure, urban edge disturbance (light/noise/predation) to SPA birds, and water quality (wastewater discharge)		The Preferred Approach HRA screened in this policy for the following reasons: The policy is permissive of essential worker dwellings without the consideration of whether land intensification has an adverse impact on ecological value. The policy has a presumption in	Screened in again due to inherent mitigation.

						<p>favour of agri/forestry development, however if this results in intensification it could have an impact on Protected Sites and in general would be contrary to NP objectives.</p> <p>On reflection intensification would have had to occur (which is outside of planning control) prior to a new dwelling being considered.</p> <p>In addition to this when the policy is read in combination with C6, C10, B1, B2 there is not considered to be any harmful impact to Protected Sites.</p>	
H7	Gypsy, Traveller, and Travelling Show People	Y	Required to go to AA because of inherent mitigation.	Recreational pressure, urban edge disturbance (light/noise/predation) to SPA birds, and water quality (wastewater discharge)		The Preferred Approach HRA screened out this policy for the following reasons: The policy requires exceptional circumstances and no harm to National Park Special Qualities.	Required to go to AA because of inherent mitigation.
H8	Building and extending a dwelling(s) to meet a person's own housing need				Y	The policy is screened out because strategic Policy H1A states the overriding consideration for all housing development is the conservation and enhancement of natural beauty, wildlife and	

						cultural heritage. Policy H8 must accord with this policy. Lacks mechanism to cause Likely Significant effect	
H9	Subdivision of residential buildings to create multiple residential units				Y	Screened out. Development would need to accord with Policy C10 which covers ecological constraints. Does not authorise new construction or impacts. Therefore, no Likely Significant Effects	
H10	Replacement Dwellings				Y	Site is already in residential use. Screened out as it is 'like for like'.	
H11	Ancillary accommodation	Y	Clause B permits physical construction of new-build residential units introducing potential risk factor pathways to protected sites.	Recreational pressure, urban edge disturbance (light/noise/predation) to SPA birds, and water quality (wastewater discharge)		Development would need to accord with Policy C10 which covers ecological constraints.	Required to go to AA because of inherent mitigation.
H12	Residential Gardens				Y	The Preferred Approach screened this policy in for the following reasons: The policy was screened in supports new development in residential gardens within a settlement and does not support new housing in residential gardens in the open countryside.	

						Policy is now screened out because Policy H12. B states In or on the edge of a settlement the development of residential gardens for housing is permitted for new local needs affordable housing providing there is no adverse impact on local settlement or landscape character, settlement form, biodiversity, or amenity.	
H13	Provision of Affordable Housing				Y	Screened out. Not relevant.	
H14	Making effective use of land for housing (development density)				Y	<p>The Preferred Approach HRA screened in this policy for the following reasons: There is potential that development could affect Protected Sites through increased domestic and recreation impact.</p> <p>Policy is screened out as the principle of development must first be established through Policy H1 which states in H1A that, the overriding consideration for all housing development is the conservation and enhancement of natural beauty, wildlife and cultural heritage.</p>	

						Design focussed, regulating the spatial element. No LSE.	
H15	Housing mix				Y	Screened out. Not relevant.	
H16	Housing size				Y	Screened out. Not relevant.	
H17	Primary Occupancy				Y	<p>The Preferred Approach HRA screened in this policy for the following reasons: There is potential that development could affect Protected Sites through increased domestic and recreation impact.</p> <p>Policy is screened out as the principle of development must first be established through Policy H1 which states in H1A that the overriding consideration for all housing development is the conservation and enhancement of natural beauty, wildlife and cultural heritage.</p>	
H18	Householder development				Y	<p>This policy was screened out in the Preferred Approach as it was not considered relevant.</p> <p>Screened out.</p>	
Rural economy							
E1	Business Development (strategic policy)	Y	In the Preferred Approach this policy was screened in for the	Water quality, air quality (emissions from increased traffic) and light			Required to go to AA because of

		<p>following reasons: There is concern over possible impact of farm diversification and business development on edge of settlements. As the impact is unknown, we take a cautious approach and screen in.</p> <p>Continue to screen in as impact is unknown and we take a precautionary approach and screen in.</p> <p>Framework to permit commercial and industrial expansion. This may introduce physical impact pathways to protected sites. Criteria D(3) and E rely on restriction</p>	<p>noise disturbance to SPA breeding bird population.</p>			<p>inherent mitigation.</p>
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			and conditions to mitigate. Under the ECJ Case C-323/117 (2018) case law, this constitutes as integral mitigation and cannot be used to screen the policy out.				
E2	Safeguarded Employment Sites				Y	Preferred Approach screened this policy out for the following reasons: Existing and proposed new safeguarded sites are not located close enough to a Protected Site to be considered to have an adverse impact. Screened out for the same reasons.	
E3	Extensions, alterations, or intensification of existing employment or business space	Y	Permitting physical development expansion into greenfield land (Criterion B(iii)) and the intensification of existing commercial activities (Criterion B) creating physical risk	Water quality, air quality (emissions from increased traffic) and light noise disturbance to SPA breeding bird population.		The Preferred Approach screened this policy out for the following reasons: Policy refers to nature recovery. The Draft Local Plan Policy E3 does not explicitly refer to nature recovery. However, it does state in the policy that; new development will be required to accord with the	Required to go to AA because of inherent mitigation.

			pathways to protected sites. Also implies HRA in Criterion A. Under the ECJ Case C-323/117 (2018) case law, this constitutes as integral mitigation and cannot be used to screen the policy out.			relevant strategic and design policies within the Local Plan. As such development must accord with strategic policy C6 and Policy B2.	
E4	Change of Use of employment/business sites				Y	Screened out. Policy E4.D states that development must also satisfies other relevant Local Plan policies. Other relevant policies would include Policy C6, C10, B1 and B2. Restrictive policy to prevent loss of existing business sites. Does not authorise new.	
E5	Agricultural, forestry or rural enterprise land management operational development	Y	Permitting physical structures and access tracks. Potential to impact Protected sites. (Criterion C relies on imposing a condition to protect National	Habitat impacts and soil erosion from access tracks, water quality (nutrient/slurry runoff), and predator/disturbance impacts to SPA birds.		The Preferred Approach HRA screened out this policy. Whilst the policy doesn't explicitly refer to Protected Sites or biodiversity. Draft Local Plan policies must be read in combination and as such Policy B2 is relevant and would resist	Required to go to AA because of inherent mitigation.

			Park's special qualities. In Criterion A. Under the ECJ Case C-323/117 (2018) case law, this constitutes as integral mitigation and cannot be used to screen the policy out.			harmful development that would adversely impact a Protected Site(s).	
E6	Farm Diversification	Y	Permitting physical structures Potential to impact Protected sites. (Criterion C relies on imposing a condition to protect National Park's special qualities. In Criterion A. Under the ECJ Case C-323/117 (2018) case law, this constitutes as integral mitigation and cannot be used to screen the policy out.	Water quality, (phosphate/nutrient loading), air quality emissions from increased traffic, and light disturbance to SPA breeding birds.		The Preferred Approach screened in this policy for the following reasons: Screened in as the impact would depend on what the diversification proposed is. For example, diversification on a farm that is located within or close to a Protected Site could have an adverse impact protected species. E6. C states: Development of new business, including extensions to existing business uses, should be accommodated successfully within the building group without adversely affecting the operational function and management of the farm as	Required to go to AA because of inherent mitigation.

