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Q2.1 Do you agree with the proposed spatial plan objectives for sustainable development in a national park?

Submission Responses					IO24 Question 2.1
#	Consultee Id	Consultee Organisation	Consultation Point	Summary and PDNPA response	Do you agree with the proposed Local Plan spatial objectives for sustainable development?
S-226-1	1369 530	Environment Agency	2.1	Need to discuss spatial strategy and settlement strategy with Severn Trent Water because making use of managed sewerage systems will better control pollutants and meet NN requirement. Agree this is an important issue and will be considered.	
S-224-1	1369 634	Sheffield City Council	2.1	Support the objectives but need to recognise the National Park's proximity to large urban conurbations (compared to other national parks) and the opportunities/challenges arising from this. Agree that the spatial objectives should be amended to reflect this.	Yes
S-223-1	1369 632	Hartington Town Quarter Parish Council	2.1	Objectives supported. Support noted.	Yes

S-222-2 S-221-1	1369 631	TPT & Sustrans	2.1	Horse riding should also be included particularly as the Pennine Bridleway starts in the Peak Park and the area is home to the Trans Pennine Trail. Noted. The National Planning Policy Framework definition of green infrastructure this says that the network should be multi-functional.	No
	1369 595		2.1	Aligns with NPPF but questions whether economic growth/needs of modern society can be reconciled with environmental enhancement. Comments noted and will be further considered.	unsure
S-214-1 S-210-1	1369 550	Hope with Aston Parish Council	2.1	Support because align with NPPF and national park purposes. Support noted.	Yes
	1369 546		2.1	Agree in principle but need to explicitly reference other interpretations of sustainability such as resources and nature recovery. The economic and social well-being duty must be in support of the two 'objectives' (national park purposes?) and not an objective itself. In principle agreement noted. Nature recovery and reduced consumption of resources are references in the draft objectives. Primary legislation is clear that the Authority should have regard to the duty in fulfilling purposes. This is not undermined by setting out spatial objectives but consideration will be given to the wording of objectives.	Yes

S-207-1	1369 542	YoulgraveC ommunityL and Trust.	2.1	Agree with proposed objectives. Need to consider the existential threat posed by climate change, prioritise nature recovery and therefore consider a flexible and imaginative approach to green technology 'over' the preservation of the built environment. Agreement and comments noted. (Nature recovery and green technologies are also considered in 'landscape, biodiversity and nature recovery' and 'climate change' sections.) Imaginative approaches will be positively considered but the scope for flexibility or prioritisation of renewables 'over' cultural heritage is proscribed by national park purposes.	Yes
S-206-1	1369 541	Peak Cluster	2.1	Support somewhat but needs focus on economic development and recognise the contributions that Carbon Capture and Storage (CCS) (Peak Cluster) can provide. We recognise that sustainable development has an economic objective but the draft spatial objectives are also framed by legislation that sets out the Authority's duty to foster economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage). Specific reference to CCS will be considered.	No
S-203-1	1369 536	Tarmac	2.1	Does not support. Strategy is for conservation, not sustainable development. Sustainable management of development should be a thread through the plan. The role of Minerals development in achieving sustainable development should be recognised. We recognise that sustainable development has an economic objective, and that Minerals development will continue to be a significant aspect of the Peak District economy. However the draft spatial objectives are also framed by legislation that sets out the Authority's duty to foster economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage).	no

S-199-1	1369 530	Environment Agency	2.1	Agree somewhat but objectives should additionally refer to climate change resilience and flood risk. In particular to recognise the flood risk of existing properties and cultural heritage, and measures to help improve the resilience of these. Leek Moors SSSI should be included as a distinct spatial area. Comments regarding resilience noted and will be further considered. An updated Flood Risk Assessment will be undertaken. SSSIs, while not separately listed, are recognised as distinctly special spatial areas and already given specific policy protection by core Strategy L2.	Yes
	1369 528		2.1	Support because purposes take precedence over duty. Support noted.	Yes
S-195-1	1369 526	Derbyshire County Council	2.1	Support in principle because statutory purposes take priority. Concern that limiting development opportunities and focusing on certain areas will impact negatively in some communities. Should include stronger reference to climate change resilience - to heat, drought, wildfire etc. The Sustainability Appraisal will assess the impact of the spatial strategy on economic and social well-being, and guide decision-making. Comments re climate change resilience noted and will be considered.	Unsure

S-194-1	1369 525	Derbyshire Dales District Council	2.1	Not supported. Development of sustainable communities appears subservient to statutory purposes and does not align with the National Park Management Plan (NPMP) Aim 4. Objectives should have more focus on sustainable communities and refer specifically to NPMP. We recognise that sustainable development has economic and social objectives but the draft spatial objectives are also framed by legislation that sets out the Authority's duty to foster economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage). We will further consider to what extent spatial objectives align with and/or refer directly to the NPMP.	No
S-192-1	1369 523	Mineral Products Association	2.1	Not supported. There is insufficient regard to economic and social considerations, contrary to the NPPF definition of sustainable development. We recognise that sustainable development has economic and social objectives but the draft spatial objectives are also framed by legislation that sets out that the Authority's duty to foster economic and social well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage).	No
S-188-1	1369 508	SMDC	2.1	Limited support. Concerns around sustaining communities, the lack of well-paying jobs and the closure of quarries. Concerns noted and will be further considered. We recognise that sustainable development has social and economic objectives but the draft spatial objectives are also framed by legislation that sets out that the Authority's duty to foster social and economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage).	

S-186-1	1369 505		2.1	Not supported. Objectives do not provide adequate framework to address climate and nature emergency. Objectives need to better integrate spatial and transport planning and high quality alternatives to the car. Vision lacks urgency. Addressing the climate and nature crises should be second objective. Comments noted and will be further considered. The Authority is somewhat constrained by the duty to prioritise national park purposes. The Vision and the non-spatial climate change objectives are set by the National Park Management Plan.	No
	1369 502	Devonshire Group	2.1	Supported. Captures the multiple challenges of sustainable development in a national park. Support noted.	Yes

S-184-1 1369 500	Hope Valley Climate Action	2.1	Not supported.Does not adequately or urgently address the climate emergency.Should recognise that the first purpose can only be achieved through radical new approaches to planning decisions.Should include: a specific objective to rapidly reduce/eliminate fossil fuel use.significant increase in renewable energy generation.carbon sequestration (not carbon capture) increased wherever and whenever possibleintegration of spatial and transport planninghigh quality alternatives to the car.policies related to climate change adaptation (eg flood water management, infrastructure storm proofingFirst purpose cannot be achieved with the landscape as it is.Must test proposals against NPPF requirement to 'shape places in ways that contribute to radical reductions in greenhouse gas emissions ...'Vision should be that we are exemplary now, not 2043.Plan must recognise uncertainties such as tipping points, weather events, changing technologies. Comments noted and will be further considered. The Authority is somewhat constrained by the duty to prioritise national park purposes. We do however acknowledge the tension between some aspects of landscape conservation/Special Qualities and the goal of nature recovery and carbon sequestration. This tension will be resolved by the National Park Management Plan (NPMP) process. The Vision and the non-spatial climate change objectives are properly set by the NPMP and reflected in the spatial objectives and planning polices in the local plan.	No

S-183-1	1369 499	United Utilities	2.1	Support Objectives. Wish to assess any possible future development to determine land interests or easements and address in any site specific policy. Recommend policy that identifies the need to engage with statutory undertaker for water to determine whether any proposal is on land used for public water supply. Wind energy developments should be located to minimise impacts on water supply. Recommend the following policy "Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are located on catchment land used for public water supply, careful consideration should be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification of any required mitigation measures including a site management plan." Groundwater Source Protection Zones - need to ensure protection from pollution and locate development sites away from Zones. Recommend standalone policy. Noted and will be further considered.	Yes
	1369 498	Hathersage Parish Council	2.1	Support. Policies to support first purpose should be more evident throughout the plan, in particular regarding recreation and tourism. Noted and will be further considered.	Yes
	1369 497	BakewellTo wnCouncil	2.1		
	1369 490	The Coal Authority	2.1	Support the continued inclusion of a policy which addresses land instability. Noted.	

S-173-1	1369 488	Land & Nature Team (PDNPA)	2.1	Not supported. Bullet 2 - should refer to Sandford principle. Bullet 5 - should include promoting climate change adaptation Include additional bullet 'reduces carbon and methane emissions' Noted and will be further considered.	No
S-168-1	1369 470	Railfuture	2.1	Support but does not go far enough Reducing the need to travel must not weaken economic development or the viability of public transport. PDNPA focus on first purpose should not detract from economic and environmental benefits that rail can bring. Objectives do not adequately address rail. Principal railways stations should be cycling hubs. Noted and will be further considered. The National Park Authority must seek to foster the economic and social well-being of local communities in perusing the statutory purposes (our emphasis) of a national park.	Yes
S-166-1	1369 468	Breedon	2.1	Does not agree. Not address NPPF para 32. Skewed towards regulation and management. NPPF says national parks have highest status of landscape protection. Draft objectives makes reference to supporting business development.	No

S-165-1	1369 466	Taddington & Priestcliffe PC	2.1	Unsure. Second objective should be included in the list (one objective). Separate bullet point for thriving and sustainable communities. Duty to foster social and economic well-being is not just related to development. Objectives should take into account the impact on local communities of new development, visitor pressure, behaviour, haulage, cross park travel. Noted and will be further considered. It is accepted that that the duty refers to wider issues, however the spatial objectives in a local plan should properly only refer to the use and development of land.	unsure
S-163-1	1368 617		2.1	Support. Should refer to Sandford Principle to clarify how PDNPA would respond to conflict. Bullet 3 - query whether 'responsive to' a strong enough term. Noted and will be further considered.	Yes
S-162-1	1369 460	HPBC	2.1	Unsure. It is questioned whether communities can be sustained due to the lack of well paying jobs and potential quarry closures. Noted and will be further considered. Current policies support all kinds of business development and we will commission further research to understand the new economic challenges and opportunities, and the implications of this for new planning policy.	unsure

S-161-1	1369 459	CPRE Peak District & South Yorkshire	2.1	Does not support.Objectives do not adequately address (are silent on) climate change and increased visitor numbers.Should have explicit objectives (and strategy/policy) for reducing carbon, especially in new development. Suggest inclusion of 'reduces carbon emissions in new development in line with national targets for net zero by 2050'.The changes proposed do not go far enough to support transition to a low carbon future and meet mandatory emissions targets - this needs to be addressed in policy as any future design code will not go far enough. Noted and will be further considered. The proposed Spatial Objectives for 'Climate Change and Sustainable Building' address 'the transition to a low carbon future'. The issue of increased visitor numbers has been considered and addressed in the proposed spatial objectives and policy options for 'Recreation and Tourism' and 'Travel and Transport'.	No
S-158-3	1369 452	TPT & Sustrans Joint Response	2.1	Does not support. Horse riding should be mentioned alongside walking and cycling. Noted and will be further considered. The reference to walking and cycling is within a footnote definition of blue and green infrastructure, as an example only. Recreation routes are another example.	No
S-154-1	1369 442		2.1	Not supported. Objectives should reflect that 'enjoyment' of the National Park has changed, for example more visitors, at more times of the years, social media influences (specific places and activities), congestion, parking and litter. Noted and will be further considered. These issues are reflected in the the objectives and policy options for 'Recreation and Tourism' and 'Travel and Transport'.	No

S-151-1	1369 433		2.1	Unsure. Housing on greenfield sites should not be happening, there is no data on need. Brownfield sites are not mentioned. Too much regard for car users and car parks. No mention of limiting HGVs, public transport or rail improvements. Little reference to biodiversity (and no reference to the loss of certain bird species), heather burning, grouse shooting, sheep farming. Noted and will be further considered. The data on housing need is set out in the 'Housing', section which was taken from the 2023 consultant's report 'Population Projection and Housing Needs Assessment'. The development of brownfield land is permitted by current policies that will be brought forward. The Authority is not responsible for managing traffic, providing public transport or any aspect of land management (other than on land owned by the Authority.) Objectives for biodiversity are set out in the section on 'Landscape, biodiversity and Nature Recovery'.	Unsure
S-150-1	1369 431		2.1	Unsure Detail is not sufficient to support the ambition. Control measure already in place have had a negative effect on the economy and the countryside, eg from the impact of tourism and badly maintained older properties. Noted. Objectives are set out separately for other topic areas.	Unsure
S-147-1	1369 428	The Campaign for the Peak Line	2.1	Support. Objectives are timid proposals that do not respond adequately to the rising number of visitors projected in the McKinsey reports, the surrounding conurbations, and the implications of climate change. Any net increase in parking spaces is admission of strategic failure regarding conservation and sustainability. National Park purposes and the Sandford Principle are not adequate for the challenges. Noted and will be further considered.	Yes

S-140-2	1369 412	Hope and Derwent Woodlands Parish Council	2.1	UnsureThere are too many restrictions that will have the effect of stifling innovation, business development and local ideas. Noted and will be further considered. Current policies support all kinds of business development and we will commission further research to understand the new economic challenges and opportunities, and the implications of this for new planning policy.	unsure
S-137-19	1369 370	Derbyshire ALC	2.1	Support. Support noted.	Yes
S-134-8	1366 865	RSPB	2.1	Support. Development should not just promote nature recovery etc (bullet 5), but seek to deliver these things. Noted and will be considered.	Yes
S-133-2	1369 350		2.1	Unsure. A new town or garden village should be considered at Newhaven where the A5012 joins the A515. Noted. Such development would be contrary to the National Planning Policy Framework which states at paragraph 189 that the scale and extent of development should be limited.	Unsure
S-128-27	1369 275	Rural Action Derbyshire	2.1	Not supported. Does not give sufficient focus to the economic and social objectives of the National Planning Policy Framework (NPPF). Noted. We recognise that sustainable development has social and economic objectives but the draft spatial objectives are also framed by legislation (as well as the NPPF) that sets out that the Authority's duty to foster social and economic well-being is delivered in pursuance of national park purposes (to conserve and enhance natural beauty, wildlife and cultural heritage).	No

			Supported. National park purposes correctly referenced but objectives also recognise the need for homes, businesses and community facilities.	
S-118-1	1369 267	Haddon Estate	2.1 Support noted.	Yes
S-117-1	1369 166		2.1 Supported. Support noted.	Yes
S-113-1	1369 153	Edale PC	2.1 Support. Aligns with purposes. Noted	Yes
S-111-1	1369 134	Accessible Derbyshire	2.1	
S-110-1	1369 133	Middleton & Smerrill PC	2.1 Supported. Properly link sustainable development with national park purposes. Support noted.	Yes
S-107-5	1368 485	NCHA	2.1 Supported. Support noted.	Yes
S-104-30	1368 161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.1 Fundamental to purposes. Support noted.	Yes
S-103-12	1368 574	Marshall's plc	2.1 Does not agree with spatial objectives as not aligned to NPPF especially regarding economy. The draft objectives include to retain and enable the development of new businesses to address the duty on national park authorities to seek to foster the social and economic well-being of local communities.	No

S-101-1	1369 010	Business Peak District	2.1	Not supported. More could have been done to set out the planning policy principles that will help in delivering thriving and sustainable communities as well as the innovations needed to support sustainable travel. Comments noted and will be further considered. Planning policy principles are set out within the consultation document as a whole.	No
	1368 689	Greater Mancheste r and High Peak Ramblers	2.1	Supported. To note that second purpose includes access and opportunities for exploring nature on foot in quiet and tranquility. Comments noted and will be further considered.	Yes
S-88-1	1368 685	Rainow PC	2.1	Generally supportive. Community must be able to grow and prosper but has challenges such as an aging population and fewer young people. The school attracts pupils from outside which creates traffic problems. Comments noted and will be further considered.	Yes
S-86-1	1368 682	National Trust	2.1	Supported. Emphasis placed on landscape character, nature recovery and carbon sequestration are supported. Holistic approach, including landscape scale change/enhancement and partnership working with communities and stakeholders is required. Comments noted and will be further considered.	Yes

S-73-1	1368 375	Bradwell Community Land Trust	2.1	Support commitment to thriving and sustainable communities. New development is necessary and need not conflict with other aims. It is noted that the Peak District National Park Authority has discretion over what is considered major development. A continuation of overly-restrictive policy will not achieve thriving and sustainable communities. New plan must resolve sustainability problems highlighted in the Sustainability Appraisal, namely the cost and under-delivery of affordable homes and the prevalence of holiday and second homes. Comments noted and will be further considered.	unsure
	1368 373	Tideswell Parish Council	2.1	Broad support. Need to further emphasise that residents and settlements in the Park contribute to cultural heritage and thriving communities, it is not just landscape features and nature. This will then unsure policies will focus on developing and sustaining communities through sensitive provision of local housing. Comments noted and will be further considered.	Yes
S-69-14	1368 325	Derbyshire Dales District Council	2.1	Support. Support noted.	Yes
S-68-18	1368 264	Bakewell Resident	2.1	Not supported.Does not include key policy areas of renewable energy and climate adaptation.Comments noted and will be further considered.	No
S-62-25	1368 170		2.1	Support. Support noted.	Yes

			Unsure. First purpose should be separate from secondary objectives. The objective to promote understanding should be unpicked and qualified because enjoyment means different things to different people - any forms of enjoyment harm the environment. Education is missing as an objective. Comments noted and will be further considered. The Sandford Principle establishes that the first purpose of national parks take precedence when there is an irreconcilable conflict between purposes. The Authority's role in delivering education is set out in the National Park Management Plan; planning policy only considers the land-use implications.		
S-60-1	1368 155	2.1		unsure	
S-59-26	1368 081	2.1	SMDC	Support. Support noted.	Yes
S-52-1	1368 140	2.1	North East Derbyshire District Council	No cross boundary issues identified. The area of NE Derbyshire within the National Park has no role to play in meeting any housing or development needs. Noted and will also be considered as part of the ongoing Duty to Co-operate discussions.	
S-50-54	1367 561	2.1	Peak Park Parishes Forum	Support. Broadly fit with statutory purposes and thriving and sustainable communities. Comments noted.	Yes
S-44-25	1367 865	2.1	Eyam Parish Council	Support. Support noted.	Yes

S-43-1	1367 843	Natural England	2.1	Support. Particularly welcome the inclusion of blue and green infrastructure and the objective to promote nature recovery. Plan should take a strategic approach this including biodiversity net gain and improving connectivity. Vision is succinct and could be expanded. Comments noted and will be further considered. The Vision is set by the National Park Management Plan and the local plan sets spatial objectives derived from this.	Yes
	1367 805		2.1	Support. Support noted.	Yes
S-40-3	1367 788		2.1	Support. Planning policy for affordable homes must attach greater weight to custodians of the National Park including farm workers, rangers, litter collectors etc. New NPPF may distort many issues currently being consulted on, namely; definition of affordable housing, reform of NSIP, isolated homes and rural tourism/leisure. Comments noted and will be further considered. The NPPF reference to national parks is unchanged in the most recent NPPF update. Parks have the highest status of protection with regard to landscape and scenic beauty and the scale and extent of development should be limited.	Yes
	1367 452		2.1	Not supported.Does not address developing meaningful employment and the need to help business develop.Noted and will be further considered. Current policies support all kinds of business development and we will commission further research to understand the new economic challenges and opportunities, and the implications of this for new planning policy.	No

S-30-1	1367 447	Country Landowner s Association	2.1	Unsure. Should be more focus on rural development to minimise the need to travel, and on EV charger installation/sustainable transport. Comments noted and will be further considered.	Unsure
S-29-14	1367 323		2.1	Unsure. Need to address large developments on the edge of the Park, for example the negative visual and light impacts near Stanton Lees. Comments noted and will be further considered. Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England. Relevant authorities must now seek to further the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to have regard to their statutory purposes.	unsure
S-28-1	1367 322		2.1	Not supported. Does not respond to climate and biodiversity crisis because of the level of growth and the numbers of visitors that are promoted. Comments noted and will be further considered. Many of the issues identified are outside the scope of the local plan.	No

S-19-6	1367 234		Unsure. Need to encourage cycling for access to services. Does not acknowledge the need for energy; assumes energy needs can be met elsewhere instead of locally. Plan is not proactive and impedes change. Plan must align with local authority sustainable community strategies. Need to address provision of car charging facilities at tourism spots and solar outside villages.	
		2.1	Noted and will be further considered.	unsure
	1367 217	Staffordshire Police	The 'Thriving and Sustainable Communities' definition should include the NPPF reference to the impact of crime and disorder on quality of life, and previous government advice regarding crime and sustainable communities. Comments noted. The definition was written and agreed jointly by the Peak Park Parishes Forum and the National Park Authority as part of the Management Plan process, in advance of the Local Plan review.	unsure
S-13-7	1364 893		Support. Support noted.	Yes

S-9-32	1364 715	2.1	UnsureAppears to be no change from current policy.Many objectives are not being achieved, especially for biodiversity and clean rivers. Intensive farming in the White Peak is cited as an example.The lack of National Park Authority statutory powers is highlighted.Comments noted and will be further considered.Proposed objectives contain new references to nature recovery, carbon sequestration, blue and green infrastructure and other public benefits such as clean air and water and flood prevention.Objectives must ensure that development is manged in a way that furthers national park purposes, which includes to conserve and enhance wildlife. The 'Landscape, Biodiversity and Nature Recovery' Topic Paper sets out how, and to what extent, local plan policy has been successful in delivering this.	Unsure
S-7-12	1364 251	2.1	Support. Support noted.	Yes

2.2 Have we identified the right policy issues with regard to delivering national park purposes?				
Submission Responses 2.2			Consultation point	
#	Consultee Id	Consultee Organisation		Have we identified the right policy issues with regard to delivering national park purposes?
			Summary and PDNPA Response	
S-223-2	1369632	Hartington Town Quarter Parish Council	2.2 Support. Need to clarify what is meant by 'enhancement'. Support noted and definition of enhancement will be further considered.	Yes
S-221-2	1369595		2.2 Support but need to consider detail and implementation. Support noted. Policy and supporting text in the draft plan will contain more detail.	Yes

S-214-2	1369550	Hope with Aston Parish Council	2.2	Support policy principles and welcome proposed changes that will better support nature recovery, biodiversity net gain and green design. Support noted.	Yes
S-210-2	1369546		2.2	Agree, but should be more emphasis on nature recovery. This is noted and will be considered.	Yes
S-207-2	1369542	Youlgrave Community Land Trust.	2.2	Issues have been correctly identified. Excessive lighting is identified as an issue at some farms and business premises. Support and comments noted.	Yes
S-206-2	1369541	Peak Cluster	2.2	Support. Does not adequately reflect climate emergency. Does not reflect the substantial contribution that the Peak District could make. Peak cluster carbon capture project could eliminate almost 25% (3 million tonnes) of Derbyshire and Staffordshire emissions. Spatial strategy should recognise the importance of carbon capture and storage. GSP1 should be amended to include an additional or amended strand that recognises the National Parks' 'Race to Zero' pledge and/or net zero more generally. Support and comments noted and will be further considered. Carbon Capture is also considered as a stand alone issues. (Issue 22 in the consultation.)	Yes

S-204-1	1369537	Ministry of Defence	2.2	No comment made on specific policy issues. Re-states NPPF (para 101) and other requirements (DfT/ODPM Circular 01/2003) re impact on operational defense sites, statutory consultation and location data and safeguarding maps. Review or drafting of policy provides opportunity to better inform developers of the statutory requirements regarding proposed development that triggers the criteria in Safeguarding Plans. Noted and will be further considered.	1
S-203-2	1369536	Tarmac	2.2	Does not support. The scale and extent of development would require limitation only if it did not meet wider national park objectives. Comments noted. The National Planning Policy Framework at para 189 that the scale and extent of development in national parks should be limited.	No
S-199-2	1369530	Environment Agency	2.2	Unsure. GSP2 should reference climate change resilience to encourage developers to think of the future, eg rainwater harvesting. Noted and will be further considered.	Unsure
S-197-2	1369528		2.2	Support. Support noted.	Yes

S-194-2	1369525	Derbyshire Dales District Council	2.2	Does not support. Objectives do not adequately consider management plan objectives or social and economic well-being. Objectives do not adequately address affordable housing delivery in the context of sustainable development. Noted and will be further considered. The National Park Authority must seek to foster the economic and social well-being of local communities in perusing the purposes of a national park. (This is often referred to as 'the duty.') Current local plan policy GSP1, proposed to be carried forward, requires all development to be consistent with the Authority's purpose and duty. Management plan objectives and 'the duty' are taken into account in the specific policy areas, in particular for 'housing', 'business' and 'shops, services and community facilities'.	No
S-192-2	1369523	Mineral Products Association	2.2	Does not support. The spatial strategy has overlooked all the pillars of sustainable development. Noted. Spatial objectives for sustainable development in a national park are considered specifically in Issue 1 and sustainable development is a thread throughout the plan. Issue 2 concerns general spatial policies that will deliver national park purposes, having regard to the duty to foster social and economic well-being of local communities. Current policy DMP DM1, 'the presumption of sustainable development in a national park' is proposed to be carried forward in the new local plan.	No

S-186-2	1369505		2.2	Support. Does not adequately address the climate and nature crises. Support noted. It is proposed that policy is amended to address these issues.	Yes
S-185-2	1369502	Devonshire Group	2.2	Support. Support noted.	Yes
S-184-2	1369500	Hope Valley Climate Action	2.2	Not supported. Policies do not mention climate change and the urgent need to reduce emissions. Noted. The Issues and Options consultation documents states (page 20) that 'GSP2 will include an additional reference to . . . the next zero target'.	No
S-183-4	1369499	United Utilities	2.2	Supported. It is recommended that the link between blue/green infrastructure, surface water management and landscape design is outlined as a strategic requirement in the local plan to ensure that sustainable surface water management is at the forefront of the design process. Noted and will be positively considered.	Yes
S-173-2	1369488	Land & Nature Team - PDNPA	2.2	Supported. Support Noted.	Yes

S-165-2	1369466	Taddington and Priestcliffe Parish Council	2.2	Unsure. It is unclear how Question 2 differs from Question 1. It is not clear what 'additional reference to special qualities' means. If policies are limited to national park purposes the interests of local communities may be overlooked. Comments noted and will be further considered. Question 1 is about spatial objectives whereas Question 2 is about proposed changes to current policy. The reference to special qualities is considered in more detail in Issue 3. It is proposed that planning policy GSP2 is amended to refer to special qualities (as well as, or instead of referring to valued characteristics) to align with the National Park Management Plan. Current policy GSP1 B will be carried forward in the new local plan. This refers to the National Park's legal purposes and duty (duty to seek to foster the social and economic well-being of local communities in pursuing purposes).	Unsure

S-161-14	1369459	CPRE Peak District and South Yorkshire	2.2	Not supported. Current General Spatial Policies must better address carbon emissions with specific, achievable and measurable targets. Applications for development must include information on energy use and emissions. Policy DMH11 and relevant climate change policy and guidance should be amended to include securing travel plans, off-site active travel infrastructure and public transport provision. Noted and will be positively considered. The National Park Management Plan properly considers carbon emissions, and may include targets. The local plan must then address this in developing policies for the use and development of land.	No
S-154-2	1369442		2.2	Unsure. Policy and action must be strong and robust because of the biodiversity loss within and outside the National Park. Action must be at a high level, and landscape-wide. It is not clear what the National Park Authority can do regarding blue and green infrastructure as national policy is not strong. Noted and will be positively considered. The Authority is currently reviewing it's design guide/code and its approach to developer contributions - blue nad green infrastructure will be considered in this context alongside strategic planning policy.	Unsure
S-151-2	1369433		2.2	Supported. Support noted.	Yes

S-150-2	1369431		2.2	Not supported. Must advocate for local sustainable development. Businesses and people needing a home will go elsewhere. The National Park has no base economy. With regard to BNG, entropy and decay are natural unless on a brownfield site. Noted and will be further considered. Current policy DM1, which will be brought forward in the new local plan, supports sustainable development in the context of a national park.	No
S-147-2	1369428	The Campaign for the Peak Line	2.2	Support. Plan must be considerably strengthened to support travel by sustainable means. A 2024 Bakewell survey notes that the town is a natural transport hub with many visitors, but public transport (buses) is adversely affected by high traffic volumes. Incremental, scattered developments will result in more traffic into Bakewell. Noted and will be positively considered. The preferred spatial strategy will be subject to Sustainability Appraisal.	Yes
S-137-16	1369370	Derbyshire ALC	2.2	Support. It is important to go beyond the minimum requirements. Noted and will be positively considered.	Yes

S-136-51	1369368	2.2	Support. The plan needs: a broader definition of natural beauty and landscape that is not restricted to just landform. For example wildlife rich landscapes are a crucial part of natural beauty. a wider definition of green and blue infrastructure aligned to Natural England's definition. Noted and will be positively considered.	Yes

S-132-3	1369081		2.2	No. The plan does not have the right balance to foster social and economic well-being and sustainable communities, considering the shrinking and aging population. The plan should prioritise affordable social housing and make a significant contribution to meeting objectively assessed need. Noted and will be further considered. The National Park Authority must seek to foster the economic and social well-being of local communities in perusing the purposes of a national park. (This is often referred to as 'the duty.') Current local plan policy GSP1, proposed to be carried forward, requires all development to be consistent with the Authority's purposes and duty. 'The duty' is taken into account in the specific policy areas, in particular for 'housing', 'business' and 'shops, services and community facilities'. Current policy HC1, proposed to be carried forward, prioritises local needs affordable homes. The National Planning Policy Framework at para 189 states that the scale and extent of development in national parks should be limited so this is an important factor in determining the extend to which objectively assessed housing need can be met.	No
S-128-49	1369275	Rural Action Derbyshire	2.2	Unsure. Noted.	Unsure

S-118-2	1369267	Haddon Estate	2.2	Supported. Suitability of policies will depend on how they work practice, for example with building regulations and viability. Noted and will be positively considered. Our approach to developer contributions and whole plan viability is being considered as part of the local plan review.	Yes
S-117-3	1369166		2.2	General support. Want to know more about lighting and signage, especially in relation to isolated properties. Comments noted and will be further considered.	Yes
S-113-2	1369153	Edale Parish Council	2.2	Support. Support noted.	Yes
S-110-2	1369133	Middleton and Smerrill Parish Council	2.2	General support. Renovation of listed buildings must be supported. Comments noted. Conversion of listed buildings is supported by current policy. Renovation of listed buildings is subject to listed building consent as well as planning consent.	Yes
S-107-11	1368485	NCHA	2.2	Support. Support noted.	Yes
S-104-6	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.2	Not supported. Thriving and sustainable communities should be included. Comments noted and will be further considered. GSP1, proposed to be carried forward, recognises our social and economic duty and thriving and sustainable	No

				communities are considered as part of this.	
S-103-6	1368574	Marshall's plc	2.2	Does not support, does not include economy or align with NPPF. General Spatial Policies will continue to align with the purposes and duty of a national park. The duty is to seek to foster social and economic well-being.	No
S-100-1	1368991	Marsh Farm Development Co Ltd	2.2	Support. Support noted.	Yes
S-98-27	1368689	Greater Manchester and High Peak Area of the Ramblers	2.2	Support. Wish to see explicit reference to access; all new developments must protect and enhance public rights of way and/or create new opportunities for walking. Comments noted and will be further considered. The reference to green infrastructure includes walking and cycling.	Yes
S-86-2	1368682	The National Trust	2.2	Unsure Difficult to comment due to broad nature of policy but welcome reference to nature recovery, BNG and net zero. Comments noted and will be further considered.	Unsure

S-76-1	1368482	Sport England	2.2	Unsure. The spatial strategy and supporting text should acknowledge the sport and physical activity that takes place in the National Park and the importance of this for physical and mental well-being and transforming communities. The Authority should have regard to the Sport England strategy 'Uniting the Movement' whose themes are recover and reinvent, connecting communities, positive experiences and connecting health and well-being. New development, especially housing, should provide opportunities for healthy lifestyles and communities in line with the NPPF, PPG, Sport England's recently published 'Active Design Guidance' and the forthcoming 'Active Design Principles'. Comments noted and will be further considered.	Unsure
S-73-2	1368375	Bradwell Community Land Trust	2.2	Not supported. Peak District villages are an important element of the National Park and their success is dependent on the people living there. Therefore explicit reference should be made to supporting development that safeguards and improves long-term sustainability, increasing the availability of housing and supporting and retaining local services and employment opportunities. Comments noted and will be further considered.	No
S-71-2	1368373	Tideswell Parish Council	2.2	Support. Must be balanced with the need to enable residents to live in sustainable communities with sufficient housing	Yes

				provision. Support noted.	
S-68-16	1368264	Bakewell Resident	2.2	Not supported. GSP 2 should also cover sustainability and climate adaptation if its covering net zero. GSP3 should include renewable energy and climate adaptation if its noting signage and lighting. Comments noted and will be further considered.	No
S-64-2	1368242	Sustainable Hayfield	2.2	Not supported. The first purpose of a national park needs to include specific reference to biodiversity. Comments noted and will be further considered.	No
S-62-39	1368170		2.2	Support. Support noted.	Yes
S-59-12	1368081	SMDC	2.2	Support. Support noted.	Yes
S-52-2	1368140	North East Derbyshire District Council	2.2	No cross-boundary or housing requirement issues. Noted and will be further considered in Duty to Co-operate discussions.	1
S-50-45	1367561	Peak Park Parishes Forum	2.2	Support. Support noted.	Yes

		Natural England	2.2	Support. Other policy areas for consideration are: flood risk management and river restoration. Flooding is addressed in CC5 but there could be greater consideration of flood risk management including policy on the value of river restoration and promoting natural flood risk management. air quality. We note that the adopted policy DMC14 Pollution and disturbance is not being reviewed. However, we suggest this policy could be extended to include the provision of on farm waste/ slurry management infrastructure which has been an issue for Natural England particularly the siting and height of covered slurry stores. habitat regulations. Natural England agrees with the screening report & conclusion that all protected sites located within the Peak District National Park boundary are screened in and will be further considered through an Appropriate Assessment.	
S-43-2	1367843			Comments noted and will be further considered.	Yes
S-42-40	1367805		2.2	Support. Nature recovery should address non-native species. Net zero-targets should be robust. Comments noted and will be further considered. The local plan is concerned with the development use of land, having regard to nature recovery and net zero targets, rather than individual non-native species and the setting of carbon targets.	Yes

S-40-4	1367788		2.2	Support. Aspirations must be viable and deliverable. Net zero and biodiversity initiatives are cited as examples where proven design and technology may deliver positive net benefit. The NPA's s106 policies are weak, ambiguous and unenforceable and will undermine delivery of policy at every level. The new local plan should introduce specific policy measures that require planning agreements to deliver in all respects. Comments noted and will be further considered. The Authority is reviewing its approach to viability.	Yes
S-35-1	1367737	Year	2.2	Priority should be to meet the needs and aspirations of the local community, including well-being and support for traditional and local industry that meets high environmental standards and offers good employment potential. Comments noted and will be further considered. Current policies support all kinds of business development and we will commission further research to understand the new economic challenges and opportunities, and the implications of this for new planning policy.	1
S-30-2	1367447	Country Landowners Association	2.2	Unsure. New greener development must be permitted to ensure that there is the wealth and labour to deliver on targets over the years. Comments noted and will be further considered.	Unsure

S-20-1	1367235	Oldham Council	2.2	Support. Policy should make specific reference to relevant Local Nature Recovery Strategies. Comments noted and will be further considered.	Yes
S-13-44	1364893		2.2	Support. These are the right issues but the concern is how these will be addressed and whether or not the priority order is maintained. Comments noted and will be further considered. The Sandford Principle establishes that the first purpose of national parks takes priority if there is irreconcilable conflict.	Yes
S-11-1	1364858	Tintwistle Parish Council	2.2	Unsure. Planning policy in boundary Parishes, such as Tintwistle, is unjust, in that people living in the same village can, and often do, have their Planning applications dealt with in differing ways depending on whether their home lies on one side of the Park boundary or the other. Within (but not outside) the village, HPBC and not PDNPA policies should apply. There should be similar provisions for other border Parishes. Comments noted and will be further considered.	Unsure
S-10-2	1364790		2.2	Support. Support noted.	Yes
S-9-27	1364715		2.2	Support. Support noted.	Yes

S-8-13	1364695	-	2.2	Not supported. Should be more priority on biodiversity because of the UK and global crisis. The Authority focuses too much on cultural heritage and preservation of the 'status quo' regarding agricultural development and landscape character. These are important but biodiversity enhancement must be elevated to an issue of similar importance. Current approach maintains a landscape of degraded biodiversity in the White Peak (outside the dales.) Comments noted and will be further considered. Although national park purposes are unchanged, it is recognised that we need to update policy with regard to the new legal frameworks for nature recovery.	No

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

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Point	Summary and PDNPA Response
S-224-2	1369634	Sheffield City Council	2.3	The Special Qualities do not adequately reflect the important but intangible aspects that are included as Valued Characteristics, such as flow of landscape character beyond the park boundary. Agree that this is an important aspect that should continue to be included. The Special Qualities will also be reviewed alongside the National Park Management Plan.
S-223-3	1369632	Hartington Town Quarter Parish Council	2.3	Add green space within villages. Noted and will be further considered.
S-221-3	1369595		2.3	Natural lithophytic communities on gritstone and limestone edges valley bottom mesophytic flushes and marshes. Comments noted and will be further considered.

S-214-3	1369550	Hope with Aston Parish Council	2.3	Hawthorn scrub, hazel scrub, 19th century plantations, and rewilding sites may be considered as special qualities. Extend lowland pastoral landscapes to Dark Peak valley bottom. The suggestions will be positively considered. The reference to the geographical location of landscapes types is beyond the scope of this consultation.
S-210-3	1369546		2.3	Some special qualities are in tension, for example white peak farmed landscape/landscape-scale nature recovery and quiet recreation/vs accessibility by car. This is noted and accepted and will be considered by the Authority as part of the local plan and management plan review processes.
S-207-3	1369542	Youlgrave Community Land Trust.	2.3	Should include hedges and unimproved verges. Noted and will be further considered.
S-203-3	1369536	Tarmac	2.3	The phrase 'abandoned extraction or mining sites (landscape scars) eg collieries, quarries, mine shafts, bell pits' has negative connotations but meets all but one of the feature categories. Such sites are particularly important for protected species such as raptors. Comments noted and will be further considered.
S-200-1	1369531	Stanton in Peak Parish Council	2.3	Include ancient local access routes. Many are not registered but have been used for centuries in relation to historic industries. Comments noted and will be further considered.
S-195-2	1369526	Derbyshire County Council	2.3	The SQ of 'abandoned sites of industry' should include word 'historic'. Comments noted and will be further considered.
S-194-3	1369525	Derbyshire Dales District Council	2.3	More emphasis on the delivery of sustainable communities. Comments noted and will be further considered.

S-192-3	1369523	Mineral Products Association	2.3	The geology of the park as the canvas for landscape and foundation for cultural and industrial heritage. Comments noted and will be further considered.
S-186-3	1369505		2.3	The table contains omissions and does not accurately break down the Qualities into Features, eg tranquility is omitted from many features where it would be found and adventure and exploration apply to all Features. Dissection is not helpful for a holistic spatial planning approach. Comments noted and will be further considered.
S-185-3	1369502	Devonshire Group	2.3	List is comprehensive. Comments noted.
S-173-3	1369488	Land & Nature Team - PDNPA	2.3	The Landscape Strategy should be described as 'identifies the key elements and the quality of experience which creates the 'sense of place' and the special qualities of the different landscapes within the Peak District, while planning for and guiding the positive management of future changes to enhance the landscape and its natural beauty. It defines a number of landscape outcomes and shows where these are most important spatially within the landscapes of the National Park.' Strongly support identification of Key Features as Special Qualities are too vague. Should include how Key Features have been identified. Should reference Landscape Strategy, Nature Recovery Plan and Valued Characteristics in Core Strategy Include natural heritage - 'individual elements of landscape habitat, land-use and cultural heritage.' Comments noted and will be further considered.
S-165-3	1369466	Taddington and Priestcliffe Parish Council	2.3	Core Strategy Valued Characteristics are clearer and more lucid than Special Qualities, but need revision and update. Comments noted and will be further considered.

S-163-2	1368617		2.3	Agree with principle but some Key Features are incorrectly defined, missing or should be removed. Heritage attributes need refining and grouping. Intangible heritage should be added. Comments noted and will be further considered.
S-156-1	1367563		2.3	Include ancient woodlands and plantations on ancient woodland sites. Comments noted and will be further considered.
S-154-3	1369442		2.3	The word 'park' in contemporary terms means 'a place to come and do what you want' (as in an urban park), not 'a place where conservation is key'. The Authority has not understood this. Comments noted and will be further considered.
S-153-1	1369437		2.3	Include ancient local access routes that have been used for centuries in relation to historic industries such as lead mining. Comments noted and will be further considered.
S-151-3	1369433		2.3	Include temperate rainforest, Curlew and Golden Plover nest sites and Hen Harrier. Comments noted and will be further considered.
S-150-3	1369431		2.3	Include human activity that maintains the Special Qualities, farming is especially important. Comments noted and will be further considered.
S-137-26	1369370	Derbyshire ALC	2.3	Alignment of documents allows coherent and consistent planning. Comment noted.
S-136-39	1369368		2.3	The list is not accurate and contains significant omissions. All ecosystems provide vital benefits. If vital benefits are ecosystem services/public goods, how do crosses provide and hazel scrub not provide? Comments noted and will be further considered.

S-134-3	1366865	RSPB	2.3	All scrub not just hazel. Species and species assemblages. Concern that some Key Features conflict with each other, this must not hamper nature recovery. Heather moorland and mixed heath should be changed to heathland or dry heath if that is what it refers to (as wet heath is listed separately.) Heather moorland is not a habitat; such areas are often denuded and species poor due to management. Preserving 'heather moorland' for its own sake actively works against habitat restoration and nature recovery. 'Managed moorland' is problematic and should be removed. Without a definition of management it may mean burning on peat or service of medicated grit trays that prevent nature recovery. Much 'managed moorland' should be active blanket bog or wet heath (already Key Features). Comments noted and will be further considered.
S-128-12	1369275	Rural Action Derbyshire	2.3	Noted.
S-120-33	1368991	Marsh Farm Development Co Ltd	2.3	
S-117-4	1369166		2.3	Generally supportive of the approach. Need to retain or develop aspects that relate to quality of life, for example tranquility, even when this is difficult to measure. Should include graveyards and milestones. Should include markers of tranquility such as wheeling of buzzard, croak of raven, notes of curlew etc. Comments noted and will be further considered.
S-113-3	1369153	Edale Parish Council	2.3	List is comprehensive. Noted.
S-107-7	1368485	NCHA	2.3	

S-104-2	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.3	Biodiversity and thriving and sustainable communities. Comments noted and will be further considered.
S-103-8	1368574	Marshall's plc	2.3	Recognition of the (positive) impact on the landscape of the Peak Park's industrial heritage. Abandoned buildings of industry and abandoned sites of industry are existing special qualities. Noted.
S-98-14	1368689	Greater Manchester and High Peak Area of the Ramblers	2.3	Key landscape features. Open access. Rights of way. Comments noted and will be further considered.
S-71-3	1368373	Tideswell Parish Council	2.3	More weight should be placed on Peak District settlements and communities so the "thriving communities" objective is supported. Comments noted and will be further considered.
S-69-15	1368325	Derbyshire Dales District Council	2.3	If there is no difference between VC and SQ then they should be aligned. Comments noted and will be further considered.
S-68-20	1368264	Bakewell Resident	2.3	Demonstrating how climate adaptation can protect landscape, wildlife, habitats, farming and communities. Comments noted and will be further considered.
S-64-4	1368242	Sustainable Hayfield	2.3	
S-62-41	1368170		2.3	Green spaces within rural settlements. Comments noted and will be further considered.

S-59-8	1368081	SMDC	2.3	
S-50-19	1367561	Peak Park Parishes Forum	2.3	Good levels of biodiversity. Thriving communities. Comments noted and will be further considered.
S-44-17	1367865	Eyam Parish Council	2.3	Thriving communities. Comments noted and will be further considered.
S-43-3	1367843	Natural England	2.3	Natural England agrees with the Special Quality Key features that have been set out. Comment noted.
S-42-15	1367805		2.3	Policy on non-native species and harm they are doing to the efforts to re-establish woodland. More support for farmers in relation to protection of livestock from dogs, communication / signage. Comments noted and will be further considered.
S-40-5	1367788		2.3	The list should benchmark the state and condition of each feature in order that Policy is able to be proactive in ensuring that where appropriate development management decisions act to mitigate, halt or reverse degradation and potentially eventual loss. Comments noted. Condition assessments are mostly beyond the scope of the local plan. Where condition assessments are undertaken by other departments/organisations these will be taken into account.
S-36-1	1367737		2.3	GPS2 and GPS3 should be suitably worded to enable some flexibility to cover intention rather than rigid inflexibility. Comments noted and will be further considered.
S-31-2	1367452		2.3	

S-13-24	1364893		2.3	Consideration of how climate change has affected the area especially flooding and the need to consider more upland pasture tree planting to slow water catchment flows. Comments noted and will be further considered.
S-9-12	1364715		2.3	Drystone walls. Drystone walls are disappearing due to farmers increasing field sizes. Noted. Policy will continue to ensure that wherever possible, dry stone walls are retained. National legislation determines what does and does not need planning permission.

2.4 Spatial Strategy settlement tiers – which option do you prefer?					
Submission Responses					
#	Consultee Id	Consultee Organisation	Responded Consultation Point	Summary and PDNPA response	Which option do you prefer?-Other (describe)
S-224-3	1369634	Sheffield City Council	2.4	Support for a tiered approach as this is a sensible strategy for managing development and facilitating larger, viable housing schemes. Support for tiered approach noted.	Change the settlement strategy so that there are more tiers

S-223-4	1369632	Hartington Town Quarter Parish Council	2.4	Retain current approach. Appendix 5 settlement list inaccurate for Hartington (no playground, public transport not good, post office due to close, primary school vulnerable.) Hartington is small village. If tiered system implemented Hartington would be Tier 2. Multi-tiered system relies on judgement of planners not the community. Position on tier should not be judged by supporting health communities not visitor capacity, eg Hartington is swamped. Abandoning the parish first approach for affordable homes is wrong for anywhere except the largest town. Comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not
S-221-4	1369595		2.4	Support tiered strategy so that policy can be finely tuned to the needs of different communities. Comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-220-1	1369594		2.4	Support for tiered strategy because of the difference in size and character of the settlements. Offering new homes to eligible people within their district is better than the current situation where they have to move away altogether. Comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-218-3	1369554		2.4	Support tiered strategy as it provides a clear underpinning to housing delivery. Comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-214-4	1369550	Hope with Aston Parish Council	2.4	Support for Option 2: retain 2-tier strategy but review the list. No sufficient evidence to justify a more complex system. Lack of housing delivery is due to other factors. Monitoring the changing nature of settlements and reviewing 2-tier list is appropriate. Preference noted and will be considered.	Retain a 2-tier strategy but review the list

S-210-4	1369546		2.4	Retain 2-tier strategy. Impossible to properly comment without knowing what villages are proposed for what tier. Villages with no public transport should be excluded. Preference noted. Future consultations will set out the preferred strategy and list the villages.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not
S-207-4	1369542	Youlgrave Community Land Trust.	2.4	Support for a tiered approach as this may support co-operation between authorities and quicker delivery of schemes. Support for tiered approach noted and will be considered.	Change the settlement strategy so that there are more tiers
S-200-2	1369531	Stanton in Peak Parish Council	2.4	Support either expanded Option 2 (review list half way through plan period) or Option 3 to provide more granular categorisation. Comments noted and will be further considered.	Unsure
S-197-3	1369528		2.4	Unsure. Comment noted.	Unsure

S-196-1	1369527	Peak District Rural Housing Association	2.4	Support Option 2 because local connection is important for parish councils and rural communities. That homes are built for those that live in or have a strong connection to that parish is a firm expectation. Would welcome flexibility is cascade agreements between parishes to mitigate against void properties. Comments noted and will be further considered.	Retain a 2-tier strategy but review the list

S-195-3	1369526	Derbyshire County Council	2.4	Support Option 3. This is the most appropriate option in the context of the overarching need to increase the provision of affordable housing. This is a common approach in other non-National Park Derbyshire local planning authorities and is also justified for the National Park to ensure the right scale of development takes place in the right type of settlement. The hierarchy proposed is supported as this is a reflection of the different settlement types. A tired approach may lead to larger-scale developments and the County Council's developer contributions policy will apply. The County Council recognises the additional viability issues associated with development in the National Park and would welcome further discussion to agree a suitable new policy approach. Comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-194-4	1369525	Derbyshire Dales District Council	2.4	Option 3. Similar to DDDC approach. Would allow level of development proportionate to the settlement. Makes clearer which settlements are suitable for development and at what scale. It is considered appropriate that affordable housing should be permitted wherever a local need arises. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-189-1	1369519		2.4	Option 2. Multi-tier system is too complicated. Each community must have a proper say when reviewing the list. Preference and comments noted and will be further considered. We will consult again on the preferred option and the details.	Retain a 2-tier strategy but review the list

S-188-2	1369508	Staffordshire Moorlands District Council	2.4	Option 3. Allows for a finer grain analysis of settlements to allow an appropriate level of development. Provides guidance and clarification on which settlements, sites and scale of development is likely to be acceptable. Agree that appropriate levels of development in 'split' settlements such as Waterhouses should be considered on a case-by-case basis. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-185-4	1369502	Devonshire Group	2.4	Option 2. Recognise challenge of providing certainty while not excluding opportunities in other areas, therefore option 2 most appropriate. Must recognise opportunities for limited scale development in small settlements. Distribution of development should generally accord with a settlement hierarchy taking into account critical mass for viable infrastructure/services; the need to prevent a free-for-all pattern of development where that could run counter to sustainability objectives and protection of the character of the smallest settlements. LP should (continue to) focus development on Bakewell and the larger villages, but provide some flexibility for development elsewhere if needed. It will not be possible at point of adoption of the LP to identify all and every development need , so some flexibility is required so as to retain the ability to respond to future identified needs. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list

S-183-2	1369499	United Utilities	2.4	No preference. Disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure. Any strategy must deliver growth proportionate to the size of the settlement. In small rural settlements even small sites can disproportionately impact existing infrastructure. Any allocations for any development should be in principal settlements. New homes should be of the highest quality and sustainable to positively contribute to resident physical and mental wellbeing, and climate emergency needs. UUW wish to understand the number and appropriate locations for development so that investment in water and wastewater infrastructure can be planned and flood risk managed. Comments noted and will be further considered.	

S-182-2	1369498	Hathersage Parish Council	2.4	No clear reason to change current arrangements. Development boundaries should be put into practice elsewhere. Preference and comments noted and will be further considered.	
S-180-1	1369496	Castleton Parish Council	2.4	Option 1. The current two-tier system appears to work for Castleton and the suggested five-tier system looks unnecessarily complex. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

S-174-3	1369489	Labour Party - Bakewell and Northern Dales branch	2.4	Option 3. Provides a clear underpinning to question regarding sites for development. Indicative list of tiers would have been helpful. Preference and comments noted and will be further considered. The allocation of settlements to tiers is a complex and time-consuming process so it is most appropriate to so this only when the principle has been decided.	Change the settlement strategy so that there are more tiers

S-172-1	1369486	Grindleford Parish Council	2.4	Support Option 3. Creates a more differentiated approach to settlement development. Accept that PDNP is guided by statute in how it manages the tension between landscape/environment and needs of local communities. The National Park does not exist for the benefit of those who live here. Environmental and community objectives need not be in tension. Shrinking/aging population less able to support the environment or sustain services, including public transport. Good example is the tree-planting group. Would support cautious development, eg limited infill. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-166-2	1369468	Breedon	2.4	The has to have more flexibility than a strict adherence to settlement tiers. It should continue to permit affordable housing as an exception policy outside the settlement tiers in special circumstances. Given the scarcity of brownfield sites within the Park, policy needs to specifically address this issue. Comments noted and will be further considered. Option 3 ('the tiered approach') sets out that affordable housing is acceptable in all tiers.	

S-165-4	1369466	Taddington and Priestcliffe Parish Council	2.4	No preference. Another option may be to consider Bakewell and 'hamlets and settlements with few or no services' separately. No evidence or justification to show how settlement tiers will help to achieve the aim of thriving and sustainable communities or why policy should change. For most of last 20 years housing providers were able to work with current system. Building up one village to meet the needs of others will not help the others to sustain services and facilities such as schools, village halls etc. Allocating land in a single area will be detrimental to others, as noted in the Sustainability Appraisal. Agree that there should be some flexibility in smaller villages (as in Tier 4). If Option 2 is adopted, any review should be based on objective principles to avoid NIMBYism. A case could be made to consider Bakewell separately but this must not detract from development elsewhere. The inclusion of other parishes in Tier 1 will undermine the thriving and sustainable communities objective. If concept of Tier 1 were accepted, selection of settlements should be based on clear criteria, not the chance of land being offered for development. Comments and alternative proposal noted and will be further considered.	

S-163-3	1368617		2.4	Option 3. Will allow PDNPA to plan ahead and work better with housing authorities. Will provide better security of provision and economies of scale. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-162-2	1369460	High Peak Borough Council	2.4	Option 3. Allows finer grain analysis leading to guidance and clarification on settlements, sites and scale of development likely to be acceptable. Agree that split settlements should be case-by-case. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-161-6	1369459	CPRE Peak District and South Yorkshire	2.4	Option 3. Support building sustainable and well-designed affordable housing in local communities, and giving businesses the scope to develop in ways that are consistent with national park purposes. Demographic change needs addressing urgently if the national park is not to become home mainly to commuters and retirees, alongside increasing numbers of holiday lets. The changing of the settlement tiers could help support smaller communities more than the current approach. Whilst it makes sense to prioritise already well served settlements for the greatest amount of new housing, there should still be scope for sensitive development to help support affordable homes, new services, facilities and infrastructure in less sustainable locations. Tiered approach also has potential to reduce greenhouse gas emissions. May be problems with detail, eg local people having a say about designation to a tier so further reg 18 consultation is appropriate. Preference and comments noted and will be further considered. The Authority is intending to undertake a further Regulation 18 consultation (draft plan and preferred options) in November 2025.	Change the settlement strategy so that there are more tiers

S-156-2	1367563		2.4	Option 2. Must retain current parish-centric approach to local need affordable housing supply and demand. Any departure from this does not have public consent and is fundamental change to development of green field sites. Current methodology serves to protect the special qualities of the Peak Park and should be retained. Residents in Tier 1 settlements (most notably those in Derbyshire Dales) would be landed with a whole lot of ugly developments on their hitherto pleasant, green doorstep, especially given that in conjunction with this district approach to demand/need, the PDNPA are airing the promotion of larger scale development by referring to smaller scale projects as potentially non-viable . Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

S-154-4	1369442		2.4	Unsure. Concern that we could end up with (i) over development in some areas and (ii) a homogenous urban landscape that is not in keeping with the special qualities of the landscape. Preference and comments noted and will be further considered.	Unsure
S-153-2	1369437		2.4	Option 2. Settlements should be reviewed half way through plan period. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list
S-151-4	1369433		2.4	Unsure. Should be brownfield first but no 'prior right to develop'. Other development should be individually assessed. Comments noted and will be further considered.	Unsure

S-150-4	1369431		2.4	Option 2. Zoning is unattractive. Should be case-by-case. Most land in the Peak District is privately owned by people who are links in a chain of generations that care for the landscape and culture. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list
S-144-2	1369422		2.4	Unsure. Some communities in the Park already have an adequate population but others are too small and would be more stable and more sustainable if they were bigger. Example of Bamford whose small/older population does not comfortably sustain the community services and facilities unlike bigger villages in the Hope Valley such as Bradwell and Hathersage. Facilities in Bamford are sustained by passing trade. Comments noted and will be further considered.	Unsure

S-140-1	1369412	Hope and Derwent Woodlands Parish Council	2.4	The Parish of Hope Woodlands is not on the Settlement List and is presumably included with Derwent. It should be listed separately since it is a Parish in it own right with separate Parish Councillors. Comments noted and will be further considered. The Settlement List on page 24 of the Issues and Options Report is extracted from the Core Strategy. The Settlement List in Appendix 5 includes small hamlets but excludes scattered farmsteads. Both lists relate to settlements rather than parishes.	
S-137-48	1369370	Derbyshire ALC	2.4	Option 3. If Option 3 implemented it should allow natural growth of small-scale retail, business and community services in Tier 3 settlements. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-136-20	1369368		2.4	Prefer Option 3 but Option 2 also acceptable. Need appropriate housing in most communities. If this is not through tiers it should be through re-assessment of settlements. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-132-1	1369081		2.4	Option 3. Allows for proportionate development but affordable housing should be provided wherever need is demonstrated. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-129-4	1369199	Rowsley Parish Council	2.4	Option1. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

S-128-36	1369275	Rural Action Derbyshire	2.4	Option 3. More needs to be done to secure affordable housing to counter labour shortages in key occupations such as healthcare and hospitality. Changing the tiered approach and opening up homes for people in the same tier would go some way to increasing the supply of affordable homes. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-118-3	1369267	Haddon Estate	2.4	Option 3. Greatest potential to meet stated spatial objectives for sustainable development. Gives greater control over scale of development and certainty for landowners and developers. Example contrasting Bakewell and Rowsley. Breaking of parish first principle the parish first approach for tier 1 settlements would mean that, in appropriate locations, a scale of residential development could come forward that could support the delivery of more significant quantities of affordable housing, as well as market housing. The multi-tiered approach was adopted by the Lake District Local Plan and so there is precedent for this within a national park. The establishing of a multi-tiered settlement hierarchy would also be a good first step towards allocating specific sites for development. If Option 3 adopted a robust evidence document should clearly set out the criteria for settlements to be assessed. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-117-5	1369166		2.4	Unsure. We don't want a Bakewell weighting down the rest of the park with satellite housing estates. We do need a balanced distribution so the visitors will want to visit the PDNP as a place of natural beauty and to experience the feeling of being in a special place. I believe that there should be an opportunity in every village to 2045 to develop one of two self-build homes where justified. As a society we need to be responsive to pressures faced by housing authorities and housing associations but I do not believe these bodies have an understanding of what a National Park is and what its purposes are. The NPA must play its part but not at the expense of profit-making led by economies of scale. Comments noted and will be further considered.	Unsure

S-114-1	1369155	Kirklees Council	2.4	No preference. Wish to know more about implications for Kirklees. Comments noted. The Authority is planning a further Regulation 18 consultation on preferred options/draft plan.	
S-113-4	1369153	Edale Parish Council	2.4	Option 2. Option 3 is too complicated and may disadvantage smaller communities. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list

S-110-3	1369133	Middleton and Smerrill Parish Council	2.4	Option 2 or 3. Option 1 does not give enough flexibility for planning development in the long term. Either option will require further consultation. Preference and comments noted and will be further considered. The Authority will undertake a second Regulation 18 consultation on the draft plan/preferred options. Currently this is planned for November 2025.	
S-108-1	1369131	Youlgrave Parish Council	2.4	Option 1 and/or 2 preferred. From Youlgrave's perspective wish to remain as a named settlement where development is acceptable in principle. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

S-107-10	1368485	NCHA	2.4	Option 3. Would make some affordable developments easier to process and hence more attractive for development. Occupants from smaller tier three Parishes, which may not have the opportunity for housing, at least could move to accommodation within Peak Park. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-106-1	1369124	Stanton in Peak PC	2.4	Option 3. Provides for a more granular categorisation which will allow for the characteristics of different settlements to be reflected. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-104-37	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.4	Option 2. There is a clear desire for those that wish to continue to live within the Park to remain within their own local environment and not have to move a significant distance to anonymous larger settlements which are likely to be some distance away. The current list has been in existence for some considerable time, and the villages listed may not still be the most appropriate. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list
S-101-7	1369010	Business Peak District	2.4	Should consider separate chapter in the new local plan for the Peak District villages (or for each tier if relevant) to set out the principles for ensuring sustainable communities. Comments noted and will be further considered.	Unsure

S-98-22	1368689	Greater Manchester and High Peak Area of the Ramblers	2.4	Unsure. We recognise the need for affordable housing. Policy should require development to be sensitively located, work with surrounding character, protect rights of way and help to link people with nature. Comments noted and will be further considered.	Unsure

S-88-2	1368685	Rainow Parish Council	2.4	No preference stated. We would welcome the development of small collections of new builds if this attracted younger people to the village. But we note that current planning policies might make this difficult to achieve. There should be changes to the current planning policies which create more opportunities for affordable housing in and around the village. Our village has a high proportion of residents who are older living in properties which are or will be too large for their needs. Residents cannot move because of the lack of suitable accommodation. We would therefore welcome changes to current planning policies which create opportunities for development suitable for those aged 55 and over. Comments noted and will be further considered.	Unsure

S-85-1	1368680	Grindon Parish Council	2.4	Option 3. More environmentally sustainable and contributes to the goal of building vibrant communities. Larger settlements with services are better placed to absorb growth. In middling tiers, growth could help to sustain services that exist. In the smallest settlements improved infrastructure (accessibility/roads) would be required. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-73-3	1368375	Bradwell Community Land Trust	2.4	Option 3. Will help support vitality it Top Tier settlements and allow more people to live close to services and public transport links. Do not agree that housing in top-tier settlements is offered to residents in need from anywhere in the Peak District. A Peak District wide approach would also compromise the role of Community Land Trusts (like the one in Bradwell) which are obliged to serve their local community. Would need to carefully consider the size and types of development that will be considered favourably in each tier. For example, most higher tier settlements (such as Bradwell) should be able to accommodate some infill development and some small-scale development at their edge, including on greenfield sites. This could include market housing, particularly where this would help deliver affordable housing. Preference and comments noted and will be further considered. The Issues and Options document (Option 3 page 28) sets out that in Tier One Settlements 'development in principle is acceptable for local needs affordable homes to address the housing needs arising from any parish within the Peak District National Park part of the relevant housing authority'.	Change the settlement strategy so that there are more tiers

S-71-4	1368373	Tideswell Parish Council	2.4	Option 1 or 2 Parish first approach must be retained. Preference and comments noted and will be further considered.	
S-69-16	1368325	Derbyshire Dales District Council	2.4	Option 3 Greater flexibility and a pragmatic approach to meeting housing need. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-68-26	1368264	Bakewell Resident	2.4	Option 3. Population data shows current local plan is not delivering. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-67-21	1367857	Over Haddon Parish Council	2.4	Unsure. The majority feel that the current two-tier system is good enough because it places our village among others that are much bigger but allows us to have similar rights over planning and local decisions. Need to be free to decide through planning rules regardless of tier. Don't want housing forced but do want freedom to have housing if needed. Comments noted and will be further considered.	Unsure
S-62-54	1368170		2.4	Option 3. Two tier system is overly simplistic. Needs to be better aligned with other proposed changes. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-61-3	1368184		2.4	Option 2. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list
S-60-2	1368155		2.4	Option 1 or 2. Prefer option 1 to protect character of very small settlements. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not
S-59-34	1368081	SMDC	2.4	Option 3 Peak District is a changing disparate area with many interplaying needs. Two-tier system is unrealistic when the area and settlements are so diverse. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-57-1	1368149	Great Longstone Parish Council	2.4	Option 3. Longstone needs more affordable housing and the ability to determine its own direction rather than allocation from PDNPA. Prefer multi-tier settlement tier approach. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-53-1	1368144	Curbar Parish Council	2.4	Option 1 No convincing evidence for changing the current settlement strategy. The current strategy has worked well in delivering affordable housing in the places where need arises. The argument for restricting development based on registered providers' need for economies of scale is not backed up by any evidence the Council has seen. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

S-50-52	1367561	Peak Park Parishes Forum	2.4	Option 2. Option 2 needs to be broadened to allow, through exception clause(s), limited development in any settlement where specific circumstances justify this. More than 2 tiers is likely to be unworkable, because of difficulty in objectively deciding which community falls into which tier. There is need for clear criteria as to how Planning rules will be applied in parishes which straddle PDNPA's boundary - as, in those parishes, there is a not unreasonable belief that the whole settlement should be treated the same and that it is unjust to have an (often illogically drawn) intra-village boundary. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list

S-45-23	1367903	Froggatt Parish Meeting	2.4	Option 3. Accounts for the relative size and constraints of the settlement. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-44-3	1367865	Eyam Parish Council	2.4	Option 2. Option 2 needs to be broadened allow for exclusions so development in any settlement can progress where local need demands. Preference and comments noted and will be further considered.	Retain a 2-tier strategy but review the list

S-43-4	1367843	Natural England	2.4	No preference. In accordance with paragraph 181 of NPPF, local plans should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal and Habitat Regulations Assessment, to justify the site selection process and to ensure sites of least environmental value are selected. Comments noted and will be further considered.	Unsure
S-42-45	1367805		2.4	Option 3. Consistent with other local authorities. Clearer for the individual settlements to see where they sit and the guidelines that will apply in each tier. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers

S-40-6	1367788		2.4	Option 3. Will serve to be more reactive and accommodative in terms of meeting local affordable housing need, especially small scale developments such as those that might be undertaken on rural exception sites. Labour Government is proposing to make available a wider range of (funding) sources for small scale affordable housing in rural communities. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-36-2	1367737		2.4	Unsure. Tiered approach is too complex. Proposed development should be considered on its merits, not by which tier it belongs to!! Comments noted and will be further considered.	Unsure

S-31-3	1367452		2.4	Unsure. Need one simple option, not complicated and can't be used to stop development. Comments noted and will be further considered.	Unsure
S-30-3	1367447	Country Landowners Association	2.4	Unsure. It is recommended that there is no formal settlement hierarchy. Risk that all development is channelled to predetermined settlements, based on a rigid tiered system. Unfavoured areas being starved of essential development, leading to them becoming unsustainable. Proportionate and organic incremental sympathetic development (such as housing that affordable) must be permitted across the whole administrative area. Comments noted and will be further considered.	Unsure

S-25-1	1367242	Little Longstone Parish Council	2.4	Amend Appendix 5 'Settlement list'. Little Longstone has poor public transport. Comments noted.	
S-15-4	1364436		2.4	Option 3. To enable careful housing developments where there are good existing community facilities, public transport and infrastructure. Preference and comments noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-13-29	1364893		2.4	Option 1 The main strategy must be sustaining the special characteristics of the landscape, biodiversity and socio-cultural vernacular developments. Concern that more tiers may mean watering down of main priority. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

S-12-2	1364877		2.4	Option 3 Preference noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-9-52	1364715		2.4	Option 3. Preference noted and will be further considered.	Change the settlement strategy so that there are more tiers
S-7-43	1364251		2.4	Option 1. Simple and well-understood. Need to better understand the constraints that are preventing developments in these settlements. Preference and comments noted and will be further considered.	Retain the current approach - a 2-tier strategy of those settlements where new development is acceptable in principle, and the rest, where it is not

2.5 What is your preferred option for sites for housing development?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary and PDNPA response
S-224-4	1369634	Sheffield City Council	2.5	Support site allocation in Tier One settlements but should also consider allocations in Tier Two and limited market housing. Support for allocations in Tier One and Two settlements is noted and will be considered. Market homes are supported where they enable conservation and enhancement of the National Park.

S-223-5	1369632	Hartington Town Quarter Parish Council	2.5	Option 2. Support site allocations principle in Bakewell or perhaps other villages with populations in excess of a thousand people. If this turns out to be the broad criteria for Tier 1 in a multi-tier strategy the we would support the policy in general. Understand they are most likely to be able to absorb larger housing development and as such these schemes will be significant capital projects that will take considerable planning and funding. Local needs must be firmly established before sites are designated, otherwise the pressure from developers to allow mixed developments will be immense and viability becomes centre stage. Would support clear allocation for affordable homes only with no open market to subsidise development. This will dampen speculative land prices. Preference and comments noted and will be further considered.

S-221-5	1369595		2.5	No preference on options. Should significantly reduce development in National Parks due to catastrophic decline in Biodiversity and habitat quality. Future new development should be minimal and strictly controlled. Comments noted and will be further considered. The National Planning Policy Framework says that development in national parks should be limited.
S-220-2	1369594		2.5	Option 1. Current approach should be retained to prevent tier 1 settlements from becoming over-developed. Preference and comments noted and will be further considered.
S-218-2	1369554		2.5	Option 2 It is the main practical basis for delivering new affordable housing at volume with economies of scale to meet new government standards for nutrient neutrality and net biodiversity gain. No justification is given for the apparent gradualist perspective and this may be possibly encourage a steady inflation of land values around those settlements selected to host such sites. Preference and comments noted and will be further considered.

S-214-5	1369550	Hope with Aston Parish Council	2.5	Support for Option 1, exceptions approach because it is compatible with managing site provision alongside other initiatives to address under-supply. Site allocation has too many disadvantages. Support for option 1 exceptions approach is noted.
S-210-5	1369546		2.5	Support exceptions approach because this works best with a 2-tier strategy and indicative housing delivery figures are too high. Support for exceptions approach is noted and will be considered.
S-207-5	1369542	Youlgrave Community Land Trust.	2.5	Support option 2 (exception sites plus allocation in tier 1 settlements) as this may identify a range of sites and the disadvantages do not outweigh the benefit. Land value will be restricted if sites are for non-market housing. Preference and comments noted and will be considered.

S-205-1	1369539	Kingsman Homes	2.5	Option 2. It is an effective way to manage and control the way in which housing comes forward within the Peak District in a manner that upholds the purposes of the National Park. It is entirely reasonable to direct those allocations towards Tier One Settlements, which are recognised as the most sustainable locations with the Peak District given their established level of local services and facilities including public transport services to nearby urban areas. Preference and comments noted and will be further considered.
S-200-3	1369531	Stanton in Peak Parish Council	2.5	Option 2. Provides further flexibility over the current exceptions approach, but still retains the controls to prevent unwanted development. Preference and comments noted and will be further considered.

S-197-4	1369528		2.5	Option 1. Option 2's disadvantages outweigh the advantages. In particular rising land values will affect affordability. Housing defined as 'affordable' is often unaffordable for young people, a problem exacerbated by high levels of holiday homes, second homes and empty properties. Preference and comments noted and will be further considered.
S-196-2	1369527	Peak District Rural Housing Association	2.5	Option 1. As a Registered Provider that holds stock within the Peak Park and is also a provider of rural housing enabling services, we know that the most important thing to rural communities and parish councils is the local connection criteria. Their firm expectation is that any new homes built are, first and foremost, for people who live in, or have a strong connection to a particular parish, and remain so in perpetuity. Preference and comments noted and will be further considered.

S-195-4	1369526	Derbyshire County Council	2.5	Option 2. Agree that site allocations is a relevant issue and works best with a tiered settlement strategy. It is considered and supported that in the context of National Park purposes, only those settlements in the top tiers should have allocated sites and elsewhere the exceptions approach would still apply. That would be more likely to ensure that allocations respect National Park purposes and new development is directed to the most suitable and sustainable locations to accommodate new development. Preference and comments noted and will be further considered.
S-194-5	1369525	Derbyshire Dales District Council	2.5	Option 2. It would give greater clarity about the extent and scale of development likely to be acceptable in Tier 1 settlements (including Bakewell) and the location of potential new development. Preference and comments noted and will be further considered.

S-193-1	1369524	Winster Parish Council	2.5	The Park should still allow subtlety of local first-offer housing need to anyone within the parish. Then if there is none, to anyone from any parish. This can then also be viewed as sowing the needs of a community to have more permanent residents - more families to balance the demographic regardless of whether there is anyone within the local community specifically in housing need. The village in itself may be in need of housing need more families, more permanent residents. Comments noted.

S-191-3	1369522		2.5	No preference. No clear case for additional housing to tackle either depopulation, the expectation of achieving sustainable communities, or the wish to rebalance the demographics of the community. Accept problem of affordability. The number of people actually needing to live in the Park is relatively modest. Many parts of the Park are relatively close to its border. Away from National Parks, it is unremarkable for people to live several miles from where they work. We should be setting comparable expectations for the Park. For example a holiday cottage in Winster can be cleaned by someone living in Darley Dale or Matlock. There is a good argument to hope to continue to accommodate those who have worked in the Park and want to remain in the same community when they retire. There are enough suitable properties in existence to accommodate these groups but many of this group will not be able to afford the cost of suitable accommodation in the Park. Comments noted and will be further considered.

S-188-3	1369508	Staffordshire Moorlands District Council	2.5	Option 2. Will make the process of delivering housing where it is needed more straightforward and create more certainty as to exactly where development will take place. This will assist registered providers to determine whether a site and what scale of development is likely to be acceptable. Council would also like to see housing allocations in Tier 2 settlements (larger settlements with key services). Preference and comments noted and will be further considered.
S-185-5	1369502	Devonshire Group	2.5	

S-183-3	1369499	United Utilities	2.5	No preference. If a new approach is introduced in the Local Plan, UUW requests that your site selection process asks the promoters of a site to confirm how they intend to manage surface water. The discharge option for the management of surface water is a critical determinant of the impact on our wastewater assets. The preference of UUW would be for surface water to be managed via alternative means than the public combined sewer, which helps to manage flood risk and the impact of new development on water quality. UUW requests that you consider the extent to which land that may be allocated is in fragmented ownership and whether this will be likely to compromise a co-ordinated approach to the delivery of sustainable development. We believe that raising this point at this early stage is in the best interest of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner. Comments noted and will be further considered.

S-174-2	1369489	Labour Party - Bakewell and Northern Dales branch	2.5	Option 2. It is the main practical basis for delivering new affordable housing at volume with economies of scale to meet new government standards for nutrient neutrality and net biodiversity gain. No justification is given for the gradualist perspective and this may encourage a steady inflation of land values around those settlements selected to host such sites. Preference and comments noted and will be further considered.
S-173-4	1369488	Land & Nature Team - PDNPA	2.5	
S-170-8	1369472	Historic England	2.5	Unsure. Require the historic environment to be fully considered within any proposals for housing development with reference to Historic Environment Advice Note 3: Site allocation in Local Plans. Comments noted and will be further considered.
S-168-2	1369470	Railfuture	2.5	Option 2 Concentrating residential development in a smaller number of places provides the possibility for the supporting infrastructure to be enhanced at these locations. Preference and comments noted and will be further considered.

S-165-5	1369466	Taddington and Priestcliffe Parish Council	2.5	Option 1. Will not delay plan. Supports aim of thriving and sustainable communities. Do not agree with disadvantages as presented; lack of delivery is not a policy issue as it worked well prior to 2013. Does not properly set out how land allocation will address need over the lifetime of the plan. Will detract the energy and investment needed to support Thriving and Sustainable objective for Tier 2 and below. Preference and comments noted and will be further considered.
S-162-3	1369460	High Peak Borough Council	2.5	Option 2. Will create straightforward process for housing delivery with more certainty over location and scale, assisting registered providers Council would also like to see housing allocations in Tier 2 settlements (larger settlements with key services). Preference and comments noted and will be further considered.

S-161-9	1369459	CPRE Peak District and South Yorkshire	2.5	Option 1. Housing allocations will uplift land value resulting in fewer affordable homes per site. Allocations would only be supported if it can be clearly demonstrated that primarily local needs affordable housing could be secured on them. Need to consider key workers other than currently covered in Core Strategy policy HC2. Preference and comments noted and will be further considered.
S-156-3	1367563		2.5	Option 1. Current exceptions approach upholds National Park purposes and and keeps greenfield development to a minimum related to justified, proven demand. Option 2 may lead to bribery and corruption, hostility and division in settlements. Developers and landowners may see the value of their grazing land 'skyrocket' due to decisions made by parish councils and PDNPA. Preference and comments noted and will be further considered.
S-154-5	1369442		2.5	Option 1. There are fewer high impact disadvantages. Long term need cannot be known. Preference and comments noted and will be further considered.

S-153-3	1369437		2.5	Option 1. Other options inflate land value. Preference and comments noted and will be further considered.
S-151-5	1369433		2.5	Against any development on greenfield. Should compulsory purchase brownfield. Comments noted and will be further considered.
S-150-5	1369431		2.5	Option 1. It is harmful to focus new build in a small number of areas - this risks creating concentrated deprived communities. Preference and comments noted and will be further considered.
S-137-45	1369370	Derbyshire ALC	2.5	Option1. Better chance for sustainable and thriving communities across the Park and no urbanisation in bigger places. Preference and comments noted and will be further considered.

S-136-19	1369368		2.5	Option 2. Exception sites come forward on a piecemeal basis and are often not in ideal locations. Allocating some sites means that we have more control over where they are. Land prices within PDNPA are already quite high and likely to remain do. The immediate timescales for submission using the old method have been lengthened, enabling a longer term approach to enable us to get the correct submission. Preference and comments noted and will be further considered.
S-129-5	1369199	Rowsley Parish Council	2.5	Option 1. Allow parish council maximum say in the process. Preference and comments noted and will be further considered.
S-128-2	1369275	Rural Action Derbyshire	2.5	Option 1. Exceptions approach works in a two tier area. Would put too much emphasis on tier one. Would require lengthy negotiation and slow down the pace of agreeing the Local Plan. Preference and comments noted and will be further considered.
S-120-41	1368991	Marsh Farm Development Co Ltd	2.5	Option 2. Preference noted and will be further considered.

S-118-4	1369267	Haddon Estate	2.5	Option 2. It is a way to enable more suitable and affordable housing in appropriate locations. The removal of the parish first approach for allocations creates the potential for larger viable development which will address long term population trends, rather than only addressing short term needs. Council will have more control over the location of development, as well as giving landowners and developers clarity over the status of land and the requirements that go along with development. it is considered inappropriate for green field allocations to only relate to affordable housing without evidence to support that approach. There should be a specific affordable housing requirement per allocation, with some market housing allowed. This market housing could be available to those with a local connection and would assist in the viable delivery of affordable housing. This would also result in more mixed communities living in a range of tendered properties. Preference and comments noted and will be further considered.

S-114-2	1369155	Kirklees Council	2.5	Kirklees Council wish to learn more about proposed sites for housing development. Comments noted and will be further considered. A second Regulation 18 consultation (draft plan/preferred options) will be undertaken.
S-113-5	1369153	Edale Parish Council	2.5	Option 1. Provides more flexibility within a place-based approach, and so would be more likely to deliver affordable housing where people want to live. Preference and comments noted and will be further considered.
S-110-4	1369133	Middleton and Smerrill Parish Council	2.5	Option2. It would provide new housing for local people but would not guarantee that the homes would be affordable. Preference and comments noted and will be further considered. Option 2 (as set out on page 34 of the Issues and Options Report) sets out that '..policy would require housing development on allocated sites to meet local affordable need ..' The definition of 'affordable home' is set out on page 103 of the Report and is based on national policy. It is acknowledged that some homes within the definition may not be affordable to local people.

S-108-2	1369131	Youlgrave Parish Council	2.5	Option 1. Preference and comments noted and will be further considered.
S-107-1	1368485	NCHA	2.5	Option 2. Viability and time taken to bring schemes forward are issues. Allocations will make some development more efficient hence attractive to RPs to form part of their programme. Preference and comments noted and will be further considered.
S-106-7	1369124	Stanton in Peak PC	2.5	Option 1. Provides flexibility but retains control. Preference and comments noted and will be further considered.
S-104-32	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.5	Option 1. Risk that housing is concentrated in a few Tier 1 settlements leaving other villages with little opportunity to develop. Need flexibility to support local need where identified. Preference and comments noted and will be further considered.

S-100-2	1368991	Marsh Farm Development Co Ltd	2.5	Option 1. Preference noted and will be further considered.
S-98-35	1368689	Greater Manchester and High Peak Area of the Ramblers	2.5	Would like to see sensitively located development that works with surrounding character, protects rights of way and links people with nature. Comments noted and will be further considered. These requirements are existing policy proposed to be carried forward.
S-76-2	1368482	Sport England	2.5	Allocations must take into account Sport England policy to avoid challenge at examination. Site allocations that promote development should not prejudice the use of sports facilities in accordance with Paragraph 193 of the NPPF. Comments noted and will be further considered.

S-73-4	1368375	Bradwell Community Land Trust	2.5	Unsure Different approach is needed. Site allocations not appropriate in a national park where development opportunities are likely to be small-scale. Will be time consuming to identify. New approach should (subject to landscape and valuable open space considerations): Support development on brownfield sites and infill greenfield within the settlement. Support for small scale development, including on greenfield sites, on the edge of settlements where this would bring clear benefits (e.g. affordable housing, market housing development that delivers affordable housing, space for local business etc) If such sites can be easily identified they should be allocated. New policy should require market housing above a specific size threshold to require a percentage of affordable housing provision. Comments noted and will be further considered. The Authority is undertaking a (commissioned) viability assessment to determine site typologies and thresholds for developer contributions to affordable housing provision.

S-71-5	1368373	Tideswell Parish Council	2.5	Unsure. Different option would be to identify, with residents, a register of brownfield sites, without the need for a 'tiered' option or removal of the 'parish first' approach. Comments noted and will be further considered.
S-69-31	1368325	Derbyshire Dales District Council	2.5	Option 2. Seems more likely to result in properly planned development to meet local need ie housing need within the Park, which should not mean just the parish and adjoining parish. Preference and comments noted and will be further considered.
S-68-21	1368264	Bakewell Resident	2.5	Option 2. The current approach is not working and the Local Plan should seek approaches that reduce costs for developers which will bring forth more developments. Preference and comments noted and will be further considered.
S-62-14	1368170		2.5	Option 2. Concerned about pressure on land values. Additional housing is better in larger settlements but must respond to local need. Preference and comments noted and will be further considered.

S-60-3	1368155		2.5	Option 1. Preference noted and will be further considered.
S-59-20	1368081	SMDC	2.5	Option 2. Would provide more opportunity for small scale development to meet this need for local affordable housing. Preference and comments noted and will be further considered.
S-50-18	1367561	Peak Park Parishes Forum	2.5	Option 1. Option 2 may well not solve the problem of not enough houses being built, and may also lead to too many homes being built in some locations while not enough in others. In other words, Option 2 may weaken some communities through over-centralisation of homebuilding elsewhere in the Park. Option 1 must be applied more positively, ie less refusals than currently. Preference and comments noted and will be further considered.

S-45-7	1367903	Froggatt Parish Meeting	2.5	Option 2. Tier 1 settlements are better suited to meeting the policy requirements and will alleviate pressure from smaller settlements. Preference and comments noted and will be further considered.
S-44-42	1367865	Eyam Parish Council	2.5	Option 1. To accommodate local need. Preference and comments noted and will be further considered.
S-42-9	1367805		2.5	Option 2. All options must be considered as exceptions that are acceptable to the local residents. Preference and comments noted and will be further considered.

S-40-7	1367788		2.5	Option 2. Provides a more certain, less contentious pathway to delivery. Delivery requires funding and securing this is quicker and more straightforward for allocated sites. Community relations/tensions better addressed through open consultation of a range of site options rather than single ad hoc windfall site. Allocated site will have been assessed as available, suitable and deliverable. Once allocated the contentious phase is passed, planning permission can be secured and development undertaken, dovetailing to funding streams. Preference and comments noted and will be further considered.
S-30-4	1367447	Country Landowners Association	2.5	Option 1. Supports mechanisms that deliver sustainable and affordable homes. Policies should be clear and encourage applications for sustainable affordable homes. Preference and comments noted and will be further considered.
S-29-1	1367323		2.5	Preference for small brownfield sites. Prevent village sprawl. Consult the local community. Comments noted and will be further considered.

S-18-2	1367233		2.5	Small pockets of land. Query whether council cannot buy land and develop. Comments noted and will be further considered.
S-15-6	1364436		2.5	Option 2. To enable careful housing developments where there are good existing community facilities, public transport and infrastructure. Preference and comments noted and will be further considered.
S-13-25	1364893		2.5	Option 1. Aligns to national park purposes. Preference and comments noted and will be further considered.
S-9-49	1364715		2.5	Option 2. Restrictions exacerbate affordability problem. More local needs housing will support the primary settlements, younger residents, schools and doctors. Preference and comments noted and will be further considered.

S-8-5	1364695	-	2.5	Option 1. The development of affordable housing needs to be a priority. Where such developments have been held up, it is more likely to be due to specific site issues, such as highways or wastewater issues, rather than a fault with the policy. Preference and comments noted and will be further considered.

Q2.6 What is your preferred option regarding development boundaries?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary and PDNPA response
S-223-6	1369632	Hartington Town Quarter Parish Council	2.6	Unsure. Prefer Option 2 but also support 3. Any village should have the opportunity to define a development boundary, but the boundary needs proper rationale, to be subject to scrutiny and accepted by the majority of the community. Neighbourhood plan route is best way to consider the many factors (green space, historic layout, conservation area etc.). Authority should better support parishes to produce neighbourhood plans. Comments noted and will be further considered.

S-221-6	1369595		2.6	Option 3. If new development is allowed then development boundaries should be delineated for additional settlements, however, these must make provision for the complete protection of existing green spaces and the historic nature of the settlement. Preference and comments noted and will be further considered.
S-220-3	1369594		2.6	Option 1. Best satisfies National Park purposes. Preference and comments noted and will be further considered.

S-214-6	1369550	Hope with Aston Parish Council	2.6	Support for option 1 retain current policy. There is no evidence to suggest boundaries improve development management. Boundaries may encourage inappropriate development. Consultation process to define boundaries would be lengthy and potentially flawed. Preference and comments noted and will be further considered.
S-210-6	1369546		2.6	Council wishes to understand more about options that may affect Kirklees. Comments noted. A further Regulation 18 consultation on preferred options/draft plan, is planned.
S-207-6	1369542	Youlgrave Community Land Trust.	2.6	Support option 3 (development boundaries for key settlements) because this reassures communities, acts as a check and can help in the identification of sites. Preference and comments noted and will be considered.

S-200-4	1369531	Stanton in Peak Parish Council	2.6	Option 1. To prevent land hoarding/land price increases and potential house price increases. Neighbourhood plans allow settlements to outline sustainable growth and affordable housing. Preference and comments noted and will be further considered.
S-197-5	1369528		2.6	Option 1 Communities outside Bakewell can define a development boundary in a Neighbourhood Plan. Preference and comments noted and will be further considered.

S-195-5	1369526	Derbyshire County Council	2.6	Option 3. The need to identify additional settlement boundaries is justified and supported. The definition of settlement development boundaries is common in most of the existing adopted District and Borough Local Plans in Derbyshire and has been a successful tool for directing new housing development to be located within or adjoining existing settlement framework boundaries. It also helps to provide more clarity and certainty for developer as to which land is considered to be land in the open countryside and subject to more restrictive policies for development. Many neighbourhood plans that have been prepared in Derbyshire in recent years have also been more proactive in seeking to define settlement boundaries where the principle of new development would be acceptable. Given the relatively small scale nature of settlements in the NP, careful consideration will need to be given to which settlements in the hierarchy would be appropriate for settlement boundaries suggest those within tiers 1 and 2. Plan must make clear the scale and type of development that would be appropriate within the boundaries. Preference and comments noted and will be further considered.

S-194-6	1369525	Derbyshire Dales District Council	2.6	Option 3. The National Park Authority should determine when and where development boundaries are situated because the Neighbourhood Plan process is too slow. Must establish criteria to identify how they are drawn in the plan for a consistent approach. Preference and comments noted and will be further considered.
S-193-2	1369524	Winster Parish Council	2.6	No preference. Does not affect Winster. Comments noted.

S-188-4	1369508	Staffordshire Moorlands District Council	2.6	Option3. For consistency with regard to cross-boundary settlements. Waterhouses within Staffs. Moorlands District has a development boundary but the part on the Peak Park side does not.Sustainable development could potentially be accommodated here and a development boundary would help to define where this could take place. Preference and comments noted and will be further considered.
S-185-6	1369502	Devonshire Group	2.6	Option 1. Overly optimistic/ambitious due to diversity of settlements, complexity of multiple constraints and uncertainty regarding specific development need/aspirations/opportunities. Preference and comments noted and will be further considered.

S-165-6	1369466	Taddington and Priestcliffe Parish Council	2.6	No Option selected but opposed to boundaries in principle as this would prevent development on exception sites outside the boundary. Comments noted and will be further considered.
S-163-4	1368617		2.6	Option 3. Appropriate if tiered approach is pursued. Preference and comments noted and will be further considered.
S-162-4	1369460	High Peak Borough Council	2.6	Option 3. To align with cross-boundary settlements that have a boundary on the High Peak side, eg Hayfield and Tintwistle. Sustainable development could potentially be accommodated here and a development boundary would help to define where this could take place. Preference and comments noted and will be further considered.

S-161-7	1369459	CPRE Peak District and South Yorkshire	2.6	Option 3. Current approach effectively prevents development but less effective at supporting housing delivery. Designating new development boundaries for higher tier settlements with good range of services/facilities could be a useful alternative to housing site allocations. Such an approach would still need adequate mechanisms to secure primarily local need affordable housing. Preference and comments noted and will be further considered.
S-156-4	1367563		2.6	Option 3. Must continue with exceptions approach and other restrictive measures and ensure housing is for that parish or adjoining. Preference and comments noted and will be further considered.