						<p>the primary business, the valued character of the landscape, or any other first or second purpose Special Qualities.</p> <p>Draft Local Plan policies must be read in combination and as such Policy B2 is relevant and would resist harmful development that would adversely impact a Protected Site(s).</p>	
E7	Onsite farm anaerobic digestion and agricultural waste management	Y	Primary purpose is positive (Criterion A) but establishes framework for permitting physical structure across open countryside. Agricultural waste facilities emit localised atmospheric pollutants creating direct risk pathways to protected sites.	Air quality (ammonia NH3 emissions harming sensitive lichen, mosses, water quality, (phosphate/nutrient loading), and construction impacts on habitat.		<p>The Preferred Approach HRA screened this policy out for the following reasons The policy seeks to manage farm waste etc and have a positive effect. Not considered to impact Protected Sites.</p> <p>Policy E.7 A states that Applications for development associated with the appropriate and environmentally sensitive management of nutrients, slurry, manure and ammonia are supported in principle</p>	Required to go to AA because of inherent mitigation.
E8	Homeworking				Y	Screened out. Not relevant.	
Shops, other town centre uses, community services and facilities							

S1	Shops, other town centre uses, community services and facilities in settlements				Y	Screened out. If a proposal was near to a Protected Site(s).	
S2	Shops and other town centre uses in the open countryside				Y	Screened out. If a proposal was near to a Protected Site(s).	
S3	Impact assessment for shops, other town centre uses and community services and facilities				Y	Screened out. Not relevant.	
S4	Change of use of shops, other town centre uses, community services and facilities				Y	Screened out. Not relevant.	
S5	Provision and retention of community open space, sport and recreation sites and facilities				Y	Screened out. If a proposal was near to a Protected Site(s).	
S6	Local Green Spaces				Y	The Preferred Approach screened this policy out for the following reasons: Policy supports the retention of local green spaces that could include nature linkages. Screened out.	

S7	Outdoor advertising				Y	Screened out. Not relevant.	
Minerals and waste							
M1	Minerals development (strategic policy)	Y	Supports extensions of time and establishes framework for exceptional new mineral operations / waste facilities. Minerals and waster policies rely on inherent mitigation to manage impacts. Under the ECJ Case C-323/117 (2018) case law, integral mitigation cannot be used to screen the policy out.	Groundwater drawdown, heavy sediment runoff affecting river quality, atmospheric dust N02 deposition, and vibrational/noise disturbance to SPA birds			Requires AA as inherent mitigation
M2	Fluorspar proposals (strategic policy)			Drawdown, heavy sediment runoff affecting river quality, atmospheric dust N02 deposition, and vibrational/noise disturbance to SPA birds	Y	The Preferred Approach screened this policy out for the following reasons: Requires any environmental impact to be appropriately mitigated. Screened out.	
M3	Building and roofing stone (strategic policy)			Drawdown, heavy sediment runoff affecting river quality, atmospheric dust N02 deposition, and	Y	The Preferred Approach screened this policy out for the following reasons: Requires	

				vibrational/noise disturbance to SPA birds		any environmental impact to be appropriately mitigated. Screened out.	
M4	Restoration and aftercare	Y				The Preferred Approach screened this policy out for the follow reasons: The policy requires biodiversity enhancement.	Requires AA as inherent mitigation
M5	Mineral safeguarding (strategic policy)	Y				The Preferred Approach screened this policy in for the following reasons: Policy safeguards sites within Protected sites. The policy is now screened out because the Draft Local Plan Policy M5 'applying the policy' text states: The Policy safeguards areas that are within protected sites. Any application would be considered under Policy B2 Protecting sites, species and networks. This sets out at Clause B that development proposals that are likely to adversely affect internationally protected sites (Special Areas of Conservation, Special Protection Areas, Ramsar Sites or candidate and formally proposed versions of these designations) will be refused	Requires AA as inherent mitigation

						permission except where there are imperative reasons of overriding public interest why the proposal should proceed and adequate compensatory provision is secured. A Habitats Regulations Assessment is required where there is potential for development proposals to cause a significant adverse effect.	
W1	Waste Management (strategic policy)				Y	The Preferred Approach screened this out because the policy states that new or expanded facilities will not be permitted. Restoration and after use/management has to contribute to biodiversity values. Continue to screen out.	
HW1	Redevelopment of Hope Works				Y	Screened out. Policy requires consideration of in the context of the wider policies within this development plan, and any development is required to be conservation led and consider biodiversity.	
MW1	The justification for minerals and waste development				Y	The Preferred Approach screened out this policy. The policy includes a caveat that consideration includes any detrimental effect on the	

						environment and evidence is sufficiently robust. Policy MW1.B looks at impact and enhancement.	
MW2	Waste management facilities				Y	The Preferred Approach screened in this policy for the following reasons: The policy doesn't set out explicitly the potential impact on ecology. The Draft Local Plan Policy MW2 is screened out because MW2. C states that any development of small-scale waste management facilities must be in accordance with or do not undermine the achievement of Local Plan Core Policies. This would include the requirements of Policy C6: Biodiversity and nature recovery.	
MW3	Impacts of minerals and waste development on amenity				Y	The Preferred Approach screened this out as it was not considered relevant. Screen out.	
MW4	Impact of minerals and waste development on the environment				Y	The Preferred Approach screened this policy in as it was considered that the policy does not provide sufficient safeguarding of Protected sites.	

						<p>The HRA recommended including the use of ecological receptors.</p> <p>The Draft Local Plan Policy MW4i includes reference to the risk and impact on environmental receptors, including from any pollution.</p> <p>Screened out.</p>	
MW5	Cumulative effects of minerals and waste development				Y	<p>Policy is screened out for the same reasons as considered in the Preferred Approach: The policy considers cumulative impact as set out within the Habitat Regulations.</p> <p>Screened out.</p>	
MW6	Ancillary minerals development	Y				<p>This policy was screened in for the Preferred Approach because the policy does not reference environmental impact. There could be impact to the Protected Sites from the removal of plant machinery.</p> <p>Draft Local Plan Policy MW6 states that: If it is considered that development may affect a Protected Site (for example the operation of machinery) then</p>	Requires AA as inherent mitigation