S-154-6	1369442		2.6	Option 3. Some settlements may need to be considered in the way that Bakewell is. Preference and comments noted and will be further considered.
S-153-4	1369437		2.6	Option 1. To stop speculative land hoarding & consequent increase in land value. Neighbourhood plans can be used. Preference and comments noted and will be further considered.
S-151-6	1369433		2.6	No option preferred. Brownfield sites should be used until exhausted, not greenfield. Comments noted and will be further considered.
S-150-6	1369431		2.6	Option 2. Parishes should set the boundary. Preference and comments noted and will be further considered.

S-143-1	1369421		2.6	No preference given. Use of current housing stock or redevelopment/reconfiguration of other buildings should be explored before destroying untouched green fields. Questions specific to Bakewell Development boundary regarding decisions on, and process for change. Comments noted and will be further considered. With regard to the specific questions: Boundaries are changed as part of the statutory local plan or neighbourhood plan process. For a local plan decision-making is ultimately by Members of the Authority on officer advice. For a neighbourhood plan decision-making is by independent examiner and referendum. Both processes involve community consultation. Bakewell's development boundary was last changed in May 2019 on adoption of the Development Management Policies Document. Noted.

S-137-47	1369370	Derbyshire ALC	2.6	Option 3. Clear and fair. Neighbourhood plans are difficult for smaller places. Preference and comments noted and will be further considered.
S-136-32	1369368		2.6	Option 3. Bakewell is not the only settlement suitable for development. PDNPA setting the appropriate development boundaries will enable control over what happens, where, developing a strategic oversight for the whole plan. It should not be dependent on parishes developing an neighbourhood plan, but could be superseded by them. Preference and comments noted and will be further considered.

S-128-31	1369275	Rural Action Derbyshire	2.6	Unsure. Any approach must not impact on the availability of land for rural exception sites. Comments noted and will be further considered.
S-120-5	1368991	Marsh Farm Development Co Ltd	2.6	Option 3. To protect the open countryside. Preference and comments noted and will be further considered.
S-118-5	1369267	Haddon Estate	2.6	Option 3. Support for tier 1 settlements if tiered approach adopted. Elsewhere would be too restrictive. Preference and comments noted and will be further considered.

S-114-3	1369155	Kirklees Council	2.6	Council wishes to understand more about options that may affect Kirklees. Comments noted. A further Regulation 18 consultation on preferred options/draft plan, is planned.
S-113-6	1369153	Edale Parish Council	2.6	Option 1. Boundaries can be set in neighbourhood plans. May hold up progress on the plan and implementation. Brownfield sites outside development boundaries could potentially be used for housing. If modern farm buildings are demolished they could be replaced with appropriate new builds. Preference and comments noted and will be further considered.

S-107-17	1368485	NCHA	2.6	Option 3. To align with tiered approach. Will help to manage landowners expectations. Preference and comments noted and will be further considered.
S-104-20	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.6	Option 2. We see development boundaries as potentially very divisive and likely to be restrictive as circumstances change. Most villages effectively have a sort of boundary defined by the conservation area and this provides much of the protection needed. Where there is no conservation area defined the settlement is considered to be open countryside and therefore any development will be highly restricted. Preference and comments noted and will be further considered.

S-98-30	1368689	Greater Manchester and High Peak Area of the Ramblers	2.6	Unsure. Support sensitively located housing. Comments noted and will be further considered.

S-73-5	1368375	Bradwell Community Land Trust	2.6	Unsure. Prefer that is left to neighbourhood plans for most settlements but no view on Bakewell. Development boundaries can provide a high degree of certainty about where development will and won't be accepted. However, they are difficult to draw because they require a detailed study of the edge of each settlement and a multitude of subjective decisions about what to include and exclude. If they are drawn tightly around the built area, they will be too restrictive but, if they are drawn more widely, they require decisions now about which land might be suitable for development many years ahead. These decisions can be flawed because circumstances and opportunities change over time. It is time-consuming and costly to change a development plan and there is a risk that development boundaries are used to prevent development which should be allowed. The settlement / built area boundary in the 2015 Bradwell Neighbourhood Plan is now out of date and should be superseded by more flexible local plan policies. A more appropriate approach would be to have local policies which are flexible enough to allow positive developments within and on the edge of settlements, and which avoid trying to define hard and inflexible boundaries. Comments noted and will be further considered. Current policy, proposed to be carried forward, permits development in and on the edge of named settlements.

S-68-13	1368264	Bakewell Resident	2.6	Option 3. To align with tiered approach, reduce red tape and encourage appropriate development. Preference and comments noted and will be further considered.
S-62-13	1368170		2.6	Option 3. Neighbourhood Plans are very challenging for a Parish Council to produce and in reality would require PCs to rely on external consultants to navigate the Neighbourhood Plan maze. Yet Development Boundaries can surely be key to a local community having a significant say on where and what form of development can occur on the margins and within the current confines of their community. Preference and comments noted and will be further considered.

S-59-27	1368081	SMDC	2.6	Option 3. Need to have guidelines and boundaries to focus planning applications and protect certain areas. Preference and comments noted and will be further considered.
S-50-33	1367561	Peak Park Parishes Forum	2.6	Option 2. Pointless concept given that exception sites are (rightly) allowed outside the boundary. Preference and comments noted and will be further considered.
S-44-18	1367865	Eyam Parish Council	2.6	Option 2. Support local need provision. Preference and comments noted and will be further considered.
S-42-21	1367805		2.6	Option 1. Where development boundaries are defined by neighbourhood plan then they should be implemented. Preference and comments noted and will be further considered.

S-40-8	1367788		2.6	Option 1. Development boundaries should not prevent sites coming forward outside the boundary. Preference and comments noted and will be further considered.
S-30-5	1367447	Country Landowners Association	2.6	Unsure. Can be useful but need to be mechanism for adjustment. Comments noted and will be further considered.
S-18-1	1367233		2.6	Option 3. Needed for places like Bakewell and Bradwell. Should be defined by railway and roads. Preference and comments noted and will be further considered.
S-13-11	1364893		2.6	Option 1. Current policy still provides room for developments. Preference and comments noted and will be further considered.

S-9-4	1364715		2.6	Option 3. More certainty and to reduce speculative applications. Preference and comments noted and will be further considered.
S-7-22	1364251		2.6	Option 1. Preference and comments noted and will be further considered.

Q2.7 Do you think there is additional local benefit to be gained by designating local green space in and on the edge of Peak district settlements?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary and PDNPA response
S-223-7	1369632	Hartington Town Quarter Parish Council	2.7	Yes. Overwhelming support for LGS in consulting for neighbourhood plan. Green spaces within and on the edge of villages are an irreplaceable national and historical asset. Process should involve re-examining existing 'important open space' designations as these are often out of date. Agreement and comments noted and will be further considered.

S-222-3	1369631	TPT & Sustrans	2.7	Support as a way of involving the community.
S-221-7	1369595		2.7	Agree. Should not be restricted to traditional 'greens'. Should link habitats and create green corridors. Agreement and comments noted and will be further considered.
S-220-4	1369594		2.7	Agree. Would help to mitigate the risks of increased development into open countryside and the negative impacts of such development on the Park's special landscapes. Agreement and comments noted and will be further considered.

S-214-7	1369550	Hope with Aston Parish Council	2.7	Agree that there is additional local benefit because existing policies will not always defend locally valued spaces. Health benefits should be recognised in the spatial strategy. Noted. Health benefits of local green spaces are implied in the draft 'spatial strategy: proposed Local Plan spatial objectives for sustainable development in a national park'. This supports blue and green infrastructure, including public spaces, and the economic and social well-being of local communities. However consideration will be given to including a specific reference to health.

S-210-7	1369546		2.7	Does not support identifying green spaces because all land in a national park should be protected. Any designated green spaces should be accessible and have a nature recovery objective. Preference noted. Some land in a national park can be developed. Green space designation must be in accordance with the criteria set out in the NPPF. This means that while accessibility and nature recovery objectives are not prevented (and may be actively encouraged), they are not a requirement.
S-207-7	1369542	Youlgrave Community Land Trust.	2.7	Support for green space. May contribute to biodiversity, eg by creating wildlife corridor. Support and comment noted and will be further considered.

S-200-5	1369531	Stanton in Peak Parish Council	2.7	Agree. Some green spaces form a crucial part of a village scene and may be an amenity, eg a cricket pitch or the local village pond. Many areas are not under the control of parish councils and could be developed, changing the very essence of the village scene. Agreement and comments noted and will be further considered.

S-199-3	1369530	Environment Agency	2.7	Agree. It is important to consider if there are any areas of local importance which are not currently protected as a community recreation site or open space in a conservation area. Sites which developers do not currently need to have consideration for would be better protected by being designated as a Local Green Space. It is also worth considering how all the areas identified are incorporated to the LNRS in terms of mapping areas of high nature value and areas of opportunity to create/expand these habitats. Would designating areas as Local Green Space ensure/change the way that they are incorporated into the LNRS? Agreement and comments noted and will be further considered. Any LGSs designated will be mapped and considered alongside the Authority's nature recovery strategy and the statutory LNRS process.

S-197-6	1369528		2.7	Agree. LGS contributes to local distinctiveness which communities can help to define. Agreement and comments noted and will be further considered.
S-195-6	1369526	Derbyshire County Council	2.7	Agree. If development boundaries are drawn up there is a worry that all of the area within the boundary has the green light for development. It is therefore considered that Local Green Space designation (and may be other heritage designations) could be a useful tool for protecting areas within the development boundary. We therefore feel that development boundaries and Local Green Space should be used in combination. Agreement and comments noted and will be further considered.

S-194-7	1369525	Derbyshire Dales District Council	2.7	Unsure. There will always be local areas of green space within communities that have some value. If there is a reasoned justification for protecting additional areas of open space for transparency firstly the plan should set out the criteria and secondly set out what criteria the site is considered to be judged against. Comments noted and will be further considered. Criteria will be as set out in the NPPF.
S-193-3	1369524	Winster Parish Council	2.7	Unsure. May increase land price. Comments noted and will be further considered.

S-185-7	1369502	Devonshire Group	2.7	No. Need not demonstrated. Current local plan already offers significant protection. If NPA decides there is additional local benefit then evidence should include where lack of designation has led to disbenefits or challenges for informed decision-making. Would create additional complexity and cost. Disagreement and comments noted and will be further considered.
S-165-7	1369466	Taddington and Priestcliffe Parish Council	2.7	No. The whole of the National Park is a heritage asset and it is unclear why certain areas of land should be given more protection than others. The benefits of any new development should be weighed on a case by case basis against the qualities of the chosen site. Disagreement and comments noted and will be further considered.

S-158-4	1369452	Trans Pennine Trail and Sustrans Joint Response	2.7	Yes. To ensure community involvement. Agreement and comments noted and will be further considered.
S-154-7	1369442		2.7	Yes. Landscape setting is valued by some people, but others would just want to develop. Pragmatic approach in the context of conservation. Agreement and comments noted and will be further considered.
S-153-5	1369437		2.7	Yes. Some green spaces form a crucial part of a village scene and may be an amenity outside the control of parish councils. Agreement and comments noted and will be further considered.
S-151-7	1369433		2.7	Unsure. All greenfield should be protected. Comments noted and will be further considered.

S-150-7	1369431		2.7	Unsure. It MUST be in hands of the Parish, District or Town local democratic body control. The PDNPA has too much representation of non-local ideas and interests for Protected Opens Space and LGS designation. Comments noted. Local Green Space can only be designated by parish councils or neighbourhood forums in a neighbourhood plan, or by a local planning authority in a local plan. District councils are not the planning authority for the Peak District National Park.
S-137-30	1369370	Derbyshire ALC	2.7	No. The benefits would not outweigh the administration. Does not take into account that the value of a space may be lost over time. Disagreement and comments noted and will be further considered.

S-136-13	1369368		2.7	Yes. There will be areas of formal or informal recreation that are very important to local communities, of a higher priority than the general background level. It is important that they should be able to identify and record these, as much as for their cultural heritage benefit. Agreement and comments noted and will be further considered.
S-129-3	1369199	Rowsley Parish Council	2.7	Yes. Agreement noted and will be further considered.
S-128-15	1369275	Rural Action Derbyshire	2.7	Unsure. Need to consider alongside boundary question. If no boundaries, LGS would be of benefit, but not otherwise. Comments noted and will be further considered.

S-120-35	1368991	Marsh Farm Development Co Ltd	2.7	Yes. Major developments on the boundaries of the Peak Park could have a detrimental impact. Agreement and comments noted and will be further considered.
S-113-7	1369153	Edale Parish Council	2.7	No. Further protections not necessary. Disagreement and comments noted and will be further considered.

S-104-25	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.7	Yes. Local green space is highly valued by both residents and visitors. This is particularly true where villages are surrounded by extensive farming activity. Areas of green space within and around the villages provide areas for outdoor activities and open vistas that traditionally characterise country villages from suburbia. We therefore consider that they provide a significant local benefit. Wish to ensure that the villages are closely involved in their designation. Agreement and comments noted and will be further considered.
S-98-38	1368689	Greater Manchester and High Peak Area of the Ramblers	2.7	Yes. Local communities themselves need to lobby for such designation. If designated we would wish to protect rights of way and link people with nature. Agreement and comments noted and will be further considered.

S-76-3	1368482	Sport England	2.7	Request policy review. Policy on open space is not backed up by up to date evidence and worded such that a wide interpretation could be made. The Council Playing Pitch Strategy (PPS) is dated January 2018. Sport England are unaware of any steering group meeting that has taken place since then that has ensured that the recommendations and action plan of the PPS have been kept robust and up to date. Current policy does not consider developments that may prejudice the use of the sports facilities. Comments noted and will be further considered. The National Park Authority is not responsible for Playing Pitch Strategies but responds those of our constituent authorities.

S-71-6	1368373	Tideswell Parish Council	2.7	Unsure. In certain cases there would be additional local benefit but designation is better via the Neighbourhood Plan process. Comments noted and will be further considered.
S-69-40	1368325	Derbyshire Dales District Council	2.7	Yes. Many villages have particularly special areas which are important to the life of the community and should be capable of protection. Agreement and comments noted and will be considered.
S-68-8	1368264	Bakewell Resident	2.7	Yes. In combination with development boundaries for Tier 1 settlements, open space and local green space should be defined and protected to give communities and developers clear guidance on what proposals will and will not be acceptable. Agreement and comments noted and will be further considered.

S-62-26	1368170		2.7	Yes. It should lie with a community to identify which local green spaces are, for a variety of reasons, held to be important to that community. Agreement and comments noted and will be further considered.
S-59-29	1368081	SMDC	2.7	Yes. Local Green Spaces are are vital importance in helping to educate communities about nature. We are presently living in a nature crisis. there needs to be areas set aside residential areas where people can explore, experience and empathise with nature. Agreement and comments noted and will be further considered.
S-50-31	1367561	Peak Park Parishes Forum	2.7	Yes. Caveated by saying that such designation needs to be applied sparingly (so as not to be unduly restrictive) and that the criteria need to be carefully designed. Agreement and comments noted and will be further considered. Criteria are set out in the National Planning Policy Framework.

S-45-27	1367903	Froggatt Parish Meeting	2.7	Yes. Affords additional protection. Agreement and comments noted and will be further considered.
S-44-22	1367865	Eyam Parish Council	2.7	Unsure. Must not negatively impact on local need (housing.) Comments noted and will be further considered.

S-43-5	1367843	Natural England	2.7	Yes. We suggest that ideally these areas should connect with the wider Green Infrastructure Network. Green Infrastructure should be a specific policy within the new Local Plan Review. A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in paragraph 181 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Agreement and comments noted and will be further considered.
S-42-16	1367805		2.7	Yes. In a neighbourhood plan. Agreement and comments noted and will be further considered.

S-40-9	1367788		2.7	No. Provided that the extant Policy position whereby development may be permitted in certain circumstances is retained. Disagreement and comments noted and will be further considered.
S-29-2	1367323		2.7	Yes. Should be designated to protect special areas from development on the edge of villages. Agreement and comments noted and will be further considered.
S-13-26	1364893		2.7	Yes. Due to creeping urbanisation. Agreement and comments noted and will be further considered.
S-9-38	1364715		2.7	Yes. Agreement noted and will be further considered.

Q2.8 Thinking about current policy T1 is there anything else we should include in an aspirational sustainable transport land use policy?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary and PDNPA response
S-223-8	1369632	Hartington Town Quarter Parish Council	2.8	The respondent favours the following: - EV charging in car parks to serve residents and visitors. Electric bikes from the visitor centres to encourage park and cycle' To be considered as T1 and other policies are developed
S-222-4	1369631	TPT & Sustrans	2.8	Active travel routes should be free from barriers with cycle parking and storage. Any development should provide cycle storage. Comments noted and will be positively considered.

S-221-8	1369595		2.8	The respondent suggested the following aspirations: - Consider lobbying for a charge for all through traffic. Consider lobbying for weight limits for lorries travelling through the park. (with exemptions for locally based hauliers). Discourage businesses which generate high volumes of commercial transport. (Especially if these could operate outside the National Park). The suggestions are interesting ones and will be considered as the Plan is progressed, but most are outside of the direct scope of the Plan to deliver
S-220-5	1369594		2.8	The respondent would like to see: - Consideration given to the establishment of "Cross Park" sustainable travel routes. Traffic free routes across the Park would surely encourage more people to walk and cycle rather than use a car. The National Park Authority is currently producing a National Park equivalent of a Local Cycling & Walking Infrastructure Plan, which will pick this up.
S-214-8	1369550	Hope with Aston Parish Council	2.8	Should include explicit reference to electric vehicle charging infrastructure. Noted and will be considered.

S-213-1	1369549	The British Horse Society	2.8	The respondent believes that we should make the following additions to T1 Recognise equestrians as vulnerable road users along with cyclists and pedestrians and that horse riding be acknowledged as a form of active travel Equestrians should be included in shared route provision wherever possible; methods could include a wider single verge and a cycle / pedestrian route alongside. Incorporate the principles of the Hampshire Countryside Access Forum (HCAF) guidance Equestrians in Hampshire within planning policy. We recognise that equestrians are also vulnerable road users; where the Plan refers to named types of vulnerable users, equestrians will be included where appropriate. We acknowledge that horse riding is a form of active travel and that the requirements of horse riders should be met when delivering multi-user routes, wherever it is practical to do so. Current policies T6: Routes for walking, cycling and horse riding, and waterways and DMT5: Development affecting a public right of way (Part D) specifically refer to horse riding alongside walking and cycling. Reference to the Hampshire Countryside Access Forum (HCAF) guidance Equestrians in Hampshire will be considered in the further development of the Plan.

S-210-8	1369546		2.8	More radical approach needed through advocacy work. Work with highway authorities to restrict traffic on smaller/minor roads in areas of high landscape/recreation value, eg Goyt Valley, Upper Derwent, Coal Pit Lane. Suggestions noted and will be positively considered.
S-207-8	1369542	Youlgrave Community Land Trust.	2.8	Better public transport. Establish transport hubs in larger, well-connected communities. Electric recharging and car parking with charge points cannot be allowed to dominate the open landscape. Comments noted and will be further considered.

S-203-4	1369536	Tarmac	2.8	The respondent provided the following comment: - Current Policy T1 seeks to deter cross Park traffic. There are nationally significant mineral extraction sites and industrial manufacturing operations located within the Park. In addition, mineral extracted from the Park is transported outside of the Park and mineral extracted from outside the Park is imported in. Mineral development can only occur where it is located, and policy should be worded so that it can be flexible to the individual circumstances associated with traffic movements generated. Opportunities for sustainable modes of transport should be supported but equally, recognition should be made of financial viability for delivering necessary infrastructure and also the implications on other National Park objectives. The respondent raises valid points but there seems to be some confusion as what is meant by 'cross-Park traffic. In the context of Policy T1 it refers to that traffic which does not have an origin or destination within the National Park. None of the examples given by the respondent would be classed as 'cross-Park' traffic as it would have a legitimate origin or destination within the National Park.

S-200-6	1369531	Stanton in Peak Parish Council	2.8	The respondent made the following suggestions: - Far better communication links to villages and outlying farms is still required, there are villages where even some mobile networks do not have coverage. The internet coverage is woeful in many places and there is a clear lack of push by suppliers to extend fast broadband throughout the NP area which restricts some working from home which would reduce some travel in and out of the NP. Above all the impact of visitor journeys needs to be addressed, better rail facilities (more space for cycles on trains arriving in the NP and just outside would help) better advertising is needed such as travel to Matlock by train from Derby with your bike and access the NP. Out of park parking for Park & Ride. The whole electric vehicle charging system needs to be viewed from the position of no driveway charging facilities rather than the way its currently being implemented and hydrogen accepted as the real future. Noted and will be positively considered.
S-197-7	1369528		2.8	The respondent wishes to an addition to Policy T1(D) T1D states 'Improved connectivity between sustainable modes of travel will be sought.' The respondent wishes to see the policy say 'Improved connectivity and reliability between sustainable modes of travel will be sought.' This is a valid point and will be considered as the Plan is further developed.

S-195-7	1369526	Derbyshire County Council	2.8	The respondent made the following suggestions: - These proposed policies are very much welcomed and investing in routes for people to walk, wheel and cycle will help to achieve the overall ambition for Derbyshire Cycle Network, including more and better-connected multi-user trails which will cater for both leisure and everyday journeys. Active travel helps to create happier, healthier and greener communities by reducing social isolation, improving health and helping the PDNPA and DCC meet their climate change commitments. There may also be scope to outline clear support for home-working in this section. However, in order to be deliverable & achievable Policy T1 must align with and reflect Highway Authority priorities, responsibilities, and sovereignties, thereby maximising benefits, creating synergy and minimising potential negative consequences for all. Ensuring alignment and collaboration between partners offers better opportunity to identify and mitigate against potential unintended consequences, such as: 1. Increased Traffic in Neighbouring Areas Encouraging more visitors to use public transport could lead to congestion in towns just outside the Park, especially at rail stations and bus hubs, if adequate transport links are not in place. 2. Pressure on Local Infrastructure Increased footfall in villages and towns around key entry points to the National Park may put strain on local amenities, such as parking facilities, toilets, and shops, potentially overwhelming smaller communities. 3. Displacement of Car Parking If visitor car use is discouraged within the Park, it may lead to higher levels of parking in neighbouring areas, particularly if sufficient public transport options are not available. The respondent raises valid points, and the National Park Authority takes a pro-active approach in working with partners. However, it must be recognised that the National Park is covered by more than one highway authority and achieving a perfect synergy with the aims and desires of all of our constituent authorities may be difficult. It should also be borne in mind that the traffic passing from and through neighbouring areas also contributes to the congestion, carbon emissions, airborne pollution and other disbenefits experienced within those neighbouring areas. Our ultimate aim is for as many people as possible to make their journey to the National Park by public transport and / or active travel. Whilst private EV's offer a more sustainable means of accessing the National Park, a one-for-one switch from ICE

				to EV will not ease the pressure of vehicles on the busier parts of the National Park; with all of the issues identified by the respondent continuing to occur within the National Park.

S-194-8	1369525	Derbyshire Dales District Council	2.8	The respondent made the following suggestions: - Any public transport service must dovetail in with existing and proposed new development. It should also be deliverable, viable and sustainable i.e. one that endures beyond any limited trial period. If necessary such services should be subsidised. The respondent raises valid points, these will be considered as the Plan is developed.
S-193-4	1369524	Winster Parish Council	2.8	The respondent made the following comments: - The Park needs to recognise changing patterns - eg of young people NOT learning to drive, and that changes can be very long term. We need a joined-up and clear policy on electric car charging for residents, especially those without off-road parking. The respondent raises valid points, the first of which has potentially long-terms affects on how people travel, and the services that they can access. The second point is a high priority for the Government, which is offering funding to highway authorities for roadside charge points. Derbyshire County Council has held a public consultation to identify sites for EV charge points.

S-186-4	1369505		2.8	The respondent made the following comments: - There are two serious omissions in this policy. (i) It is not framed within the urgent need to reduce transport emissions; (ii) sustainable travel is not defined. (i) Transport is the sector with now the greatest emissions, having made no contribution in the first 30yrs to reducing carbon emissions. The Plan should ensure maximum benefits can accrue for sustainable travel from development that occurs. Current best practice is not good enough and the Local Plan needs to go beyond it the RTP1 with the TCPA have produced some strong guidelines. This will require strong partnership with local and combined authorities. As location of development underpins the spatial response to the climate emergency and jobs and growth are driving the governments agenda, investment opportunities through the spatial plan will be limited. Nevertheless the policy must be framed within carbon reduction. (ii) There are several references to sustainable travel and transport. The settlement strategy is founded on good public transport. Sustainable transport will be promoted at recreation and tourist hubs. The plan will enable travel by sustainable means. But nowhere is sustainable travel defined. Sustainable must mean active travel and public transport are the first choice to access jobs, services, education, leisure, shops because they represent a competitive alternative to the private car. The policy should include the sustainable travel hierarchy, which will also help to define and reinforce sustainable (see below). To reduce the need to travel should be added by private car, as the intent is not to stop people travelling per se. The aim is to remove pressures for more highway capacity to be built, improve the quality of rural and urban life, and reduce carbon emissions, pollution and environmental damage. The language of the policy must leave no doubt in developers mind what is expected strong explicit policies should not only promote public transport and active travel but condition it for larger developments. When taken together, policies T1, T2 and T7 must require sustainable transport schemes encouraging a modal shift away from motor vehicles, and traffic management schemes within environmentally sensitive locations, with reduced car parking. Suggested changes to T1 (amendments in bold and italics) A. Conserving and enhancing the National Parks valued characteristics will be the primary criterion in the planning and design of transport and its management. B. All travel by both people and freight should contribute to carbon reduction. C. An integrated public transport system for bus and rail based on One Network One Timetable One

				Ticket will be promoted. D. High quality safe and convenient walking and cycling facilities will be promoted and integrated with public transport. E. Cross-Park traffic will be deterred. F. Modal shift to sustainable transport will be encouraged. The Sustainable Travel Hierarchy will be applied to access to all development and all traffic management schemes. G. Improved connectivity between sustainable modes of travel will be sought. Travel hubs will be supported. H. Impacts of traffic within environmentally sensitive locations will be reduced and minimised I. Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted. J. Demand management and low carbon initiatives will be sought where appropriate. Sustainable travel hierarchy. Making sustainable travel choices a reality depends on implementation of a sustainable travel hierarchy. CPREs example is presented below but see also that of the Energy Trust. In descending order, the decreasing sustainability of the options for travel and the choices that minimize carbon emissions and energy, reduce the need to travel by car and are the healthiest. For a multi-modal journey, each leg should be taken by the most sustainable means available. When planning, funding and implementing transport solutions the hierarchy should be applied downwards from the inverted base of the triangle, giving greatest priority from the top down. Its application is essential to ensure sustainability. Travel hubs. These are essential in order to provide the connectivity for seamless journeys for medium and longer journeys. The policy needs to spell out their scope from small e.g. bus and cycle to rail-bus hubs. Criteria include: Safe place to have a break in journey in shelter and continue onwards, Toilets, warm drink, bike and EV car hire Reliable bus service to integrate with trains Attractive and safe access for walkers and cyclists Shuttle bus for onward travel to other villages and attractions Information accessible to all; easily available for onward journeys to key attractions. See that of the

				Energy Saving Trust as an example https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/>https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/ Signage to indicate way finding to bus/train stops, nearby attractions Charging for e-bikes and EVs. The respondent makes good points and they will be considered as the Plan is developed.

S-184-3	1369500	Hope Valley Climate Action	2.8	The respondent made the following points: - Core Strategy T1 - needs updating. In its present form there are two serious omissions in this policy. (a) It is not framed within the urgent need to reduce transport emissions; (b) sustainable travel is not defined. (a) As the sector with now the greatest emissions, and having made no contribution in the first 30+yrs to reducing carbon emissions, travel and transport must now contribute. This will not be easy for the PDNPA to bring about. It is not a transport authority and has to work with 7 local transport authorities and 5 combined authorities, making integration complex and resource intensive as numerous partnerships are required. Current best practice is not good enough, and the Local Plan needs to go above and beyond the Royal Town Planning Institute with the Town and Country Planning Association have produced some strong guidelines. There is fleeting mention of low carbon initiatives but the policy is not framed within carbon reduction. (b) There are a number of welcome references in policies to the need for sustainable transport. However there is a serious omission in not being more explicit about what sustainable looks like. Road traffic is increasing, 90% of visitors arrive by car and public transport especially bus services, the workhorse, are underfunded with falling patronage and increasing fares. Does sustainable just mean replacing all the fossil fueled vehicles with EVs? Our belief is that sustainable transport must mean public transport and active travel are the first choice to access jobs, services, education, leisure, shops because they represent a competitive alternative to the private car. Including the sustainable travel hierarchy will help to define sustainable. References to reducing the need to travel should include by private car, as we don't want to stop people travelling per se. The aim is to remove pressures for more highway capacity to be built, improve the quality of rural and urban life and reduce carbon emissions, pollution and environmental damage. The language of the policy is soft. There must be no doubt in developers' minds what is expected strong explicit policies should not only promote public transport and active travel but condition it for larger developments. We therefore suggest that Core Strategy T1 should be amended as follows. Policy Core Strategy T1A. Conserving and enhancing the National Parks valued characteristics will be the primary criterion in the planning and design of transport and its management. B. An integrated

				public transport system for bus and rail based on One Network One Timetable One Ticket will be promoted.C. High quality safe and convenient walking and cycling facilities will be promoted and integrated with public transport.D. Travel by both people and freight should contribute to carbon reduction.E. Cross-Park traffic will be deterred.F. Modal shift to sustainable transport will be encouraged. The Sustainable Travel Hierarchy will be applied to access to all development and all traffic management schemes. (see note below)G. Travel hubs that enable seamless well-connected journeys will be supported H. Impacts of traffic within environmentally sensitive locations will be reduced and minimised. I. Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted.J. Demand management and low carbon initiatives will be sought. Sustainable travel hierarchyMaking sustainable travel choices a reality depends on implementation of a sustainable transport hierarchy. The Council for the Protection of Rural Englands version of this below is presented as anexample1 ; in descending order, the decreasing sustainability of the options for travel and the choices that minimize carbon emissions and energy, reduce the need to travel by car and are the healthiest. For a multi-modal journey, each leg should be taken by the most sustainable means available. When planning, funding and implementing transport solutions the hierarchy should be applied downwards from the inverted base of the triangle, giving greatest priority from the top down. Its application is essential to ensure sustainability. Digital communication walking wheeling and cycling public and shared transport sustainably fuelled vehicles ICE vehicles water transport aviation Travel hubs These are essential in order to provide the connectivity for seamless journeys for medium and longer journeys. The policy needs to spell out their scope from small e.g. bus and cycle to rail-bus hubs. Criteria include: Safe place to have a break in journey in shelter and continue onwards

				Toilets, warm drink, bicycle, e-bicycle and EV car hire Reliable bus service to integrate with trains Attractive and safe access for walkers and cyclists Shuttle bus for onward travel to other villages and attractions Information accessible to all; easily available for onward journeys to key attractions Signage to indicate way finding to bus/train stops, nearby attractions. The response contains really useful suggestions that will be considered during the development of the Plan.

S-172-2	1369486	Grindleford Parish Council	2.8	The respondent supplied the following suggestions: - The shortness of this section is disproportionate to the importance of this issue for residents and visitors alike; but this reflects the Parks limited control over policy and services. That said, the question implies that the Park should look dare one say imaginatively at what can be done. GPCs response on issue 4 notes that some densification within existing settlements can help make the market for improved public transport services. Beyond this, we believe that there is scope for more charging for parking in places where parking is currently free. An example of where this could be done would be the spaces on the B6521 running past Padley Gorge. The aim would not be to price off demand, but to generate a consistent revenue stream which could improve other facilities, including sustainable transport issues. It also seems to us likely that there is scope for buses to do more perhaps at weekends, the use of smaller buses (ideally with bicycle storage) making regular predictable round trips starting and finishing at access points such as railway stations. The well-used free bus routes in central Manchester could provide a model for this; or perhaps the Sherpar Wyddfa bus service in the Eryi National Park. While this is not strictly a matter for a planning document, progress in new service provision would go further than most measures to meet our shared objectives. The respondent raises some good points, some of which, roadside parking charges for example, lie outside the scope of the Plan. The points will be considered as the Plan is developed.

S-168-3	1369470	Railfuture	2.8	The respondent made the following comments: - Though the aims in Core Strategy T1 are laudable, we see little tangible action to bring them about. For example, the lack of railway stations in much of the Park mean existing rail users are driving long distances to those stations that do exist, both from within and outside the Park but crossing the area in the process. (For example, driving to Grindleford to catch trains to Manchester.) Furthermore, buses are a valuable form of sustainable transport, but they are themselves vulnerable to the traffic congestion that currently occurs. This is a deterrent to usage. A viable rail alternative enables users to avoid this problem. The policy should reinforce the pursuit of improved connectivity between sustainable modes of travel, especially around existing and potential new railway stations. The lack of effective public transport in much of the National Park will have the effect of suppressing latent demand for travel, both from residents and visitors who do not have access to cars. Improvement would unlock at least some of this, to the benefit both of users and the economy. By way of comparison, we note the Sustainable travel and transport section in the Lake District National Park Partnerships Management Plan 2020-2050. This makes direct reference to rail and bus improvements and initiatives plus integration between the two. https://www.lakedistrict.gov.uk/caringfor/lake-district-national-park-partnership/management-plan/sustainable-travel-and-transport The respondent raises some good points that will be considered as the Plan is developed.

S-166-3	1369468	Breedon	2.8	The respondent provided the following comment: - Breedon considers that after closure of the Cement Works instead of the private branch line connecting to the Hope Valley rail line being dismantled, instead its potential should be considered for retention as a sustainable travel link to the wider rail network. The respondent's suggestion is a good one, and has the potential to support the future use of the site, possibly through a Very Light Railway approach.
S-165-8	1369466	Taddington and Priestcliffe Parish Council	2.8	The respondent provided the following comment: - Some Plain English and a clear indication as to which if any of these are in practice deliverable through the Local Plan would help. Visitor Management and off-road parking for visitors, businesses and local residents are key issues, as is the impact upon nature. The respondent's comments will be considered as the Plan is developed.

S-161-13	1369459	CPRE Peak District and South Yorkshire	2.8	The respondent advises the following: - There is a need for an exemplary approach to reducing carbon emissions associated with transport and travel. An aspirational transport policy is supported in principle and the CPRE PDSY acknowledge the challenges of increasing visitor numbers and the complexity of the PDNPA working with seven different local transport authorities and five combined authorities. However, the current spatial strategy in relation to sustainable travel needs to be framed within the urgent need to reduce carbon emissions and to mitigate the impacts of visitor traffic whilst also providing public transport and active travel alternatives for those wishing to visit the Peak. The CPRE (national) report Every Village, every hour 2021 buses report highlights the issues and need for better public transport within and connecting into the PDNP. Making sustainable travel choices a reality depends on implementation of a sustainable transport hierarchy. CPREs (national) version of this below is presented as an example; in descending order, the decreasing sustainability of the options for travel and the choices that minimize carbon emissions and energy, reduce the need to travel by car and are the healthiest. For a multi-modal journey, each leg should be taken by the most sustainable means available. When planning, funding and implementing transport solutions the hierarchy should be applied downwards from the inverted base of the triangle, giving greatest priority from the top down. Its application is essential to ensure sustainability. - digital communication - walking wheeling and cycling - public and shared transport - sustainably fuelled vehicles - ICE vehicles - water transport - aviation Integrated Travel Hubs are essential in order to provide the connectivity for seamless journeys for medium and longer journeys. The policy needs to spell out their scope from small e.g. bus and cycle to larger scale rail-bus hubs. Criteria include: Safe place to have a break in journey in shelter and continue onwards

				Toilets, warm drink, bike and EV car hire Reliable bus service to integrate with trains Attractive and safe access for walkers and cyclists Shuttle bus for onward travel to other villages and attractions Information accessible to all; easily available for onward journeys to key attractions Signage to indicate way finding to bus/train stops, nearby attractions Frequent, affordable, flexible sustainable transport services should be provided with visitor car restraint. The current sustainable transport policy T1 covers in brief the right themes but more detail is needed in a PDNPA Local Plan in respect of reducing travel by private car albeit whilst also improving opportunities for residents and visitors to travel by alternative modes. What sustainable means in relation to new development and its location needs to be set out in some detail, with regard to where development is supported, and what is needed off site and on site to make the development accessible to a high degree. Sustainable should mean that public transport and active travel are the first choice to access jobs, services, education, leisure and shops because they represent a competitive alternative to the private car for both those living within and visiting the Peak District. A recent study by the RTPi highlights the need for more to be done by planning to create a settlement pattern, layouts and designs of development that makes alternatives to the car competitive in terms of travel times (RTPi The Location of Development). On this note the PDNPA should consider policies requiring higher density in relation to locations which are most sustainable for new development. There is also a strategic need to not just identify where improvements are needed in terms of integrated transport and travel but for an on-going dialogue with surrounding local and mayoral authorities to secure investment. Accordingly, the CPRE PDSY would suggest the following changes to policy T1:Policy: Core Strategy T1A. Conserving and enhancing the National Parks valued characteristics will be the primary criterion in the planning and design of transport and its management.B. Development within the National

				Park should make a positive contribute to reducing emissions of carbon and national targets for net zero in terms of travel by both people and freight contingent.C. An integrated public transport system for bus and rail based on One Network One Timetable One Ticket will be promoted.D High quality safe and convenient walking and cycling facilities will be promoted and integrated with public transport.E Cross-Park traffic will be deterred. F. Modal shift to sustainable transport walking, wheeling, public transport and zero emissions private transport will be supported and promoted through the application of the Sustainable Travel Hierarchy to all development and all traffic management schemes. G.Improved connectivity between sustainable modes of travel will be sought. H Travel hubs will be supported and promoted to help connect services and facilities. I Impacts of traffic within environmentally sensitive locations will be reduced and minimised. J Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted. K Demand management and low carbon initiatives will be sought. Where appropriate. L Strategic green routes for walking and cycling into and within the Park and for increasing opportunities for local people to access local amenities and longer distance commuting will be promoted (Question 23) A new policy should be created which concentrates on promoting sustainable transport in new developments. Such policies are contained in other Local Plans and aims to ensure at developmentmanagement stage the implementation of layouts and designs which connect sites to wider walking, cycling and public transport networks and also enhance off-site provision where necessary to make the development acceptable in planning terms. The respondent provides valid comment that will be cosidered in the development of Policy T1.

S-159-1	1369454	Staffordshire County Council	2.8	The respondent made the following comments: - We would support an aspirational transport strategy that aligns with our emerging LTP4 to be published in 2025, which may help inform amendments to policy T1. We look forward to seeing our constituent authority's Local Transport Plans, their development, will inform the new T1 policy.
S-158-2	1369452	Trans Pennine Trail and Sustrans Joint Response	2.8	The respondent made the following suggestions: - Greater emphasis on supporting active travel infrastructure, including additional cycle parking and storage facilities at key locations along the trails. Promoting cycling as a healthy and environmentally-friendly mode of transport is critical in reducing carbon emissions and alleviating congestion in our towns and villages. By providing better facilities for cyclists, the Peak District can help foster a greener, more sustainable future while continuing to prioritize the health and well-being of its residents and visitors. Active travel routes should be free from restricted barriers to encourage full use by all legitimate users regardless of ability. Cycle parking and cycle storage should be provided to encourage sustainable transport modes. Cycle storage should also be provided as part of any future development within the Peak Park. The respondent raises valid points. Some of these would be picked up in current policy under Policy T2(F) as part of travel plans. There is the opportunity for the proposed Recreation Attractions and Recreation Hubs policy to also help with the delivery of these aspirations. There is also the opportunity to include an overarching approach within the revised Policy T1.

S-154-8	1369442		2.8	The respondent provided the following comments: - Conserving and enhancing the National Parks valued characteristics will be the primary criterion in the planning and design of transport and its management. Agree, but some options presented in this Review could result in fragmentation Cross-Park traffic will be deterred. It is completely unclear what this means in practice deterred means no management because there will always be reasons why no positive action should be taken. Modal shift to sustainable transport will be encouraged. Too vague, too big, and very unclear. There is no truly sustainable transport in this area some people use busses where available, some drive to take the train. The biggest issues are the private car and delivery vehicles. Neither of those two are truly sustainable, and the use of cars is impossible to manage. Improved connectivity between sustainable modes of travel will be sought. What does this mean? Impacts of traffic within environmentally sensitive locations will be minimised. This is too vague to be meaningful we can seek to minimise means business as usual. What are the environmentally sensitive locations and are socially sensitive locations even considered (parking, congestion, etc)? Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted. Why do the highlighted words not feature more in policies? In fact quiet enjoyment was dropped from NP purpose some time ago (unfortunately). Demand management and low carbon initiatives will be sought where appropriate. Avoid over-focus on low carbon. There are lots of other things that impact on the NP and wider environment. It is totally unclear what this means. The respondent raises good points, these will be considered as the Plan is developed.

S-153-6	1369437		2.8	The respondent made the following comments: - Far better communication links to villages and outlying farms is still required, there are villages where even some mobile networks do not have coverage. The internet coverage is woeful in many places and there is a clear lack of push by suppliers to extend fast broadband throughout the NP area which restricts some working from home which would reduce some travel in and out of the NP. Above all the impact of visitor journeys needs to be addressed, better rail facilities (more space for cycles on trains arriving in the NP and just outside would help) better advertising is needed such as travel to Matlock by train from Derby with your bike and access the NP. Out of park parking for Park & Ride. The whole electric vehicle charging system needs to be viewed from the position of no driveway charging facilities rather than the way its currently being implemented. The comments provided will be considered as Policy T1 is reviewed.

S-152-2	1369434		2.8	The respondent made the following observations: - Car use, and therefore road usage, is increasing. Small rural villages such as Grindleford have single roadaccess. Any new housing stock would likely increase the number of cars using the limited road access. Visitor numbers to the Peak District have increased massively since lockdown. Most visitors come by car, mostly due to the poor public transport, unless they are brave enough to risk not being able to get home again! Whilst the number of visitors is good for local business getting around for local people is becoming increasingly difficult. How does the Peak Park intend to deal with this? What is their plan? Car parks are not wanted here, better public transport is the only sustainable alternative. Whilst the respondent raises some valid points / concerns, they do not suggest changes or additions for T1.

S-151-8	1369433		2.8	The respondent provided the following comments: - the local public transport is very poor. Northern Rail is appalling. The 2 hourly bus in the day (65) that serves Grindleford (never in the evening) is plainly inadequate. Less cars need to be driven into the Park, so public transport needs to be much, much better The operation of existing bus and rails services is outside of the National Park Authority's control and the scope of this plan. However, the general concerns will be considered as part of the review of policy T1.

S-150-8	1369431		2.8	The respondent provided the following comment: - I think that to make an impact, the major traffic and travel issue should be addressed; tourist traffic. Residents and businesses need better sustainable transport than there currently is, and high levels of tourist traffic and speeding motorcycles are a significant problem and threat. I am a driver in my 60s who also has cycled in the Peak all his life. I would like to see: a. Controls on speed and noise b. Far better routes between villages and towns for cycling. Some routes in my area that we cycled for many years, have even been stopped by the National Trust meaning far more dangerous narrow roads must be used. c. Parking needs to be sorted out, Nether Padly now suffers very dangerous parking problems due to staff and visitors to local tourist businesses. d. Bring affordable Park and Rides back, such as the one that existed at Grindleford Station. The comments provided are useful, but some lie outside of the scope of the Plan. They will be considered as the Plan is developed.