						Policy B2 <i>Protecting sites, species and networks must be applied.</i> This sets out at Clause B that development proposals that are likely to adversely affect internationally protected sites (Special Areas of Conservation, Special Protection Areas, Ramsar Sites or candidate and formally proposed versions of these designations) will be refused permission except where there are imperative reasons of overriding public interest why the proposal should proceed and adequate compensatory provision is secured. A Habitats Regulations Assessment is required where there is potential for development proposals to cause a significant adverse effect.	
MW7	Processing of building and roofing stone				Y	The Preferred Approach screened out this policy for the following reasons: The policy includes a suitable caveat to protect the environment. Continue to screen out.	
Transport							
T1	Reducing the general need to travel and	Y	Screened in as inherent mitigation	Recreational disturbance (human/dog) to SPA		The Preferred Approach screened this policy out.	All Transport policies

	encouraging sustainable transport (strategic policy)		within all transport policies. Under the ECJ Case C-323/117 (2018) case law, integral mitigation and cannot be used to screen the policy out. Physical risks to pathways to protected sites.	breeding birds. Localised habitat loss/fragmentation, and construction run off affecting river quality.		Draft Local Plan Policy T1. A states; Conserving and enhancing the National Park's first purpose Special Qualities will be the primary criterion in the planning and design of transport and its management.	screened in as they require AA because of inherent mitigation.
T2	Reducing and directing traffic (strategic policy)	Y				The Preferred Approach screened this policy out. Draft Local Plan Policy T2.A states 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.	All Transport policies screened in as they require AA because of inherent mitigation.
T3	Cross-park roads (strategic policy)	Y				The Preferred Approach screened out this policy because it refers to the protection of Special Qualities.	All Transport policies screened in as they require AA because of

					<p>The supporting text requires the application of T2.B which requires Transport developments which increase the amount of cross-Park traffic or adversely affect the National Park's first purpose Special Qualities, the valued character of its landscape setting and the amenity and enjoyment of the National Park will not be supported unless there are exceptional circumstances of national public interest and there is a demonstrable long-term net environmental benefit within the National Park.</p>	<p>inherent mitigation.</p>
T4	Local road improvements	Y			<p>The Preferred Approach screened out this policy because it refers to national and international designations and refers to the protection of Special Qualities and a requirement for mitigation measures and where possible enhancement to mitigate impact on first purpose Special Qualities.</p> <p>Applying the policy text states: Section 245 of the Levelling up and Regeneration Act (2023)</p>	<p>All Transport policies screened in as they require AA because of inherent mitigation.</p>

					<p>places a statutory duty on Highway Authorities and other bodies in undertaking their duties to further the conservation and enhancement of the Peak District National Park's natural beauty, wildlife and cultural heritage. Large areas of the National Park are also subject to other conservation designations in relation to nationally and internationally important species and habitats; other regulations may apply in these locations.</p> <p>Highway Authorities and their agents are expected to consult with the Authority. Prior consultation enables a better understanding of any potential impacts and is more likely to result in a sensitively designed scheme with appropriate mitigation and enhancement. Provided that remedial works are planned at a scale and in a manner sympathetic to the setting, designation and other valued characteristics of the National Park and are inclusive of</p>	
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					<p>appropriate mitigation and enhancement, the Authority will be supportive of such schemes. Policy T4A sets out the relevant criteria in relation to this.</p> <p>A Schedule 2 Environmental Impact Assessment may be required for large-scale development or where a proposal would affect a designated site. In such cases planning permission may be required. The Authority will work constructively with Highway Authorities or Highways England to ensure that the planning application takes account of, and provides mitigation for, any impact on the National Park's first purpose Special Qualities. Where possible, an enhancement of the first purpose Special Qualities is required. Policy T4A also sets out the criteria to be met by the developers of such schemes.</p>	
T5	Managing the demand for freight transport (strategic policy)	Y			The Preferred Approach screened this policy out for the following reasons: The application of this policy will not	All Transport policies screened in as they

						take place near Protected Sites.	require AA because of inherent mitigation.
T6	Railway, light railway and guided bus development (strategic policy)	Y				<p>The Preferred Approach screened this policy out: The application of this policy will not take place near Protected Sites.</p> <p>Policy T6, Applying the policy states: Most applications will be major development and subject to the major development test set out in national policy. Core Policies should be applied. Core Policy C6 will apply, therefore Policies B1 and B2 will apply and require consideration of the mitigation hierarchy.</p>	All Transport policies screened in as they require AA because of inherent mitigation.
T7	Routes for walking, wheeling, cycling and horse riding and inland waterways (strategic policy)	Y				<p>The Preferred Approach screened in this policy because of concern over the risk to Protected Sites associated with A through the development of alternative routes. Also, better facilities could impact Protected Sites through increased/ intensification of use.</p> <p>Policy T7 supporting text to apply the policy states:</p>	All Transport policies screened in as they require AA because of inherent mitigation.

						<p>If it is considered that development may affect a Protected Site then Policy B2 <i>Protecting sites, species and networks</i> must be applied. This sets out at Clause B that development proposals that are likely to adversely affect internationally protected sites (Special Areas of Conservation, Special Protection Areas, Ramsar Sites or candidate and formally proposed versions of these designations) will be refused permission except where there are imperative reasons of overriding public interest why the proposal should proceed and adequate compensatory provision is secured. A Habitats Regulations Assessment is required where there is potential for development proposals to cause a significant adverse effect.</p>	
T8	Development affecting a public right of way	Y				<p>The Preferred Approach screened in this policy because there is a lack of ecological safeguards in policy part A.</p>	<p>All Transport policies screened in as they require AA because of</p>

							inherent mitigation.
T9	Traffic Management	Y				The Preferred Approach screened in this policy because the policy does not refer to minimising impacts on ecological and environmental receptors.	All Transport policies screened in as they require AA because of inherent mitigation.
T10	Business parking	Y				<p>The Preferred Approach screened in this policy because there is no reference to the impact this policy may have on Protected Sites. The policy only references visual impact.</p> <p>Draft Local Plan policy T10.A states Additional parking provision must be limited to that which is appropriate to the size of the development, its location, the visual impact of the car park and resultant parking, impact on designated sites, protected sites and any heritage assets.</p>	All Transport policies screened in as they require AA because of inherent mitigation.
T11	Residential off-street parking	Y				The principle of residential development on site has been established through Policy H1: The overriding consideration for all housing development is the conservation and enhancement	All Transport policies screened in as they require AA because of

						of natural beauty, wildlife and cultural heritage.	inherent mitigation.
T12	Visitor parking (strategic policy)	Y				<p>The Preferred Approach screened in this policy because the policy doesn't address indirect impact of new car parking provision and the movement of people into Protected sites.</p> <p>Draft Local Plan Policy T12 Bx states that the provision of new visitor parking will be assessed against their direct or indirect impact on Protected Sites.</p>	All Transport policies screened in as they require AA because of inherent mitigation.
T13	Air transport	Y				<p>The Preferred Approach screened in because of part B of the policy. The impact is unknown therefore we take a cautious approach and screen in.</p> <p>Draft Plan Policy T13 A. and B now addresses ecological considerations and Core Policy C6 and B1 and B2 would apply where relevant.</p>	All Transport policies screened in as they require AA because of inherent mitigation.
T14	Electric Vehicle Charging Points	Y				Requires EVCP to be within the curtilage of a dwellinghouse.	Requires AA as inherent mitigation

T15	Vehicular accesses to properties	Y			The policy focuses on highway safety and local character and amenity. The principle of developing a site will have been addressed in Policy H1 which states in H1.A. The overriding consideration for all housing development is the conservation and enhancement of natural beauty, wildlife and cultural heritage.	Requires AA as inherent mitigation
T16	Transport related wildlife severance	Y	While the policy Y16 seeks to restore ecological connectivity via wild bridges and tunnels, the policy is permissive towards wildlife severance. The policy does not go far enough to avoid wildlife severance and impact. Also, the policy only refers to vehicular traffic on the highway whereas wildlife severance could occur on PRowS. Under the ECJ Case C-323/117	Construction-stage sediment runoff affecting water quality, localised hydrological disruption (such as to bogs) and construction noise disturbing SPA breeding birds.		Requires AA as inherent mitigation

			(2018) case law, integral mitigation and cannot be used to screen the policy out. Physical risks to pathways to protected sites.				
Utilities							
U1	New or expanded water resource reservoirs (strategic policy)	Y				There is a presumption against new reservoir development including extensions to existing. The policy states that there must be exceptional circumstances which are set out in the NPPF as being: 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; the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	All utility policies screened in as they require AA because of inherent mitigation.

						The policy requires significant mitigation if development were to occur.	
U2	Development that requires new or upgraded service infrastructure	Y				<p>The Preferred Approach screened it out as it referred to the National Park Special Qualities.</p> <p>It also refers to Policy CC4 requiring sustainable drainage. Policy U2.B states Measures will be required to assess and prevent any impacts on nutrient neutrality resulting from the delivery of new sewer and wastewater connections.</p> <p>In addition to this when the policy is read in combination with C6, C10, B1, B2 there is not considered to be any harmful impact to Protected Sites.</p>	All utility policies screened in as they require AA because of inherent mitigation.
U3	New and upgraded electricity distribution networks (strategic policy)	Y				Policy U3.C states Any infrastructure and ancillary works or buildings should be located, designed and landscaped to minimise their impact on the National Park's first purpose Special Qualities, paying particular attention to built and cultural heritage, valued landscape character,	All utility policies screened in as they require AA because of inherent mitigation.

					habitats and on any other established activities. In addition to this when the policy is read in combination with C6, C10, B1, B2 there is not considered to be any harmful impact to Protected Sites.	
U4	Water networks (supply, treatment and wastewater) (strategic policy)	Y			Policy U4.A states Any infrastructure and ancillary works or buildings should be located, designed and landscaped to minimise their impact on the National Park's first purpose Special Qualities, paying particular attention to built and cultural heritage, valued landscape character, habitats and on any other established activities. In addition to this when the policy is read in combination with C6, C10, B1, B2 there is not considered to be any harmful impact to Protected Sites.	All utility policies screened in as they require AA because of inherent mitigation.
U5	Development close to utility installations	Y			The policy is not directly related to ecology and states that development would 'not permitted where it would present an unacceptable loss	All utility policies screened in as they require AA

						of amenity or risk to those using the development'.	because of inherent mitigation.
U6	Telecommunications infrastructure (strategic policy)	Y				<p>The Preferred Approach screened in the policy because there is no specific reference to ecology in the policy so we take a cautious approach and screen in as the impact is unknown.</p> <p>The supporting text states: If it is considered that development may affect a Protected Site (for example the installation or operation of equipment) then Policy B2 <i>Protecting sites, species and networks must be applied</i>. This sets out at Clause B that development proposals that are likely to adversely affect internationally protected sites (Special Areas of Conservation, Special Protection Areas, Ramsar Sites or candidate and formally proposed versions of these designations) will be refused permission except where there are imperative reasons of overriding public interest why the proposal should proceed</p>	<p>All utility policies screened in as they require AA because of inherent mitigation.</p>

					and adequate compensatory provision is secured. A Habitats Regulations Assessment is required where there is potential for development proposals to cause a significant adverse effect.	
U7	Restoration of utility and telecommunications infrastructure sites	Y			<p>Removing infrastructure might have an impact on Protected Sites so we take a cautious approach and screen in as the impact is unknown.</p> <p>If it is considered that development may affect a Protected Site then Policy B2 <i>Protecting sites, species and networks must be applied</i>. This sets out at Clause B that development proposals that are likely to adversely affect internationally protected sites (Special Areas of Conservation, Special Protection Areas, Ramsar Sites or candidate and formally proposed versions of these designations) will be refused permission except where there are imperative reasons of overriding public interest why the proposal should proceed and adequate compensatory</p>	All utility policies screened in as they require AA because of inherent mitigation.

					provision is secured. A Habitats Regulations Assessment is required where there is potential for development proposals to cause a significant adverse effect.	
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Appendix Four: Appropriate Assessment

Information on Relevant Sites

Details of the Relevant SAC and SPA, reasons for notification and condition of the sites and the qualifying features are provided in Section x

Potential Effects on Conservation Objectives

The table below: *Policy Assessment and Reasoning Conclusion and Recommendations*, includes each of the policies in the Draft Local Plan which were deemed in the Screening Assessment to require an Appropriate Assessment. This was largely because of integral mitigation within the policies. Under the ECJ Case C-323/117 (2018) case law, integral capacity checks or cross-policy environmental safeguards cannot be used to screen out these risks at the screening stage; therefore, those policies were taken to the Appropriate Assessment stage in order to ensure the assessment process was robust.

Any sections or policies that would not have an LSE on the Relevant sites because of Policy CP5 will trigger the requirement for an HRA at the project level, must be considered in the Appropriate Assessment. Full assessment of policies and their cumulative impacts can be found in the screening assessment.

Policy Assessment and Reasoning Conclusion and Recommendations

Policy	Assessment and Reasoning	Conclusion
Policy C8 Development strategy (strategic policy)	The geographical location of the named settlements in Policy C8 table against the boundaries of the SACs and SPAs have been analysed. 1) The settlements within Hope Valley (Hope, Bradwell, Hathersage) sit right beneath the South Pennine Moors SAC/SPA. Housing or business expansions here mean immediate, localised risk of recreational trampling and urban edge effects (noise, light, pets) on the sensitive breeding bird populations (Merlin and Golden Plover).	No Likely Significant Effects with proposed mitigation (C8, C9, B2 and Criterion D (v)(c))