S-147-3	1369428	The Campaign for the Peak Line	2.8	The respondent made the following comments: - Omitted from T1 is any consideration of the 30% of the population without access to a car (per ONS). Often in less well paid jobs, these are people who might have most to gain from the benefits from the Park. Shortcomings of bus as a reliable form of transport at present traffic volumes are referred to here. The same applies to those with disability and no access to a car. Current policy is one of selective access: The 70% Park. Yet the Park claims to be for all, without much idea of how to get people there. The liquidation of Derbyshire Community Transport is a tragedy, highlighting local mobility/access issues. Policy as presented today, seems to be a call for the return of rail. As just one example, the results of current policy and development tends to maximise cross park travel. There is no other means than rail for achieving the mass shift to public transport desired by the Park. Nothing else works on that scale, for modal shift and emissions reduction. The bar for sustainable and accessible public transport is set high by Transport for the North's publication about Transport Related Social Exclusion, which underpins its new strategy document: https://www.transportforthenorth.com/social-inclusion/ TfNs recognition of the high proportion of socially excluded, at 3.3million in a region with a total population of 16 million is doubtless mirrored in Derbyshire and the East Midlands The reported rise of 16% in visitors to 9.46 million annually, with projected further increases to 2030 means little progress can be made until the accelerating visitor numbers are offered a realistic and appealing choice to move to public transport. With the fragility of bus already referred to, this means rail. CPL hoped that the Park might grasp this nettle and develop a strategy similar in thinking to that of the Lake District National Park, trying to reduce the importance of cars by insisting that more people use rail to arrive. With the Park's ability to bring back the Peak Line, it can do better than this. The potential is for the Authority to outshine the Lakes and achieve an absolute reduction in visitor traffic. This would make the Park a top performer amongst its peers. The first green shoots of success are seen now on the Hope Valley line, where post COVID journey volumes are now well in excess of volumes prior to the pandemic (Fig D below). These results are encouraging, but they do not touch honey pot areas in and around Bakewell. Until the Peak Line returns little will be achieved. Park and ride or edge of town parking offers some

				congestion advantage, but little reduction in emissions. The findings from the recent work on bus referred to elsewhere confirms the limitations of bus as a primary travel mode. Visitors find them at their most unreliable, just when most needed at peak times (summer holidays and bank holidays). However, once the train is available, modal shift will reduce car volumes, permanently. This will aid reliability of bus services, encouraging those arriving by train to use them for first / last mile transfer, to/from their destination. This point was demonstrated by the recent snow falls. On the day after the heaviest snow falls, car volumes were low with people working from home or not travelling. Using the buses on that day the Trent Barton nines were all running at the timetabled 15 minute intervals. The following day, traffic returned and service returned to their usual level of disruption. That sums up the aspiration for the Park, for effective buses, deliverable once the railway is restored and car volumes are reduced. CPL is disappointed to see that none of this is explored. With policy set at a high aspirational level, it could be developed later with stakeholders. During campaigning, CPL was told that 6 million people visit Bakewell annually, not validated, though DfT published road vehicle volumes suggest 10 million vehicle movements in the town annually. Enticed to use rail, a modal shift to train of between a third and a half of the 6 million is possible. As a premier national and international tourist attraction, the Park is arriving late at confronting the scale and complexity of rising visitor numbers. The advantage is that the Park can now learn from the mistakes of others, such as Luxembourg. But by shying away from the problem and the need to invest in fixed link transport solutions, kicking the can down the road, this seems to maintain or exacerbate emissions. Future funding might come to be set by approving and then benchmarking the success of policies now being developed. The implications of Core Strategy, T1, therefore require careful consideration. Given the pressures of rising traffic volumes, projected to rise even further, a rethink about what sustainable travel means in practice for the Park might usefully be undertaken. The consultation offers only past data, but the chart below (Figure A) from McKinseys report on the UK visitor economy (domestic and inbound) suggests a bright future for the visitor economy, but only if congestion and pollution are controlled and reduced. This projected surge in visitor numbers and traffic needs to be managed and rail would do the job. It is a surprise to find that the increase in local traffic flows has been as little as 16% between 2012 and 2023. However, McKinsey (above), now projects equally significant post COVID increases in UK domestic and inbound tourism. PDNP can expect a similar increase in road traffic by 2030, with little support from changes to bus.

				Given that climate change statute anticipates a reduction of perhaps 20% in private mileage on the way to net zero, any change policy seems unlikely to help much. For example, inbound visitors, arriving at Manchester Airport, destined for the Lake District National Park can reach Windermere by train in less than 2.5 hours, with at most, one change. On discovering the lack of appealing public transport, visitors to the Peak District are likely to hire a car (source: Visiting Peak District and Derbyshire) The PDNPA can have a solution to this through its own railway, the Peak Line, which can bring about many good things, including the reduction of cross park travel. There are significant levels of cross park journeys by car and HGVs, given the lack of appealing public transport. A snapshot of the problem is set down in the 2014 Atkins report on the A6 corridor, suggesting that T1 is not yet successful: https://www.highpeak.gov.uk/media/1620/MQ3-A6_Corridor-Study-Final-Report-2014/pdf/MQ3_A6_Corridor_Study_Final_Report_2014.pdf Non-compliant Cross Park Travel car travel to rail interchange. This chart (Fig B below) from page 67 of the report is informative, though a full analysis is beyond the scope of this submission. Atkins discovered that the shortcomings of rail connectivity meant that commuters from Hartington, Matlock, Chesterfield and Mansfield drive regularly across the Park, in search of a suitable railhead interchange, with Grindleford station being favoured. Although this may be a relatively small number of drivers, most days, post COVID it is one segment of several. There is also a Chinley catchment, not as extensive, but one which also extends into the Park to the south of Buxton. These journeys are caused either from an absence of rail or through the inadequacy of current services, all constrained by the lack of the Peak Line. b) Driving from origin to destination It should be noted that this diagram takes no account of another segment, those who drive the entire distance of their journey from similar points of origin to Stockport or Manchester. On leafleting the A6 corridor, CPL has encountered commuters who have admitted to coming close to serious accidents as they have almost nodded off at the steering wheel on the way home to either Bakewell or Matlock from Manchester. This situation is unacceptable. HGVs - cross park transit. At a recent in Matlock presentation, CPL encountered a bereaved mother whose daughter was killed some time ago when her car was in collision with one of the steady stream of quarry lorries at the A515 / A 5012 Newhaven junction. In conversation, she stated that the link between road safety and rail reinstatement had not previously occurred to her. She left the room a new supporter of rail. Similar discussions have taken place with Ashbourne residents, where

				there have been other accidents on the A515 HGV route. A recent analysis of HGV volumes suggested the possibility of the Peak Line helping to remove 70,000 round trips (for aggregates and cement) from Derbyshire Dales roads. Although this applies to current volumes, the quarries regularly announce expansion. Available emissions reductions from such changes are substantial. They were first documented in a study for the reinstatement campaign with estimates from Derby University in 2019. A further indication of volumes and the potential for impact is illustrated below using publicly available DfT data for road volumes. All transport segments for residential, visitor, public service and freight are included in arriving at 10 million journeys each year. With suitable encouragement, work by MEMRAP estimated more than 2 million journeys could be moved to rail each year. The Bakewell survey at Easter 2024 referred to elsewhere shows that bus improvements, whilst welcome, are unreliable and get caught up in traffic congestion, encouraging users from the 70% of the population with cars, to go back to them. If the National Park continues to oppose the return of rail, then the continued use of Strategy T1 is unhelpful, since it is unachievable. Comments on T1 are as follows: A. Network Rail has changed considerably in the years since privatisation. In the past, net loss was tolerated. However, it currently has a licence that requires no gain, no loss. In the next operating period, its licence will change again to require net gain to be delivered, aligned with Park requirements and recent statute. B. There are various ways in which cross park traffic is maximised currently: a. Commuting and business drive to park at railhead b. Commuting and business drive the entire distance c. Bakewell congestion for residents and visitors d. Inbound visitors car hire e. HGVs journeys across the Park maximised C. Current marketing to increase use of the Hope Valley Line has been successful (see graph below). The increase between 2018_9 and 2023_4 is about 105,000 for all the stations on the line. (See graph below). However, the benefit from any transfer to bus around the park is minor due to unreliability and the effect of congestion. We note that the 170 aims to bring in more people from Chesterfield. But to make change at levels of transformation requires the reinstatement. D. The model for multi-modal transfers at hubs is the Borders Rail station hub at Galashiels: https://www.youtube.com/watch?v=zAoV_k9hiyk. This grade of facility will be required at Bakewell to achieve the effect required by this policy E. F. and G: The availability of multi-modal hubs at railway stations will allow the Park to exert far

				greater control over the mode of access to the most sensitive areas. CPL has discovered that visitors to the Monsal Trail expressed interest in possibility of taking a train, rather than the car, with suitable alternative provision. Incentives (i.e. attraction + rail/wayfarer ticket) can entice, rather than coerce, at least in the first instance. As the only scalable and robust solution to its transport challenges, the railway cannot yet help, as re-opening is a number of years away. However, the difficulties caused to the National Park environment, also to Derbyshire and the East Midlands in general by its absence are significant. The available benefits for the economic, social and environmental wellbeing and development of the Park, county and the whole region are substantial. The comments above aim to illustrate, at a high level, how the railway can help take the delivery of and compliance with policy T1 to a new level, an order of magnitude beyond anything possible today. If the Park is to demonstrate sustainability in its approach to transport and modal shift, then this is the leading option. The above chart shows recent successes of Hope Valley Line marketing in raising ridership during the post COVID period. From the regulators recently released 2023/4 data, it is clear that the stations in the Hope Valley have increased over pre-COVID ridership levels by over 100,000 journeys in those 12 months. However, this is one small area of the Park and its capacity is limited. Though some trains have been increased in length on the Hope Valley, it is the return of the Peak Line that would really make a difference. You will be well aware that such convenient access into the Park is not available from the south (i.e. Nottingham, Derby and other points of origin). Building on the evidence offered above, the introduction of the Peak Line into the transport equation will allow a modification especially to B of T1:- Commuter, business and visitor traffic levels could be reduced across the park- HGV traffic to be reduced from the quarries. Initial analysis suggests that 70,000 annual HGV round trips by road today, travelling south across Derbyshire Dales could be shifted onto rail. Point 1C can refer to the preference for the hubs established at each station access point within the Park, allowing multi-user options to be maximised: walk, cycle, bus and even taxi for difficult to reach destinations and those with special mobility needs. The Park should not shy away from any short term impact from reinstatement. Network Rail is obliged to comply with statute and deliver net gain. The Nottingham university study commissioned by MEMRAP in 2020/1 showed that the railway could be accompanied by new or extended Nature Recovery Networks. The author considered that this would be a major improvement. Careful management of the implementation could be valuable for the biodiversity and wider longer term

				prospects. The respondent's focus is on rail reinstatement along the Monsal Trail. The comments suggest that it is within the gift of the National Park Authority to reopen the railway, it is not. Current Policy allows for reinstatement should a scheme come forward that meets the requirements of National and Local Policy. So far, no scheme that is able to do so has been brought forward. The National Park Authority is clear in it's policy that safeguarding for rail does not imply support for any scheme. The response is recorded in the suggestions as showing support for rail reinstatement on the Monsal Trail.

S-142-3	1369419		2.8	The respondent provided the following comments: - theres little proposed here and needs a clearer direction of travel towards truly sustainable means: active and public transport. Its stated that between 2012 and 2023 traffic flow in the National Park has increased by 16%. So, words arent working. Damage is being done. Rather than encouraging modal shift is it time to switch to actively disincentivising visits by private car? The balance is currently swung way too far towards cars being the easiest, cheapest, most normalised way to access the park. This is wrong. Ultimately National Parks were not set up to spend all their time managing private cars. Electric charging points are picked out as a key limiting factor while nothing is specified about what might be limiting travel by other means. Id say transport policy desperately needs specific mention of cycle parking and storage which is a serious limiting factor to enabling sustainable cycle travel into and around the park &mdash; for access to the countryside, leisure tourism spending and everyday local residents journeys. New cycle parking can be delivered with barely any spatial impact and for minimal cost. Quite unlike car charging points. Why not an objective to have secure Sheffield-style cycle stands retrospectively installed in every village and town centre, at every Peak District National Park car park, at every key tourist destination (eg Chatsworth). The park should also have a defined policy document stipulating design standards and numbers for cycle parking/storage whenever new development occurs. It should commit to the installation of a certain minimum number of new secure stands each year until areas are adequately served. Local parish councils could bid or request to be provided. The respondent makes some useful suggestions, however, retrofit of cycle parking is outside of the scope of the Plan. We can however require travel plans to accompany larger developments and require cycle parking as part of that. The Authority is also currently producing a National Park equivalent of a locally Cycling & Walking Infrastructure Plan. The delivery of new or improved multi-user routes can drive the supply of facilities for cyclists in support of local business.

S-138-1	1369372		2.8	The respondent made the following comments: - The policy is insufficiently ambitious. It should take into account the recommendations and findings contained in reports such as: https://www.transportfornewhomes.org.uk/about-us/transport-for-new-homes-charter/ https://www.transportfornewhomes.org.uk/about-us/transport-for-new-homes-charter/ https://neweconomics.org/uploads/files/NEF_Trapped-Behind-The-Wheel_Final.pdf https://www.sustrans.org.uk/media/4491/4491.pdf https://www.sustrans.org.uk/media/4491/4491.pdf The respondents comments are noted.
S-137-10	1369370	Derbyshire ALC	2.8	The respondent made the following comment: - Active travel (walking, cycling) will not always be possible/attractive on current paths and tracks: may need development and may need some land for use as paths etc. The comments provided are useful, the Authority is currently producing a National Park equivalent of a Local Cycling & Walking Infrastructure Plan.

S-136-5	1369368		2.8	The respondent made the following comments: - Encouraging staying within the National Park should be encouraged, with other appropriate supporting policies, to reduce the impact of day visitors. Transport considerations in individual applications should include their impacts, both local and strategic, on the special qualities, in addition to their impacts on highways. The respondent raises good points that will be considered as the Plan is developed.
S-128-16	1369275	Rural Action Derbyshire	2.8	The respondent made the following comments: - We would suggest that an aspirational sustainable transport land use policy should pick on key themes of the LP and set a standard for all new development which should take into account: - travel to work areas, key destinations and routes and consider local transport hubs for example, build in community energy schemes, EV charging points in settlements and make a priority to support live/work spaces and incentivise the development of green tourism initiatives, invest in travel planning for inbound visitors to focus on sustainable travel around the Peak. The response contains some useful suggestions that will be considered as the Plan is developed.

S-120-31	1368991	Marsh Farm Development Co Ltd	2.8	The respondent provided the following comment: - Tighter control is needed on where cars can park protecting grass verges and reducing congestion in our communities. The comment provided is useful, and will be considered as the Plan is developed.
S-117-2	1369166		2.8	The respondent wishes to include public transport connectivity across the whole of the National Park. This aspiration is supported. However, delivery falls outside the scope of this Plan. The National Park Management Plan includes a Sustainable Travel Framework, which may cover this. We will consider ways in which the aspiration could be included within T1, but within the scope of the Local Plan.

S-113-8	1369153	Edale Parish Council	2.8	The respondent made the following suggestions: - The policy needs to be more explicit: A Cross-Park traffic will be deterred B National Infrastructure projects which encourage heavy traffic will be usually be opposed. C Provision for modal shift to public transport and active travel (walking, wheeling and cycling) will be required for new developments. D Improved connectivity between sustainable modes of travel - bus, rail and active travel - will be supported E Traffic within environmentally sensitive locations will be minimised through support for sustainable transport. F Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics or impact negatively on communities, will be promoted. G Road charging will be considered for visitors to the National Park. The respondent makes some interesting suggestions that will be considered as Policy T1 is developed. It should be noted that road user charging lies outside of the scope of the Plan and the remit and responsibility of the National Park Authority.
S-110-5	1369133	Middleton and Smerrill Parish Council	2.8	The respondent suggested the following: - More reliable local bus services- routes to take visitors to e.g. centres for bike hire, to encourage active travel. Whilst a valid point, the provision of bus services lies outside of the remit of the National Park Authority; and the scope of the Plan.

S-104-14	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	2.8	The respondent provided the following comments: - A major issue for both visitors and residence is the appearance of large groups of very noisy vehicles across the Park, particularly on summer weekends. Whilst wishing to encourage usage of the Park by the widest range of visitors, it should not be to the serious of others. The Parish Council thought the NPA should consider more radical opportunities such as using NPRCs to introduce a system for charging admission to at least the wilder areas of the NP and towing at least the vehicles that are parked most dangerously. The respondent raises some concerns that are generally beyond the scope of the Plan and the remit of the National Park Authority to control. The Authority is not responsible for the policing of motor vehicles on public roads. It also does not have any powers to introduce charges for use of public roads.

S-98-4	1368689	Greater Manchester and High Peak Area of the Ramblers	2.8	The respondent made the following comments: - It may be that the Local Plan should include an obligation on all planning applicants to have considered what the proposed development would contributed to the achieving of the core objectives on sustainable transport. Beyond the local plan review process, it is essential that the authority renews its commitment to work with all partners to seek solution. The respondent raises an interesting point - the NPPF (2024) requires the delivery of Transport Assessments for new developments and the production of Travel Plans. However, it is also clear in paragraph 116 , that: - "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

S-84-1	1368677	Langsett Parish Council	2.8	The respondent wishes to include the following: - Langsett Parish Council would support the introduction of public transport services for its own residents but also for the very many visitors to the Langsett area. We are sure you are already aware of the consultation currently being undertaken by the South Yorkshire Combined Mayoral Authority, which will be an opportunity for these suggestions to be considered and we are sure you will be commenting on that review in connection with your own Local Plan review. The provision of public transport lies outside of the scope of this plan. However the National Park Management Plan's Sustainable Travel Framework focuses on a range of travel options including public transport. The Authority seeks to influence those with the power to deliver public transport within the National Park, seeing it's provision as vital for residents and visitors. The National Park Authority has submitted a response to the SYMCA Franchising of Bus Services Consultation.

S-76-4	1368482	Sport England	2.8	The respondent provided the following comments: - Sport England welcome the intention of a sustainable transport land-use policy as it could in turn promote active travel. Sport England consider active travel is the simplest and most inclusive way of getting people to incorporate activity into their daily lives and has numerous benefits for physical and mental health, the environment, the places we live, quality of life and social inclusion. Working with Active Travel England (ATE) and the Office for Health Improvement and Disparities (OHID), Sport England has produced an updated version of the Active Design guide. Please refer to our website - Theme 1 supporting active travel that provides further details about active travel as well as case studies. The respondent provides useful comment that will be considered as we develop the Plan. The Authority is currently producing a National Park equivalent of a Local Cycling & Walking Infrastructure Plan.

S-71-7	1368373	Tideswell Parish Council	2.8	The respondent's comments are as follows: - The shift to electric vehicles: providing charging points (or facilitating others to do so) will be critical. This will benefit to both visitors (so chargers in car parks), but also for residents (who will require charging solutions nearer to home). Many Peak District villages are typically full of small cottages with mostly on street parking - and the options for EV charging are limited. The points raised are valid - highway authorities are leading on this, with funding from the Department for Transport. Derbyshire County Council held a consultation to identify sites for roadside charging points during 2024.
S-70-1	1368372		2.8	The respondent provided the following suggestions: - Include a new paragraph in policy T1 to capture the PDNPAs intent to promote and facilitate the expansion and delivery of sustainable transport alternatives with the relevant transport authorities and other bodies. Suggested wording: The expansion and delivery of sustainable transport solutions will be promoted and facilitated. The suggestion is a good one and will be considered as the Plan is developed

S-69-41	1368325	Derbyshire Dales District Council	2.8	Much more could be done to improve interconnectedness of public transport services and provision of information to transport users. The PDNPA should work with county councils and rail providers to develop public transport hubs with joined up access between trains, buses, cycle hire and running/walking trails. The development of hubs of this nature could require planning permission and as such would fall under the remit of this Plan. However, responsibility for delivering transport hubs rests with the relevant Transport authority. The National Park Management Plan does include the commitment to deliver a Sustainable Travel Framework through partnership working.
S-68-3	1368264	Bakewell Resident	2.8	The respondent made the following suggestions: - Impacts of traffic and related air pollution on communities will be minimised. proposals for sustainable transport infrastructure and facilities which improve the connectivity of existing and new sustainable transport infrastructure, services and networks will be supported (this is from the Lake District Local Plan). These are good suggestions and will be considered as the Plan is developed.

S-62-3	1368170		2.8	The respondent made the following suggestions: - Add responsiveness to fast changing transport related technologies e.g. is the electrical infrastructure in many of our rural communities fit for purpose should the take up of electric vehicles move forward as the drive for net zero bites? The respondent raises a valid point, that the the plan will need to adapt to new technologies that may include EV and other low carbon modes. The Plan will need to reflect this as it is developed.
S-59-17	1368081	SMDC	2.8	The respondent made the following comment: - No but I think this element is important to champion
S-57-2	1368149	Great Longstone Parish Council	2.8	The respondent made the following comment: - General opinion was that the current transport policy particularly around bus service was inadequate, again this was a view from the floor and not voted on as a majority. Whilst accepting that bus services have been a concern of residents for some time, and having sympathy with the issue, the National Park Authority is not a Transport Authority and has no powers or remit for providing bus services. Those responsibilities lie with bus operators and transport authorities.
S-50-29	1367561	Peak Park Parishes Forum	2.8	The respondent provided the following comment: - It is probably of only slight value to focus on this, as so many of the transport issues are outside PDNPA's control.
S-44-24	1367865	Eyam Parish Council	2.8	The respondent provided the following comment: - No, as transport is largely outside control of Peak Park

S-43-6	1367843	Natural England	2.8	The respondent provided the following suggestions: - Active travel should be included in the policy to encourage focus on getting more people to walk and cycle for short journeys instead of relying on cars and public transport. This is a way of improving the health and fitness of communities and improving air quality by reducing congestion and carbon emissions. Transport proposals, including walking and cycling, should link with policies on Green Infrastructure and ecological networks to support access to nature. Transport proposals can also offer opportunities to create new habitats and/ or connect habitats for example railway embankments and highway verges. In addition, commonly encountered air quality impacts on designated sites are associated with emissions from increased road traffic resulting from new development and transport schemes. The impact of increased emissions should be fully considered and mitigated where there is potential to impact designated sites. The respondent raises useful suggestions that will be considered as the plan develops.

S-42-18	1367805		2.8	The respondent provided the following comments: - The current position is far from satisfactory. The local bus services are far too infrequent and really unreliable. There is not enough made of the local rail hubs from the existing Sheffield-Manchester rail - shuttle bus services from Grindleford - Bakewell would open up many opportunities and at a relatively low cost. The &pound;00's millions required to reinstate the Matlock Buxton rail service would be far more effective if a fraction of this was spent on enhancing the bus service to existing rail hubs. The respondent raises valid points, but they are largely outside of the scope of the Local Plan.
S-40-10	1367788		2.8	The respondent made the following suggestions: - Sites should be allocated to optimize economies of scale at locations that are strategic in both the local and tourism context to establish large scale EV charging stations. A piecemeal approach which leads to a great many small-scale facilities is likely to have a greater negative impact in terms of vehicular movements and localized loss of amenity. Whilst the respondent raises valid points, any EV charging stations of the scale described are likely to be major development. As such they would need to meet the Major Development Test for National Parks as set out within paragraph 190 of the National Planning Policy Framework (2024).

S-31-4	1367452		2.8	The respondent provided the following suggestion: - Make more use of Park and Ride schemes to cut down on congestion. The current Local Plan includes Policy T7D which states: - Park and ride schemes will be encouraged to the main visitor areas, where they can be accommodated without harm to the valued characteristics of the area and will provide a net environmental benefit to the National Park. It is likely that this approach will be carried forward into the New Plan.
S-30-6	1367447	Country Landowners Association	2.8	The respondent made the following suggestions: - The rural nature of the park must be taken into account when making decisions. Sustainable transport is encouraged and development across the park should be supported. To support local EV charger installation and minimise the need to travel large distances. Lack of local development is one reason why individuals may need to travel to larger settlements such as Bakewell. Local development should be supported and make local use of public transport. Rural development must be supported in order to support local services The respondent raises valid points that will be considered as the plan is developed.

S-29-5	1367323		2.8	The respondent provided the following comments: - a shift to sustainable transport to be encouraged but I am not sure what that means in reality. My village does not have a bus service as the lanes are too narrow for a normal coach or bus and that applies to many villages unless a smaller "mountain Goat" type service is to be introduced. Easier access for homes to have electric charging or a village facility would be welcome. Highway authorities are able to access government funding for on-street EV charging facilities. Derbyshire County Council recently held a public consultation to identify possible sites.
S-13-18	1364893		2.8	The respondent gave the following comment: More encouragement for integrated transport timetables Whilst a valid point, this is beyond the scope of the Local Plan.
S-9-36	1364715		2.8	The respondent gave the following suggestions: - Subsidies for bus travel into peak park. Work with other authorities to encourage better bus and train connections for locals. NB car parking charges do not have desired effect at places like Curbar Gap, leading to stupid parking on the road The Peak District National Park Management Plan is a partnership plan that includes the development of a Sustainable travel Framework. The aspirations above are part of the remit of the Management Plan.

S-7-38	1364251		2.8	The respondent made the following suggestion: - Evaluate road charging (with discount for residents) and/or enhanced parking restrictions and higher parking charges (with resident permit system), reinvesting the proceeds in public transport, including park and ride schemes. Road user charging and resident parking permits are outside of the scope of this plan and the remit of the National Park Authority. Bot would need to be introduced by our seven constituent highway authorities.
S-6-2	1364014		2.8	The respondent made the following comment: - There needs to far better public transport across the middle of the Park e.g. Hope Valley to the High Peak - there are hardly any buses for locals or tourists. Whilst the point may be valid, the National Park Authority does not have any remit to deliver public transport services.

Q3.1 Do you agree with the proposed spatial objectives for landscape, nature and biodiversity

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Point	Summary and PDNPA response
S-224-5	1369634	Sheffield City Council	3.1	Yes. Broadly agree with the spatial objectives but would wish to see how planning policy can support a move from upland farming into more hybrid uses that better support biodiversity, habitat expansion and flood mitigation. Qualified support noted. Comments will be positively considered. The National Park's Special Qualities include those related to settled upland farming and our National Park Management Plan vision is that we are exemplary in our response to climate change and nature recovery. The balance (where there is a conflict) must be reconciled in the next National Park Management Plan (when Special Qualities will be reviewed) and the ongoing protected landscapes targets and outcomes framework. The local plan will respond to this.
S-223-9	1369632	Hartington Town Quarter Parish Council	3.1	Agree. Agreement noted.
S-222-5	1369631	TPT & Sustrans	3.1	Support due to relationship between nature and physical and mental health. Support noted.

				Support.
S-221-9	1369595		3.1	Support noted.
S-220-6	1369594		3.1	Support
S-214-9	1369550	Hope with Aston Parish Council	3.1	Support spatial objectives, however the 30x30 commitment should be included and specific reference to long term protection for non-designated sites of nature conservation value. Noted and will be positively considered. Current policy (Core Strategy L2A) already gives specific protection to sites, features or species.
S-210-9	1369546		3.1	Does not support objectives because of the conflict/tension between preservation of settled agricultural landscapes and the promotion of nature recovery. Comment noted, and will be positively considered. Proposed objectives can only be framed within the context of the adopted national park management plan (that sets out Special Qualities) and landscape strategy, where the same conflicts are also apparent. The Authority's one plan for nature recovery, the statutory local nature recovery strategies, the protected landscapes targets and outcomes framework, and any future iterations of the landscape strategy and management plan may resolve this, and where these processes align with the local plan process, the local plan objectives can amended accordingly.
S-207-9	1369542	Youlgrave Community Land Trust.	3.1	Agree with objectives but implementation is largely through farming and national policy/subsidy. Agreement noted.
S-203-5	1369536	Tarmac	3.1	Yes. A focus on larger expanses of habitat runs the risk of not according with/delivering local priorities and strategies so that the right types of habitat are created in the right place. Comments noted and will be considered.
S-200-7	1369531	Stanton in Peak Parish Council	3.1	Issue of external lighting on new authorised buildings outside Conservation Areas needs to be restricted. This is becoming a major issue where one is allowed so others follow affecting not just the significance of ensuring dark skies but also affecting wildlife on an increasing scale. Comments noted and will be positively considered.

S-199-4	1369530	Environment Agency	3.1	Support the inclusion of nature based solutions to mitigate flooding being included as a spatial objective. Objective 3 should be more ambitious to reverse damage to nature create climate change resilience. Objective 4 could be more ambitious by supporting nature recovery Objective referencing Lawton Principles and the statutory LNRS should also reference delivering a minimum 10%BNG. Need In this section an objective linked to delivering measures identified in the LNRS. The healthy soil and clean water objective could also promote farming best practises, e.g. Catchment Sensitive Farming techniques and be enhanced by including an objective to protect the quality of groundwater and groundwater dependent features from pollution. Comments noted and will be positively considered.
S-197-8	1369528		3.1	Support. Support noted.
S-194-9	1369525	Derbyshire Dales District Council	3.1	Support. Support noted.
S-193-5	1369524	Winster Parish Council	3.1	Support. Support noted.
S-188-5	1369508	Staffordshire Moorlands District Council	3.1	Support. Support noted.

S-187-1	1369506	Sheffield Parks and Countryside Service	3.1	Mostly sound but the historic agricultural landscapes needs more thought. What is needed from NP farming (esp upland farming), ie production vs biodiversity, habitat expansion (including urban flood mitigation and water quality). Historically the landscape of the NP was not farmland - may be a more hybrid future that is not about preserving the status quo. Farming, land management and nature recovery working better together. Qualified support noted. Comments will be positively considered. The National Park's Special Qualities include those related to settled upland farming and our National Park Management Plan vision is that we are exemplary in our response to climate change and nature recovery. The balance (where there is a conflict) must be reconciled in the next National Park Management Plan (when Special Qualities will be reviewed) and the ongoing protected landscapes targets and outcomes framework. The local plan will respond to this.
S-186-5	1369505		3.1	Yes. Need to reflect the urgency required to address the recovery. The word close is not strong enough for what is required. Nature continues to decline despite everyone's best efforts. Some strong indicators with close monitoring will be required to achieve what's necessary. Support and comments noted and will be positively considered.
S-185-8	1369502	Devonshire Group	3.1	Yes. The Chatsworth Whole Estate Plan aligns with many of the objectives. Support and comments noted and will be positively considered.
S-184-4	1369500	Hope Valley Climate Action	3.1	Objectives lack ambition. Framing falls seriously short in its reflection of the climate emergency. Climate change adaptation and mitigation should be an overarching consideration. First point stated in Issue 9 should read: To manage development through close consideration of special qualities, valued landscape character, nature recovery and the impact of climate change. The spatial objectives should also set out a contribution to positive outcomes with respect to climate change mitigation, such as tree and hedge planting. It should be recognised and accepted that landscapes and indeed our biodiversity will change, whether by our own climate mitigation actions, or else by extreme climatic conditions that will come upon us. Different landscapes and biodiversity will need to be valued. There needs to be recognition of the fact that a farming monoculture that consists of little but sheep grazing may not be appropriate for the future. Comments noted and will be positively considered.
S-183-5	1369499	United Utilities	3.1	United Utilities - Yes

S-173-5	1369488	Land & Nature Team - PDNPA	3.1	Not supported. Concern regarding the link to statutory nature recovery strategies. These are currently being developed but we have concerns that we may have significant reservations about some of the LNRs. Whilst we have a statutory duty to have regard to them, we do not have to fully comply with them. Our strong preference is therefore to link LP policy to the (non-statutory) Peak District Nature Recovery Plan, which will have had regard to the relevant LNRs (thereby fulfilling our statutory duty), rather than the LNRs directly. This needs to strongly reference managing development in accordance with the Landscape Strategy, as well as to NR strategies. If we do retain direct reference to LNRs, this should at most refer to having regard to them, rather than being in accordance with them, so that we can overrule them with our own local policies if needed. There is inconsistency with the wording of these objectives and the wording of very similar objectives in the Landscape Strategy. We think that it makes sense for the Local Plan to follow the wording of the Landscape Strategy in this case (for consistency and lack of ambiguity). In the Landscape Strategy, equivalent wording for these are: To protect, manage and enhance the scenic qualities, natural beauty, openness, wildness and tranquility of our moorland and moorland fringe landscapes (with their limited enclosure and lack of obvious man-made features). To protect, manage and enhance the scenic qualities, natural beauty and cultural value of our distinctive farmed pastoral gritstone and limestone uplands (with their harmony, pattern and scale of enclosure with views punctuated by mature trees) To protect, manage and enhance the enclosed, intimate nature of the limestone dales, gritstone cloughs and upper and lower river valleys. Protect is not enough - should say manage and enhance. Question whether spatial objectives should be mapped. Objectives 3 and 5 both effectively refer to the Natural Zone, and could be combined. We also suggest some modifications to reflect the fact that openness is not a characteristic of all Natural Zone land, and in line with the Nature Recovery Plan and Wooded Landscapes Plan we may also wish to increase tree/shrub cover in some areas of the Natural Zone. We therefore suggest- To protect the remoteness, wildness, tranquility and natural character of the Natural Zone (moorland, limestone hills, limestone dales and ancient and semi-natural woodland), and to enhance/extend in accordance with the Peak District Landscape Strategy and Nature Recovery Plan. Objective 4 refers to protecting settled agricultural landscapes. We suggest adding 'and treescapes'. Agree with Objective 6 - maintaining and improving the darkness of night skies - would welcome discussing how to embed this within policy. Suggest it may be helpful to add 'by reducing light pollution and unnecessary lighting, particularly in sensitive areas.' Objective 7 (nature-based solutions) should include promoting resilience, eg 'To support nature-based solutions that promote resilience and adaption to climate change and flooding, and that deliver climate change mitigation.' Objective 8 (healthy soil) - should also promote soil diversity and highlight the importance of peat. Eg 'To promote diverse and healthy soil, and clean air and water and support incentives that protect peat and restore peat hydrology to

				enable greater carbon sequestration in our moorlands.' Suggest a further objective along the lines of to promote integrated delivery of environmental benefits which maximises the provision of ecosystem services . Comments noted and will be positively considered.
S-166-4	1369468	Breedon	3.1	Management of the Cement Works site already does and will continue to contribute to enhancement of biodiversity and thus nature recovery.

				Comment noted.
S-165-9	1369466	Taddington and Priestcliffe Parish Council	3.1	Support provided first objective covers visitor management. It is not clear how all of these can be delivered through the Local Plan - e.g. improving dark skies. Support and comment noted and will be further considered.
S-163-5	1368617		3.1	Support. Must fully reference the Landscape Strategy, and wording should be closely aligned/the same to reduce confusion. There is more scope however in these objectives to include the historic environment, which has the ability to help shape and inform landscape adaptation (for climate change) and nature recovery etc and this could be more explicitly reflected in the wording. Noted and will be positively considered.
S-162-6	1369460	High Peak Borough Council	3.1	Support. Support noted.
S-161-10	1369459	CPRE Peak District and South Yorkshire	3.1	Support. Support noted.
S-159-2	1369454	Staffordshire County Council	3.1	Support. The spatial objectives are more robust when policy and statutory strategies aligned. Spatial objectives listed under Issue 9, and in particular those to provide enhancements to benefit the landscape and nature, and stronger protections for remote, tranquil landscapes and dark skies are supported. Support noted.
S-158-5	1369452	Trans Pennine Trail and Sustrans Joint Response	3.1	Support. Support noted.

S-157-1	1369450	Holme Valley Parish Council	3.1	Support. Support noted.
S-154-9	1369442		3.1	Unsure. Agree generally but great risk that 'To manage development through close consideration of special qualities, valued landscape character and nature recovery' is not strong enough, especially in the context of some of the options in this Review. Close consideration seems vague. How will we ensure that nature will recover? Comments noted and will be further considered alongside the NPA's role in the statutory protected landscapes targets and outcomes framework.
S-153-7	1369437		3.1	Support. There needs to be far more active management of external lighting effects on the current dark skies within the NP. The abundance of external lighting on new authorised buildings outside Conservation Area needs to be restricted. Support and comments noted and will be further considered.
S-151-9	1369433		3.1	Support. Need to stop moorland burning. Encourage Hen Harriers to nest (and be allowed to breed.) Support and comments noted.
S-150-9	1369431		3.1	Support. Support noted.
S-147-4	1369428	The Campaign for the Peak Line	3.1	Support. The study undertaken by this campaign in 2020/1 showed clearly that the reinstatement of the railway brings net gain along the alignment and especially in the Wye Valley between the course of the railway and extended active travel networks, accessible directly from the stations on the line. Support and comments noted and will be further considered.

S-137-40	1369370	Derbyshire ALC	3.1	Objectives in line with Park purposes but are broadly framed and it is not clear how these objectives will fit together with other objectives, such as housing development, tourism and transport. How is the balancing going to be achieved and what are the criteria and what is the weighting of different objectives? Comments noted. The Authority is has a legal duty to seek to foster the economic and social well-being of its local communitieis <i>in pursuing</i> the purposes of a national park, the first of which is to conserve and enhance landscape, wildlife and cultural heritage. Threfore it would be inappropriate to 'balance' social and economic objectives with objectives that seek to deliver first purpose.
S-136-21	1369368		3.1	Not supported. Disagree with having an explicit policy on protecting the distinctive and valued historic character of the settled agricultural landscapes. Where these are of heritage value, it should be protected but it has no inherent value as farmland, as that is a land use, rather than a land type. The landscape of the Peak District was formed via many things, forestry, woodland clearance, quarrying, farming, grouse shooting and all of them have their issues. It is not the activity that has the heritage value, it is the features that derive from it. This has implications in other policies. Comments noted and will be positively considered.
S-134-4	1366865	RSPB	3.1	Unsure. Protecting open character should not preclude an increase in native tree/scrub cover to increase biodiversity. Recognise this plan and objective is in relation to development, it would be a mistake to allow interpretation of the wording to be used to prevent nature positive change through other means. Comments noted and will be positively considered.
S-118-6	1369267	Haddon Estate	3.1	Support. Support noted.
S-117-6	1369166		3.1	Support. Support noted.

S-113-9	1369153	Edale Parish Council	3.1	Support. Nature recovery depends on the priority given to different issues such as land use and development. Dark skies will be only aspirational without regulations. Comments and support noted.
S-107-6	1368485	NCHA	3.1	Unsure. Noted.
S-104-27	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	3.1	Support. There needs to be much more education of visitors and officialdom, and visitor numbers must be managed so that they do not harm the landscape and biodiversity. Comments and support noted.
S-98-11	1368689	Greater Manchester and High Peak Area of the Ramblers	3.1	Support. We believe that access on foot to the countryside does not conflict with nature conservation and the need to preserve biodiversity. Comments and support noted.
S-86-3	1368682	The National Trust	3.1	Unsure. Given the vital importance of related moorland restoration work, currently being carried out by the National Trust and partners in the Peak District, we ask that carbon sequestration is reflected directly in the Local Plans spatial objectives here. Comments noted and will be positively considered.

S-74-1	1368379		3.1	Supported. Authority should do more to promote, protect and enhance biodiversity. Comments and support noted.
S-71-8	1368373	Tideswell Parish Council	3.1	Support. We agree with the objectives provided that housing development doesn't become unviable for developers. Comments and support noted and will be positively considered. A viability report will set out issues related to BNG obligations.
S-69-12	1368325	Derbyshire Dales District Council	3.1	Support. Support noted.
S-68-24	1368264	Bakewell Resident	3.1	Support. Adaptation to climate change and flooding should be higher up the list. Noted. Position on list is not order of importance.
S-67-17	1367857	Over Haddon Parish Council	3.1	Support An important element of the landscape character is the pattern of fields bounded by dry stone walls. It seems to us that some of these, especially some of the more ancient field near to the village, do not receive sufficient protection from farm modernisation and whilst we would not expect farming patterns to stand still we feel a better balance should be struck so as to preserve the distinctive character of this landscape. Lathkill Dale is already a well-conserved natural landscape. We believe that it could be further enhanced by restoring the river regime the level and seasonality of its flow to its historic pattern by blocking the redundant soughs beneath Magpie Mine and Lathkill Mine. In particular this would enrich the biodiversity of the river and the dale above Lathkill Lodge during the Summer half of the year. Perhaps any Winter flooding could be mitigated by the judicious introduction of beavers? Support noted and will be positively considered.

S-62-34	1368170		3.1	Support. Applaud recognition of the need to enhance the connectivity of ecosystems. Concern particularly regarding health of our river systems e.g. Tideswell Brook, River Dave, R Manifold, with pollution both from release of sewage as well as the flushing of medicines supporting our aged populations into our water systems. Support and comments noted and will be positively considered.
S-59-23	1368081	SMDC	3.1	Support. Support noted.
S-57-3	1368149	Great Longstone Parish Council	3.1	Support. Support noted.
S-52-3	1368140	North East Derbyshire District Council	3.1	It is noted that the consultation proposes to continue to protect the Natural Zone and to enhance/extend it in accordance with the priorities of Nature Recovery Strategies. The council supports this general approach and draws attention to the Derbyshire Local Nature Recovery Strategy and the councils Plan for Nature which are currently in preparation to inform the review of its own Local Plan. These strategies will aim to set priorities for nature recovery outside the National Park and provide important evidence in helping to plan where wildlife corridors or stepping stones between the National Park and urban areas beyond the Parks boundary can be most effective. Comments noted and will be positively considered.
S-51-9	1368085		3.1	Support. Support noted.

S-50-16	1367561	Peak Park Parishes Forum	3.1	Support. If real progress is to be made, there needs to be education of public and officials and more focus on ensuring visitor numbers are not too great to prevent protection of biodiversity and landscape. We suggest that the allusion to Nature Recovery Strategies in the pink box on p.46 might be better worded as "best practice nature recovery practices" (as it may turn out that some of the statutory NRSs - which we have yet to see - are not best practice). Support and comments noted and will be positively considered.
S-45-13	1367903	Froggatt Parish Meeting	3.1	Support. Support noted.
S-44-16	1367865	Eyam Parish Council	3.1	Unsure. Needs to be consistent with local need. Comments noted.
S-43-7	1367843	Natural England	3.1	Support. Welcome the requirement to recover nature in accordance with the emerging Local Nature Recovery Strategies. Support and comments noted.
S-42-36	1367805		3.1	Support. Need to be more proactive in defining measures, kpi, publicising pre and post measures - AND following up 12 months after to ensure that the changes have become sustainable. Too often improvements do not prove to be sustainable. Comments noted and will be further considered alongside the NPA's role in the statutory protected landscapes targets and outcomes framework.

S-40-11	1367788		3.1	Support. Can policy encourage and secure a working relationship between the interest of the natural environment and those of the agricultural community. With engagement, incentive and education the agricultural community can make a net positive contribution to the natural environment, its flora and fauna. Many of the Special Quality Key Features set out within Appendix 2 are impacted by degradation (e.g. rivers, peat bogs). The list should benchmark the state and condition of each feature in order that Policy is able to be proactive in ensuring that where appropriate development management decisions act to mitigate, halt or reverse degradation and potentially eventual loss. By way of example, a proposal to site a new and/or enlarge a visitors car park close to a major trail that affords access to a peat bog that is recognized as being vulnerable should be determined having regard to its secondary and induced environmental impacts, alongside the more typically assessed site specific/primary impacts. Securing a base line understanding of the state, condition and health of the key features will better inform such a process. Comments noted and will be further considered alongside the NPA's role in the statutory protected landscapes targets and outcomes framework.
S-30-7	1367447	Country Landowners Association	3.1	Support. These areas require an amount of sensible and sustainable development to be permitted that supports the wider special objectives. If there is no money and a depopulation of rural areas then the objectives are not going to be met. Support and comments noted.
S-20-2	1367235	Oldham Council	3.1	The objective should perhaps seek to protect as well as enhance biodiversity to ensure core habitat areas are protected as designations as well as enhanced. Provide maps of the PDNPA and LNRS coverage in future drafts. Comments noted and will be positively considered.
S-13-45	1364893		3.1	Support. Support and comments noted.

S-9-15	1364715		3.1	Support. I agree with the objectives, but planning policy has so little effect on how land is actually used. Support and comments noted.

Q3.2 Do you agree with the proposed policy approach to nature recovery

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-6	1369634	Sheffield City Council	3.2	Unsure. Approach is supported only in part because there should be greater emphasis on recovery (not just protection) of priority species. This is noted. The draft spatial objective for landscape, biodiversity and nature recovery is to 'significantly enhance biodiversity in accordance with the Lawton principles'. The related planning policy principles refer to 'enhancement', 'nature recovery' and 'habitat creation'. Our ambition is that new planning policy will maximise the potential for nature recovery so it is appropriate to consider a greater emphasis on recovery.
S-223-10	1369632	Hartington Town Quarter Parish Council	3.2	Agree. Phrases such as 'maximise the potential for all developments, even at the smallest scale' are hard to define and could easily lead to bureaucratic debate and conflict. Agreement and comment noted and will be further considered. Design for biodiversity is also being considered as part of the design guide review.
S-222-6	1369631	TPT & Sustrans	3.2	TransPennineTrail and Sustrans Support because all developments should provide improvements to landscape and nature recovery. Support noted.

S-221-10	1369595		3.2	Support. Agreement noted.
S-214-10	1369550	Hope with Aston Parish Council	3.2	Hope with Aston PC Partly agree. Existing biodiverse areas and key resources (eg hedgerows) should be protected. Partial support noted. The aspect of current policy L2 that protects sites, features or species of biodiversity interest, will be retained in new policy.
S-207-10	1369542	Youlgrave Community Land Trust.	3.2	Agree. Education (including of resident communities) is needed because many don't understand that a 'beautiful' landscape can be nature depleted. Agreement noted and will be considered.
S-200-8	1369531	Stanton in Peak Parish Council	3.2	Agree. Agreement and comment noted.
S-199-5	1369530	Environment Agency	3.2	Agree. With amendments: make clear that any enhancement should also help achieve nutrient neutrality (in applicable catchments), reduce flood risk and contribute to the delivery of natural capital and green infrastructure strategies, including cross-boundary strategies. In addition, where it is proposed to include requirements for development falling outside mandatory BNG in the new policy, this should include an expectation on development when the baseline units are zero to ensure that some environmental enhancement is delivered. The policy should also recognise the importance of habitat connectivity in supporting nature recovery and promote blue/green corridors e.g. encouraging the removal of weirs. Agreement and comment noted and will be further considered.
S-197-9	1369528		3.2	Agree. Agreement noted.

S-194-10	1369525	Derbyshire Dales District Council	3.2	Agree. Agreement and comment noted and will be further considered.
S-193-6	1369524	Winster Parish Council	3.2	Agree. But change for some clear policies here. For example, new developments, extensions, must have wildlife provisions like bee bricks, swift/owl/bat boxes etc. Really small but can make big change. Agreement and comment noted and will be further considered. Design for biodiversity is also being considered as part of the design guide review.
S-188-6	1369508	Staffordshire Moorlands District Council	3.2	Agree. Agreement noted.
S-186-6	1369505		3.2	Agree. Need to reflect the urgency - the word 'close' is not strong enough for what is required. Some strong indicators with close monitoring will be required to achieve what's necessary. Agreement and comment noted and will be further considered.
S-185-9	1369502	Devonshire Group	3.2	Agree. Concerned about unreasonable burdens on development proposals. Agreement and comment noted and will be further considered. The Authority is undertaking a whole plan viability assessment.

S-184-5	1369500	Hope Valley Climate Action	3.2	Unsure. Insufficient reflection of the climate emergency and how this will impact on the landscape and nature. The new policy should clearly reflect that the Peak District landscape and biodiversity will experience significant challenges and changes over the new policy timeframe. Nature recovery will not be a return to previous norms, but rather a process of protecting and valuing a changed landscape and natural world. Agreement and comment noted and will be further considered.
S-183-6	1369499	United Utilities	3.2	Biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity. We are currently evaluating all land owned by UUW within local authorities that could be used for habitat creation or enhancement works and developing a list of candidate sites. In identifying land, we clearly recognise the strategic importance of aligning our site selection process with local, regional and national policies and objectives on biodiversity and nature recovery. We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers. We request that your policy includes sufficient flexibility to allow for off-site provision. This is particularly in respect of existing and new infrastructure sites. On-site provision may not be the most appropriate long-term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. It is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers. This approach is supported by the planning practice guidance which states that the approach to BNG should be resilient to future pressures from further development. Comment noted and will be given positive regard.

S-173-6	1369488	Land & Nature Team - PDNPA	3.2	Disagree. Need to reference 30x30 and PLOTf as drivers for change. Bullet 4- We suggest this should read 'Make clear that proposals should align to local priorities and strategies so that the right habitat and landscape character is created in the right place, with reference to the Peak District Landscape Strategy, Wooded Landscapes Plan and Nature Recovery Plan.' Bullet 5 refers to nutrient neutrality in applicable catchments . Should the concept of nutrient neutrality be extended across the whole of the NP? We suggest a further bullet along the lines of seek enhancements which reduce emissions from land use and increase landscape resilience/climate resilience (e.g. promoting diverse species selection for new woodlands, slowing the flow etc) . Disagreement and comments noted and will be further considered.
S-165-10	1369466	Taddington and Priestcliffe Parish Council	3.2	If the intention is to go beyond these, it needs to be explained why National Park residents/businesses must bear the burden of this when their immediate neighbours outside the National Park, and possibly covered by the same Nature Recovery Strategy, do not. Comment noted and will be further considered.
S-163-6	1368617		3.2	Agree. Need to make reference explicitly to the Landscape Strategy and One Plan Nature Recovery Plan for the National Park. Agreement and comment noted and will be further considered.
S-162-5	1369460	High Peak Borough Council	3.2	Agree. Agreement noted.

S-161-11	1369459	CPRE Peak District and South Yorkshire	3.2	Unsure. Not clear how the new Local Plan would meet the requirements of the NPPF7 in respect of identifying, mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks. Not clear how the plan would identify and pursue opportunities for securing measurable net gains for biodiversity in a spatial sense. The PDNP's LNRS document does not provide mapped priority areas/sites and the Local Plan issues and options document does not refer to the Natural Capital Strategy published by Derbyshire County Council. The new Local Plan should show on the policies map, not just core sites and the ecological network but also priority opportunity areas for nature recovery. The plan's policies should also be written to work well with updates to the policies map as and when relevant LNRS s are adopted. Further work appears to be necessary on this theme, and there is a need for on-going co-ordination with the responsible authorities preparing Local Nature Recovery Strategies. Comment noted and will be further considered. Agree that further work and co-ordination is needed in this area.
S-159-3	1369454	Staffordshire County Council	3.2	Agree. It involves all development regardless of scale and makes clear that proposals should align to local priorities and strategies, while seeking to conserve and enhance valued landscapes with special qualities. Agreement and comment noted.
S-158-6	1369452	Trans Pennine Trail and Sustrans Joint Response	3.2	Agree. Agreement and comment noted.

S-157-2	1369450	Holme Valley Parish Council	3.2	Agree. Mixed feelings about an increase in tree planting. Due regard must be given to the wading bird habitat which is already established and an increase in trees will destroy this. Agreement and comment noted. The Authority's woodland strategy takes this issue into account. New planning policy will align with this strategy.
S-154-10	1369442		3.2	Unsure. There is a great risk that 'To manage development through close consideration of special qualities, valued landscape character and nature recovery' is not strong enough, especially in the context of some of the options in this Review. Close consideration seems vague. How will we ensure that nature will recover? Comment noted and will be further considered.
S-153-8	1369437		3.2	Agree. Agreement noted.
S-151-10	1369433		3.2	Unsure. Developments seldom enhance wildlife and biodiversity. A lot of evergreen nonnative plants are often used. Any developments on greenfield sites will change long standing migratory pathways and breeding sites. Comment noted and will be further considered. Design for biodiversity is also being considered as part of the design guide review. Sites of existing biodiversity value are protected by current policy L2.
S-150-10	1369431		3.2	Disagree. It is an unacceptable attempt to intrude into the affairs of people and business. Such a broad definition must not be allowed. The extension of influence beyond the BNG exemptions to Residential and small sub 25 sq m plots is a huge land grab. Disagreement and comment noted and will be further considered. Greater than 10% BNG is being considered as part of a whole plan viability report.

S-138-7	1369372		3.2	Agree. Would like to see this go even further. Agreement noted.
S-137-27	1369370	Derbyshire ALC	3.2	Agree. Other objectives need balancing and weighing, and it is not clear to us how this is to be done. Agreement and comment noted. Priority is given to national park purposes, and the Sandford Principle establishes that where there is in irreconcilable conflict, the first purpose (to conserve and enhance natural beauty, wildlife and cultural heritage) takes precedence.
S-136-17	1369368		3.2	Agree. BNG is not going to deliver nature's recovery in the National Park, due to the amount of development, and we should be looking at all opportunities and mechanisms to do it. Agreement and comment noted. The local plan can only consider opportunities and mechanisms that are part of the planning system.
S-134-2	1366865	RSPB	3.2	Agree. If there is ever a conflict when conserving and enhancing special qualities, nature recovery should be the priority. Agreement and comment noted and will be further considered.
S-131-1	1369333	Swifts Local Network: Swifts & Planning Group	3.2	Unsure. In summary, the nature recovery policies are very welcome, but please consider building-dependent wildlife such as red-listed bird species which inhabit buildings in the Peak District. Noted

S-128-4	1369275	Rural Action Derbyshire	3.2	Unsure. It will be impossible to achieve this objective without considering the social and economic drivers of the resident population. There needs to be sufficient scope for development that supports the sustainability of the park without overly compromising the nature recovery. We think that the proposed policy approach may prove to be too restrictive. Comment noted. The duty to foster the economic and social well-being of residents is fully considered as part of the plan-making process.
S-120-43	1368991	Marsh Farm Development Co Ltd	3.2	Agree. Agreement noted.
S-117-7	1369166		3.2	Agree. Agreement noted.
S-113-10	1369153	Edale Parish Council	3.2	Agree. A point could be added, and wording strengthened - nature-based solutions will be secured for local problems. Agreement and comment noted and will be further considered.

S-112-1	1369151	Forestry Commission	3.2	Unsure. You may wish to consider having some policies regarding the protection of Ancient Woodland in line with paragraph 186 (c) of the National Planning Policy Framework. You also may wish to consider specifying the protection of Priority Habitats such as Lowland Mixed Deciduous Woodlands which are on the National Forest Inventory and the Priority Habitat Inventory (England) and also long established woodland, as identified in Keepers of Time: Ancient and Native woodland and trees policy in England . You may also wish to consider whether to include a policy on tree planting and replacements where trees are lost to development, such as replacement and compensation requirements. The Forestry Commission also encourages authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach, for instance through: *the inclusion of green infrastructure (including trees and woodland) as a requirement in and around new development. * tree planting is a consideration in every development not just as compensation for loss. *promoting the use of home grown timber used in construction as a sustainable building material Comments noted and will be further considered. Existing Local Plan policies to protect trees and ensure their aftercare, maintenance and management. We will review these and update them to reflect new guidance.
S-110-7	1369133	Middleton and Smerrill Parish Council	3.2	Agree. Agreement noted.
S-107-12	1368485	NCHA	3.2	Unsure Comments noted. Biodiversity requirements are being considered as part of a whole plan viability report.
S-106-10	1369124	Stanton in Peak PC	3.2	Agree. Agreement noted.
S-104-44	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	3.2	Agree. Agreement noted.

S-98-3	1368689	Greater Manchester and High Peak Area of the Ramblers	3.2	Agree. We believe that access on foot to the countryside does not conflict with nature conservation and the need to preserve biodiversity. Agreement and comment noted.
S-86-4	1368682	The National Trust	3.2	Agree. This policy area will need to be ambitious to recognise the role of landscape scale recovery and the enabling part that planning can play in this. A joined-up and partnership approach will be required, with wider links to relevant local priorities and strategies as noted by the PDNPA. Agreement and comment noted.
S-71-9	1368373	Tideswell Parish Council	3.2	Agree. But expecting each individual planning application to be able to implement mitigations is short sighted. A more strategic approach should be taken by PDNPA where they implement larger mitigation schemes (which would deliver greater improvements) to which individual developers can contribute to the costs. Greater benefits to nature recovery, and more pragmatic than expecting site specific mitigations. Agreement and comment noted and will be further considered.
S-69-32	1368325	Derbyshire Dales District Council	3.2	Agree. PDNPA should require much more than 10% BNG. Agreement and comment noted and will be further considered. BNG is also considered under Issue 11.
S-68-29	1368264	Bakewell Resident	3.2	Agree. Agreement noted.
S-64-5	1368242	Sustainable Hayfield	3.2	Agree. Agreement noted.
S-62-37	1368170	Mr Keith Quine	3.2	Agree. Agreement noted.

S-59-14	1368081	SMDC	3.2	Agree. Agreement noted.
S-57-4	1368149	Great Longstone Parish Council	3.2	Agree. Agreement noted.
S-50-12	1367561	Peak Park Parishes Forum	3.2	Agree. Agreement noted.
S-45-21	1367903	Froggatt Parish Meeting	3.2	Unsure. Noted.
S-44-15	1367865	Eyam Parish Council	3.2	Agree. If no conflict with local need. Agreement and comment noted.
S-43-8	1367843	Natural England	3.2	Agree. Includes the key points to achieve a positive approach to nature recovery and incorporates recent changes to legislation such as Biodiversity Net Gain, Local Nature Recovery Strategies and Nutrient Neutrality. We welcome the fourth point i.e. that the right habitat should be created in the right place. We advise that the Plan should encourage woodland habitats where appropriate as Natural England is looking to increase tree cover over both the edge of the uplands and in the White Peak and the policy approach should support this approach. We suggest that Green Infrastructure could also be mentioned within this policy. Whilst Green Infrastructure is often considered within urban areas it is also relevant to rural areas. In a rural context it can refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Agreement and comment noted and will be further considered.
S-42-24	1367805		3.2	Agree. Agreement and comment noted and will be further considered.

S-40-12	1367788		3.2	Agree. Many of the Special Quality Key Features set out within Appendix 2 are impacted by degradation (e.g. rivers, peat bogs). The list should benchmark the state and condition of each feature in order that Policy is able to be proactive in ensuring that where appropriate development management decisions act to mitigate, halt or reverse degradation and potentially eventual loss. Agreement and comment noted and will be further considered. The Authority will follow the statutory Protected Landscapes Targets and Outcomes Framework.
S-23-1	1367239		3.2	Is there a Green Infrastructure Plan? It will be written alongside the local plan.
S-13-40	1364893		3.2	Agree. Agreement noted.
S-9-9	1364715		3.2	Agree. Agreement noted.
S-8-11	1364695	-	3.2	Agree. There are some straightforward, specific requirements that could be placed on every development (such as the inclusion of Swift bricks in all two storey or higher developments). Agreement and comment noted and will be further considered. Design for biodiversity is also being considered as part of the design guide review.
S-7-37	1364251		3.2	Agree. Agreement noted.
S-6-1	1364014		3.2	Unsure. The Peak park looks the same as the land outside it. It should be better. It has the look of the Amazon rainforest with the jungle chopped down. There is not enough done to balance recreation for humans and nature. Comment noted.

Q3.3 Do you agree that new planning policies for BNG should go beyond the 10% mandatory requirement?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-7	1369634	Sheffield City Council	3.3	Support going beyond 10% and sets out issues regarding the evidence that may be needed to justify this. May impact on viability. This is noted and issues highlighted will be considered. The impact of BNG (and +10%) will be/is being considered in an independent whole plan viability report.
S-223-11	1369632	Hartington Town Quarter Parish Council	3.3	Agree in principle but question about how this is accurately measured. Agreement and comment noted. The BNG metric would be used.

S-222-7	1369631	TPT & Sustrans	3.3	Support because this is particularly important in a national park and will improve nature recovery. Support noted.
S-221-11	1369595		3.3	Support. Support noted.
S-214-11	1369550	Hope with Aston Parish Council	3.3	Agree BNG requirements should be greater than mandated, suggest 20%, and suggest the National Park Authority should become a responsible body. Agreement noted. The Authority is considering the implications of becoming a responsible body but this decision will be taken separately to the local plan process.
S-210-10	1369546		3.3	Support going beyond mandatory as this will help the Authority to deliver nature recovery. Support noted.
S-207-11	1369542	Youlgrave Community Land Trust.	3.3	Agree should require greater than 10% and that new development should minimise hard surfaces and contribute to nature corridors. Agreement and comments noted and will be further considered.

S-206-3	1369541	Peak Cluster	3.3	No. 10% BNG is nationally agreed. No justification for the Peak District to ignore this evidence base or for the burden of habitat creation in the Peak District to fall disproportionately on developers. Increasing the expectation in terms of units delivered following the DEFRA metric may encourage developers to offer the cheapest solution to maximising the number of BNG units. Better outcomes for nature and biodiversity might be delivered with a 10% net gain and encouragement in policy for developers to work with local stakeholders to maximise the quality rather than quantity of units. Disagreement noted and comments will be further considered. Viability of 10%+ BNG is being considered by independent consultants as part of the whole palm viability assessment.
S-203-6	1369536	Tarmac	3.3	No. Less nuanced and priority habitats would be being delivered. Does not take account of individual site circumstances nor the habitats removed to facilitate development. Additional gains could be sought voluntarily or policy worded to seek a minimum of 10% to accord with the mandatory legislation. Disagreement and comment noted and will be further considered.
S-200-9	1369531	Stanton in Peak Parish Council	3.3	Yes. Every National Park should be at the forefront of increasing biodiversity. Not only should their goals be higher than 10% they should have a policy of incrementing year on year. Agreement and comments noted.

S-199-6	1369530	Environment Agency	3.3	Agree. Should also include an expectation on development when the baseline units are zero to ensure that some environmental enhancement is delivered. Other LPAs are using +10%, eg Surry and Oxford. Oxford evidence shows that the statutory minimum target of 10%BNG will not be sufficient to reverse the historic losses caused by development during the current local plan periods and make a meaningful contribution to delivering the national and local biodiversity targets for 2030. Creating local planning policies that go beyond the statutory minimum is possible, but open to challenge on viability grounds. Recommend PDNP authority gathers robust local evidence and sets out any additional requirements very clearly. Evidence, including information set out in the PDNP State of the Park Report, could provide initial justification as to why a policy requiring 10% BNG is being put forward. It will also be important to consider the existing biodiversity value and other legislative protections in the area, and how this may affect the ecological justification and/or need to require greater than the statutory minimum BNG target. E.g., Approx. one third of the land in the PDNP authority falls within an existing protected / designated sites, e.g. SSSI, SAC, SPA. These sites are subject to existing legislation that requires them to be protected and enhanced. Under statutory BNG, projects in (non-intertidal) designated sites are restricted to providing BNG on the non-designated features of the site. Consideration of how this could affect developers ability to deliver BNG in the context of local opportunities is likely to be necessary. We recommend this is considered when thinking about the justification and rationale. Agreement and comments noted and will be positively considered.
S-197-10	1369528		3.3	Yes. Agreement noted.

S-195-8	1369526	Derbyshire County Council	3.3	Yes. To align to the National Park purpose of enhancement it is considered appropriate that PDNP look to go over and above the 10% mandatory BNG, particularly in minerals related development where biodiversity net gain was often higher than the mandatory 10%. Agreement and comments noted and will be further considered.
S-194-11	1369525	Derbyshire Dales District Council	3.3	No. In the National Park, where there are already significant Biodiversity opportunities, establishing evidence to justify this may be difficult. Secondly National Park policies already result in additional costs for development- more than 10% BNG may further exacerbate viability/development costs to the point where it might threaten the viability of development coming forward. Finally as BNG is post application all the LP is likely to be able to do identify this as an aspiration rather than be a policy determinant. Disagreement and comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-193-7	1369524	Winster Parish Council	3.3	Agree. Agreement noted.

S-192-4	1369523	Mineral Products Association	3.3	No BNG is not intended to be the only tool for nature recovery. Most biodiversity loss is not due to development. The PPG is very clear in that Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented. No such evidence has been provided. Comments noted. Further work to evidence developer contributions and viability in plan-making will support any future decision.
S-188-7	1369508	Staffordshire Moorlands District Council	3.3	No issues raised of concern.
S-186-7	1369505		3.3	Yes. Due to scale of biodiversity loss. Achieving 10% BNG would in effect just be offsetting any harm from the development, without contributing to restoring nature. This would not achieve National Park statutory purposes. Agreement and comments noted and will be further considered.
S-185-10	1369502	Devonshire Group	3.3	No until evidence is provided and DG will then review their position. Disagreement and comments noted and will be further considered.
S-184-6	1369500	Hope Valley Climate Action	3.3	Yes. Agreement noted.
S-183-7	1369499	United Utilities	3.3	UUW are supportive of the need to promote nature-based solutions to mitigate and adapt to climate change and flooding. Comment noted.

S-173-7	1369488	Land & Nature Team - PDNPA	3.3	Yes. We welcome the intention to consider going beyond the 10% mandatory BNG. We note the implications for applicants of determining whether the proposed netgain is significant or not, and wonder whether we should set out the criteria by which we intend to define significant in the Local Plan. Agreement and comments noted and will be further considered.

S-166-5	1369468	Breedon	3.3	No. Rather, the policy could be more positively framed to give substantial weight to any BNG in excess of 10% and to legally secured biodiversity enhancements which have special relevance and value at an application site. Such an approach would encourage more than simply providing the habitat with the highest unit score and would encourage design which produces high quality biodiversity outcomes. In the explanatory text at 3.16 it is stated that an increased requirement of up to 20% BNG does not affect viability. Requesting opinion on this matter without first providing suitable robust evidence is not a sound approach, as current national case reviews have proven this to not be the case. Breedon considers that the % enhancement of biodiversity required should be tested by an EIA process, (or similar) rather than there being a universal rule applicable Plan wide imposed on every site. Breedon expects that the % BNG offered in future planning applications may well be greater than 10% but this should be considered on a project by project basis. Not to allow such flexibility would undermine established planning principles. The PDNPA should provide for example related evidence from quarry restoration in the National Park to support whatever % increase they plan to suggest so this can be considered by consultees and examined for soundness. In addition the PDNPA should also consider the quality and appropriateness of proposed habitats rather than simply aiming to achieve a high % gain. Agreement and comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.

S-165-11	1369466	Taddington and Priestcliffe Parish Council	3.3	Most people will support a positive response to nature recovery. However, imposing extra burdens on local residents and businesses in the National Park needs to be justified. Comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-163-7	1368617		3.3	Yes. Protected landscapes should be exemplars in this regard. Need to ensure no inadvertent adverse effects (e.g. by establishing the wrong habitat on a heritage site). Can we insist that off-site BNG is delivered within the NP? Agreement and comments noted and will be further considered. Criteria are already set nationally for off-site BNG.
S-161-12	1369459	CPRE Peak District and South Yorkshire	3.3	Yes. Supports seeking more than 10% biodiversity net gain if demonstrated viable at a whole plan level. Agreement and comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-158-7	1369452	Trans Pennine Trail and Sustrans Joint Response	3.3	Yes. Particularly within a national park to improve nature recovery. Agreement and comments noted.
S-157-3	1369450	Holme Valley Parish Council	3.3	Yes by the PC as this would be an indication of serious intent to tackle the climate crisis. No from the residents who feel that they should be subjected to the same rules and processes as developments on the other side of the Peak Park boundary. Comments noted and will be further considered.

S-154-11	1369442		3.3	Yes. Have a meaningful Nature Recovery Plan with specifics on what needs to be 'recovered', why and to what extent with targets. Agreement and comments noted and will be further considered. BNG outcomes will be linked to the Authority's nature recovery plan.
S-153-9	1369437		3.3	Yes. Every National Park should be at the forefront of increasing biodiversity. Agreement and comment noted.
S-151-11	1369433		3.3	Yes. Developments seldom enhance biodiversity Agreement and comment noted.
S-150-11	1369431		3.3	No. Huge cost implications for the people who own the Park and have cared for it for many generations Disagreement and comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-146-1	1369425		3.3	Recommend adding large ponds to development plans and swift bricks to be used in new buildings. Comments noted and will be further considered. The Authority is also reviewing its Design Guide and will consider small-scale biodiversity enhancements that can be made.
S-140-3	1369412	Hope and Derwent Woodlands Parish Council	3.3	No. Biodiversity should remain at the legal requirement of 10% with recommendations and suggestions for further BNG enhancement. Disagreement and comments noted and will be further considered.

S-137-33	1369370	Derbyshire ALC	3.3	Yes. A good idea but needs to be realistic. We do wonder whether setting the targets very high could lead to destruction of biodiversity by landowners before any application for planning permission on a site is made. Agreement and comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report. Issues around destruction pre-planning are covered by existing regulations.
S-136-34	1369368		3.3	Yes. Within the National Park, it should be 20%. We should be very clear about application of the mitigation hierarchy, ensuring that development is strategically placed to enable nature's recovery. Agreement and comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-134-7	1366865	RSPB	3.3	Yes. Along with ensuring statutory purposes are met, National Parks should be at the forefront of 30 by 30 and one mechanism to ensure the NP is delivering for nature at the scale required is to go above and beyond the mandatory requirement for BNG. Agreement and comments noted and will be further considered.
S-128-24	1369275	Rural Action Derbyshire	3.3	Unsure. Would request that it is not imposed on affordable housing developers as it would be cost-prohibitive and stifle development. Comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-120-11	1368991	Marsh Farm Development Co Ltd	3.3	Yes

S-118-7	1369267	Haddon Estate	3.3	Unsure. Insufficient information to form view. Concerned about financial viability of development, esp affordable housing which typically has a slim margin between being viable and unviable. BNG is required by the Environment Act and is not subject to viability exemptions. However, the viability impacts of additional requirements beyond the 10% would be subject to viability testing through the Local Plan preparation and the development management process. Comments noted and will be further considered. +10% BNG is being considered as part of a whole plan viability report.
S-117-8	1369166		3.3	Unsure
S-113-11	1369153	Edale Parish Council	3.3	Yes. This is a national park, but nature is in a worse state than in other places which are not protected. Agreement and comments noted and will be further considered.
S-110-6	1369133	Middleton and Smerrill Parish Council	3.3	Yes. This aspiration is supported in the PDNP vision statement. We support the plan to work with partners to establish a locally specific evidence base. Agreement and comments noted and will be further considered.
S-104-42	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	3.3	Yes. Agreement noted and will be further considered.

S-103-11	1368574	Marshall's plc	3.3	No. The PPG states that planning authorities should not seek a higher percentage than the statutory objective of 10%. Disareement and comments noted and will be further considered. The full guidance states "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented." Paragraph: 006 Reference ID: 74-006-20240214
S-98-45	1368689	Greater Manchester and High Peak Area of the Ramblers	3.3	Unsure. No specific expertise on BNG questions. Agreement noted.
S-86-5	1368682	The National Trust	3.3	No. The National Trust are supportive of the 10% mandatory requirement for BNG. It is noted that any proposed increase will be underpinned by further evidence and justification, linked to the wider vision for the Local Plan. We will comment further when more detail and evidence is available. Disareement and comments noted and will be further considered. At the time of writing a whole plan viability report is being prepared that includes the question of +10% BNG.
S-69-21	1368325	Derbyshire Dales District Council	3.3	Yes. PDNP should do better. Agreement and comments noted and will be further considered.

S-68-46	1368264	Bakewell Resident	3.3	No. Enhancing the BNG requirement may put off developments essential to conserving other aspects of communities within the Park. The policy should stipulate that 10% is the minimum but no maximum is set so developers can go beyond this where BNG can enhance the local area. Disareement and comments noted and will be further considered.
S-64-6	1368242	Sustainable Hayfield	3.3	Yes. Agreement noted.
S-62-47	1368170		3.3	Yes. Be aspirational. Agreement and comments noted and will be further considered.
S-59-16	1368081	SMDC	3.3	Yes If nature recovery is to be championed, I would favour it being set at 15 or 20%, particularly for larger scale developments. Agreement and comments noted and will be further considered.
S-57-5	1368149	Great Longstone Parish Council	3.3	Yes. Agreement noted.
S-50-46	1367561	Peak Park Parishes Forum	3.3	Unsure. We support the "beyond 10%" aspiration but only in respect of Planning decisions where it is appropriate and reasonable - there will be some applications where it isn't, because of specific circumstances. Position and comments noted and will be further considered.
S-45-4	1367903	Froggatt Parish Meeting	3.3	Yes Agreement noted.

S-44-34	1367865	Eyam Parish Council	3.3	Unsure. This should not be mandatory and should depend on a case by case basis. Noted.
S-43-9	1367843	Natural England	3.3	Natural England advise that the policy may set out a percentage biodiversity net gain target greater than the statutory minimum of 10% that applies across the plan area or for specific parts of the plan area. Any higher policy requirement than 10% should be achievable and evidence based. Evidence should justify the target proposed and demonstrate that development is deliverable. The Local Plan should also encourage wider environmental gains, going beyond BNG to secure other natural capital benefits and benefits to people. Comments noted and will be further considered.
S-42-22	1367805		3.3	Yes. Objectives should be robust and achievable. Agreement and comments noted and will be further considered.
S-40-13	1367788		3.3	Yes. Relatively small-scale changes in approach can generate disproportionately large benefits, including through the adoption of a cohesive working relationship between the agricultural and conservation sectors. Agreement and comments noted and will be further considered.
S-31-5	1367452		3.3	No. Increasing the requirement from 10% will just add extra costs to the people who live and work in the National Park. We should work to Government limits. Disagreement and comments noted and will be further considered.

S-30-8	1367447	Country Landowners Association	3.3	Country Landowners Association - No. Larger BNG is supported on a voluntary basis. The minimum 10% gain provides net biodiversity net gain and applicants are free to deliver proposals voluntarily in excess of the minimum 10% which is encouraged. Mandating larger BNG will add costs and complications onto development which will in some cases severely impact viability. As increased BNG requirements mandates more land take, less development space and increased improvements costs.
S-29-6	1367323		3.3	Yes. Agreement noted.
S-13-5	1364893		3.3	Yes. Agreement noted.
S-9-7	1364715		3.3	Yes. 10% is a small amount. It might also make sense to encourage biodiversity schemes whereby a developer could contribute to rewilding of marginal farmland elsewhere in the Peak, which would have a larger overall effect than minor works on the edges of a small development site. I am aware this approach is being used on the outskirts of London. Agreement and comments noted.
S-8-2	1364695	-	3.3	Yes. Agreement noted.
S-7-28	1364251		3.3	Yes. Agreement noted.

Q3.4 Do you think that current policy (DMC2) correctly sets out the exceptional circumstances for development in the Natural Zone?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-8	1369634	Sheffield City Council	3.4	Policy could be tightened, as evidenced by the Mickledon Edge enforcement and appeal. Suggest Sheffield City Council and Natural England will advise on wording. Noted and will be considered.
S-223-12	1369632	Hartington Town Quarter Parish Council	3.4	Yes. Agreement noted.
S-222-8	1369631	TPT & Sustrans	3.4	Support for principle of exceptional circumstances and current policy. Support for principle and current policy noted.

S-221-12	1369595		3.4	Supports policy DMC2. I agree with the strong presumption against development. Within this area even small scale projects can have a disproportionately large impact on the landscape. A more accurate term would be semi-natural zone or wildlife refuge areas. Agreement and comment noted and will be further considered.
S-214-12	1369550	Hope with Aston Parish Council	3.4	Agree, but policy needs to take into account any possible expansion of the natural zone. Agreement and comment noted. Policy wording in the context of a revised boundary will be taken into account.
S-210-11	1369546		3.4	Agrees that if exceptional circumstances are necessary, that they are correctly set out. Agreement noted.
S-207-12	1369542	Youlgrave Community Land Trust.	3.4	Agree. Allows flexibility depending on circumstance. Agreement noted.

S-206-4	1369541	Peak Cluster	3.4	Allowance also needs to be made for critical national infrastructure and associated development where necessary to tackle the climate crisis provided the mitigation hierarchy has been followed to avoid, reduce and mitigate for any adverse effects on the characteristics of the natural zone. Disagreement and comment noted and will be further considered. Critical national infrastructure would be considered under the NPPF major development in a national park test.
S-203-7	1369536	Tarmac	3.4	The map covers large expanses. The NPPF is clear that minerals are a finite resource and may only be worked where they are found. It is suggested that DMC2 should have some flexibility within it to recognise this. Comment noted and will be further considered. Minerals development would be considered under the NPPF major development in a national park test.
S-200-10	1369531	Stanton in Peak Parish Council	3.4	Yes. Agreement noted.
S-199-7	1369530	Environment Agency	3.4	Yes. Agreement noted.
S-197-11	1369528		3.4	Yes. The provisions of DMC2 seem fair and reasonable [they should not be weakened]. Agreement noted.

S-195-9	1369526	Derbyshire County Council	3.4	No. It is considered that the management of the NZ should also lead to an enhancement of the PDNP. Could Ai and Aii be an and instead of an or? Disagreement and comment noted and will be further considered.
S-194-12	1369525	Derbyshire Dales District Council	3.4	Yes. The current exceptional circumstances appear to be reasonable, and there does not seem to any obvious additional or alternatives. Agreement and comment noted and will be further considered.
S-193-8	1369524	Winster Parish Council	3.4	Yes. Agreement and comment noted and will be further considered.
S-192-5	1369523	Mineral Products Association	3.4	We note the use of quarried millstones to highlight the value of the Natural Zone at Stanage Edge. Quarrying and other land uses such as agriculture have moulded the landscape over of the park over the centuries. Comment noted and will be further considered. Mineras development would be considered under the NPPF major development in a national park test.
S-186-8	1369505		3.4	Yes. Agreement noted.

S-185-11	1369502	Devonshire Group	3.4	es. When referencing a personal planning permission, the criteria might better reference appropriate person or business reflecting that some proposals will be put forward by a commercial entity. Agreement and comment noted and will be further considered.
S-184-7	1369500	Hope Valley Climate Action	3.4	No. The Local Plan overall should make much greater provision for renewable energy infrastructure, and although it would be preferable if this were located close to where the energy need is, i.e. close to settlements, rather than in the Natural Zone, we believe the Plan should support a more flexible approach to permission for renewable energy infrastructure in the Park, including on an exceptions basis, new renewable energy infrastructure in the Natural Zone to help meet national need. Recognise that, in practice, this means big wind turbines. Disagreement and comments noted. Such development would be subject to other policy considerations and the NPPF 'major development in a national park' tests.

S-173-8	1369488	Land & Nature Team - PDNPA	3.4	No. We agree that existing NZ policy has generally been effective in protecting the NZ from development, and strongly support its retention. We suggest two possible changes: Policy L1B currently applies to development in the NZ. We suggest that it could also usefully apply to development that is outside but significantly impacts on the special qualities of the Natural Zone. Where development is permitted, policy DMC2C (ii) and (iii) restricts it to 2 years, and to a personal consent. We wonder whether either of these policies have been implemented to date, and whether or not their retention is justified. Disagreement and comments noted and will be further considered.
S-165-12	1369466	Taddington and Priestcliffe Parish Council	3.4	Broadly agreed. It is difficult to see how C (ii) and (iii) can always be justified. Agreement and comment noted and will be further considered.

S-163-8	1368617		3.4	Yes. Tthe policy is correct, but the language needs to reflect the Special Qualities. While I understand why it was chosen, I do not like the term Natural Zone because it implies that human influence on this landscape is minimal, which is not the case (the image used in the consultation document is a case in point!). Some of our most important and densely clustered heritage assets lie in the Natural Zone. Agreement and comment noted and will be further considered.
S-158-8	1369452	Trans Pennine Trail and Sustrans Joint Response	3.4	Yes. It is important to only allow justification under exceptional circumstances to protect the natural area of the Peak Park. Agreement and comment noted.
S-157-4	1369450	Holme Valley Parish Council	3.4	No. Points C (ii) and (iii) could be more tightly drawn. The tightest possible restrictions are needed to conserve and enhance the natural zone. Disagreement and comment noted and will be further considered.
S-156-5	1367563		3.4	No. Should be more limiting to development. Disagreement and comment noted and will be further considered.

S-154-12	1369442		3.4	No. There should be no development in the Natural Zone. Development needs to be defined to include activities that will one day lead to proposals for development as peoples behaviours and expectations of what they can do will change. (I know I am suggesting a bit of crystal ball gazing here that I implied would not be appropriate earlier, but there must be consideration of likely future trends). Disagreement and comment noted and will be further considered.
S-153-10	1369437		3.4	Yes. Agreement noted.
S-151-12	1369433		3.4	Unsure. It should very seldom be required to develop such land.
S-150-12	1369431		3.4	
S-137-31	1369370	Derbyshire ALC	3.4	Yes Exceptional circumstances should be framed very restrictively. Agreement and comment noted.

S-136-1	1369368		3.4	Yes. Whilst I agree fundamentally with the approach, I disagree with the approach taken with regard to enabling farm businesses to remain viable. This is valid as an approach if we include a special quality of "protecting the distinctive and valued historic character of the farmed landscape" and leads to a tautology, where farm businesses are protected because they are a special quality, even if they are damaging the other special qualities. Where moorland restoration is taking place, it enhances the other special qualities. Agreement and comment noted and will be further considered.

S-134-1	1366865	RSPB	3.4	Unsure - This policy is largely still adequate but there may need to be greater clarity on the definition of "for the management of the natural zone". This must be explicit that it is management that genuinely enhances/restores habitats within the natural zone and does not include management for other purposes, such as for commercial activities that take place within the natural zone. This policy must also be tight enough to ensure no loopholes that allow damaging practices to be perceived as being in favour of the NP's valued characteristics when they actually harm nature's recovery. There is a risk that certain aspects regarded as "cultural heritage" to some might be used to undermine genuine nature recovery. Comment noted and will be further considered.
S-128-30	1369275	Rural Action Derbyshire	3.4	Yes. It is essential that development in the Natural Zone is permitted where it enables to viability of farm business which are coming increasingly under pressure due to falling farm incomes and limited diversification opportunities. Agreement and comment noted.
S-120-28	1368991	Marsh Farm Development Co Ltd	3.4	Yes. Agreement noted.

S-113-12	1369153	Edale Parish Council	3.4	Yes. It is important to only allow justification under exceptional circumstances to protect the natural area of the Peak Park. Agreement and comment noted.
S-110-8	1369133	Middleton and Smerrill Parish Council	3.4	Yes Agreement noted.
S-107-18	1368485	NCHA	3.4	Yes. Agreement noted.
S-104-41	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	3.4	Yes Agreement noted.

S-98-41	1368689	Greater Manchester and High Peak Area of the Ramblers	3.4	Yes. Our starting point is one of strong support for the policy of strict protection. We understand the need for exemptions, for example to enable moorland restoration to take place and as discussed below at question 24, appropriate development that enables the statutory duty to promote understanding and enjoyment of its special qualities. We believe that developments to enable farm businesses to remain viable should be linked to other policies to promote sustainable farming and be consistent with public access and the enjoyment of the Natural Zone. Agreement and comment noted and will be further considered.

S-94-2	1367847	Wharfe Rural Planning	3.4	No. There is a need for a more nuanced approach that balances conservation with sustainable tourism development. The policy's references to viability are not broad enough to encompass the potential benefits of developments which have a more informative/educational focus, but cannot be directly linked to viability. At present, the policy wording prevents landowners from exploring options which allow for sustainable tourism such as e-bike trails, or classrooms, interactive kids trails, small-wellness retreat spaces, or restaurants using Peak District produce, but these potential developments align with the broader goals of conservation and enhancement of the National Park's valued characteristics. These initiatives could promote sustainable tourism, reduce carbon footprints, and educate visitors on the importance of preserving natural landscapes. Informational and educational developments could foster a deeper connection between visitors and the natural environment, encouraging responsible behaviour and long-term conservation efforts. Allowing controlled and well-planned tourism developments could provide economic benefits to local communities, creating jobs and supporting local businesses. This, in turn, could generate additional resources for conservation efforts. Our client has no intention of impacting the landscape he loves, but does feel the current policy wording is too restrictive of development which is not wholly focused on profit/viability. Policy DMC2 should be revised to include provisions for sustainable tourism developments that meet strict environmental criteria and contribute to the conservation and enhancement of the National Park. By doing so, we can achieve a balanced approach that supports both the protection of the Natural Zone and the promotion of sustainable tourism. Disagreement and comment noted and will be further considered. Such developments are permissible in the wider countryside outside the Natural Zone.

S-86-6	1368682	The National Trust	3.4	Unsure. Discussion of current policy (L1B and DMC2) correctly identifies that some supporting development does need to occur within the Natural Zone. This is considered to fall under the exception of management of the Natural Zone. It is important to recognise that appropriate, relevant and enabling development does need to be carried out by landowners, including the National Trust, in the interests of landscape management. Furthermore, to the benefit of landscape and habitat recovery alongside visitor management in the Natural Zone. Whilst we support the principles of Natural Zone policies, particularly with regard to limiting inappropriate large-scale development. We would welcome further recognition of the important role of appropriate development required to support the management of the Natural Zone. Also, where current policy DMC2 states permitted development rights will be excluded further clarity on the mechanism for this is required alongside the parameters under which this policy can, or should, be implemented. This is with the overall intention of creating a positive framework for Natural Zone stewardship that relevant stakeholders can work under the Local Plan vision and in partnership with the PDNPA. Comment noted and will be further considered.

S-69-38	1368325	Derbyshire Dales District Council	3.4	Disagree. Development in the Natural Zone must be limited strictly to that essential for the management of the Natural Zone only. The reference to conserving other valued characteristics is far too wide, given the huge number of valued characteristics. Allowing farm businesses to remain viable should not be regarded as "exceptional circumstances" in the Natural Zone. Moorland restoration is an appropriate purpose but such development should be temporary with an end date for removal or review of the development. Disagreement and comment noted and will be further considered.
S-68-39	1368264	Bakewell Resident	3.4	Yes. One of the unique features of the Park is its large Natural Zone. Wildlife and habitat protection would be best achieved by its conservation. Agreement and comment noted and will be further considered.
S-62-29	1368170		3.4	Unsure. There are clear pressures on the Natural Zone currently so I suspect further review is warranted. Comment noted and will be further considered.
S-59-13	1368081	SMDC	3.4	Yes. Agreement noted.

S-50-28	1367561	Peak Park Parishes Forum	3.4	Yes. Agreement noted.
S-45-20	1367903	Froggatt Parish Meeting	3.4	Unsure. Noted.
S-44-13	1367865	Eyam Parish Council	3.4	Agree. Protecting the Natural Zone is important and there could be cases where it is not in the interest of the local community. Agreement and comment noted.
S-43-10	1367843	Natural England	3.4	Agree. Natural Englands encouragement of a positive policy approach to support the delivery of favourable condition on protected sites. We have concerns regarding the statement about proposals that aid agricultural activity under policy DMC 2 may compromise the construction of the large fences that are going to be needed between the National Trust properties and the shooting estates if we are going to enable a grazing regime change to cattle. Agreement and comment noted and will be further considered.

S-42-5	1367805		3.4	Unsure. Recently seen refusals to planning overturned post event on appeal to higher courts. Would DMC2 be robust enough to withstand legal challenge that we have seen far too often from monied organisations or individuals who think they are above the aims of PDNPA? Comment noted and will be further considered.
S-40-14	1367788		3.4	Yes. Protection of these zones is critical. Agreement and comment noted.
S-30-9	1367447	Country Landowners Association	3.4	No. We support the blocking of damaging development although if the policy can be used to refuse sympathetic sustainable much-needed development then this can undermine the ability of remote communities to invest in the environment and parks statutory purposes. Disagreement and comment noted and will be further considered. Development can take place in the open countryside outside the natural zone.
S-13-35	1364893		3.4	Unsure. There are many pressures on the landscape especially from visitors. I'm unsure how best to protect the landscape. More paths urbanise the landscape. Education and restrictions to keep to paths rather than make new paths across open land are needed. Comment noted and will be further considered.

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S-9-37	1364715		3.4	Yes. Agreement noted.
S-7-40	1364251		3.4	Yes. Agreement noted.

Q3.5 Do you think the new local plan should have a policy for whole estate plans?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary and PDNPA response
S-224-9	1369634	Sheffield City Council	3.5	No concerns, especially useful for giving weight to ecological considerations and linking to the BNG policy. However need to be cautious about giving weight to unwritten Whole Estate Plans. Concerns noted. It is proposed that policy weight would only be given to Whole Estate Plans that are approved by the Authority. The approval process would be by committee but not the planning committee. For a Whole Estate Plan to be approved by the Authority it must demonstrate significant enhancement, including to nature recovery.
S-223-13	1369632	Hartington Town Quarter Parish Council	3.5	Yes - they are the largest tracts of land and dialogue between the Authority and landowner must be beneficial. Support noted.
S-221-13	1369595		3.5	Yes. Support noted.

S-214-13	1369550	Hope with Aston Parish Council	3.5	Support because a reasonable case is made. Support noted.
S-210-12	1369546		3.5	Does not support WEPs because estates will consider them 'development charters' and it is difficult to define them. Preference and concerns noted. If the Authority adopts a WEP policy in the new local plan it would be accompanied by guidance to address these issues.
S-207-13	1369542	Youlgrave Community Land Trust.	3.5	Does not agree because estates are part of the Park, not separate islands. Preference and comments noted and will be further considered.
S-203-8	1369536	Tarmac	3.5	Large landholdings could benefit from forming part of a Whole Estate Plan. Tarmac has operations at Old Moor Quarry which is cross boundary (primarily supplying operations at Tunstead Quarry located within Derbyshire). Given the proximity to the Peak Park boundaries a joint approach with the landowner and Authority could be beneficial. Support and comments noted and will be further considered.
S-200-11	1369531	Stanton in Peak Parish Council	3.5	Much more has to be done to ensure large landowning estates carry out their responsibilities to the countryside. Where landowners abdicate their responsibilities there needs to be a mechanism to take custodianship and preserve the heritage. Comments noted and will be further considered.
S-195-10	1369526	Derbyshire County Council	3.5	Support and would like to be involved in their production. Support and comments noted and will be further considered.