	<p>2) The Wye Valley / Central settlements (Bakewell, Tideswell): These areas drain directly into the River Wye catchment. This is a critical pathway for the Peak District Dales SAC, which is highly sensitive to water quality and phosphate/nutrient loading.</p> <p>3) Smaller hamlets and villages close to the Peak District Dales SAC grasslands can be vulnerable to localised construction impacts or localized traffic pollution.</p> <p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • To mitigate potential localised urban edge impacts on the South Pennine Moors SAC/SPA resulting from development directed to the named settlements under policy C8, the Local Plan relies on the application of Policy C9 (Settlement Capacity and Limits) which restricts development to tight settlement boundaries, therefore ensuring the any development if functionally separate from a protected site (Criterion C). • Policy C8 contains integral safeguard under Criterion B, requiring all 	
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	<p>applications to demonstrate that ‘settlement capacity’ has been evaluated against ‘significant harm to first purpose special qualities’ (which includes the National Park’s biodiversity and international sites).</p> <ul style="list-style-type: none"> • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required. • Major strategic items such as Hope Works redevelopment (Criterion D (v)(c)) will be subject to a standalone Supplementary Plan which will require its own project level HRA. 	
<p>Policy B1 Protecting and managing the Natural Zone</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • The phrasing of Criterion A(i) mirrors the Habitats Regulations regarding Imperative Reasons of overriding Public Interest (IROPI). Any proposal using this policy within a Protected site cannot bypass the statutory HRA derogation tests. • The policy includes restricted 2 year consents (Criterion C(ii) to monitor ecological responses. • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required. 	<p>No Likely Significant Effects with proposed mitigation (C6, B2 and Criterion A(i).</p> <p>Overriding public interest test aligns with HRA derogation laws, meaning the Authority retains legal control to block unmitigated harm.</p>

<p>Policy RT1 Recreation, environmental education and interpretation in and on the edge of settlements (strategic policy)</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • The phrasing of Criterion B(iv) triggers a mandatory check on international site impacts • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required • Proposal generating new or increased parking must be cross assessed under the Plan’s strategic transport policies (Policy T12) 	<p>No Likely Significant Effects with proposed mitigation (B2, C6 and Criterion B(iv) and T12).</p>
<p>Policy RT2 Recreation, environmental education and interpretation in the countryside (strategic policy)</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • The phrasing of Criterion C(i) demands ‘compelling evidence of exceptional circumstances’ to justify location and enforces strict environmental capacity checks (Criterion B(iii) triggers a mandatory check on international site impacts. • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required 	<p>No Likely Significant Effects with proposed mitigation (C(i) Criterion B(iii), Criterion 1, .B2 and C6.</p>

	<ul style="list-style-type: none"> • Criterion C (11) explicitly supports small-scale developments designed to <i>reduce or mitigate visitor impact</i>. 	
<p>Policy RT3 Hotels, bed and breakfast and self-catering accommodation (strategic policy)</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • The phrasing of Criterion D limits new hotels to well-located brownfield sites and mandates an ecological assessment (Criterion D(v)) • Reinforced by policy C6 and the plan-wide sustainable design criteria which explicitly states the requirement for nutrient neutrality. • Internal rule that development must not create unacceptable ecological impact. 	<p>No Likely Significant Effects with proposed mitigation (Criterion D(v)), D(v), C6 and sustainable design guide criteria) Overall limits tourist development to strict ecological capacity thresholds and operates under binding plan-wide safeguards.</p>
<p>Policy RT5 Holiday occupancy of camping, campervan and caravan sites</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • (Criterion A(v)) and nutrient neutrality A(vii) (Internal rule) reinforced by policy C6 ensures that development must not create unacceptable ecological impact. 	<p>No Likely Significant Effects with proposed mitigation (A(v)) and nutrient neutrality (A(vii)) and C6.</p>

<p>Policy RT7 Facilities for keeping and riding horses</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criterion vii mandates a strict capacity check, dictating that the available bridleway network must not harm the area’s special qualities. • Reinforced by policy C6 	<p>No Likely Significant Effects with proposed mitigation (vii) and C6.</p>
<p>Policy CC2 Low carbon and renewable energy development (strategic policy)</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criterion A (i) and A(ii) mandates that all schemes should conserve and enhance biodiversity and the Park’s special qualities, along with application of mitigation principle), • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required 	<p>No Likely Significant Effects with proposed mitigation A (i) and A(ii) and Criterion vii and C6</p>
<p>Policy CC4 Sustainable drainage (strategic policy)</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criterion B, C, D) mandates strict environmental protection including nutrient neutrality • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required 	<p>No Likely Significant Effects with proposed mitigation B, C, D and C6</p>

<p>Policies H1, H6, H7, H11, H12 Housing</p> <p>*See below table for analysis of distance from settlements to Protected sites.</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Inherent mitigation criteria explicit compliance with National Park purposes and ecological safeguards including nutrient neutrality. • Reinforced by policy C6 	<p>No Likely Significant Effects with inherent mitigation and Policy C6.</p>
<p>Policy E1 Business development</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criterion G bans isolated commercial development in the open countryside • Criterion C restricts greenfield expansion to tight settlement edges. • Inherent mitigation criteria explicit compliance with National Park purposes and ecological safeguards including mandatory Nutrient Neutrality framework. • Reinforced by policy C6 and mandatory Nutrient Neutrality framework • Criteria D (3) and E 	<p>No Likely Significant Effects with inherent mitigation Criteria C, D (3) and E, and policy C along with the mandatory Nutrient Neutrality framework.</p>
<p>Policy E3 Extensions, alterations, or intensification of existing employment or business space</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criterion B(v) means that approved extension must be subservient • Reinforced by policy C6 and mandatory Nutrient Neutrality 	<p>No Likely Significant Effects with inherent mitigation B(v), alongside Strategic Policy C6 and B2 and HRA (B2).</p>

	framework and HRA requirements (reinforced in B2).	
Policy E5 Agricultural, forestry or rural enterprise land management operational development	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Reinforced by policy C6 and mandatory Nutrient Neutrality framework • Would be informed by project HRA (Policy B2) if Likely Significant Effect. • Criterion C ensures site specific construction plans. 	No Likely Significant Effects through inherent mitigation (Criterion C), alongside Policy C6 and mandatory Nutrient Neutrality/HRA frameworks (B2).
Policy E6 Farm diversification	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criteria A and B mandate that new business must be ancillary in function and operation to the agricultural or nature recovery business • Criterion C imposes that all development must be accommodated into existing building group • Reinforced by policy C6 and mandatory Nutrient Neutrality framework • Policy limits growth through Criteria A and B. 	No Likely Significant Effects through inherent mitigation (Criterion A, B and C) alongside Policy C6 and mandatory Nutrient Neutrality/HRA frameworks (B2).

<p>Policy E7 Onsite farm anaerobic digestion and agricultural waste management</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Criteria B mandate restrict restrictions capping operational size, feedstock volumes and vehicle movements • Reinforced by policy C6 and mandatory Nutrient Neutrality framework <p>Policy limits growth through Criteria A and B.</p>	<p>No Likely Significant Effects through inherent mitigation (Criterion B) alongside Policy C6 and mandatory Nutrient Neutrality/HRA frameworks (B2).</p>
<p>Policy E8 Aires for motorcaravans (campervans) in car parks. (Not policy. May be referred to as RT8 in supporting documents)</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Paragraph 9.69 establishes strict local mechanism: The Authority will deploy Article 4 Directions to strip exemptions and force full planning control if an operation threatens the National Park’s special qualities. • Reinforced by policy C6 and mandatory Nutrient Neutrality framework • Mandating no dog policy in breeding bird window (July-August) and prohibiting external lighting to safeguard bat foraging roots. 	<p>No Likely Significant Effects because the policy equips the Authority to use Article 4 along with Policy C6 and mandatory Nutrient Neutrality/HRA frameworks (B2).</p>
<p>Policies M1 – M5, W1, MW1-MW7 Minerals and waste</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Inherent mitigation criteria meaning explicit compliance with National Park purposes along with ecological 	<p>No Likely Significant Effects through inherent mitigation set out in each policy, alongside Policy C6 and mandatory Nutrient Neutrality/HRA frameworks (B2).</p>

	<p>safeguards such as strict project based HRAs and Construction and Environment Management Plans.</p> <ul style="list-style-type: none"> • Mandatory Environment Agency discharge consents. • Reinforced by Policy C6 	
<p>Policies T1, T2, T3, T4, T6, T7, T8, T9, T10, T12, T13 Transport</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Inherent mitigation criteria meaning explicit compliance with National Park purposes along with ecological safeguards such as strict project based HRAs and Construction and Environment Management Plans. • Mandatory Environment Agency discharge consents. • Impacts to protected sites and Functionally Linked Land will be addressed under Policies C6 and B2, as required 	<p>No Likely Significant Effects because the policy equips the Authority to use Article 4 along with Policy C6 and mandatory Nutrient Neutrality/HRA frameworks (B2).</p>
<p>Policy T16 Transport related wildlife severance</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Inherent mitigation – this policy explicitly aims to ‘preserve ‘habitat functionality and foraging routes. Its underlying intent is aligned with conservation. Criteria meaning explicit compliance with National Park purposes along with ecological safeguards such as strict project 	<p>No Likely Significant Effects with inherent mitigation alongside Strategic Policy C6 and statutory frameworks including Nutrient Neutrality and HRA (B2).</p>

	<p>based HRAs and Construction and Environment Management Plans. To ensure that the construction of the structures does not cause an AEOL, all proposals brought forward under Policy T16 remain strictly subordinate to Strategic Policy C6.</p> <ul style="list-style-type: none"> • Alongside ecological safeguards such as strict project based HRAs and Construction and Environment Management Plans. 	
<p>Policies U1-U7 Utilities</p>	<p>The mitigation included in the Local Plan is considered sufficient for the following reasons:</p> <ul style="list-style-type: none"> • Inherent mitigation criteria meaning explicit compliance with National Park purposes along with ecological safeguards such as strict project based HRAs (B2) and Construction and Environment Management Plans. • Reinforced by Policy C6 	<p>No Likely Significant Effects with inherent mitigation alongside Strategic Policy C6 and statutory frameworks including Nutrient Neutrality and HRA (B2).</p>

***Assessment of Housing Settlements in relation to Protected Sites**

The spatial analysis of the Local Plan's settlement strategy reveals that some identified settlements are in immediate proximity to European Protected sites, with settlements such as Flagg, Litton, and Over Haddon intersecting the boundary (0m) of the Peak District Dales SAC, and Froggatt and Hayfield intersecting the boundary (0m) of the South Pennine Moors SAC/SPA.

Due to these zero-distance and <500m distances, the principle of permitting housing development, including local-needs exception sites and custom self-builds, cannot rely on generic distance-based screening exclusions. The following settlements would automatically trigger a full Appropriate Assessment.

To prevent an Adverse Effect on Site Integrity (AEOI), the plan-wide framework targets specific mitigation. For the 13 settlements identified within the 500m critical threshold of the Peak District Dales SAC, any housing proposal that increases overnight accommodation is legally bound by the mandatory Nutrient Neutrality Framework.

For the 8 settlements identified within the 500m of the South Pennine Moors SAC/SPA, any housing delivery is strictly conditional upon passing project-level HRAs. This may include developer-funded visitor management infrastructure and mandatory mitigation to prevent disturbance to breeding bird territories from domestic or recreational pressure.

Settlements within 500m – 2000m would trigger project level HRAs primarily based on drainage, water quality and habitat and human impacts.

Over 2-24 km would trigger testing primarily regarding recreational impacts.

Appendix Five: In Combination

Authority	Relevant Plan	In-combination effects Y/N	Description of the in-combination effects	Mitigation Conclusion
East Midlands Mayoral Combined Authority	Growth allocations across the Derbyshire Dales and High Peak boroughs alongside regional strategies targeting a £1 billion increase in the visitor economy.	Y	Potential LSEs increased visitor pressure	<p><i>Destination Management Strategy</i> within the <i>Development Management Plan</i> to build infrastructure outside the park's boundaries relieving pressure from protected sites.</p> <p>Bound by nutrient neutrality and holiday let caps.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Greater Manchester Mayoral Combined Authority	<i>Places for everyone</i> Framework (Part of the Local Plan) allocating significant housing clusters on the Eastern Fringe (Oldham/Tameside).	Y	Potential LSEs increased visitor pressure. The <i>Places for everyone</i> document sets a combined target of 175,000 new homes and releases greenbelt. It presents direct and indirect impacts on protected sites.	<p>The Brownfield Strategy Mandate (Policy JP-Strat1 / JP-Strat5): The PfE framework does not allow uncontrolled, continuous sprawl toward the national park boundary. It enforces a strict, policy-backed preference for high-density regeneration inside the "Core Growth Area" and "Inner Areas".</p> <p>Local Planning Authorities (Oldham, Tameside) provide inherent mitigation such as Public Spaces Protection Orders (PSPOs) that legally prohibit open flames in upland areas and mandates for open spaces for any residential scheme exceeding 10 units, relieving pressure on protected sites.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>

<p>South Yorkshire Mayoral Combined Authority</p>	<p><i>South Yorkshire Growth Plan (2025-2035).</i> (Physical site allocations and localised development management policies are determined under the independent, adopted and emerging Local Plans for the constituent LPAs (Sheffield City Council and Barnsley Borough Council).</p>		<p>Potential LSEs increased visitor pressure. High density urban extensions within the western zones of Sheffield and Barnsley.</p> <p>Commercial and residential growth across South Yorkshire increases vehicle and freight use across the Pennines, adding to cumulative nitrogen deposition.</p>	<p>Enforces strict model of not promoting uncontrolled outward suburban sprawl towards National Park boundary. Instead, it enforces development and employment zones within central urban areas.</p> <p>Prioritising active travel links and sustainable rail infrastructure. (Promoting use away from cars, mitigating atmospheric emission increases).</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
<p>West Yorkshire Mayoral Combined Authority</p>	<p>Updated Local transport Plan (LTP)</p>	<p>Y</p>	<p>Potential LSEs increased visitor pressure through high density urban extensions within the western zones of Kirklees.</p>	<p>The LTP mandates carbon reduction framework that prioritises low-emissions public transport.</p> <p>Nature recovery corridors and sustainable drainage networks are required to be delivered for any transit related development, absorbing potential impacts on protected sites.</p>