S-194-13	1369525	Derbyshire Dales District Council	3.5	Unsure. No formal status unless brought into the Local Plan and subject to public consultation. This should be the way forward if WEP are required. Noted.
S-193-9	1369524	Winstanley Parish Council	3.5	Yes, but with same restrictions on local need/community development. Comments and preference noted and will be further considered.
S-192-6	1369523	Mineral Products Association	3.5	No. Whole Estate Plans can be delivered through the Management Plan. Noted.
S-185-12	1369502	Devonshire Group	3.5	The Devonshire Group welcomes the support of the NPA for the WEP as published and wholeheartedly supports the inclusion of a policy within the LP that would give positive regard to it in decision making. It should be noted that the WEP does not cover the entirety of DG's interests across the NP, relating only to the Core Estate. Principles set out within the WEP are, however, also reflected in how land and property assets beyond the Core Estate are managed. Support and comments noted and will be further considered.
S-184-8	1369500	Hope Valley Climate Action	3.5	Yes. Should be required to include a clear route to Net Zero and climate mitigation plans. Support and comments noted and will be further considered.

S-173-9	1369488	Land & Nature Team - PDNPA	3.5	Unsure Recognize the intention and potential merits but concerned that policy may be discriminatory against smaller applicants. How are estate and whole estate plan defined? What scale does this operate at? Should Whole Farm Plans be included? What form should endorsement by the Authority entail? What is meant by give positive regard There is arguably some conflict between application of existing planning policy and Catchment Sensitive Farming (CSF) measures designed to reduce pollution/run-off, eg over covers for slurry lagoons and muck heaps, which may need resolving. Would a CSF plan be regarded as a whole estate plan ? We would suggest that implementation of a CSF Plan should be given positive regard. Comments noted and will be positivley addressed if a WEP policy is pursued.

S-171-2	1369485	Forward Land	3.5	Yes. Valuable framework for traditional estates to develop comprehensive, long- term strategies, including for those seeking to diversify into tourism. These plans can encompass a wide range of issues, from conservation and heritage management to economic development and community engagement. By incorporating a positive policy for whole estate plans, the Local Plan can: - Encourage sustainable tourism development - Facilitate the development of sustainable tourism initiatives - Enable the recycling of redundant buildings and infrastructure - Provide an opportunity for estates to repurpose existing buildings and infrastructure for new uses - Promote heritage conservation - Help to preserve and enhance the cultural heritage of the Peak District National Park by providing a mechanism for the long-term stewardship of historic buildings and landscapes. - Support rural economies - Contribute to the economic vitality of rural communities by encouraging the diversification - Enhance public access. By providing guidance and support at the early stages of plan development, local authorities can help to ensure that whole estate plans are well-considered, sustainable, and aligned with the broader goals of the Local Plan. Comments noted and will be positivley addressed if a WEP policy is pursued.
S-165-13	1369466	Taddington and Priestcliffe Parish Council	3.5	Consultation does not explain how this would work or what it would cover so it is difficult to answer. If such plans are to be planning guidance they need to address local housing, transportation and employment issues and be subject to an open and inclusive consultation. Comments noted and will be positivley addressed if a WEP policy is pursued.

S-163-9	1368617		3.5	Yes. Opportunity to think holistically about landscapes that has benefits for planning, nature recovery, heritage, energy. These documents take a very long time and a lot of resource to produce, so it would be helpful for estates to know that there is a policy in place to support their production, and also that there is clear guidance on what is needed to ensure they can be endorsed by the PDNPA. The guidance would also need to include information on the scope/structure of a WEP, and provide some good practice examples. Comments noted and will be positively addressed if a WEP policy is pursued.
S-157-5	1369450	Holme Valley Parish Council	3.5	No We are uncertain as to why there should be any special treatment for developments on estates. They should be subject to the same rules and process as all other developments. Comments noted and will be positively addressed if a WEP policy is pursued.
S-154-13	1369442		3.5	Yes. It is essential that there is consistency and transparency. Large estate owners, whether private or trusts, should not be exceptional because of size or perceived power/influence. Preference and comments noted.
S-153-11	1369437		3.5	Estate management should focus on the NP and therefore the wider amenity of the land. Much more has to be done to ensure landowners, in particular, large landowning estates carry out their responsibilities to the countryside by clear proactive management of that within their ownership. Comments noted.
S-151-13	1369433		3.5	No

S-150-13	1369431		3.5	No. Large estates are already getting advantage over residents and small business and overdevelopment is changing the villages. Preference and comments noted and will be further considered.
S-137-36	1369370	Derbyshire ALC	3.5	Support. Noted.
S-136-11	1369368		3.5	Yes. To encourage a proactive, strategic approach to development. Preference and comments noted and will be further considered.
S-134-6	1366865	RSPB	3.5	Yes. To deliver transparency and vision re National Park purposes and management plan objectives. A policy in relation to whole estate plans should prevent unexpected development. Preference and comments noted and will be further considered.
S-129-2	1369199	Rowsley Parish Council	3.5	Yes. Support noted.
S-128-38	1369275	Rural Action Derbyshire	3.5	Unsure. Would welcome opportunities to provide affordable housing developments within estates. Comments noted and will be further considered if a WEP is developed.
S-120-14	1368991	Marsh Farm Development Co Ltd	3.5	Yes

S-118-8	1369267	Haddon Estate	3.5	Yes. The Estate is a custodian of a significant area of the Peak District and takes its responsibilities to the environment and community incredibly seriously. The Estate would welcome a Local Plan policy that made reference to Whole Estate Plans and looks forward to an opportunity to discuss the scope of this in relation to the Haddon Estate in due course. Preference and comments noted and will be positively considered if a WEP is developed.
S-113-13	1369153	Edale Parish Council	3.5	No. Other policies should cover development within estates. Noted and comments will be considered.
S-107-19	1368485	NCHA	3.5	Unsure
S-104-36	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	3.5	Not supported. Normal planning processes should apply. Preference and comments noted and will be further considered.
S-98-26	1368689	Greater Manchester and High Peak Area of the Ramblers	3.5	Unsure See the potential value for looking at larger integrated land management approaches and would want any such plans to be clearly linked to other policies to promote sustainable farming and to be fully consistent with public access and the enjoyment of the landscape. Comments noted and will be further considered.

S-86-7	1368682	The National Trust	3.5	Yes It is innovative and appropriate given the vital role that estates play across the Peak District, including those under the care of the National Trust. Supporting wording states that WEPs allow for development to be considered on estates in a transparent, holistic way, and to demonstrate how business growth can deliver ecosystem services such as carbon storage, nature recovery and other public benefits. This policy is also considered as a way in which to strengthen the partnership of estates with communities, wider stakeholders and the PDNPA. In turn acting as a key delivery mechanism for the Local Plan and NPMP vision. We advocate for a new policy area here and would welcome further discussion in the interests of shaping an appropriate approach, alongside considering delivery methods. Preference and comments noted and will be positively considered if a WEP is developed.
S-69-13	1368325	Derbyshire Dales District Council	3.5	Unsure - Insufficient information on what the benefit of WEPs might be. Comments noted and will be further considered.
S-68-11	1368264	Bakewell Resident	3.5	Yes. Estates need to be encouraged to organise how they will adapt to climate change whilst conserving and enhancing their wildlife, habitats, communities and businesses. Preference and comments noted and will be further considered.
S-62-10	1368170		3.5	Unsure. Not well understood but am aware of significant estates in PDNPA so probably wise to set out policy. Comments noted and will be further considered.

S-61-1	1368184		3.5	No. Estates would be against the whole ethos of a National Park, and could set a precedent if allowed. Preference and comments noted and will be further considered.
S-59-24	1368081	SMDC	3.5	Yes, to support integrated approach. Preference and comments noted and will be further considered.
S-51-8	1368085		3.5	Yes, to help large landowners to plan holistically, to get a little bit more certainty up front but without financial commitments or planning commitments on either side. Preference and comments noted and will be further considered.
S-50-13	1367561	Peak Park Parishes Forum	3.5	No. Undemocratic for WEP to be afforded any credence or priority within the Planning process unless the WEP has been through the same level of scrutiny (e.g. stakeholder input and independent assessment) as a Neighbourhood Plan would. Preference and comments noted and will be further considered.
S-45-28	1367903	Froggatt Parish Meeting	3.5	Yes to provide inclusion of specific and defined planning gain. Preference and comments noted and will be further considered.
S-44-36	1367865	Eyam Parish Council	3.5	Yes but be consistent with wider planning. Preference and comments noted and will be further considered.
S-43-11	1367843	Natural England	3.5	Unsure. Could be a positive approach eg landscape scale nature recovery. Concern re weight they would be given in the decision-making process. Comments noted and will be further considered.

S-42-14	1367805		3.5	Yes. To ensure that continued planning and thought goes into the process. Will allow ongoing monitoring and improvement of strategies. Preference and comments noted and will be further considered.
S-40-15	1367788		3.5	Yes. Noted.
S-30-10	1367447	Country Landowners Association	3.5	Yes. Facilitates upkeep of the treasured landscapes in the future. Many estates provide housing and employment space for locals, providing them with unique insights into the local demand of sensitive development in their communities. Preference and comments noted and will be further considered.
S-13-20	1364893		3.5	yes. Noted.
S-9-16	1364715		3.5	Yes. Noted.
S-7-20	1364251		3.5	No The Authority should encourage the development of WEPs but should not 'endorse' them, since this implies approval of any development proposals that they may contain. Each development proposal should be considered on its merits, regardless of whether it forms part of a WEP. Preference and comments noted and will be further considered.

4.1 Do you agree with the proposed local plan spatial objectives for cultural heritage and the built environment?

Submission Responses	Question 4.1			
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-14	1369632	Hartington Town Quarter Parish Council	4.1	Agrees. General support but notes a recognition is needed to deliver significant enhancement which could well mean that the costs involved see owners of the assets disinclined to undertake work.
S-222-9	1369631	TPT & Sustrans	4.1	Agrees as its important to protect the assets.
S-221-14	1369595		4.1	
S-214-14	1369550	Hope with Aston Parish Council	4.1	Response noted. Agrees - incorporating low carbon issues into the objectives is important.

S-207-14	1369542	Youlgrave Community Land Trust.	4.1	Agrees. Gives example: In North Yorkshire much recent Association housing has been built to good effect, using the stone of demolished cotton mills in Bradford and surrounding towns. It is appreciated that some stone barns are of historical importance and should be protected as in Parwich. Competent builders of rubble walls for housing should be established and architects encouraged to further develop options, within the Park style, that may be cheaper (both financially and environmentally) to construct.
S-205-2	1369539	Kingsman Homes	4.1	Gives a context of a contemporary planning permission however the response doesn't appear to be made in relation to heritage assets. Thanks so much for your comment.

S-203-9	1369536	Tarmac	4.1	Response notes that policy needs to ensure it is not overly onerous. For clarity, this issue regards spatial objectives. Response comments that they believes the approach to be contrary to the NPPF objectives which set a hierarchy to consideration of development effecting heritage assets. For clarity, the NPPF is statutory and a key consideration to any changes within the local plan. Any changes to spatial objectives would not lessen the level of consideration attributed to cultural heritage and its protection. In addition, the response notes policy would need to be more prescriptive on the landscape heritage objectives it is seeking to protect to ensure it does not conflict with achieving landscape character objectives that could be delivered through development. PDNPA existing policy is influenced by the National park purposes to protect the landscape and heritage. This therefore takes precedence over any objective regarding climate change - however new guidance urges us to take a proactive approach to climate change.
S-200-12	1369531	Stanton in Peak Parish Council	4.1	Agrees Respondent notes there are also improvements that need to be made in areas which may not be covered by Conservation Area designation, improved awareness by planners and more importantly, ensuring that better conditions are set and adhered to on properties outside conservation areas, but which are equally important as examples of traditional builds in the NP.
S-199-8	1369530	Environment Agency	4.1	Flood risk prevents a challenge to a range of cultural heritage assets within the Peak Park and including an objective to improve the resilience of these assets to flooding would be of benefit.

S-194-14	1369525	Derbyshire Dales District Council	4.1	Respondent agrees. Support in principle but notes that in circumstances conflicts arise between sustainable development and spatial objectives. ; Current NPPF policies support the notion to give appropriate weight in these circumstances.
S-193-10	1369524	Winsters Parish Council	4.1	Agrees. Notes that a sensible approach towards energy saving measure is to be taken: a clear policy on solar, and a clear policy on electric charging. And the Objectives need to take the challenges of retrofit into account – avoiding the creation of awkward areas and cold spots that will make it harder to achieve effective insulation
S-192-7	1369523	Mineral Products Association	4.1	Response is noted no to agree. In summary the response notes that mineral extraction has been fundamental in delivering the landscape as it now stands. The objectives seek to end the industry's contribution after 2042.
S-190-1	1369521	Marchington Stone Limited	4.1	Response noted. The response summaries notes an undressed issue in the consultation which is that cultural heritage through policies within the forthcoming Plan without acceptance that this is, at least in some part, achieved through the provision of locally distinctive mineral products, which can only be worked where they are found. However, in several of the posed scenarios, there is a clear intention to distance, and ultimately uncouple, the PDNP from its geology and abundance of viable minerals that underpin the character of the Park. The PDNPA policy does recognise the importance of mineral extraction. For example, policy MIN1 is under review to scope whether to permit extensions of time for those quarries with end date of February 2042

S-189-2	1369519		4.1	Response is noted. Respondent agrees with the proposed spatial objectives as they need to be conserved. Questions meaning of enhancement. To clarify, this takes lead from NPPF policy where any development should seek to conserve and where possible enhance through development. Essentially where any development should occur, the development should conserve the heritage of the building and aim to provide enhancement/ public benefit for example through improving the condition of the building or furthering its significance through design such s introducing traditional features appropriate to the building. Specific enhancement would be sought through the planning permission by officers and cultural heritage officers and would not be something to lay out within policy. Inherently this would all form part of the planning judgement.
S-188-8	1369508	Staffordshire Moorlands District Council	4.1	Agrees
S-185-13	1369502	Devonshire Group	4.1	Agrees.

S-184-9	1369500	Hope Valley Climate Action	4.1	Response is noted to agree. They note that cultural heritage remains significantly at risk. They further note the objectives should acknowledge that some changes to the landscape, which hitherto would not have been considered acceptable, will be necessary to achieve the decarbonization of our economy, and protection against extreme weather events. Any development of cultural heritage will have to be weighed against existing policy and the NPPF framework. Whilst the PDNPA wishes to further incorporate climate change action with cultural heritage, this would not be at detriment to the existing heritage assets. Any development considered inappropriate would be refused on the basis of level of harm to the assets, in accordance with the NPPF. As the next section sets out, where harm outweighs the public benefits of a project, and the application is refused, then that implies an acceptance that the heritage asset may be lost.
S-170-1	1369472	Historic England	4.1	Respondent is noted to agree. ; The respondent supports the objectives within Paragraph 4.2 and welcome their inclusion.

S-165-14	1369466	Taddington and Priestcliffe Parish Council	4.1	Response noted. The respondent does not agree with the spatial objectives. The respondent notes that "Conserve and enhance" (second bullet point) should read "conserve and/or enhance". There should be a more balanced approach that takes in also the contribution to local communities and the economy, as well as the benefits of conversion in environmental terms. To note, in accordance with existing PDNPA policy and the NPPF the planning balance does incorporate the public benefit the restoration of a building would provide for a community. The planning balance would take into account further the benefits deliverable in terms of the environment but this is weighted against statutory NP purposes to protect the landscape quality. Conserve and enhance is written in accordance with the NPPF. The response notes the transition to a low carbon future will require some realism and compromise.

S-163-10	1368617		4.1	Response is noted. The respondent notes that whilst they agree with the spatial objectives they could be furthered by including engagement/ interpretation to meet NPMP objectives and Np purposes which are not adequately captured by policy RT1; rather, the Local Plan policies should enable the educational opportunities from any development to be maximised (e.g. archaeology open days). The respondent notes an opportunity to widen the scope of interpretation, and embed more securely in policy, those aspects of development that help to conserve and reveal the significance of local heritage and which contribute to the ongoing story, enjoyment and appreciation of the local area. There is also the opportunity to use interpretation to engage with a wider range of people. A simple addition could be To identify opportunities for, and seek to deliver, interpretation of and engagement with the NPs cultural heritage. The response also notes that intangible heritage needs to be in the explanatory narrative of any revised policies &ndash; it is adequately captured in the first objective (and can be captured in the Key Attributes list for special qualities).
S-162-7	1369460	High Peak Borough Council	4.1	Response noted.
S-158-9	1369452	Trans Pennine Trail and Sustrans Joint Response	4.1	The respondent is noted to agree. ;

S-157-6	1369450	Holme Valley Parish Council	4.1	Response noted. The respondent appreciates the focus on climate change. The response questions how the distinctive characteristics of places are protected and how we could resist conformity and uniformity. They would like to see an approach based on consistency using criteria rather than application of rigid rules. For clarity, the existing planning policy sets expectations for conversion of heritage assets in accordance with NPPF guidance and traditional design within the National Park. This issue and option would accommodate for climate change where existing policy is less considerate.
S-154-14	1369442		4.1	Noted respondent does not agree. Explanation is required. Please note that in regards to 'conserve and enhance cultural heritage in the transition to a low carbon future' the expectation would be that introducing low carbon building techniques/ low energy related projects should not harm the existing character of the property in accordance with national and local policy; and where possible development of this ilk should lead to enhancement of the property.
S-153-12	1369437		4.1	Response noted to agree. The respondent notes that they think improvements are needed in areas outside of conservation area designation to include planner awareness and further conditions for properties. They note enforcement issues which are not part of this consultation.
S-151-14	1369433		4.1	Unsure - brownfield development only if essential. Unsure whether the respondent has answered in regards to the correct spatial objectives here as this chapter regards cultural heritage.

S-150-14	1369431		4.1	Respondent disagrees. Notes: They need to include the indigenous people and how they will, and need to influence the ongoing cultural heritage you cant put the people in aspic, but you can help make things happen it the right way.
S-138-14	1369372		4.1	Respondent is unsure as there's a need to address not just transition to low carbon but responding to climate change. ; PDNPA should give further weight to reversible development. Please note this response shall be considered.
S-137-25	1369370	Derbyshire ALC	4.1	Respondent agrees. Notes the protection may also require some change, but it should be within the overall objective of protection.
S-136-27	1369368		4.1	Response noted.
S-128-20	1369275	Rural Action Derbyshire	4.1	Respondent agrees but notes that principles need to reflect that the Peak District is also a living, working space and this also needs to be fit for purpose. ; Some cultural assets will find it difficult to transition to a low carbon future due to affordability, limited alternative options eg village halls and community buildings.
S-120-39	1368991	Marsh Farm Development Co Ltd	4.1	Response noted.
S-107-2	1368485	NCHA	4.1	Response noted.

S-104-10	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	4.1	Response noted unsure. Generally supports. Suggests that little consideration is given to what happens if development permission is refused and the asset is allowed to deteriorate to such a state that its retention is no longer viable. As the section later notes, where development is not appropriate the action would be to accept that the building becomes part of the architectural landscape history of the national park. This is in compliance with the NPPF.
S-103-13	1368574	Marshalls plc	4.1	Respondent is noted as unsure. They note that positive consideration should be given to the promotion, supply, conservation and use of indigenous building stone which not only is a low carbon building product and if quarried locally has a low carbon footprint in comparison to other building materials, over hundreds of years has contributed significantly to the beauty and the character of the Peak Park
S-102-2	1369015	National Grid	4.1	The respondent suggests including a policy strand in the local plan that promotes a comprehensive and coordinated approach to development, which respects existing site constraints such as utilities (e.g., National Grid Electricity Transmission (NGET) assets). This would ensure consistency with national planning policy and align with the sustainable development and design standards promoted by NGET, especially as pressure for development increases.
S-101-2	1369010	Business Peak District	4.1	Response is noted. Whilst you make an excellent point, this consultation does identify a sustainable communities definition and it is taken into account in later chapters.
S-98-7	1368689	Greater Manchester and High Peak Area of the Ramblers	4.1	Response noted to identify that we could include further consideration to specific remit around questions 14,15 or 16 but on Question 17, in addition to the issues set out, the adverse impact of conversions on adjacent walking routes and the quiet enjoy enjoyment of the landscape should be set out.

S-86-8	1368682	The National Trust	4.1	Respondent is noted to agree that the objectives are reasonable in principle. ‘conserve and enhance cultural heritage in the transition to a low carbon future & is noted to be important particularly in regards to long-term viability and management of heritage assets.
S-71-10	1368373	Tideswell Parish Council	4.1	Response noted to agree.
S-69-25	1368325	Derbyshire Dales District Council	4.1	Response noted. For clarity, this issue expands on existing policy and management.
S-68-14	1368264	Bakewell Resident	4.1	The respondent doesn't agree. They note they would prefer to see that renewable energy provision and climate adaptation in an appropriate and culturally sensitive format. Thank you for your response. please be ensured that nay development in this ilk would be subject to PDNPA policy and the NPPF policy on cultural heritage, and supported by PDNPA built heritage advice.

S-67-26	1367857	Over Haddon Parish Council	4.1	The response is noted to agree in principle but the consultation raises further questions. 'To conserve and enhance designated and non-designated heritage assets, including conservation areas, listed buildings and their setting and historic farmsteads and their setting how when the Peak Park does not achieve it now'.Existing policy does, in accordance with the landscape strategy, aim to protect and enhance cultural heritage. This is a requirement of policy from the NPPF (National Government). 'To identify opportunities for, and seek to deliver, significant enhancement not sure what this means'.By this, what is meant is for any development made in regards to cultural heritage assets, and their setting, development should be sure to conserve the existing cultural significance of the assets and where possible through development seek to enhance its significance i.e by consolidating past work, by reintroducing key historic features of the building etc. This is always informed by cultural heritage consultants. To conserve and enhance cultural heritage in the transition to a low carbon future - how far will this work against the other objectives -lacks detail. ; Thank you, this is noted and will be adressed.
S-62-12	1368170		4.1	Response is noted to agree. Non designated heritage assets are so numerous and diverse in nature that it appears that a new, refined methodology is needed to assist when development of an area is being considered.
S-59-11	1368081	SMDC	4.1	Respondent is noted to agree because they are assets which need to be considered and protected.

S-57-6	1368149	Great Longstone Parish Council	4.1	The respondent notes that management of cultural assets to allow solar panels on grade 2 listed buildings was something that was requested from the floor, however, there was no vote. This will be taken into consideration thank you for your response.
S-50-43	1367561	Peak Park Parishes Forum	4.1	The respondent agrees with the proposed spatial objectives for cultural heritage as they support the first statutory purpose of the National Park. However, they raise concerns that the objectives may be too vague for practical application in specific planning applications. They also question how the objectives align with the need to support low-carbon initiatives, particularly whether they would prevent sensible insulation of heritage homes.
S-47-1	1368041		4.1	The respondent is noted not to agree. The respondent notes that the wording of the objectives prioritises the conservation of cultural heritage without taking into account need: to keep heritage properties habitable and to make them more sustainable. They ;note current rules do not takes risks in account. The ;respondent believe it is out of touch with the reality of the climate crisis and that we should be doing all we can to keep heritage properties liveable.
S-44-28	1367865	Eyam Parish Council	4.1	Agrees and notes plan must be sympathetic to use state of the art technology to enhance heritage assets.
S-42-31	1367805		4.1	Respondent is unsure. Notes the need to balance unobtrusive renewable energy solutions with heritage assets

S-40-16	1367788		4.1	Agreed save that recognition must be had of the fact that securing elements of the cultural heritage and built environment alongside an inappropriately applied pursuit of a low carbon future will present challenges in terms of economic viability, implementation and ultimately delivery.
S-30-11	1367447	Country Landowners Association	4.1	The respondent agrees with the proposed spatial objectives for cultural heritage, supporting efforts to help heritage transition to a low-carbon future. They emphasize the importance of identifying opportunities for significant enhancement and enabling development that supports the upkeep of heritage in the National Park.
S-20-3	1367235	Oldham Council	4.1	Notes the third objective To identify opportunities for, and seek to deliver, significant enhancement needs expanding to state what it is enhancing.
S-13-34	1364893		4.1	Agrees with proposed Local Plan Spatial Objectives for Cultural Heritage because it is also part of the landscape.
S-9-10	1364715		4.1	Agrees

				Does not agree with the Issue 14 Local Plan Spatial Objectives but agrees generally. Asks tat more be added ; to emphasise landscape character, biodiversity. Carries on to talk on low carbon futures. Notes that in relation, enhancing biodiversity may be regarded to damage cultural heritage.
S-8-7	1364695	-	4.1	Suggests that biodiversity takes precedence over landscape in some cases.
S-7-44	1364251		4.1	Agrees subject to flexibility so people can modify their property.

Q4.2 Please tell us about any issues or concerns you have about our approach to heritage assets.

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-15	1369632	Hartington Town Quarter Parish Council	4.2	Sees benefit to both parties.
S-221-15	1369595		4.2	Respondent notes that Heritage Significance is subjective and changeable as a term. Notes a flexible less prescriptible approach would be needed to prevent future gems falling through the net.
S-214-15	1369550	Hope with Aston Parish Council	4.2	Notes support for listing of non-designated assets.
S-210-13	1369546		4.2	Support the idea that the local plan should clearly set out the methodology for deciding whether a building is a non-designated heritage asset and the significance of that asset
S-194-15	1369525	Derbyshire Dales District Council	4.2	Response noted. The respondent suggest the local plan sets out a methodology for deciding local heritage value which should sit outside the local plan process. ; To note, this would already be set out in part by groups such as Historic England and English Heritage which is available publicly for access. Methodology such as this wouldn't be part of a local plan review in this context.

S-188-9	1369508	Staffordshire Moorlands District Council	4.2	Thank you for your response.
S-185-14	1369502	Devonshire Group	4.2	Thank you for your response. The respondent appreciates the positive relationship with the National Park Authority (NPA) regarding heritage and supports the ongoing use, conservation, and repurposing of heritage assets. However, they express concern that the Local Plan (LP) should recognize that cultural heritage, including the built environment, is dynamic and should evolve. They emphasize that heritage assets require maintenance, and an overly-restrictive approach can hinder necessary investment for their conservation. They advocate for a more positive and pragmatic approach to development management, allowing heritage to evolve while ensuring its preservation.
S-184-10	1369500	Hope Valley Climate Action	4.2	Thank you for your response. The respondent expresses concern that the current approach to heritage assets is not aligned with addressing the climate emergency. They are particularly focused on the implications of determining whether a building is a non-designated heritage asset. The respondent emphasizes that listed buildings and other heritage assets should be allowed to participate in climate change mitigation, as suggested by Historic England Advisory Notes. They advocate for planning permissions that prioritize approval for measures like solar panels, wind turbines, heat pumps, and insulation, rather than rejection.

S-170-2	1369472	Historic England	4.2	Thank you for your response. The respondent has highlighted several areas where the approach to heritage assets could be further developed: Implications of setting:They suggest that the plan should further define the role of archaeology, the need for heritage impact assessments, and the inclusion of archaeological assessments when necessary. Consideration of key views and landscapes: The respondent emphasizes the importance of considering the impact of development on views and landscapes, even if the heritage asset itself is not directly affected. Demolition of heritage assets:The need for clear guidance on how to deal with the demolition of heritage assets is also raised. Climate change and renewable energy: They propose incorporating considerations of climate change and renewable energy generation in the context of heritage assets, highlighting the need for policies that allow the adaptation of heritage assets while balancing preservation concerns. Registered Parks and Gardens: The respondent also references a question about the inclusion of registered parks and gardens. Non-designated archaeology:A comment on including non-designated archaeology of national significance is suggested for greater clarity. Setting and significance:The importance of setting in determining the significance of heritage assets should be better outlined, especially regarding development in or near these settings. Policy improvements:The respondent welcomes the consideration of assessing which current policies are effective and which areas need improvement, especially concerning non-designated heritage assets. The provided links to good practice advice and further resources support these points.

S-165-15	1369466	Taddington and Priestcliffe Parish Council	4.2	Respondent notes a better balance is needed for heritage assets and their management. Worth as an asset and the contribution it can make are what are important. Settings needs careful definition as it can be interpreted too widely.
S-163-11	1368617		4.2	The respondent raises two main concerns regarding the approach to heritage assets: Non-Designated Heritage Assets (NDAs): The respondent agrees that the decision process for establishing non-designated heritage assets (NDAs) needs to be clearly defined. They emphasize that the policy should not only focus on buildings but should also cover other heritage features that could be considered NDAs. They note that the current policy L3(B) is more restrictive compared to the National Planning Policy Framework (NPPF) and DMC5, particularly with regard to how harm to heritage assets is defined. They suggest that policy L3 needs to align more closely with the NPPF, where there is more nuance around what constitutes harm to heritage assets. Determining Significance of Heritage Assets: The respondent points out that assessing the significance of heritage assets is a complex issue that requires adherence to best practice guidance from Historic England. They argue that creating a unique methodology for assessing significance would not be appropriate. They recommend that the policy or accompanying narrative should reference Historic England's guidance, but without being overly specific, as the guidance documents are periodically updated. In summary, the respondent advocates for a more nuanced and flexible approach that aligns with current best practice and national frameworks, particularly around the treatment of NDAs and the assessment of significance.

S-157-7	1369450	Holme Valley Parish Council	4.2	The respondent supports a clear, transparent methodology for heritage asset decision-making but stresses the need for quality training to ensure proper application. They also highlight the importance of monitoring decisions to ensure consistency and accuracy.
S-153-13	1369437		4.2	There are also improvements that need to be made in areas which may not be covered by Conservation Area designation, improved awareness by planners and more importantly, ensuring that better conditions are set and adhered to on properties outside conservation areas, but which are equally important as examples of traditional builds in the NP.
S-150-15	1369431		4.2	Notes Scope Creep as a concern. There needs to be very clear definition, and democratic approval by the residents of what can be considered a non-designated heritage asset, and what can be considered significant. Financial assistance must be in place to support the owner of a newly identified Non-Designated Heritage asset. Farmers and small land owners are already disadvantaged by the Peak Park economically, we musn't make that worse.
S-137-51	1369370	Derbyshire ALC	4.2	The respondent agrees with the approach but emphasizes that the details matter. They note that heritage assets should be considered alongside other objectives, and sometimes change may provide a greater overall benefit, requiring a balance of priorities.
S-136-8	1369368		4.2	No concerns over the proposals. Clarity over the methodology for deciding the significance of heritage assets would be good.
S-128-22	1369275	Rural Action Derbyshire	4.2	Policies too restrictive for community assets.
S-120-38	1368991	Marsh Farm Development Co Ltd	4.2	Notes: Without allowing sympathetic development of heritage assets, where these are appropriate, we will loose buildings as they fall into disrepair.

S-113-14	1369153	Edale Parish Council	4.2	- They are described in very general terms which sometimes leads to illogical conclusions. - Sometimes regulations seem to protect assets of which there are many examples, such as traditional cottages, disproportionately, not taking into account other urgent issues such as energy efficiency and climate change.
S-104-26	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	4.2	Notes the current way of managing non-des assets is confusing as non-des not recognised until PP is already submitted. There is inconsistency in our current approach.
S-86-9	1368682	The National Trust	4.2	Greater clarity on the methodology for determining non-designated heritage assets is supported, with alignment to national policy and guidance. This approach, avoiding a definitive list, would provide consistency with other Local Planning Authority policies and offer more certainty for applicants while benefiting the historic built environment. The creation of a Local List of non-designated heritage assets using this methodology is also supported for the same reasons.
S-71-11	1368373	Tideswell Parish Council	4.2	Notes no issues.
S-68-19	1368264	Bakewell Resident	4.2	
S-67-14	1367857	Over Haddon Parish Council	4.2	Over Haddon Parish Council says that the Peak Park struggles to protect heritage assets now - especially if they are not governed by planning constraints or rules as shown by what happened to the lynchets in Over Haddon recently
S-62-23	1368170		4.2	Shares concerns over the diversity of the field and prominence given by some in a local community setting ;

S-50-2	1367561	Peak Park Parishes Forum	4.2	1. Clearer definition is needed as to what are heritage assets. 2. More flexibility is needed as to how rules are applied, e g: - Little point in trying to retain/protect a heritage asset which has become too derelict to be worth saving. - Few heritage assets are so special that the owners should be prevented from progressing low-carbon initiatives (e.g. sensible insulation of 'heritage' homes).
S-44-37	1367865	Eyam Parish Council	4.2	Requires flexibility to interpret rules Enforcement.
S-42-43	1367805		4.2	- Global Climate crisis.
S-40-17	1367788		4.2	None supplied.
S-30-12	1367447	Country Landowners Association	4.2	The respondent highlights that each heritage property is unique and requires proportionate consideration. While protecting heritage is crucial, sympathetic development may be needed to justify upkeep costs. Such development can enhance the park's purpose, including improving the visitor experience and providing housing and employment opportunities.
S-20-4	1367235	Oldham Council	4.2	Would the guidance which sets out methodology for deciding whether a building is a non-designated heritage asset also include assets that are not buildings? E.g. bridges, gates etc. If so would it be useful to make this clearer? We will consider this point as part of our ongoing consultation, particularly where additional clarification is needed for best responses.
S-13-32	1364893		4.2	Development must enhance and move forward in a climate sustaining way. Thank you for your response we will add this to our feedback.

Q4.3 Do you think that we should have a Local List of non-designated heritage assets?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary	
S-223-16	1369632	Hartington Town Quarter Parish Council	4.3	Respondent is noted to agree as it would provide a degree of certainty.	Yes
S-222-10	1369631	TPT & Sustrans	4.3	Respondent it noted to agree. They note the assets are important features of the PDNP for residents and should be offered protection.	Yes
S-221-16	1369595		4.3	The respondent is noted to agree. They note that heritage significance changes with time and a flexible less prescriptive approach is needed to prevent loss of future cultural gems.	Yes

S-214-16	1369550	Hope with Aston Parish Council	4.3	Agrees. A single Local List of non- designated heritage assets will help to conserve important buildings and would bring spatial consistency to their management. We welcome the suggestion that local communities should be involved in the designation of criteria.	Yes
S-210-14	1369546		4.3	Agrees.	Yes
S-200-13	1369531	Stanton in Peak Parish Council	4.3	Agrees there should be a local list. Notes that if buildings fall just outside a conservation area they can be deemed as not worthy of heritage consideration, but their position and impact on the landscape can be just as important and the overall visual quality of development needs to be considered not just on the property but its effects on other nearby buildings.	Yes

S-194-16	1369525	Derbyshire Dales District Council	4.3	Response noted. The respondent suggest that should a local list of non-designated heritage assets be required, then the process of setting the criteria and identifying what assets could appear on the list should be undertaken outside the Local Plan process, and where appropriate those designated would appear on the Policy Maps, and to which policies in the Local Plan would apply.	

S-192-8	1369523	Mineral Products Association	4.3	Does not agree. Notes they believe it will create an unnecessary burden on the authority at a time resource are scarce. Consideration can be given to any buildings if, and when, proposals are brought forward for development. The methodology referred to under Issue 15 can be applied at the time an application is made. In addition, we would add that the photograph used to characterise the national park would not be possible without the benefits of quarrying allowing local character and vernacular to be maintained from the buildings to the extensive drystone walling of the park.	No
S-189-3	1369519		4.3	Disagrees and notes should be designated when a development is submitted.	No

S-185-15	1369502	Devonshire Group	4.3	Notes an agreement but that the the practicalities of preparation of such a document would be very challenging. The number of buildings and other structures across the NP that could be considered to have heritage significance, sufficient to be designated as non-designated heritage asset is high. The resources required to undertake a sufficiently robust assessment would be very significant. Even then, criteria would still be required to allow the assessment of buildings/structures within an application process that might have been missed within any initial assessment.	
S-170-3	1369472	Historic England	4.3	Thank you.	
S-165-16	1369466	Taddington and Priestcliffe Parish Council	4.3	Notes it may create more problems than it solves and that a selection criteria needs o be objective.	

S-163-12	1368617		4.3	The applicant is undecided. - Notes it would be resource heavy. - Ongoing - Will support if can be adequately sourced.	Unsure
S-158-10	1369452	Trans Pennine Trail and Sustrans Joint Response	4.3	Agrees as it is an important feature of the National Park and should be protected.	Yes
S-157-8	1369450	Holme Valley Parish Council	4.3	The Comment is noted to agree. They note that local people should be involved. They note a local list is essential to ensure distinctive difference in style of buildings is respected. They note it will be resource heavy and should be considered an investment in terms of social and economic value.	Yes

S-156-6	1367563		4.3	Notes their agreement. It is simply a good idea and would hopefully prevent the likes of Network Rail attempting to demolish historical signal boxes, clueless developers imposing unsympathetic changes upon historical buildings which may not be scheduled monuments but which still enhance a historical setting. Perhaps such a local list could be complemented with some form of design guidance for development, ensuring that those listed heritage asset buildings cannot be damaged with the imposition of out-of-keeping solar panels, UPVC windows etc.	Yes

S-153-14	1369437		4.3	Respondent agrees there should be a local list. It appears that if buildings fall just outside a conservation area they can be deemed as not worthy of heritage consideration, but their position and impact on the landscape can be just as important and the overall visual quality of development needs to be considered not just on the property but its effects on other nearby buildings.	Yes
S-151-15	1369433		4.3	Respondent is unsure of the process.	Unsure
S-150-16	1369431		4.3	Respondent is noted to disagree for two reasons: - Resources - Could be done as a voluntary scheme.	No

S-138-12	1369372		4.3	Agrees. value in indicating the significance of non-designated assets that are valuable to local communities, which should be an consideration when development is proposed. The maintenance of a local list need not be onerous.	Yes
S-137-4	1369370	Derbyshire ALC	4.3	Notes agreement - Creates certainty in the planning process. - It sounds like the administrative resources needed would be significant, whereas the benefit of certainty would probably be limited. In most cases an individual review would be needed in any event, and a local list would presumably risk being challenged (at significant cost and resource).	Yes
S-136-24	1369368		4.3	Agrees but notes a retrospective methodology would be useful only in certain developed areas.	Yes

S-128-21	1369275	Rural Action Derbyshire	4.3	Agrees. Needs to be open and transparent and understood by the community.	Yes
S-120-15	1368991	Marsh Farm Development Co Ltd	4.3	Agrees.	Yes
S-118-9	1369267	Haddon Estate	4.3	Agrees. Notes Haddon would benefit. It is accepted that it would be a good starting point but needs more work.	Yes
S-113-15	1369153	Edale Parish Council	4.3	Does not agree. If the local plan includes clear criteria for determining whether a building is a non-designated heritage asset and its significance, it seems unnecessary with limited resources to draw up a local list. Those applying for planning permission should have a good idea, from the criteria, and hopefully with preapplication guidance, of how a building should be considered.	No

S-110-9	1369133	Middleton and Smerrill Parish Council	4.3	The respondent agrees that a Local List of non-designated heritage assets would be beneficial. It would involve local people in creating the register, providing clarity and understanding of the selection criteria. This process would also help local communities gain insight into how planning decisions are made, fostering greater transparency.	Yes
S-104-21	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	4.3	The respondent supports the idea of a Local List, provided that the village has sufficient opportunity to contribute to its creation. Many local assets, while not qualifying for national or regional listing, are important to the community and should be documented. This would ensure consistent treatment of these assets over time, helping to enhance the village's character and appearance.	Yes

S-86-10	1368682	The National Trust	4.3	The respondent supports the creation of a Local List of non-designated heritage assets, provided that a clear methodology is used to determine them. This methodology should align with national policy and guidance. A non-definitive list would be in line with other Local Planning Authority policies, offering greater clarity for applicants and benefiting the historic built environment.	Yes
S-71-12	1368373	Tideswell Parish Council	4.3	The respondent believes a Local List may not be necessary, provided that the criteria for determining heritage assets are sensible and pragmatic. They suggest that Parish Councils developing Neighbourhood Plans could validate and "sign off" on the proposed heritage assets list prepared by the Peak District National Park Authority (PDNPA), allowing for local input.	No

S-69-17	1368325	Derbyshire Dales District Council	4.3	The respondent is unsure about having a Local List of non-designated heritage assets. While they see the idea of listing important buildings as potentially beneficial, they express concerns that it may be difficult to define and may not provide significant overall benefits.	Unsure
S-68-12	1368264	Bakewell Resident	4.3	The respondent does not think a Local List of non-designated heritage assets is necessary, as long as a free service is available for interested parties, neighbors, buyers, and developers to check the status of a property as a non-designated heritage asset.	No

S-67-11	1367857	Over Haddon Parish Council	4.3	Over Haddon Parish Council supports the idea of a Local List to highlight non-designated heritage assets and ensure their significance is considered in development proposals. They would want to be involved in drafting and agreeing on the selection criteria in consultation with local people. However, they note that local lists currently have limited planning weight, so it's unclear how much influence they would actually have. They also believe it would provide villages with a way to highlight buildings that might otherwise be overlooked. A local list would support existing DM policies and would give clarity through this policy.	

S-66-10	1368276		4.3	The respondent believes that a Local List of non-designated heritage assets would lead to an overwhelming number of buildings and assets being included, making it harder to develop or update properties due to increased red tape. They argue this would slow down new housing development and question the need for such a list, as the current approach of requiring a proportionate Heritage Statement is sufficient, particularly for householders.	No
S-62-15	1368170		4.3	The respondent supports a Local List of non-designated heritage assets, as it would provide recognition to heritage assets that are at risk of development and ensure their protection.	Yes
S-59-1	1368081	SMDC	4.3	The respondent believes that a Local List of non-designated heritage assets is important to ensure these assets are given special consideration during the planning process.	Yes

S-57-7	1368149	Great Longstone Parish Council	4.3	The respondent fully supports the creation of a Local List for non-designated heritage assets, emphasizing the importance of informing owners and prospective purchasers about any applicable restrictions to their properties.	Yes
S-50-30	1367561	Peak Park Parishes Forum	4.3	The respondent believes a Local List for non-designated heritage assets would be too restrictive, suggesting that planning decisions should be made based on the specific time and circumstances of each application rather than a fixed list.	No
S-44-26	1367865	Eyam Parish Council	4.3	The respondent does not agree.	No
S-42-6	1367805		4.3	The local list would not be a restriction as is the case with listed property however it would give soe clarity to the heritage of the property in light of planning constraints and design.	Yes

S-40-18	1367788		4.3	The respondent supports a Local List of non-designated heritage assets, stating it will help inform decision-making and may highlight assets that are worthy of designation.	Yes
S-30-14	1367447	Country Landowners Association	4.3	The respondent is unsure about a Local List of non-designated heritage assets, as they believe creating the list could be resource-intensive without providing significant benefits. They suggest that policies should focus on making a positive contribution to all heritage properties.	Unsure
S-29-7	1367323		4.3	The respondent agrees with having a Local List of non-designated heritage assets, as it would be useful for considering local significant structures in the planning process.	Yes
S-16-1	1367105		4.3	Disagrees about having a local list as they believe there is already adequate protection and limited departmental resources.	No

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S-13-3	1364893		4.3	Agrees to have local list to give clarity to developers and interested parties.	Yes
S-9-35	1364715		4.3	Agrees as more certainty given.	Yes
S-7-17	1364251		4.3	Mentioned lack of resources again	Unsure

Q4.4 Do you think the new local plan should contain a specific policy relating to isolated traditional buildings?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-226-2	1369530	Environment Agency	4.4	Redevelopment of large-scale buildings, complexes need consideration of foul sewage disposal, as the new use may increase significantly the volume of foul drainage likely to be discharged to ground, as this is likely to increase the risk to groundwater. Larger developments also likely to require environment permit. Small individual buildings are unlikely to be of significant concern, unless located close to vulnerable features (springs, wetlands, protection zones, etc)
S-223-17	1369632	Hartington Town Quarter Parish Council	4.4	The response notes they don't agree that the new local plan should contain a specific policy. They note that although there should be a distinction between field barns they believe the current policy DMC10 is adequate. They note that they disagree that without maintenance they should be lost. An ideal solution would be funding incentives. We will take this comment into account.

S-221-17	1369595		4.4	The respondent agrees that tighter controls are required to prevent harmful environmental impacts associated with development in sensitive areas. This question was more about the protection of heritage however this comment is related and will be taken into account.
S-220-7	1369594		4.4	The response is noted to agree. This is based off the impact it can have on the landscape, both visually and the harm to the wildlife, as well as the light pollution causing erosion of the Park's dark skies.

S-214-17	1369550	Hope with Aston Parish Council	4.4	The respondent agrees but is unsure over some details which they don't expand on. Please get in touch for further clarification and we will be in touch. They see that existing buildings suitable for re-use around existing settlements are largely already converted. They note that field barns isolated field barns are both an important part of the landscape and an asset for nature recovery, and any clearly defined policy relating to them should defend them against inappropriate conversion. In common with many other areas for policy development, full consultation with the communities affected will be critical as policies on managing cultural heritage and the built environment are developed. Thank you for your comments we will include these in our feedback.
S-210-15	1369546		4.4	The respondent agrees. They do however note that they would be against this because they have a perception that it would urbanise the landscape and make the landscape of the national park indistinguishable from landscapes outside of the protected area. However, they note support in principle for the policy where it was carefully drafted.