			<p>Transport Plan promotes increased connectivity between West Yorkshire and Greater Manchester, in-combination traffic volume impacting air quality over the sensitive habitats of the South Pennine Moors SAC.</p>	<p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Chesterfield	Emerging Local Plan review	Y	<p>Potential LSEs increased visitor pressure through increased housing provision.</p> <p>Impacts on air quality potential LSE on European protected sites.</p>	<p>Spatial strategy centres development around walkable neighbourhoods and adopted design guides, ensuring new development within pre-existing boundaries.</p> <p>North Derbyshire and Bassetlaw housing Market Area joint statement of common ground agreement under which Chesterfield’s planning policies are collaborative with Natural England including monitoring of annual average daily traffic and nitrogen deposition near European sites.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>

Derbyshire	Statutory minerals and Waste Planning Authority for the county excluding National Park area) and the Strategic Highway Authority. Operates under Derbyshire Minerals Local Plan (currently under review).	Y	Quarrying and dewatering operations outside the park have potential to fracture deep carboniferous aquifers or disrupt local water tables. Potential to impact Peak District Dales SAC. Potential cumulative risk of atmospheric pollution.	<p>The Derbyshire Minerals Local Plan contains specific safeguarding policies. This forces fringe quarry operators applying for a permit to prove via independent hydrogeological modelling that extraction depth will not impact Peak District Dales SAC.</p> <p>Active statements of common ground between the Peak District National Park Authority and Derbyshire County Council regarding mineral sites ensuring extraction targets do not force intense operations.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Manchester City	Bound by Greater Manchester's <i>Places for everyone</i> Framework (Part of the Local Plan). Emerging Local Plan	Y	Potential LSEs through direct land take, increased visitor pressure and air quality impacts through increased housing provision (36,000-40,000 new homes).	<p>Under Draft policy SG12 new residential homes inside the city centre boundary must meet a density threshold of at least 200 dwellings per hectare, preventing urban sprawl.</p> <p>Development centred around expansion of mass transit system, steering towards low emissions sustainable travel.</p> <p>Urban Green Infrastructure mandated to satisfy open-space requirements.</p>

				Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.
Staffordshire	Statutory minerals and Waste Planning Authority for the county excluding National Park area) and the Strategic Highway Authority. Operates under adopted\minerals Local Plan.	Y	Quarrying or dewatering operations outside park have potential to fracture deep carboniferous aquifers or disrupt local water tables. Potential to impact Peak District Dales SAC. Potential cumulative risk of atmospheric pollution.	<p>Local Plan Policy NE1 enforces strict buffer protections along southwestern boundary. It uses green belt policies to prevent development creep e.g. towards The Roaches, keeping housing densities low along vulnerable upland fringes.</p> <p><i>SCC Local Transport Plan specifies freight routing protocols to direct long distance heavy industrial traffic away from narrow park roads to strategic highways away from the park's 200m critical load zones.</i></p> <p><i>SCC Minerals Local Plan contains safeguarding (such as Policy 4): Minimising impact of Mineral Development). Hydro geological modelling is required to show that extraction depth will not impact Peak District Dales SAC.</i></p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Stockport	Emerging Local Plan	Y	Potential LSEs through increased visitor pressure through allocation of thousands of new homes targeted on the eastern fringes within	<p>Stockport's Local Plan incorporates Adopted Neighbourhood Plans at the Eastern boundary zones. Statutory documents that mandate preservation of green corridors, rural buffer zones and density caps.</p> <p>Emerging Local Plan requires any residential scheme to enhance and connect directly with trail networks.</p>

			recreational areas of the Peak District. Not bound by wider Manchester targets to brownfield sites, development within commuter areas potentially resulting in impacts on air quality.	Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.
Tameside	Bound by Greater Manchester's <i>Places for everyone</i> Framework (Part of the Local Plan). Emerging Local Plan	Y	Potential LSEs through increased visitor pressure. Targeting 9,700 homes up to 2042. Site allocations include adjacent to the park	Emerging Local Plan, <i>Homes, Spaces Places</i> restricts home development to urban brownfield sites and town redevelopment. Under open space policies matching PfE Policy JP-G1, any high-density fringe housing scheme is required to restore, enhance and link to local linear trails which will prevent footfall pressure on the European Protected Sites. Developments are centred around existing railway hubs, which will encourage use of public transport rather than commuting in cars. Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.
Calderdale	Adopted Local Plan		Potential LSEs increased visitor pressure arising through housing allocation.	The Plan prioritises development within existing urban envelopes preventing urban sprawl and impacts on European Protected sites.

				<p>Under Policy GN3 the council will use developer finding mechanisms (Section 106/tariffs) to ensure housing delivery funds green infrastructure or measures to neutralise visitor impacts.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Derbyshire Dales District Council	Emerging Local Plan	Y	<p>Potential LSEs increased visitor pressure and short-term holiday lets.</p> <p>Contain primary 'honey pot corridors' Bakewell, Matlock, Chatsworth.</p>	<p>The emerging plan must co-ordinate with the Peak District National Park's plan to monitor the development of tourist and other accommodation and to mitigate if impacts are triggered.</p> <p>Transport Design Guide SPD) imposes modifications dictated by Peak District National Park Authority and funding focuses on park and ride buses in hubs such as Buxton.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
North East Derbyshire District Council	Adopted Local Plan under review looking to allocate 12,000 homes up to 2045	Y	<p>Potential LSEs increased visitor pressure, urban edge effects.</p> <p>Preferred spatial strategy prioritises high density growth in main towns such</p>	<p>Green Infrastructure Networks (Policy GI1). Any housing scheme on the fringes should protect and enhance existing wildlife corridors and connectivity. Local settlement gaps (Policy SS9/Strategic Protection). NEDDC enforces settlement gaps around northern and western fringes. These function as a buffer zone preventing urban sprawl and impacts on protected sites.</p> <p>However, while the adopted NEDDC Local Plan contains the above policy, the housing targets of 12000 units mean it may</p>