S-203-10	1369536	Tarmac	4.4	They note any wording should provide balance. As written, there is an assumption that conversion would have negative impacts. Applications need to be considered on their merits and sustainable use of existing buildings/structures given due weight in the overall balance. We will take this into account particularly the wording.
S-200-14	1369531	Stanton in Peak Parish Council	4.4	The respondent notes a general support if the conversion be linked to a particular farm or family/ shared planning unit. As existing, our housing policy would allow conversions for open housing, which the respondent notes can raise prices to unaffordable - keeping the property empty. They note a more flexible solution is required including policy which outlines acceptable uses and parameters for conversion.
S-194-17	1369525	Derbyshire Dales District Council	4.4	Response noted. The respondent notes that they have no objections provided that they may be brought into a beneficial use, and that the policy is not so restrictive that it would be impossible for conversion to occur.

S-193-11	1369524	Winster Parish Council	4.4	The respondent is noted to agree. They note it should be considered only for priority local need. They note we should be to prioritize creating multiple homes, especially when there's potential for development or sympathetic extensions that cater to the needs of families or communities. It suggests that, rather than asking if an individual needs to convert a barn to live in, the question should be whether the conversion can provide homes for others, such as family members. It also emphasizes that all developments should include permanent occupancy clauses to ensure lasting residency.
S-192-9	1369523	Mineral Products Association	4.4	The respondent agrees. Redundant, isolated buildings in the landscape could offer valuable uses for the park, preserving its character and using local materials. However, the phrase "conversions are acceptable in principle anywhere in the open countryside" should be reconsidered, as it assumes harm from such conversions, when the impact should be evaluated on a case-by-case basis. The key is finding a planning balance.
S-189-4	1369519		4.4	The response notes agreement and that a specific policy is required.
S-185-16	1369502	Devonshire Group	4.4	The respondent does not agree. No, a specific policy for isolated traditional buildings isn't necessary. Existing policies already offer sufficient control over unacceptable developments. However, it may be helpful to provide more clarity on policy interpretation through accompanying explanatory text. Additionally, the Chatsworth Whole Estate Plan (p87) identifies the value of field barns and their potential for sensitive re-use, which could be referenced in the new plan.

S-184-11	1369500	Hope Valley Climate Action	4.4	The respondent is noted to agree. They note taht the decarbonisation of the economy will lead to higher electricity demand, especially for electric vehicle charging and heat pumps. The Peak District's grid infrastructure may struggle to meet this demand, making energy storage, likely in batteries, increasingly important. Isolated traditional buildings could be ideal for housing energy storage and solar panels. The new local plan should explicitly encourage this use over converting such buildings into holiday homes. Thsi response is noted and will be considered.
S-180-2	1369496	Castleton Parish Council	4.4	The respondent agrees there should be a specific policy for dealing with damaging scenarios. Although the LPR does state a presumption that any conversions not considered as suitable would essential be left in situ, this response suggest that they think policy should protect heritage despite this.
S-179-1	1369495	Charlesworth Parish Council	4.4	In summary the respondent agrees. They note Yes, the new local plan should include specific policies for isolated traditional buildings. This would help clarify the Park's stance on these buildings, as there's a local misconception that any application for their restoration or re-use would be refused. A clear policy would encourage their re-use while ensuring it aligns with acceptable local standards, acknowledging that the surrounding areas may change in character over time.

S-173-10	1369488	Land & Nature Team - PDNPA	4.4	In short: Yes, the new local plan should include a specific policy for isolated traditional buildings. While existing policies are effective, a clearer, more transparent policy could help prevent these buildings from being lost and protect the landscape character. It would guide future re-use towards low-intensity uses like storage, stabling, or interpretive spaces, while discouraging high-intensity uses like residential or holiday homes, which negatively impact the landscape. The policy could also prioritize buildings linked to existing farm businesses that support National Park purposes. On balance, a specific policy would offer clear guidance and preserve the character of the area. They note that existing policy is robust, but there are advantages to a more transparent policy approach. If they were to favour, it would be along these lines: Lower-intensity uses (such as storage, stabling, camping barns, temporary shelter, or low-key interpretive spaces) may be acceptable for isolated traditional buildings. Higher-intensity uses (like residential, domestic, or holiday homes) are generally discouraged because they often lead to additional development (e.g., parking, curtilage) that harms the landscape and detaches the building from its original setting. If no suitable low-intensity use is found, dereliction and loss of the building is preferred over converting it to a high-intensity use. Applications are more likely to succeed when the alternative use is connected to and supports an existing farm business that aligns with National Park purposes.

S-171-3	1369485	Forward Land	4.4	Yes, the new Local Plan should include a specific policy for isolated traditional buildings. These buildings, such as field barns, are valuable elements of rural heritage and offer unique opportunities for sustainable development. Repurposing them can: Promote sustainability by reducing the need for new construction. Protect local heritage by preserving buildings that embody the area's character and history. Support rural economies through tourism ventures that create jobs and stimulate local economies. Enhance visitor experiences with unique and immersive stays, particularly in picturesque locations offering a "digital detox." A clear policy will ensure these buildings are sensitively converted, preserving their heritage value while allowing for adaptation. However, new construction should also be considered for accessible accommodations, provided it meets high sustainable standards. Thanks for your comments we will consider these carefully.
S-170-4	1369472	Historic England	4.4	The respondent supports the policy proposal.

S-165-17	1369466	Taddington and Priestcliffe Parish Council	4.4	The respondent is generally in support. The reason for the answer is that while the current policy is not entirely flawed, it requires a more realistic approach. The National Park Authority acknowledges the "ever-changing landscape," but this recognition doesn't seem to extend to barn conversions. Converting barns can provide much-needed housing, especially for local people, and may have less environmental impact than constructing new homes. Historic barns should be preserved, as a landscape filled with derelict barns is undesirable. The definition of "isolated" barns should be clarified, as most barns considered "isolated" would be exceptional, located in remote parts of the Natural Zone. It is uncertain whether a new policy is necessary or if clearer wording of the existing policy would suffice.
S-163-13	1368617		4.4	The respondent is generally in support and provide some details and odea we can consider further. Yes, the new local plan should include a specific policy for isolated traditional buildings. There is evidence suggesting that decisions on this issue often go against current policy, indicating it may not be as effective as it could be. Isolated traditional buildings have unique attributes, including heritage value, habitat, and landscape contributions, and are under significant pressure for conversion, making them a special case that deserves its own policy. The policy should clarify that the loss of some of these buildings may be acceptable if the harm from conversion is deemed unacceptable. Additionally, there are alternative ways to secure the future of these heritage assets, such as through agri-environment schemes and grant aid, not just conversion.

S-161-20	1369459	CPRE Peak District and South Yorkshire	4.4	The respondent notes: Yes, the new local plan should include a specific policy for isolated traditional buildings. The CPRE PDSY has observed an increase in proposals to convert these buildings and supports a clear policy outlining acceptable conversion parameters and uses. The PDNPA should also monitor the impact of permitted development rights for converting such buildings into non-agricultural uses. If significant issues arise, the PDNPA should consider using Article 4 directions for specific sites to protect the park's valued characteristics from harm. We haven't considered an article 4 at this stage, but this will be considered further.
S-157-9	1369450	Holme Valley Parish Council	4.4	The respondent agrees and notes: Yes, the new local plan should include a specific policy for isolated traditional buildings. These buildings have unique considerations, and while owners may want to use them economically, some have outlived their usefulness and should either decay or be repurposed sustainably. A clear policy would allow the Planning Authority to assess conversions based on specific features and conflicting demands. It's unfortunate that the authority cannot proactively address these buildings, leading to decay without needing permission.

S-156-7	1367563		4.4	The respondent notes: Yes, the new local plan should include a specific policy for isolated traditional buildings. The policy should focus on preserving the historical character of these buildings, rather than prioritizing modern features like carbon-neutral eco-design, which may conflict with their heritage value. I also support policies that could prevent inappropriate development or conversion of certain isolated buildings, as I am a strong advocate for protecting historical buildings and limiting unsuitable development in the Peak Park. Thank you for your comment which will be considered.
S-153-15	1369437		4.4	Respondent is in agreement. Conversion to dwellings may be acceptable if linked to a specific farm and family. However, converting barns for rental or open market use could drive up prices, making them unaffordable for full-time residents. A more flexible approach is needed, but not to the extent that every isolated barn is turned into a money-making asset, which would diminish the value of the local historical environment.
S-150-17	1369431		4.4	The respondent is noted to agree. Yes, the new local plan should address isolated traditional buildings. These buildings need a purpose to avoid deteriorating and being lost. It's better for someone to live in them, even with modest improvements like Velux windows, than for them to become abandoned, overgrown, or exploited for materials.

S-140-4	1369412	Hope and Derwent Woodlands Parish Council	4.4	The respondent disagrees with the idea of including a specific policy relating to isolated traditional buildings. They believe that a list of acceptable uses would be too restrictive and could exclude innovative ideas for the use of these buildings.
S-138-16	1369372		4.4	The respondent agrees with the inclusion of a specific policy relating to isolated traditional buildings, suggesting that it may sometimes be acceptable to repurpose these buildings. For instance, providing housing for local people could be seen as a preferable alternative to allowing a field barn to fall into disrepair.
S-137-5	1369370	Derbyshire ALC	4.4	The respondent supports the inclusion of a specific policy for isolated traditional buildings, stating that these buildings present unique challenges compared to those located within settlements. This distinction is particularly important in the context of the new framework of the Local Plan.
S-136-3	1369368		4.4	The respondent agrees that the new local plan should contain a specific policy for isolated traditional buildings, emphasizing their value in the landscape. They suggest that conversion could have varying impacts depending on the proximity to roads, settlements, or existing buildings. Additionally, they recommend that clear criteria be established for defining "isolated traditional buildings."

S-128-46	1369275	Rural Action Derbyshire	4.4	The absence of a policy is creating issues. There is existing policy covering heritage property and this consultation asks whether a specific policy should be made and why.
S-120-19	1368991	Marsh Farm Development Co Ltd	4.4	Agree.
S-118-10	1369267	Haddon Estate	4.4	The respondent believes that a specific policy for isolated traditional buildings would be unnecessary, as the landscape impact of their conversion could already be assessed through general landscape impact policies. If the building is listed or locally listed, existing Local Plan policy and NPPF provisions protecting the setting of such assets would apply. However, if a specific policy is included, it should acknowledge the significant benefits of bringing isolated traditional buildings back into use.
S-113-16	1369153	Edale Parish Council	4.4	The respondent believes that decisions regarding isolated traditional buildings should be made on a case-by-case basis, considering the specific application, the Park's purposes, and other development policies. They also note that enforcement can be an issue for isolated buildings.
S-108-3	1369131	Youlgrave Parish Council	4.4	The respondent agrees that the new local plan should include a policy relating to isolated traditional buildings. They emphasize the importance of further discussion and consultation on options for conserving and re-using isolated field barns and similar buildings to prevent them from being lost. While they acknowledge that such buildings may not always be suitable for conversion into accommodation, they stress the need for more detailed consideration of permissible reuse options under policy.

S-106-3	1369124	Stanton in Peak PC	4.4	The respondent believes that the new local plan should contain a specific policy relating to isolated traditional buildings. They feel it would be sensible for the plan to outline the parameters for conversion and specify which uses might be considered acceptable.
S-104-31	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	4.4	The respondent believes the local plan should include a policy on isolated traditional buildings, with a more flexible approach. They argue that barn conversions can provide housing, especially for locals, with less environmental impact than new builds. Preserving historic barns is important, and factors like location, heritage value, and community contribution should be considered in policy.
S-98-8	1368689	Greater Manchester and High Peak Area of the Ramblers	4.4	The respondent is unsure about having a specific policy for isolated traditional buildings but suggests that, if included, the plan should also address the potential adverse impact of conversions on adjacent walking routes and the quiet enjoyment of the landscape.
S-86-11	1368682	The National Trust	4.4	The respondent supports the inclusion of a specific policy for isolated traditional buildings. They believe that a policy would provide greater clarity and a refined decision-making framework. The National Trust recognizes the balance between landscape impacts, the value of traditional buildings, and the need for viable future uses. They suggest linking this policy with issues related to non-designated heritage value.

S-81-3	1368658		4.4	in favour of this in principle if the use of the buildings after conversion is prioritised for affordable local needs and permanent residents (not holiday lets).
S-71-13	1368373	Tideswell Parish Council	4.4	Agrees
S-69-28	1368325	Derbyshire Dales District Council	4.4	A proper debate on this issue would be useful, to ensure that opportunities to repurpose these buildings in a sustainable and sensitive way are maximised. W would reconsult on this should th epolicy come forward.
S-68-42	1368264	Bakewell Resident	4.4	The respondent believes the new local plan should include a specific policy for isolated traditional buildings, as it would save officer time by providing a clear framework that guides developers on the correct approach.
S-67-28	1367857	Over Haddon Parish Council	4.4	The respondent agrees that adaptive reuse of traditional buildings is a good conservation approach, but emphasizes the need for a more regularized ruling on isolated buildings. They suggest clarifying what uses are acceptable to provide clear guidance for developers and manage environmental concerns effectively.
S-64-1	1368242	Sustainable Hayfield	4.4	The respondent supports a specific policy for isolated traditional buildings, emphasizing that each building should be considered individually. They suggest that with increased tree and vegetation cover from nature restoration, these buildings may blend in more and become suitable for different uses in the future.

S-62-53	1368170		4.4	The respondent agrees with the idea of a specific policy for isolated traditional buildings. They acknowledge the complexity of the issue, noting that locations are diverse. While development might be necessary to prevent decay, they emphasize the importance of considering landscape and habitat impacts.
S-60-4	1368155		4.4	The respondent strongly opposes the conversion of isolated buildings, arguing that these structures were not originally designed for residential use. They express concern that such conversions would require alterations that could negatively affect the building's character.
S-59-6	1368081	SMDC	4.4	The respondent agrees that the new local plan should contain a specific policy relating to isolated traditional buildings, as they have a substantial visual impact and significantly affect the aesthetics of the landscape.
S-57-8	1368149	Great Longstone Parish Council	4.4	The respondent mentions that the conversion of isolated traditional buildings was discussed in relation to farmers' income, and it was suggested that such conversions should be allowed for this reason, although it was not voted on.
S-50-10	1367561	Peak Park Parishes Forum	4.4	The respondent believes that the issue of isolated traditional buildings is already adequately addressed by existing policies, and therefore, a specific policy in the new local plan is unnecessary.

S-45-16	1367903	Froggatt Parish Meeting	4.4	The respondent believes that a specific policy for isolated traditional buildings is necessary to better protect these assets and prevent inappropriate development. They also emphasize the urgent need to address the removal of dry stone walls in the Peak District, which is leading to large expanses of open space and impacting the landscape. Thank you for your comment we will consider the loss of drystone walls seperately to this issue.
S-44-50	1367865	Eyam Parish Council	4.4	The respondent believes that the issue of isolated traditional buildings is already adequately addressed by other policies, and therefore, a specific policy is unnecessary.
S-42-41	1367805		4.4	The respondent supports the inclusion of a specific policy for isolated traditional buildings, particularly when the conversion is for temporary or low-intensity uses. They suggest it could be considered for affordable housing, though access and conversion costs may limit feasibility. However, they strongly oppose converting these buildings into holiday homes or high-cost residential properties.
S-40-19	1367788		4.4	The respondent believes that a specific policy should be included for isolated traditional buildings because many of these buildings make a significant contribution to the landscape, particularly as historical agricultural or post-industrial assets. They emphasize that retaining and protecting these buildings will often be desirable.

S-30-15	1367447	Country Landowners Association	4.4	Response noted. Agrees - We should support conversions with policy actively as its essential for their upkeep and contributes to a societal benefit and to the rural housing supply. Asks to incorporate CC1 further. Notes we should be looking at the impact of planning refusals already. The existing policy surrounding isolated buildings (DS1; L1; DMC10) establishes a principle that buildings can be converted to new uses provided that such development aligns with national guidance and national park purposes. This question poses whether isolated buildings should be converted in accordance with their own policies that set out clearly what would be an acceptable use for these buildings; whether they should have their own policies that differentiate them from the existing requirements in DMC10. A building located to the edge of a settlement when converted would have a lesser impact that a building in the open countryside. The principle also being that if use is incompatible with the location of the building, the planning authority would accept the building may be lost. In this case, the respondent has agreed they should have their own policy, but has not not necessarily agreed that in some cases, the buildings may be lost, as the issues and options text sets out. They have therefore, argued that the upkeep of such building would have a positive contribution to society and in addition that the authority should lessen the planning restrictions against such buildings.

S-20-5	1367235	Oldham Council	4.4	The respondent suggests that the Local Plan would benefit from having specific evidence to inform policy on non-designated assets and isolated traditional buildings, particularly in light of the potential impacts outlined in the plan, such as housing needs in settlements and farmsteads. They imply that clearer evidence could help shape better-informed decisions and policies.
S-13-17	1364893		4.4	Response noted. Respondent disagrees - Any development of isolated buildings should fall under normal planning rules about the importance of the landscape and cultural heritage. The issues and options document sets out that there may be a requirement for isolated building to have their own policy that clearly sets the parameters for conversion. This is based upon the higher landscape impact the conversion of isolated buildings has. The normal planning (policy L1; DMC10) would keep the status quo and would not offer any further protection for the landscape and cultural heritage of such buildings.
S-9-28	1364715		4.4	Response noted. Respondent agrees that isolated traditional buildings should have their own policy. They note tracks etc are disruptive. However, that if these domestic feature are already presents, or located nearby then the building should be converted provided it does not harm the overall appearance.

S-7-35	1364251		4.4	Response noted. Respondent agrees that a new policy should be made in relation to isolated buildings. Notes that Local Plan should set out the criteria that would make it unlikely that approval would be granted for the development of isolated traditional buildings, in order to provide early guidance to potential developers. Whilst the aim of policy isn't to prevent development, the issues and options consultation issues 17 sets out that because traditional isolated buildings have the potential to harm landscape and character, a new policy should clearly set out parameters where conversion is acceptable.

Q5.1 Do you agree with the proposed local plan spatial objectives for climate change and sustainable building?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-10	1369634	Sheffield City Council	5.1	Yes, Sheffield City Council agrees with the proposed Local Plan spatial objectives for climate change and sustainable building. However, they believe the plan could go further in promoting the sustainable use of natural resources, as mentioned in the National Park Management Plan commitment to the climate emergency. The National Park plays a key role in protecting surrounding urban areas from flooding, and Sheffield City Council supports incorporating natural systems for better flood management. They also advocate for a more ambitious approach to renewable energy infrastructure. Additionally, Sheffield City Council supports the inclusion of nature recovery, carbon sequestration, flood prevention, and managing recreational pressures within the objectives. They suggest adding policies related to the sustainable use of resources, such as: Water efficiency requirements, including rainwater harvesting and grey water recycling. Design for Performance methods and Post Occupancy Evaluation tools to ensure energy performance matches design intentions. A requirement for renewable energy provision and storage in new developments.

S-223-18	1369632	Hartington Town Quarter Parish Council	5.1	Yes, respondent noted to agree with the proposed Local Plan spatial objectives for climate change and sustainable building. We particularly support the protection of long views and open skylines, as the dangers of their disruption are becoming more evident. This is shown by recent applications for large-scale wind turbines and 5G radio masts in inappropriate locations, which can harm the landscape.
S-222-11	1369631	TPT & Sustrans	5.1	Without this protection these features would no longer remain and there is a risk that the Peak District would no longer be a National Park.
S-221-18	1369595		5.1	Agrees.
S-214-18	1369550	Hope with Aston Parish Council	5.1	They agree with the proposed Local Plan spatial objectives for climate change and sustainable building. However, believe the wording of some objectives could be stronger to reflect the urgency of climate change. Phrases like "contribute to" and "support" may not convey the necessary weight, and terms like "prioritize" could be more fitting in certain objectives.
S-210-16	1369546		5.1	They agree with the proposed spatial objectives for climate change and sustainable building in principle. However, they find the phrase "to support sensitively sited, small-scale renewable energy infrastructure" too vague and open to subjective interpretation.
S-207-15	1369542	Youlgrave Community Land Trust.	5.1	Yes, they agree with the proposed spatial objectives for climate change and sustainable building. They believe the siting of solar panels on barn roofs, as well as on all new housing, would be desirable.
S-200-15	1369531	Stanton in Peak Parish Council	5.1	Yes, they agree with the proposed spatial objectives for climate change and sustainable building. They note that the National Park currently lags behind in making essential improvements to reduce climate change impacts. They emphasize the need for better communication infrastructure to reduce transportation, and more forward-thinking solutions to sustain remote communities and individual premises, which will require greater flexibility.

S-199-9	1369530	Environment Agency	5.1	They believe Objective 3 should be more ambitious, not only focusing on reversing damage to nature but also enhancing its resilience to future climate change impacts. They support making 'flood prevention' its own objective, with an emphasis on Natural Flood Management techniques. The objective to 'support work to create and manage floodplain landscapes ; should also incentivize making space for water. Additionally, they suggest adding water management as an objective, including promoting rainwater harvesting, sustainable building practices, and the use of SuDs and swales to achieve clean water and nutrient neutrality. The policy should also emphasize habitat connectivity, promote blue/green corridors, and consider improving the flood resilience of buildings for a low-carbon future.
S-195-11	1369526	Derbyshire County Council	5.1	They do not agree with the proposed Local Plan spatial objectives for climate change and sustainable building. They believe that effective and planned battery storage is crucial for the success of renewable energy projects. Therefore, they suggest amending the final spatial objective to include "battery storage," To support sensitively-sited, small-scale renewable energy infrastructure, including battery storage.
S-194-18	1369525	Derbyshire Dales District Council	5.1	Response is noted to agree. Without objection, the respondent summarises that there is need to cross refer to the National Park Management Plan Aim One and Objectives 1 to 3 as these directly relate to Climate Change.
S-193-12	1369524	Winster Parish Council	5.1	Agrees.
S-188-10	1369508	Staffordshire Moorlands District Council	5.1	SMDC is supportive of any measures to reduce the District carbon footprint.

S-187-2	1369506	Sheffield Parks and Countryside Service	5.1	They are not in agreement with the need to protect open skylines, as it seems at odds with the need for National Parks to play a larger role in the 30 by 30 initiative. They note that the National Park has a lower canopy cover than Sheffield and believe this issue needs addressing. Skyline views can be integrated into wooded, habitat-rich environments, and development that improves biodiversity should be encouraged. They suggest considering low ecological value areas, such as those used for sheep farming, for biodiversity net gain (BNG). They also emphasize that the National Park has a crucial role in protecting urban areas from flooding, and the development of natural systems for flood management should be prioritized over retaining open vistas. They inquire about the canopy cover targets for the National Park. They express concern that renewable energy infrastructure is vital for rural communities but feels the current plan lacks ambition, suggesting it should be more central to the National Park's priorities. They agree with focusing on nature recovery, carbon sequestration, and flood prevention, stating these should also be central to the National Park's goals. Canopy targets can be found in our supplementary design guidance or by contacting our heritage team directly for discussion at Built-Heritage@peakdistrict.gov.uk
S-186-9	1369505		5.1	They do not agree with the proposed Local Plan spatial objectives for climate change and sustainable building. The policy focuses mainly on adaptation to climate change, with little emphasis on mitigation, such as reducing carbon emissions. They suggest there should be two separate policies: one for carbon reduction and another for adaptation to climate change. This would ensure that climate change is prioritized in developers' planning applications. Additionally, they propose that for carbon reduction in buildings (CC1), applications should include a Sustainability Statement that shows how the proposal meets policy requirements, with a mention of sustainable travel to highlight the importance of reducing carbon emissions from travel.
S-185-17	1369502	Devonshire Group	5.1	The objectives are sufficiently broad ranging and appropriate.

S-184-12	1369500	Hope Valley Climate Action	5.1	They do not agree with the proposed Local Plan spatial objectives for climate change and sustainable building. They suggest rephrasing some objectives due to the urgency of addressing the climate emergency. Specifically, they recommend changing "To contribute to nature recovery, carbon sequestration and flood prevention" to "To promote carbon sequestration, nature recovery and flood prevention." They also suggest modifying "To protect open skylines, long views and semi-natural moorland expanses" to just "To protect semi-natural moorland expanses," as they believe open skyline protection shouldn't hinder the installation of wind turbines. Additionally, they propose amending "To support work to create and manage floodplain landscapes" to explicitly include sustainable drainage in all building development. Finally, they suggest removing "small-scale" from the objective about renewable energy infrastructure and making it the first objective. Thank you for your comment and suggestions. I will add this to our feedback and it will be considered in due course.

S-183-8	1369499	United Utilities	5.1	The response is supportive of addressing climate change and sustainable building in the Local Plan. The respondent emphasizes that climate change should be a central, overarching principle ("golden thread") throughout the plan, including water management, green and blue infrastructure, and sustainable building practices. They recommend that the plan link policies related to climate change to those concerning detailed design, and highlight the importance of "making space for water" in development. They suggest including policies for water efficiency, such as adhering to the optional water efficiency standards prescribed in Building Regulations, and recommend ensuring that surface water management is considered early in the design process. They also advocate for sustainable drainage and flood risk management, especially in areas affected by sewer flooding. Additionally, they propose that the plan incorporate green and blue infrastructure as vital components in addressing climate change, mitigating flood risk, and enhancing biodiversity. The response further suggests promoting water reuse, such as greywater recycling, and ensuring that landscaping plans consider the impact on utility services, especially in relation to tree planting. Finally, the respondent stresses the need for stronger connections between climate change policies and other policies in the plan, particularly regarding the role of sustainable water management and efficient use of water resources in future developments.
S-182-3	1369498	Hathersage Parish Council	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building but emphasizes the need for more evidence of intended action. They specifically mention the importance of sensitively sited, small-scale renewable energy infrastructure and the work to create and manage floodplain landscapes, particularly to protect and enhance peat. They express a desire to see clear, active intent behind these goals.

S-179-2	1369495	Charlesworth Parish Council	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building. They support the principles behind these objectives as they acknowledge the impact of climate change on both the built and natural environments. Additionally, they appreciate the inclusion of a monitoring regime to track progress moving forward.
S-170-5	1369472	Historic England	5.1	The respondent welcomes the consideration of climate change in the context of the historic environment and provides a link to further information on the topic available on their website. The link is to Historic England page on climate change, offering relevant insights into how climate change impacts the historic environment.
S-166-6	1369468	Breedon	5.1	The respondent agrees with the initiative of supporting "sensitively-sited, small and to medium scale" renewable energy infrastructure, specifically ground-mounted solar projects. They highlight that the Derbyshire Spatial Energy Strategy shows areas of the National Park as "more constrained" for solar PV projects over 1 MW but does not rule them out entirely. The respondent suggests that medium-scale solar projects can be acceptable in principle if they meet appropriate tests, and they believe the Plan should align with the energy strategy to ensure soundness.
S-165-18	1369466	Taddington and Priestcliffe Parish Council	5.1	Agrees.

S-163-14	1368617		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, with the caveat that there should be more flexibility in allowing innovative design approaches to energy efficiency within new buildings, where appropriate. While respecting the built tradition and character of settlements is important, they suggest that policies could be more accommodating of energy-efficient designs, especially where traditional materials like stone are not necessary or relevant for modern construction techniques. The respondent believes this flexibility could be addressed through a design code rather than rigid policy wording. We are in the process of developing a design code.
S-162-8	1369460	High Peak Borough Council	5.1	HPBC is supportive of any measures to reduce the Borough carbon footprint.
S-159-4	1369454	Staffordshire County Council	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, supporting the combination of a commitment to addressing climate change while also recognizing the sensitivities of the National Park.
S-158-11	1369452	Trans Pennine Trail and Sustrans Joint Response	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, emphasizing that without protection, key features of the Peak District could be lost, potentially jeopardizing its status as a National Park.
S-157-10	1369450	Holme Valley Parish Council	5.1	Climate change and its impact on communities is widely recognised. HVPC has already adopted many initiatives related to climate change and therefore supports the approach by the PDNP.

S-156-8	1367563		5.1	The respondent expresses mixed feelings about the proposed Local Plan spatial objectives for climate change and sustainable building. They agree with protecting open skylines, long views, and semi-natural moorland expanses but disagree with certain other objectives: Design for Low Carbon Future : They oppose supporting design and construction that enables transition to a low-carbon future, arguing it may not respect the built tradition and character of settlements, citing an example of a new development that they feel is out of place in the National Park. Renewable Energy Infrastructure: They also disagree with supporting sensitively-sited, small-scale renewable energy infrastructure, arguing that solar panels and small windmills can be visually intrusive and do not integrate well with the park's character. They suggest that the PDNPA should focus on pressuring manufacturers to create more discreet, in-keeping solutions. Overall, while the respondent is supportive of protecting the National Park aesthetics, they are wary of renewable energy projects that could disrupt the park visual and architectural integrity.
S-154-15	1369442		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, citing the broader context of climate change and its associated risks, such as drought and intense rainfall events, while stressing the importance of adequate resources for the programs.

S-153-16	1369437		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, highlighting the need for the National Park to catch up on essential improvements to reduce climate change impacts. They emphasize the importance of better communication infrastructure to reduce transport movements and suggest that more flexibility is needed in supporting remote communities and individual premises, which could be critical for long-term sustainability.
S-151-16	1369433		5.1	Agrees.
S-150-18	1369431		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, particularly supporting them as essential for the future of those living full-time in the Peak Park. They emphasize the need for upgrading and replacing housing stock, expressing a desire for new buildings to be of much higher quality compared to those built in the 70s and 80s, citing Malt House Lane in Froggat as an example of problematic construction from that era.

S-144-3	1369422		5.1	The respondent expresses strong support for immediate, bold action on climate change and emphasizes the urgency of addressing the issue. They argue that every tonne of greenhouse gases (GHG) emitted worsens climate change and that emissions early on cause more damage because of their longer atmospheric presence. The respondent points to local examples, such as the A57 Snake Pass, which has been impacted by climate-induced weather events, illustrating the tangible consequences of climate change. They call for the Peak District National Park Authority (PDNPA) to set an ambitious and clear goal for carbon neutrality by 2030. This would include all activities within the Park, covering transport, domestic and business energy use, and more. The respondent stresses the importance of setting clear targets and monitoring progress, which would unify stakeholders and enhance community cohesion. They urge the PDNPA to be bold and courageous in tackling the climate crisis and to ensure the public is taken along in this process through genuine consultation, engagement, and transparency. In terms of public opinion, the respondent highlights strong support for climate action and urges the PDNPA to leverage local groups and resources to boost community involvement in tackling the crisis. Finally, they encourage the PDNPA to focus on the co-benefits of climate action, such as improved public health from reduced traffic, to enhance public support and demonstrate the broader advantages of such measures.
S-138-15	1369372		5.1	The respondent expresses general support for the proposed Local Plan spatial objectives but highlights some concerns. They stress the need for a stronger focus on climate adaptation, specifically in relation to heavier rainfall and its impact on drainage, alongside the existing emphasis on low carbon goals and nature recovery. Additionally, the respondent suggests that there should be more emphasis on promoting biodiversity within the plan.
S-137-44	1369370	Derbyshire ALC	5.1	The respondent agrees with the objectives but notes that protecting open skylines may not always be possible. They suggest that some landscape changes, like adding plants to moors, may be needed to adapt to climate change.

S-136-36	1369368		5.1	The respondent disagrees with the objectives, but broadly agrees with the overall idea. They emphasize that the approach should focus on increasing natural capital and ecosystem services while retaining biodiversity. They question the protection of semi-natural moorlands, as it may conflict with woodland creation that could enhance natural capital and provide additional farm income opportunities. Thank you for your comment. We will consider further could enhance natural capital and provide additional farm income opportunities.
S-134-5	1366865	RSPB	5.1	The respondent is unsure about the objectives, but raises concerns. They argue that protecting open skylines and moorland should not prevent the development of native trees and scrub for nature recovery. They suggest referring to the wooded landscape plan for more detailed guidance. Additionally, they feel the objective on protecting peat should be clarified to include all types of peat and peaty soils, not just those above a certain depth. This will be added as a comment to consider further.
S-128-28	1369275	Rural Action Derbyshire	5.1	There needs to be more scope for larger scale renewable energy infrastructure, particularly community energy schemes, but also a relaxation on permitted retro fitting of air source heat pumps for existing homes.&nbsp; Thank you for your comment. Eisting policy does allow for installation of ASHP and other as well as through your pemritteed deveeleopment rights. We will consider this comment further.
S-125-1	1369282		5.1	The respondent is unsure but generally agrees with the objectives. They feel that the National Park needs to be more flexible, especially regarding the last two objectives. They emphasize the need to adapt homes, including older and listed ones, for better energy efficiency in response to the climate emergency. The respondent expresses concern that the authority is not making sufficient progress in this area.

S-113-17	1369153	Edale Parish Council	5.1	The respondent agrees with the proposed objectives, stating that the list is comprehensive. However, they highlight the challenge of prioritizing different issues, such as balancing renewable energy development with landscape character and nature recovery. They acknowledge that while nature can thrive alongside renewable energy, installations can disrupt the environment. They suggest that large-scale renewable projects, like solar farms in disused quarries, may be appropriate if they do not adversely impact visual amenity or other priorities.
S-110-10	1369133	Middleton and Smerrill Parish Council	5.1	Agrees.
S-104-23	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	5.1	The Parish Council has concerns that any such developments should be not effect the environment as we are in a National Park. In particular, any development should have a clearly identified positive effect on wildlife and biodiversity.
S-101-3	1369010	Business Peak District	5.1	The respondent is unsure about the proposed Local Plan spatial objectives for climate change and sustainable building. While they welcome references to small-scale renewable energy generation, carbon sequestration, and flood prevention, they feel the plan should explicitly mention retrofitting existing buildings and the importance of collaborations. They believe collaborations could lead to cost-effective community renewable energy projects and region-wide carbon sequestration initiatives.
S-98-25	1368689	Greater Manchester and High Peak Area of the Ramblers	5.1	The respondent is unsure about the proposed objectives, acknowledging the importance of addressing the climate crisis but emphasizing the need to protect open skylines, long views, and semi-natural moorland expanses within the National Park.

S-88-5	1368685	Rainow Parish Council	5.1	RPC acknowledges the impact of climate change and supports the PDNPA's efforts to mitigate its effects on nature and the landscape. RPC opposes solar farms but suggests using agricultural buildings for solar power instead. They also support wind turbines in specific areas and recommend exploring power generation from water. Additionally, RPC highlights the importance of considering hydrogen as a future energy source for equipment. Than you, we havent looked into hydrogen and this comemnt will be taken into cosideration.
S-86-12	1368682	The National Trust	5.1	The National Trust supports the proposed Local Plan spatial objectives for climate change and sustainable building. They welcome the emphasis on holistic landscape-scale adaptation, nature recovery, carbon sequestration, and peat enhancement. The maintenance and enhancement of peat habitats in Peak District moorlands is recognized as a key strategy for climate change adaptation. The National Trust requests that relevant policies acknowledge this and provide an appropriate supportive framework.
S-73-6	1368375	Bradwell Community Land Trust	5.1	The objectives are reasonable, but policies need to be flexible to allow for the installation of air-source heat pumps and solar panels, especially in conservation areas. Design requirements should be realistic to ensure these technologies can be implemented effectively.
S-71-14	1368373	Tideswell Parish Council	5.1	agrees.
S-69-22	1368325	Derbyshire Dales District Council	5.1	Important in particular to recognise the need for homes and businesses within the Park to be able to transition to renewable energy. Solar panels and double glazing will not harm the character of the Peak District. Any design consideration will be subject to our design guidance and existing heritage policies.
S-68-15	1368264	Bakewell Resident	5.1	Agrees.

S-67-12	1367857	Over Haddon Parish Council	5.1	Achieving an exemplary response to climate change needs to be our top priority, but it is not going to be an easy one, in particular realising and understanding the nature of our ever-changing landscape . PDNPPA needs to come to terms with the fact that chasing sustainable development is not reconcilable with building practices and materials currently prescribed
S-66-4	1368276		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, stating that tackling climate change should be a central focus for the Peak Park. They highlight a current conflict, such as not considering embodied carbon in planning decisions and the preference for stone over wood in building practices. They emphasize the need to take greater responsibility for the climate crisis, advocating for carbon sequestration and addressing the climate crisis as central goals, rather than merely preserving traditional practices.
S-65-9	1368271	Individual	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, emphasizing that climate change is the greatest threat to the park and must be addressed with urgency.
S-64-3	1368242	Sustainable Hayfield	5.1	The respondent disagrees with the proposed Local Plan spatial objectives for climate change and sustainable building, suggesting that while the objectives are acceptable, there should be a stronger commitment to allowing works that reduce carbon footprints, such as solar panels and ground-source heat pumps. The respondent feels the current approach sounds hesitant and believes the plan should actively champion these initiatives.
S-62-17	1368170		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, emphasizing that the Peak District National Park Authority (PDNPA) should and must lead the way in sustainable development.
S-59-31	1368081	SMDC	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, stating that climate change is happening and we need to do all we can to mitigate its effects.

S-50-44	1367561	Peak Park Parishes Forum	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, but with the caveat that new energy installations, while useful for reaching net-zero, should be small-scale due to the national park setting.
S-44-9	1367865	Eyam Parish Council	5.1	The respondent is unsure about the proposed Local Plan spatial objectives for climate change and sustainable building. Their concern is that the scale and scope of building should consider the National Park setting.
S-43-12	1367843	Natural England	5.1	The respondent, Natural England, agrees with the proposed Local Plan spatial objectives for climate change and sustainable building. They recommend that climate change and nature recovery should be central themes throughout the Plan. Additionally, they suggest incorporating positive policies to mitigate and adapt to climate change, acknowledging the interconnection between biodiversity loss and climate change. They also propose specific mention of nature-based solutions like peatland restoration, river restoration, and tree planting, as well as addressing the impacts of climate change on protected sites, species, and habitats. They emphasize the need for sustainable drainage and water-sensitive design.
S-42-8	1367805		5.1	The respondent is unsure about the proposed Local Plan spatial objectives for climate change and sustainable building because they feel there is insufficient detail on certain aspects. They highlight the need for more focus on flood prevention through upstream water retention and re-establishing flood plains on farmland, as opposed to expensive flood walls. Additionally, they express concern that achieving a low-carbon future may require developments that go against the character of existing settlements, pointing out a potential inconsistency in the Plan's objectives.

S-40-20	1367788		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, stating that achieving these objectives is crucial for securing climate stability and preserving and enhancing the natural environment's amenity.
S-32-29	1367524	Bamford with Thornhill Parish Council	5.1	Agrees.
S-30-13	1367447	Country Landowners Association	5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, supporting the proposals. However, they emphasize that achieving these goals will require investment in wealth and labor. They also stress the need for strong local communities, appropriate housing availability, and an economic base to support long-term improvements, urging the authority to take a more positive stance on development.
S-24-1	1367240		5.1	The respondent expresses concern that the PDNPA is not taking climate change seriously, particularly after viewing the consultation documents at the Medway Centre. As a grandfather, they are worried about the future and feel that any plan set for the next 15 years must be flexible enough to meet the challenges of reducing the carbon footprint and improving energy security.
S-19-1	1367234		5.1	The respondent disagrees with the proposed spatial objectives, arguing that small-scale development will not be sufficient to address climate change effectively. They believe that the presumption should be in favor of renewable energy development at any scale within the PDNP, with applications for unviable sites being refused.

S-17-1	1367217	Staffordshire Police	5.1	The respondent, representing Staffordshire Police, raises a concern about the potential for theft and vandalism at ground-mounted solar PV arrays in rural areas. While taking a neutral stance on the overall policy, they suggest that the Local Plan should address security provisions for such developments, particularly for photo-voltaic schemes. They propose amending the policy to include a requirement for appropriate security measures to be incorporated into ground-mounted solar PV proposals.
S-15-8	1364436		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building, emphasizing the importance of supporting the transition to a low-carbon future. They advocate for encouraging small-scale, sensitively-sited renewable energy infrastructure within the national park.
S-13-22	1364893		5.1	The respondent agrees with the proposed Local Plan spatial objectives for climate change and sustainable building but suggests that, in addition to focusing on flood plains, natural flood prevention measures in upland catchment areas should also be mentioned.
S-9-48	1364715		5.1	Agrees.
S-8-6	1364695	-	5.1	The respondent agrees with the proposed objectives but stresses the need for clearer guidance on renewable energy in listed buildings. They suggest balancing building preservation with climate adaptations, as current design standards may hinder progress.
S-7-27	1364251		5.1	Agrees.

Q5.2 Do you agree that embodied carbon should be considered as part of the requirement for high sustainability standards? Do you think the criteria in DMH9A are correct? Should the policy specifically address the loss of smaller homes?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-11	1369634	Sheffield City Council	5.2	Sheffield City Council agrees that embodied carbon should be part of sustainability standards. The current policy (DMH9A) would benefit from including embodied carbon criteria to support decisions on replacing dwellings. While there are existing standards and tools for embodied carbon assessments, they aren't widely implemented. The PDNPA could set an example by requiring assessments in future policy. Additionally, new policy should address the loss of smaller homes.

S-223-19	1369632	Hartington Town Quarter Parish Council	5.2	The respondent does not believe embodied carbon should be a major consideration in sustainability standards, as it seems relatively minor compared to other issues. They agree with the current criteria in policy DMH9A, emphasizing that with the high costs of new builds, retaining smaller existing buildings is crucial for making homes more affordable to local people, particularly without subsidies.
S-221-19	1369595		5.2	The respondent agrees that embodied carbon should be considered to show that the National Park is taking sustainability seriously. They also agree that the criteria in current policy DMH9A are correct and believe new policy should address the loss of smaller homes for the same reason, to demonstrate the National Park's commitment to these issues.
S-220-8	1369594		5.2	The respondent agrees that embodied carbon should be considered as part of high sustainability standards for replacement dwellings. They also support new policy addressing the loss of smaller homes, particularly bungalows, to accommodate the aging population and enable older people to "downsize" within their parishes. Affordability is also highlighted as a key concern for both younger and older residents.

S-214-19	1369550	Hope with Aston Parish Council	5.2	The respondent agrees that embodied carbon should be part of high sustainability standards. They believe the current policy DMH9A should be revised to include reference to embodied carbon, as it could discourage the demolition of small houses in favor of larger, more carbon-neutral ones. They suggest that the policy should encourage retrofitting existing smaller homes instead. Additionally, they support new policy addressing the loss of smaller homes.
S-210-17	1369546		5.2	The respondent agrees that embodied carbon should be considered as part of high sustainability standards, as it makes sense. They also support a new policy addressing the loss of smaller homes, citing both affordability and sustainability reasons.
S-207-16	1369542	Youlgrave Community Land Trust.	5.2	The respondent agrees that embodied carbon should be considered as part of high sustainability standards. They emphasize the need for better stone recycling systems and re-establishing rubble walls for housing. They highlight the importance of environmental wellbeing and suggest that retrofitting or rebuilding to reduce carbon output should be encouraged, while also noting concerns about the proportional increase in building footprint size. Thank you for your comments.

S-200-16	1369531	Stanton in Peak Parish Council	5.2	The respondent agrees that new policy should specifically address the loss of smaller homes. They believe these properties are essential for downsizing, allowing residents to remain in their preferred locations. Additionally, they note that replacing smaller homes with larger ones could negatively impact the availability of affordable homes. Thanks for your comment particularly regarding sizing. This will be taken into further consideration.
S-199-10	1369530	Environment Agency	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, without providing further elaboration.
S-195-12	1369526	Derbyshire County Council	5.2	Derbyshire County Council supports the inclusion of embodied carbon as part of the requirement for high sustainability standards.
S-194-19	1369525	Derbyshire Dales District Council	5.2	The respondent agrees that embodied carbon should be considered for high sustainability standards. However, they believe this must be balanced with the Written Ministerial Statement, which restricts local energy efficiency policies. As embodied carbon is being reviewed as part of the 2025 Building Regulations, the respondent views this as the appropriate framework for assessment. They also suggest that the National Park Authority's expertise in evaluating embodied carbon in planning applications should be taken into account.

S-193-13	1369524	Winster Parish Council	5.2	The respondent acknowledges that all new builds have embodied carbon. However, they argue that replacing an unsuitable home with a new one could help address the housing shortage without using additional land. The priority should be creating permanent homes, and if the existing building is only used as a holiday let, a covenant could be placed on the new building to ensure it is a permanent residence. The respondent also emphasizes the priority for developments that create multiple family homes with restrictive covenants.
S-192-10	1369523	Mineral Products Association	5.2	The respondent does not agree that embodied carbon should be considered as part of the requirement for high sustainability standards, arguing that focusing on embodied carbon overlooks the significant energy and carbon required to heat and cool buildings during use, which goes beyond the planning function's role. Regarding current policy DMH9A, the respondent agrees that the criteria are correct, believing that using local building materials is essential to retain the character of the park and maintain local vernacular.