		<p>as Sheffield and Chesterfield. In combination with neighbouring frameworks such as the Sheffield Plan this creates cumulative effects on SPAs/SACs (disturbance to birds and degradation of habitats through erosion/wildfires).</p> <p>In combination with neighbouring authorities, transport expansions such as EMCCA, cumulative air quality impacts (Nitrogen deposition and ammonia) on Peak District Dales SAC.</p>	<p>not be possible to uphold Policy SS9, therefore, No Adverse Effect on a site's integrity can be screened out.</p> <p>Because preferred fringe site selections (such as Jordan Thorpe Parkway and Ridgeway allocations) encroach upon the 24.4km Zone of Influence, NEDCC's existing localised mitigation cannot independently dismiss an in-combination Likely Significant Effect (LSE).</p> <p><u>Recommendation</u> Consequently, to secure a finding of No Adverse Effect on Site Integrity (NAOSI), it is recommended that emerging NEDCC framework must include modifications that elevate standard green infrastructure into dedicated Suitable Alternative Natural Greenspaces (SANGS) and mandate formal SAMM developer tariffs to absorb the regional recreation footprint.</p> <p>No Adverse Effect on Site integrity in combination if recommended mitigation implemented in combination with mandates and inherent mitigation.</p>
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Staffordshire Moorlands District Council	Adopted Local Plan. Under review.	Y	<p>Potential LSEs increased visitor pressure and habitat impacts arising from housing development in areas adjacent to recreational catchment of Southwest landscape, (e.g. The Roaches Tittesworth)</p>	<p>The growth strategy prioritises brownfield sites to prevent urban sprawl and use of redundant mills as well as centring development vertically, preventing encroachment into the National Park’s edges.</p> <p>Works in alignment with Staffordshire’s County Council’s Local Transport Plan embedding active travel and transport strategies, to prevent over use of cars contributing to emissions.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
High Peak Borough Council	Local Development Scheme sets out planning policy documents that are in the pipeline for the Borough	Y	<p>Potential LSEs increased visitor pressure through housing allocation in Buxton and edge expansions in Glossop and Chapel-en-le-Frith</p> <p>Urban pressures including from commuters (e.g. Glossop and Buxton are surrounded by Peak District National Park.</p>	<p>The growth strategy prioritises brownfield sites to prevent urban sprawl and use of redundant mills preventing encroachment into the National Park’s edges.</p> <p>New allocations are clustered around existing rail corridors, guiding commuters to public transport with the addition of mandatory travel plan bonds.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>

			Potential impacts on air quality via Trans Pennine corridors.	
Sheffield City Council	Local Plan currently under examination. Emerging Plan indicates housing allocations particularly on the western fringe.	Y	Target for over 35,00 to 38,000 new homes Potential LSEs increased visitor pressure. Urban edge effects, potentially impacting functionally linked land on South Pennine Moors SAC/SPA given green belt allocations.	<p>Following detailed consultation with Natural England, Peak District National Park Authority and other organisations, a proportionate developer contribution will finance work within the National Park to prevent harm to European Protected sites.</p> <p>Although green belt is specified for development, the plan maintains brownfield first and allocation vertically within the urban core preventing urban sprawl.</p> <p>The design scheme mandates that any major residential scheme should enhance and integrate with local river and woodland/green infrastructure. This will ensure availability of local walks, preventing pressure on the European protected sites.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Cheshire East Council	Adopted Local Plan	Y	Potential LSEs increased visitor pressure.	<p>Project level HRA required</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Oldham Council	Emerging Local Plan complementing <i>Places for Everyone</i> Framework	Y	Potential LSEs increased visitor pressure. In proximity to South Pennine Moors SPA/SAC.	The South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint Supplementary Planning Document provides clear advice to developers as to what development may be considered an exception within the “Urban Edge Zone” (within 400m of the South Pennine Moors SAC/SPAs) where development would not normally be

			Risk of Wildfire, trampling, bird disturbance.	<p>acceptable, 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>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Kirklees Council	Adopted Local Plan	Y	Potential LSEs through increased visitor pressure deriving from housing allocations. Potential pressure resulting in bird disturbance on SPA and erosion of footpaths.	<p>Provision in Local Plan for the site allocations and safeguarded land sites that are within 2km of the South Pennine Moors SPA with potential to affect habitat that is functionally connected to the SPA is added to the relevant site allocations and safeguarded land sites in the Allocations and Designations document (for example in the 'constraints' section of the allocation boxes). It is specified that potential for physical loss or damage to functionally connected land and impacts on the qualifying bird species of the SPA, should be assessed, and avoided or mitigated as required prior to granting permission for the development of these sites.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
Barnsley Council	Adopted Local Plan (embedded strategically within the South Yorkshire MCA framework).	Y	Potential LSEs through increased visitor pressure through housing development.	<p>Policy SE15 (Peak District National Park fringe) ensures that any development proposal lying within the National Park must protect the landscape quality, views and ecological integrity. It restricts high density or visually intrusive developments.</p> <p>Policy SE6 Strategic Green Infrastructure mandates that any major residential infrastructure must provide open spaces, preventing immediate pressure on European Protected Sites.</p>

				<p>Highest densities of development are centred around transit areas such as M6 (away from the Peak District National Park.</p> <p>Subject to the mandates and inherent mitigation, no Adverse Effect on Site integrity in combination.</p>
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The cumulative impact of other Local Authorities policies such as the addition of an increase in residential units combined with transport policies, within the 24.4 km Zone of Influence creates a potential significant impact on protected sites. The ecological pressure manifests through the following pathways:

1. Trampling and Erosion: Physical degradation of sensitive heathland and blanket bog communities (SAC features), leading to habitat fragmentation and the expansion of bare peat.
2. Bird Disturbance: Urban edge-effects - primarily off-lead dog walking - causing increased flush rates, nest desertion, and reduced breeding success for ground-nesting birds (SPA features) during the critical March–July breeding window.
3. Wildfire Risk: Potential increased urban-fringe visitor volume and the frequency of anthropogenic moorland wildfire, threatening loss of notified habitats.
4. Impacts on air quality through nitrogen deposition (NO_x and NH_3)
5. Disruption to local water tables (through dewatering on mineral sites). (Potential to impact Peak District Dales SAC).

The above table has identified the potential impact pathways which in combination with the Peak District National Park's Local Plan could create an adverse effect on South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and Peak District Moors (South Pennine Moors Phase 2) SPA and Peak District Dales (SAC)).

The in-combination assessment has identified that there is potential for unmitigated Local plan review of NEDCC Local Plan to cause an adverse effect on protected sites. While the adopted NEDCC Local Plan protects a buffer zone, the housing targets of c. 12000 units may mean it is not possible to uphold Policy SS9, therefore, NEDCC's existing localised mitigation cannot independently dismiss an in-combination Likely Significant Effect (LSE).

Recommendation

The identified risks can be mitigated by following the recommendations and inherent mitigation of all the Authority Plans detailed in the table along with recommended mitigation. The implementation of mitigation would mean that the proposed plan, either alone or in combination, is reasonably unlikely to

contravene the Conservation Objectives or adversely affect the integrity of the relevant sites. Inherent mitigation embedded within policies of the relevant plans means that there will be no Likely Significant Effects on the protected sites.

A residual risk for North East Derbyshire District Council (NEDCC) remains given the targets of 12000 units. To secure a finding of No Adverse Effect on Site Integrity (NAOSI), it is recommended that emerging NEDCC framework must include modifications that elevate standard green infrastructure into dedicated Suitable Alternative Natural Greenspaces (SANGS) and mandate formal Strategic Access Management and Monitoring (SAMM) developer tariffs to absorb the regional recreation footprint.

It is considered that provided this mitigation is adopted, there will be no Likely Significant Effects on the protected sites.