S-185-18	1369502	Devonshire Group	5.2	The respondent expresses concern about the ability of a local plan (LP) policy to provide a mechanism for assessing and considering embodied carbon that would be acceptable to both applicants and the Local Planning Authority (LPA). Without clarity on such a mechanism, they would err against implementing such a policy. Regarding current policy DMH9A, the respondent agrees that the criteria are correct, as they believe the existing policy offers appropriate opportunities to consider relevant issues. In response to the question about the 'loss of small homes,' the respondent argues that evidence should first be provided to show the scale of the issue before deciding whether policy controls are needed. They also question the ability to introduce a policy that would be workable and acceptable to both applicants and the Peak District National Park Authority (PDNPA). Concerns are raised about whether NP officers have the necessary skills and resources to report on such matters, and what additional costs the policy might impose on applicants.

S-184-13	1369500	Hope Valley Climate Action	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. They believe that the embodied carbon of a new replacement dwelling is a significant contributor to the whole life carbon of a building, and therefore, it is crucial to address it. They also suggest that the criteria in current policy DMH9A should be amended to reflect this. We will take your comment into further consideration
S-165-19	1369466	Taddington and Priestcliffe Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, noting that it should also be considered in the context of new builds versus conversions. Regarding current policy DMH9A, the respondent agrees that the criteria are correct, but they believe that replacing a building of low sustainability standards (e.g., using unsustainable materials) could also justify replacement. The respondent agrees that new policy should specifically address the loss of smaller homes, as well as their over-enlargement. They highlight that too many smaller homes are being enlarged or altered in ways that make them unaffordable for local people.

S-163-15	1368617		5.2	The respondent strongly agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, emphasizing that it is an integral part of the carbon footprint calculation for a building. Regarding current policy DMH9A, the respondent disagrees, suggesting that curtilage buildings, non-designated assets, and anything on a future Local List should also be included, not just listed buildings, in order to protect buildings of heritage significance. The respondent agrees that new policy should specifically address the loss of smaller homes, provided this issue has been identified within the National Park, making it reasonable for policy to address it.

S-159-5	1369454	Staffordshire County Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, viewing it as a long-term aspiration. However, they note that if this is to be required, there must be readily available information for these calculations to be incorporated and monitored. Regarding the loss of smaller homes, the respondent agrees that new policy should address this issue. They support the requirement for retaining small, more affordable housing, noting that larger houses are likely to have a larger carbon footprint and greater demand on resources (e.g., heating, EV charging, etc.), in addition to higher embodied carbon. They suggest that a replacement property should have a similar footprint or set a maximum threshold for the percentage increase in size.
S-157-11	1369450	Holme Valley Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. Regarding current policy DMH9A, the respondent disagrees, though the specific reasons for this are not provided. The respondent agrees that new policy should specifically address the loss of smaller homes. They argue that, in addition to the environmental impact of losing existing buildings, the lack of smaller, more affordable homes needs to be addressed both nationally and within the Peak District National Park (PDNP).

S-153-17	1369437		5.2	The respondent agrees that new policy should specifically address the loss of smaller homes. They argue that smaller homes play a crucial role in helping residents downsize and remain in their preferred locations. Additionally, they highlight the negative impact on affordable housing when replacement properties significantly increase in size, reducing the overall availability of affordable homes.
S-151-17	1369433		5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, stating that all new buildings should have their carbon expenditure measured.

S-150-19	1369431		5.2	The respondent is unsure about whether embodied carbon should be considered as part of the requirement for high sustainability standards. They express concern about the current development of data and clear comparators for embodied carbon, such as carbon in structural elements versus the building's life expectancy. They also note the potential secondary pollution from some lower-carbon materials and the safety issues with timber structures, viewing it as a complex area. They believe it is better as an aim rather than a hard requirement. Regarding current policy DMH9A, the respondent disagrees, stating that while the policy is generally good, it omits the need to replace or renew buildings that are no longer economical to update, do not fit future living and working modes, or are unpleasant to live in. On the issue of the loss of smaller homes, the respondent is unsure. They argue that small, dark rooms have no unique value and are just "pokey." However, if "small" refers to 1-3 bedroom homes, they are concerned. The respondent explains that they are currently living in a large, run-down house and would prefer to replace it with multiple smaller homes on the site. However, they note that Peak Park policies and economics make this unlikely. They emphasize that their answers challenge what local needs and affordability might look like in the future.

S-137-39	1369370	Derbyshire ALC	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. They note that in some cases, replacing a dwelling could lead to a more efficient and sustainable long-term solution. They raise the question of what the appropriate time scale should be to measure the "positive contribution" of replacement, as past materials may justify the replacement of an existing dwelling. Regarding current policy DMH9A, the respondent agrees that the criteria are broadly correct. They reiterate that replacement may lead to greater efficiency and sustainability, depending on the materials used in the past. The respondent also believes that new policy should specifically address the loss of smaller homes, considering that this issue should already be covered in the policy, with the potential benefits of replacement being considered as part of a more efficient, sustainable approach.

S-136-14	1369368		5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. They believe this approach would encourage the reuse of existing building materials and promote the use of new, lower-carbon materials, even if they are not traditional. Regarding current policy DMH9A, the respondent agrees that the criteria are correct. The respondent also agrees that new policy should specifically address the loss of smaller homes. They argue that there is still a critical need for smaller properties, and replacing small dwellings with larger ones would reduce the availability of affordable housing.
S-128-5	1369275	Rural Action Derbyshire	5.2	The respondent is unsure about whether embodied carbon should be considered as part of the requirement for high sustainability standards, stating they are not qualified to comment. They are also unsure about whether the criteria in current policy DMH9A are correct, as they feel it is not within their expertise to comment. However, the respondent agrees that new policy should specifically address the loss of smaller homes. They highlight that smaller homes are inherently more affordable and are crucial in the context of the rural affordable housing crisis.

S-127-4	1369287		5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. They argue that demolishing and rebuilding has a significant carbon impact, and emphasize the need to learn how to retrofit existing buildings instead.
S-120-2	1368991	Marsh Farm Development Co Ltd	5.2	Agrees
S-113-18	1369153	Edale Parish Council	5.2	
S-110-11	1369133	Middleton and Smerrill Parish Council	5.2	The respondent agrees that new policy should specifically address the loss of smaller homes. They argue that, due to the shortage of affordable homes for local people, it is not good policy to allow sound and habitable dwellings to be replaced by much larger, and therefore more expensive, ones.
S-108-4	1369131	Youlgrave Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, stating that it should be accounted for when considering replacement dwellings. They also agree that the criteria in current policy DMH9A are correct. Regarding the loss of smaller homes, the respondent disagrees that new policy should specifically address this issue. They argue that the reasons for the loss of smaller homes are primarily elsewhere, such as being used as holiday or second homes, and that other planning policy levers should be used to address the issue.

S-104-43	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. They note that the replacement of a building generates a large amount of carbon, both in the manufacturing of materials and the construction process. They suggest that this additional carbon should be considered in the approval process, comparing the carbon footprint of rebuilding versus refurbishing an existing building to assess when a replacement starts to reduce its carbon footprint. They also point out that current policies encourage replacing smaller buildings with larger, more carbon-efficient ones, which removes affordable homes from the housing stock and can lead to increased commuting, adding to the travel carbon footprint. Regarding the criteria in current policy DMH9A, the respondent disagrees, stating they are unsure what high sustainability standards mean. The respondent agrees that new policy should specifically address the loss of smaller homes. They highlight the impact this loss has on residents' ability to remain in the National Park, especially for those starting out or wishing to downsize, as there are insufficient smaller properties available.
S-98-31	1368689	Greater Manchester and High Peak Area of the Ramblers	5.2	Respondent is unsure.

S-71-15	1368373	Tideswell Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. However, they caution that developers should not be hampered by overly strict design codes when trying to reuse existing structures or parts of structures to address the embodied carbon issue. They highlight the potential risk of unintended consequences if a developer reuses an existing structure that doesn't meet current design standards.
S-69-23	1368325	Derbyshire Dales District Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, stating that we are in a climate crisis and there is no good reason not to do this. Regarding current policy DMH9A, the respondent disagrees, pointing out that it fails to account for the carbon cost of demolishing and replacing an existing building. The respondent also agrees that new policy should specifically address the loss of smaller homes. They argue that even when smaller homes are not designated "affordable," they are more likely to be within reach of ordinary local people and contribute to the housing mix. They also note that they are not aware of a shortage of large homes in the area.

S-68-17	1368264	Bakewell Resident	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, emphasizing that given the significant amount of embodied carbon in construction, retrofitting and reusing buildings should be prioritized over new builds to keep the carbon locked in. Regarding the criteria in current policy DMH9A, the respondent disagrees, suggesting that applicants should provide a whole-life carbon assessment to support any replacement of existing buildings, rather than only questioning buildings with heritage value. The respondent also agrees that new policy should specifically address the loss of smaller homes. They highlight that smaller homes are more affordable and should be retained. They also suggest that large extensions on smaller, cheaper homes should not be the standard practice, as it is often done to accommodate the cost of a larger home.

S-67-2	1367857	Over Haddon Parish Council	5.2	The respondent disagrees that new policy should specifically address the loss of smaller homes. They argue that some small dwellings, by today's standards, are too small for permanent habitation and, if not replaced, are often only used as holiday lets, which effectively removes them from the housing market. They further suggest that the decision to allow replacement dwellings should also consider the CO2 cost of leaving an existing dwelling. If a new structure can offer significant energy savings and is sustainably built, it may result in a net CO2 saving over time. These factors, including the embodied carbon, should be balanced in the decision-making process.

S-66-5	1368276		5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards. They share an example from their own experience, where they calculated a 4-ton carbon saving by carefully selecting building materials, but faced resistance from the Planning Officer to stray from the Design Guide. They emphasize the need for the National Park to lead by example and prioritize environmental concerns, suggesting that Sustainability Officers' comments should carry more weight than Heritage Officers'. Regarding the criteria in current policy DMH9A, the respondent agrees that they are correct, but also warns against the assumption that existing buildings should always be saved for their embodied carbon. They argue that poorly performing existing buildings are often worse than a new build constructed to high standards, such as PassivHaus. They suggest using lifecycle carbon assessments to make decisions and propose replacing inefficient bungalows with family homes to improve energy efficiency. The respondent disagrees with the need for new policy to address the loss of smaller homes. They believe the focus should be on building appropriate structures across the National Park and moving forward with development.

S-65-3	1368271	Individual	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, stressing that climate change is the greatest threat to the park and must be addressed urgently. Regarding the criteria in current policy DMH9A, the respondent disagrees, highlighting that there will be occasions where replacing an existing building with a high-specification one is necessary. They also emphasize that if buildings are retained for aesthetic reasons, they should be allowed to be upgraded to reduce emissions, even if it involves changes to the visual appearance. The respondent agrees that new policy should specifically address the loss of smaller homes, stating that it is crucial to maintain accommodation for first-time buyers.
S-62-43	1368170		5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, finding it a logical approach. They are unsure whether the criteria in current policy DMH9A are correct. The respondent believes that new policy should specifically address the loss of smaller homes, citing the need for smaller homes in the Peak District National Park (PDNPA) due to the area's age structure.

S-59-25	1368081	SMDC	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, highlighting that the construction industry significantly contributes to carbon emissions, which must be addressed in planning policy with mitigating actions. They disagree that the criteria in current policy DMH9A are correct, pointing out that it does not reference carbon sequestration. The respondent also agrees that new policy should specifically address the loss of smaller homes, stating that all new builds should be considered in efforts to address the climate crisis.
S-50-40	1367561	Peak Park Parishes Forum	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, stating that it is self-evidently the right thing to do. They disagree that the criteria in current policy DMH9A are correct, as they believe the policy allows more demolition than is desirable. The respondent also agrees that new policy should specifically address the loss of smaller homes, citing significant demand for small homes in the Peak Park and the unacceptable loss of these homes through demolition or extension.

S-44-46	1367865	Eyam Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, as long as it does not detract from the local community. They are unsure whether the criteria in current policy DMH9A are correct, citing the same reasoning as above. The respondent believes that new policy should specifically address the loss of smaller homes, stating that smaller homes, along with middle-sized and large homes, are needed.
S-42-44	1367805		5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, but raises a concern about how to measure it before and after, and ensure its sustainability. They believe that the criteria in current policy DMH9A are not correct, suggesting that smaller dwellings should be retained for both net carbon reasons and to maintain affordable housing. The respondent agrees that new policy should specifically address the loss of smaller homes, emphasizing the need to retain smaller dwellings for both net carbon reduction and affordable housing preservation.
S-40-21	1367788		5.2	

S-32-17	1367524	Bamford with Thornhill Parish Council	5.2	The respondent agrees that embodied carbon should be considered as part of the requirement for high sustainability standards, though they highlight that there may need to be some flexibility regarding the time period over which the calculation is made. They also agree that the criteria in the current policy DMH9A are correct, but they suggest the addition of considerations raised in a previous question. Additionally, they believe new policy should specifically address the loss of smaller homes, citing a clear need for more smaller homes within the National Park and the undesirability of losing existing ones.
S-30-16	1367447	Country Landowners Association	5.2	The respondent agrees that embodied carbon should be considered for sustainability standards but stresses the need for flexibility and proportionality, as this is still an evolving area. They caution against overly burdensome requirements for applicants and emphasize balancing environmental concerns with the need for modern, sustainable homes. Each case should be assessed individually, prioritizing progress over unattainable perfection.

S-13-50	1364893		5.2	The respondent agrees that embodied carbon should be considered but is unsure about the current policy criteria. They believe that replacing old, poorly constructed buildings is acceptable if they are at the end of their lifespan, as maintenance and enhancement will always require new resources. Regarding the loss of smaller homes, they are unsure, noting that in their area, there are many homes that are too small for families by current standards and lack adequate outside space.
S-9-23	1364715		5.2	The respondent agrees that embodied carbon should be considered as part of sustainability standards but is unsure about the current policy criteria (DMH9A). They are also unsure if new policy should specifically address the loss of smaller homes.
S-7-19	1364251		5.2	The respondent agrees that embodied carbon should be considered as part of sustainability standards but believes that the criteria in current policy DMH9A should be expanded to include embodied carbon. They do not think new policy should specifically address the loss of smaller homes, as the issue is more about a lack of affordable housing, partly due to smaller homes being used as holiday lets or for Airbnb.

Q5.3 Avoiding carbon emissions in development.

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-12	1369634	Sheffield City Council	5.3	Thanks for your comment. Whilst we are a planning authority we are a national park authority and not a local authority in regards therefore to compliance with building regs.
S-223-20	1369632	Hartington Town Quarter Parish Council	5.3	The respondent believes that the new local plan should not set out specific sustainability measures for different types of development, questioning whether it is the responsibility of the national park. They feel the focus should be on ensuring national guidelines and regulations are met, and that there should be vigilance in adhering to building regulations for any new development.
S-222-12	1369631	TPT & Sustrans	5.3	The respondent believes that the new local plan should set out sustainability measures for different types of development, emphasizing the collective responsibility to protect the planet. They specifically highlight the importance of including provisions for cycle parking in new developments to encourage active travel and reduce carbon emissions.

S-221-20	1369595		5.3 The respondent believes that the new local plan should set out sustainability measures for different types of development, with a strong emphasis on high levels of insulation. They suggest solar installations, particularly photovoltaic tiles, as well as air-source heat pumps for homes. They also note that roof-mounted solar panels may spoil the visual appearance of properties and surrounding areas, especially in scenic locations, and propose ground-mounted systems as a more efficient and visually acceptable option. For farm buildings, the respondent recommends roof-mounted solar panels, ground-source heat pumps, and local biomass projects (excluding wind turbines) as appropriate sustainability measures.
S-214-20	1369550	Hope with Aston Parish Council	5.3 The respondent agrees that the new local plan should specify the sustainability measures expected for different types of development. They argue that the policy should provide more detailed guidance on appropriate sustainability measures. While acknowledging the importance of buildings, they emphasize that the scale of the development and the context in which it takes place are also crucial factors in reducing carbon emissions. Additionally, they suggest that the sustainability measures should not be limited to homes, farm buildings, and businesses, but should also address other types of developments like educational facilities, health facilities, holiday accommodation, and leisure facilities.

S-210-18	1369546		5.3	The respondent agrees that the new local plan should set out sustainability measures for different types of development. They emphasize that while it's important to create a robust policy around avoiding carbon emissions, the broader issues of sustainability should also be considered.
S-207-17	1369542	Youlgrave Community Land Trust.	5.3	The respondent supports the inclusion of sustainability measures in the local plan, particularly for homes. They suggest measures such as excellent insulation, solar panels, wind turbines, sustainable heating systems, water-saving strategies (e.g., soakaways and rainwater collection), and reducing tarmac for vehicle parking. They recommend reviewing hard-standing requirements for vehicles in line with transport strategies. Additionally, they emphasize that developments should be designed to minimize carbon emissions, and planners should be open to innovative solutions that meet the goal of carbon neutrality, even if it requires adjusting visual expectations.
S-203-11	1369536	Tarmac	5.3	The respondent acknowledges the challenges of prescribing and enforcing sustainability measures for all types of development. They suggest that a cumulative effort across the National Park might be a more practical approach to achieving net-zero objectives, rather than trying to eliminate all carbon emissions in every development. They recognize the difficulty in fully eliminating emissions, especially considering the reliance on transport, but advocate for encouraging methods to minimize emissions as much as possible.

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S-200-17	1369531	Stanton in Peak Parish Council	5.3	The respondent calls for a more robust approach to sustainability, criticizing superficial energy efficiency claims in planning applications. They highlight the importance of incorporating solar panels where possible.
S-199-11	1369530	Environment Agency	5.3	The respondent agrees that the new local plan should specify sustainability measures for different types of development.
S-195-13	1369526	Derbyshire County Council	5.3	The respondent believes that the new local plan should include more ambitious sustainability measures, focusing on renewable energy, low-carbon heating, and high levels of insulation, unless technical or economic constraints prevent their implementation.
S-194-20	1369525	Derbyshire Dales District Council	5.3	The respondent agrees in principle that the new local plan should set out sustainability measures but highlights the constraints posed by the Written Ministerial Statement, which limits the ability to apply energy efficiency targets. They also note that the National Park Authority's resources for enforcement should be considered when developing policy. Thank you for your comment and note on the west ministerial statement.
S-193-14	1369524	Winster Parish Council	5.3	The respondent believes the new local plan should set out sustainability measures, emphasizing the importance of using common sense and accurate science when choosing building materials. They also stress the need to specify materials suitable for retrofitting and to include wildlife-friendly measures such as bee bricks and bat/swift boxes.

S-192-11	1369523	Mineral Products Association	5.3	The respondent argues that this issue should not be addressed through planning policy, as they believe it is not feasible to enforce sustainability measures through the planning process. They suggest that building regulations are the more appropriate tool for setting and enforcing building standards.
S-188-11	1369508	Staffordshire Moorlands District Council	5.3	SMDC is supportive of any measures to reduce the District's carbon footprint.
S-185-19	1369502	Devonshire Group	5.3	The respondent suggests that while sustainability is important, creating a robust and durable policy that remains relevant throughout the local plan period would be challenging. They believe building regulations are the appropriate framework for setting construction standards, and any additional sustainability measures should be aligned with these regulations. They emphasize that carbon reduction challenges are not unique to the National Park and should be addressed nationally. They also caution against imposing unnecessary costs on homeowners, businesses, and farmers, as it could lead to investment being diverted outside the National Park. Clear evidence of effectiveness and cost should support any required measures.
				Thank you for your comment. As a planning authority we are able to influence through our local plan but not through building regulations as we are not subject to them.

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S-184-14	1369500	Hope Valley Climate Action	5.3	The respondent strongly supports the idea that the new local plan should include stringent policies for eliminating carbon emissions. They advocate for all new homes to be built to Passivhaus standards and for minimizing carbon emissions in existing building refurbishments. They are also open to collaborating with the Park Authority to help define specific sustainability measures for homes, farm buildings, and business developments.
S-165-20	1369466	Taddington and Priestcliffe Parish Council	5.3	This has to be justified on National Park grounds.
S-163-16	1368617		5.3	The respondent agrees that the new local plan should address sustainability measures, with a focus on reducing carbon emissions rather than eliminating them entirely. However, they acknowledge that the topic is complex and requires specialist input. They feel they do not have enough understanding to develop the detailed policy themselves and suggest further exploration with expert help to ensure the policy is robust and adaptable to evolving materials, techniques, and targets.
S-162-9	1369460	High Peak Borough Council	5.3	HPBC is supportive of any measures to reduce the Borough's carbon footprint.

S-161-2 1369459 CPRE Peak
District and South
Yorkshire

5.3 The respondent believes that the new local plan should go further in supporting the transition to a low-carbon future. They argue that the current changes do not fully align with the requirements of the NPPF or take advantage of the flexibility provided by the Levelling Up and Regeneration Act 2023 and the Planning and Energy Act 2008. They encourage the PDNPA to prepare additional evidence and studies, including a carbon and climate study, viability assessment, and infrastructure delivery plan, to develop a robust net-zero policy for new development. This policy should be specific, achievable, and measurable, and it should support carbon emission reduction without conflicting with the relevant Written Ministerial Statement.

Please note any action taken would not conflict existign national guidance.

S-159-6	1369454	Staffordshire County Council	5.3	The respondent agrees that the new local plan should outline sustainability measures for different types of development. They note that current national policies are insufficient to achieve net-zero targets by 2040, and more ambitious local policies are needed. For homes, the recommended measures include: Heating and hot water via a heat pump or at least heat pump-ready systems. A minimum roof-mounted solar panel set at 1.5kW. For farm buildings, they suggest: Individual consideration of farmhouses and buildings, with a focus on supporting roof-mounted solar and other small-scale renewable systems. For business developments, the measures include: BREEAM Excellent or equivalent sustainability standards where possible. Mitigation of flooding risks through design. Heating and hot water via heat pumps or heat pump-ready systems. Onsite renewable energy, with a minimum threshold for energy use and generation capacity.
S-158-12	1369452	Trans Pennine Trail and Sustrans Joint Response	5.3	The respondent believes the new local plan should set out sustainability measures for different types of development, emphasizing the shared responsibility to protect the planet. For homes and business developments, the specific measure they suggest is the provision of cycle parking in all new developments. This is seen as a way to encourage active travel and reduce carbon emissions.

S-157-12 1369450 Holme Valley
Parish Council

5.3 The respondent agrees that the new local plan should set out sustainability measures for different types of development, as new or redeveloped buildings present an ideal opportunity to install technologies that reduce carbon emissions.

For homes, the specific measures they suggest include:

High levels of insulation

Double/triple glazing

Solar PV

Solar water heating

Air source/ground source heating

For farm buildings, they recommend:

Solar PV

For business development, they propose similar measures as for homes in office buildings, with manufacturing buildings having sustainability measures akin to farm buildings.

S-153-18 1369437

5.3 The respondent believes the new local plan should set out sustainability measures for different types of development because current energy efficiency statements in planning applications are inadequate and often seem like a "box-ticking exercise." They mention an example where a carbon reduction statement about vehicle maneuvering is flawed. They also emphasize the importance of incorporating solar panels where possible.

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S-151-18	1369433		5.3	The respondent agrees that the new local plan should set out in policy the sustainability measures expected for different types of development, stating that all developments should adhere to carbon reduction quotas.
S-150-20	1369431		5.3	The respondent disagrees, stating that the local plan should set out aims rather than fixed measures. They highlight that new low carbon building methods and materials are evolving rapidly, and fixed requirements may quickly become outdated and lead to stagnation.
S-142-4	1369419		5.3	The respondent advocates for a defined policy document on design standards and cycle parking/storage for new developments, aiming to exceed national standards. They emphasize prioritizing active travel, suggesting that housing developments with car parking should also include accessible and secure cycle storage. The respondent also highlights the issue of inadequate cycle racks at attractions and cafes, questioning the lack of planning enforcement for minimum design standards as seen in other authorities.
S-140-5	1369412	Hope and Derwent Woodlands Parish Council	5.3	The respondent believes that setting specific carbon emissions measures for each type of development (homes, businesses, farm buildings, etc.) would be too complicated, as every development is unique.

S-137-18	1369370	Derbyshire ALC	5.3	The respondent is unsure because technology could change quickly, and sustainability measures may need to be balanced with other issues. They question the appropriateness of measures for homes, especially concerning refurbishment versus replacement. They also raise concerns about defining the highest possible standards, whether by building regulations or "building regs plus," and the potential delay in implementing new technologies if rules are too strict. They also highlight the challenge of future-proofing rules to accommodate technological advancements during the life of the new plan.
S-136-12	1369368		5.3	The respondent supports setting out sustainability measures in the local plan to help achieve net zero by 2040. For homes, they suggest good insulation, housing standards, EV charging points, and renewable energy at the time of construction. For farm buildings, they recommend considering the climate impact of agricultural intensification, especially regarding livestock herds. For business development, they emphasize the need to support industries with high emissions, like Hope Cement Works, by helping them reduce emissions as they expand, ensuring their gross emissions do not increase.
S-128-32	1369275	Rural Action Derbyshire	5.3	The respondent is unsure about setting out sustainability measures in the local plan, expressing concern that it could make development more expensive. They worry that this could unintentionally stifle development, especially for affordable housing.

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S-120-42	1368991	Marsh Farm Development Co Ltd	5.3	The respondent agrees that the new local plan should set out sustainability measures for different types of development. For farm buildings, they suggest incorporating the potential for solar panels as an appropriate sustainability measure.
S-118-11	1369267	Haddon Estate	5.3	The respondent agrees that the new local plan should set out sustainability measures, but emphasizes that these standards should align with national planning policy and Building Regulations. They reference the Government's Written Ministerial Statement (WMS) dated 13 December 2023, which advises against local energy efficiency standards exceeding those in current or planned regulations. The respondent highlights the importance of ensuring that additional requirements do not undermine development viability, housing supply, or affordability. Any divergence from national standards should be well-evidenced and justified.

S-113-19	1369153	Edale Parish Council	5.3	The respondent believes that generally the same sustainability standards should apply across different developments, but some types may offer more opportunities for further improvement. For homes, they suggest measures like solar panels, heat pumps, and excellent insulation, with a minimum EPC rating of B and flexibility for listed buildings. For farm buildings, they recommend rooftop solar panels on large buildings and energy-efficient standards for heated enclosed spaces. For business developments, they advocate for solar panels, high energy-efficiency standards for enclosed spaces, and other renewable energy solutions like heat recovery and private wires. The overarching principle is that carbon emissions should be avoided, and high standards should apply to comparable building types.
S-104-5	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	5.3	The respondent believes the new local plan should include sustainability measures due to the changing environment and increased extreme weather. For homes, the focus should be on better insulation, adequate ventilation, and appropriate heating systems. For farm buildings, stronger structures to withstand storms and protect livestock are suggested. For business developments, they recommend better insulation, appropriate heating and ventilation, and more robust structures to resist storm and flood damage. The emphasis is on ensuring buildings are resilient to the changing climate.

S-103-7	1368574	Marshalls plc	5.3	The respondent is unsure about setting out specific sustainability measures in the local plan. However, they suggest positive consideration should be given to the use of indigenous building stone. They argue that this material is low carbon, particularly if quarried locally, and has a low carbon footprint compared to other building materials. Additionally, using locally sourced stone contributes to the beauty and character of the Peak Park, whereas importing materials would increase carbon emissions and undermine the park's sustainability goals for 2043.
S-73-7	1368375	Bradwell Community Land Trust	5.3	The respondent supports the idea of setting out specific sustainability measures in the local plan to avoid uncertainty for developers and to ensure that costs are factored into the development process early on. However, they stress that any requirements should align with national planning policy and not undermine development viability.&nbsp; For homes, they suggest the use of air source heat pumps and solar panels, but highlight the need for flexibility in allowing these technologies, especially in conservation areas. Additionally, they emphasize that the requirements should not make development unviable, and that evidence of development viability (costs versus values) should support the plan's policies, particularly when going beyond national standards such as those in the Building Regulations.

S-71-16	1368373	Tideswell Parish Council	5.3	The respondent agrees that the local plan should set out sustainability measures, provided that these measures are regularly updated to keep pace with technological developments. They specifically highlight the importance of retrofitting existing properties, including heritage assets and listed buildings, with sustainable measures like solar panels and heat pumps. They mention a recent case in Tideswell, where a request to install solar PV tiles on a Grade II listed property was refused, citing concerns over the purist approach of current policy. This suggests they believe more flexibility is needed to accommodate sustainable solutions in heritage contexts.
S-69-5	1368325	Derbyshire Dales District Council	5.3	The respondent supports sustainability measures in the local plan, recommending: For homesSolar panels, heat pumps, EV chargers, and bike storage. For farm buildings: Solar panels, heat pumps, and EV chargers. For business development: Solar panels, heat pumps, EV chargers, bike storage, and shower facilities.

S-68-4	1368264	Bakewell Resident	5.3	The respondent agrees that the Local Plan should include sustainability measures for different types of development. They highlight the challenges of reducing emissions in older properties due to their construction and character but emphasize the importance of ensuring that new builds and developments such as extensions, businesses, and warehouses meet high emissions reduction standards to offset the limitations of older properties. For homes, the respondent suggests reviewing the Future Homes Standard and considering additional requirements tailored specifically for the Peak District to reduce both embodied and operational carbon. For farm buildings, they recommend consulting experts like the Farm Carbon Calculator to help minimize operational and embodied carbon in existing and new buildings. For business development, they advise collaboration with organizations like the Carbon Trust to assist businesses in reducing their carbon footprints.
S-67-10	1367857	Over Haddon Parish Council	5.3	The respondent supports setting sustainability measures for different developments. They emphasize the importance of monitoring CO2 footprints of quarries and argue that low-carbon applications should be prioritized over traditional concerns about matching vernacular. They suggest focusing on designs that complement, not replicate, heritage buildings due to the climate crisis.

S-66-1	1368276		5.3	The respondent believes the local plan should set clear sustainability measures for different developments. They argue that new housing should meet net-zero standards, with a Sustainability Officer playing a key role in the approval process and mandatory training for Planning Committee members. For homes, they suggest banning gas appliances, requiring solar PVs, and including infrastructure for cycles and EVs. For farm buildings, they recommend solar PV and ground source heat pumps.
S-65-11	1368271	Individual	5.3	The respondent strongly supports the inclusion of sustainability measures in the local plan, emphasizing climate change as the park's greatest threat. They advocate for immediate improvements to building standards, with specific measures for homes including banning gas heating in favor of heat pumps, allowing solar panels, and requiring grey water collection in new builds. For farm buildings, they recommend non-gas heating methods and the use of solar panels on large roof spaces. For business developments, they suggest applying the same standards as for housing.
S-62-11	1368170		5.3	The respondent supports the inclusion of sustainability measures in the local plan, emphasizing the importance of being aspirational and holding developers accountable for meeting these standards.
S-59-22	1368081	SMDC	5.3	The respondent believes that the local plan should set out sustainability measures to optimize the potential for carbon reduction in development projects.

S-51-4	1368085		5.3	The respondent believes the local plan should set out sustainability measures, emphasizing that the park can play a significant role in addressing climate change and improving resilience. They suggest including features like secure cycle storage for homes and businesses, especially when off-road parking is required, to encourage sustainable living and commuting. Additionally, they recommend safe and secure cycle parking for business developments, using reliable racks like Sheffield stands.
S-50-14	1367561	Peak Park Parishes Forum	5.3	The respondent emphasizes the importance of sustainable, low-carbon buildings that are both healthy and cost-effective to run. They suggest prioritizing low-carbon, sustainable developments over designs that solely focus on keeping in line with traditional architecture. Key measures proposed include: For homes: Encouraging low CO2 footprint in construction, using recycled materials when possible, ensuring airtightness and incorporating renewable energy sources like heat pumps. For farm buildings: Similar to homes, with an emphasis on renewable energy (solar panels) and methane recovery from livestock. For business development: Similar measures to those for homes, focusing on low-carbon construction and renewable energy, while reusing materials where possible.

S-44-43	1367865	Eyam Parish Council	5.3	The respondent supports including sustainability measures in the new local plan, emphasizing the need for buildings that are both environmentally friendly and efficient to run. Specific measures suggested include: For homes: Low carbon footprint and the reuse of stone. For farm buildings: The same focus on low carbon footprint and reuse of materials. For business development: The same&nbsp;
S-42-39	1367805		5.3	The respondent supports the inclusion of sustainability measures in the new local plan but emphasizes the importance of effectively measuring and monitoring sustainability performance before and after development, with penalties for non-compliance. Specific measures suggested include: For homes: Insulation standards and heating technologies. For farm buildings: Energy consumption management. For business development: Energy consumption management.
S-40-22	1367788		5.3	The respondent believes that Building Control should be the primary mechanism for regulating sustainability measures in development, rather than including them in the local plan.

S-32-26	1367524	Bamford with Thornhill Parish Council	5.3	The respondent agrees that sustainability measures should be outlined in the local plan but stresses the importance of regularly reviewing the measures as technology and understanding of sustainability evolve. They do not feel qualified to suggest specific measures for homes, farm buildings, or business development.
S-31-6	1367452		5.3	The respondent believes that sustainability measures should be set by the government and enforced through building control, rather than being added as another layer of complexity in the local plan.
S-30-17	1367447	Country Landowners Association	5.3	The respondent emphasizes the importance of a flexible approach to sustainability measures, acknowledging that each building and space may require different solutions. They stress the need for support in achieving the 2040 Net Zero target, while balancing the social, economic, and environmental aspects of sustainability. They highlight the challenges faced by individuals and businesses, particularly due to the economic climate. For homes, they suggest that affordability must be balanced with environmental investments, such as high building specifications and renewable technologies. For farm buildings, the focus should be on supporting development that helps farms operate more efficiently and sustainably while maintaining food security. For business development, the goal should be to support green initiatives that improve sustainability and meet compliance, such as Energy Performance Certificates.

S-29-8	1367323	5.3	The respondent argues for making it easier for residents to install renewable technologies like solar panels, air source heat pumps, or small wind turbines to reduce carbon emissions. They advocate for simplifying the retrofitting of older properties, such as adding double glazing, to improve energy efficiency. They also point out that the current reliance on the "no adverse effects on landscape, cultural heritage, and valued character" policy might be too vague and propose that mapping areas where renewable energy developments are acceptable could help make the planning process more practical and focused.
S-19-2	1367234	5.3	The respondent argues that small-scale renewable energy solutions, such as solar thermal, may not be effective in the Peak District National Park (PDNP), as they primarily rely on electricity generated from fossil fuels. They suggest that renewable energy development should be allowed at any scale, with a presumption in favor of such development, and that applications for unviable sites should be refused. The use of biomass for fuel is justified if it prevents the biomass from being discarded and emitting methane and CO2. They also note that hydro power is limited in the White Peak area and that road transport is necessary for energy distribution. This perspective applies to homes, farm buildings, and business development alike.
S-13-42	1364893	5.3	Response noted. Agrees.
S-9-50	1364715	5.3	Response noted.

S-7-10	1364251	5.3	Response noted with suggestions, thanks. Business buildings already have the powers to install solar panels to the roofing with the December 2023 NPPF update.

Q5.4 What criteria could we use to identify areas (on a policy map) where renewable energy development is more likely to be acceptable?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-13	1369634	Sheffield City Council	5.4	Sheffield City Council supports a positive approach to renewable and low-carbon energy generation within the Park, including biomass, wind, hydro, and solar energy. The council suggests expanding what is considered acceptable for such developments and promoting these technologies to contribute to a carbon-free future. The goal is for the National Park to become an exemplar in delivering renewable energy technologies within protected landscapes.
S-223-21	1369632	Hartington Town Quarter Parish Council	5.4	Thank you for your input. It seems like you're expressing the view that the National Park Authority (NPA) should focus on ensuring compliance with national guidelines and building regulations, rather than setting specific local sustainability measures. You also mention that Q21 seems to be the same as Q20, possibly due to an error.
S-222-13	1369631	TPT & Sustrans	5.4	New industrial areas / major developments / residential developments

S-220-9	1369594		5.4	Thank you for your response. The respondent raises an important point regarding the need for small-scale renewable energy developments that can be integrated within existing structures and landscapes. This approach would help ensure that developments have a minimal impact on the wider environment while supporting sustainability goals. re nuanced strategy for renewable energy development, ensuring that it aligns with both environmental protection and the transition to a low-carbon future.
S-214-21	1369550	Hope with Aston Parish Council	5.4	Thank you for your response. The respondent notes that creating a policy map is complex due to various interacting factors, particularly visibility, architectural impact, and the surrounding landscape. They emphasize the importance of consulting with affected communities.
S-207-18	1369542	Youlgrave Community Land Trust.	5.4	Thank you for your response. The respondent suggests that technology is evolving too quickly to define specific sites on a map for renewable energy. They advocate for a pragmatic approach to energy-saving measures, noting that settlements are living communities that should evolve. They support allowing changes like double glazing, solar panels on non-listed homes, and air source heat pumps, while emphasizing that wind turbines should be encouraged in suitable contexts without excessive restrictions.

S-204-2	1369537	Ministry of Defence	5.4	Thank you for your response. The respondent highlights that the Ministry of Defence (MOD) may have an interest in developments that could impact operational capabilities, especially those that affect surveillance systems like radar. Examples include wind turbines with a tip height of 11m or more, or a rotor diameter exceeding 2m, as well as any structures over 50m in height, which may obstruct low-flying aircraft. Additionally, developments outside MOD safeguarding zones but near military properties or training areas may also raise concerns.
S-203-12	1369536	Tarmac	5.4	Thank you for your response. The respondent suggests that all development proposals for low carbon and renewable energy should be considered and supported if they align with the broader objectives of the National Park. They emphasize that renewable energy schemes are often temporary and have limited impacts over time. The respondent believes that existing exclusion zones and impact tests are adequate and that adding more could hinder the delivery of projects that reduce carbon emissions and support existing infrastructure.
S-199-12	1369530	Environment Agency	5.4	Thank you for your response. The respondent suggests that areas identified for renewable energy development should not overlap with those marked in the Local Nature Recovery Strategy (LNRS) as high nature value or habitat expansion areas. The areas should also consider the type of renewable energy being proposed, factoring in potential disturbances such as noise pollution and visual impact, particularly for wind turbines.

S-195-14	1369526	Derbyshire County Council	5.4	Thank you for your response. The respondent suggests that while creating a specific map of acceptable renewable energy locations may be challenging, it would be helpful to establish a framework defining acceptable and non-acceptable areas. They recommend defining "small-scale" renewable energy projects more clearly and advocating for more ambitious wind energy allowances than those allowed under current permitted development rules. Additionally, the County Council is increasingly consulted on battery storage facility applications, and these should also be considered in future renewable energy guidance.
S-194-21	1369525	Derbyshire Dales District Council	5.4	Thank you for your response. The respondent suggests that instead of setting specific criteria directly in the Local Plan, similar evidence to what has been prepared previously should be gathered. This would help determine the appropriate criteria and locations for renewable energy development across the entire Plan Area, which could then be presented in the Local Plan.
S-188-12	1369508	Staffordshire Moorlands District Council	5.4	Thank you for your response. The respondent suggests that the new policy should provide greater clarity by defining what constitutes "small scale," such as air source heat pumps, residential solar panels, and small-scale wind turbines. They also support the use of a policy map to identify areas where renewable energy development is more likely to be acceptable.

S-187-3	1369506	Sheffield Parks and Countryside Service	5.4	Thank you for your response. The respondent suggests that the PDNP should adopt a more progressive approach to renewable energy generation, focusing on what is needed to achieve a carbon-free future, rather than just what is considered acceptable. They propose that the Peak Park could become an exemplar in renewable energy generation.
S-185-20	1369502	Devonshire Group	5.4	Thank you for your response. The respondent highlights their investment in renewable energy technologies, including biomass boilers, hydro, PV panels, and ground source heating. They acknowledge the constraints of renewable energy infrastructure in heritage settings and protected landscapes but argue that these concerns may need to be reconsidered. They suggest placing greater emphasis on the local generation and availability of renewable energy in the planning process and finding a better balance between development and the preservation of landscape and heritage.
S-184-15	1369500	Hope Valley Climate Action	5.4	Thank you for your response. The respondent disagrees with Core Strategy CC2, particularly its statement that renewable energy development must not harm landscape, cultural heritage, or other special qualities. They argue that what constitutes "harm" is subjective, and that the scale of renewable energy development needed to electrify the economy will inevitably involve landscape changes that some may view as harmful. The respondent stresses the importance of acknowledging the need for such developments while balancing the desire to minimize harm. They also note that the Landscape Sensitivity Assessment is outdated and no longer relevant given the urgency of addressing the climate emergency.

S-183-11	1369499	United Utilities	5.4	Thank you for your response. The respondent is evaluating all land owned by UUW within local authorities for renewable energy potential and developing a list of candidate sites. They emphasize the importance of aligning site selection with local, regional, and national renewable energy and net zero policies. The respondent also expresses interest in further discussing the approach to renewable energy site delivery and the identification of new opportunities during the preparation of the new local plan.
S-166-7	1369468	Breedon	5.4	Thank you for your response. The respondent refers to the Derbyshire Spatial Energy Study and suggests that the explanatory text on small and micro-scale development should take it into account. They argue that the requirement for development to have "no adverse effect" on landscape, cultural heritage, and character is unreasonably restrictive and impractical. The respondent proposes that different renewable energy technologies should have distinct criteria and area mapping, as outlined in the Derbyshire Spatial Energy Study, and that the principle from Policy CC2 of the PDNP Local Development Framework Core Strategy (2011) should continue.
S-165-21	1369466	Taddington and Priestcliffe Parish Council	5.4	Thank you for your response. The respondent suggests that the key criteria for identifying areas for renewable energy development should include impacts on the landscape, particularly concerning exceptional views, nearby settlements, and neighboring properties.

S-163-17	1368617		5.4	Thank you for your response. The respondent suggests that while mapping areas for renewable energy development could be beneficial, it might be resource-intensive. They propose focusing on developing clear, detailed criteria to guide applicants and potentially removing permitted development rights in certain areas (e.g., solar panels on high street frontages in conservation areas). They emphasize the need for a policy approach that balances the public benefit of renewable energy with the potential harm, aligning with the National Planning Policy Framework (NPPF) approach. Boldness in policy is necessary to contribute to the net-zero target.
S-162-10	1369460	High Peak Borough Council	5.4	Thank you for your response. The respondent suggests that new policy should provide greater clarity by defining "small scale" developments, such as air source heat pumps, residential solar panels, and small-scale wind turbines. They also support the use of a policy map to identify areas where renewable energy development is more likely to be acceptable.
S-161-3	1369459	CPRE Peak District and South Yorkshire	5.4	Thank you for your response. The respondent suggests that the plan should identify areas for small-scale, community-led renewable energy development while highlighting areas where larger-scale projects would be harmful. They recommend building on existing landscape character evidence and considering the special qualities of the Park, including visual amenity, historic environment, agricultural production, and nature recovery. They also emphasize the need for further evidence, such as sensitivity mapping, and recommend encouraging site submissions for renewable energy during the upcoming call for sites.

S-157-13	1369450	Holme Valley Parish Council	5.4	Thank you for your response. The respondent agrees that the current criteria of permitting renewable energy development without harming the landscape, cultural heritage, and special qualities is appropriate. However, they highlight the challenge of developing technologies and materials that allow for renewable energy use without causing harm, especially in Listed Buildings. They suggest more consultation with renewable energy suppliers and the PDNP to develop acceptable technologies.
S-156-9	1367563		5.4	Thank you for your response. The respondent is opposed to large-scale renewable energy development in the Peak Park, particularly wind turbines and solar farms. They suggest that smaller developments should be assessed on a case-by-case basis, limited to energy production for individual households. Visual impact and the preservation of the area's rural and historical character should be prioritized. They also believe the natural zone should be free from renewable energy development.
S-154-16	1369442		5.4	Thank you for your response. The respondent emphasizes that the scale of renewable energy development should be "reasonable" and in line with the protected landscape's special qualities. They suggest that solar panels, wind turbines, and similar technologies should be treated similarly to any large new building or development, ensuring they do not negatively impact the landscape.
S-150-21	1369431		5.4	

S-137-17	1369370	Derbyshire ALC	5.4	The respondent suggests using the following criteria to identify areas for renewable energy development: Impact on the landscape Impact on people Impact on biodiversity
S-136-52	1369368		5.4	The respondent suggests considering: Small-scale renewable energy developments and whether they truly have an impact. Comparing the impact of renewable energy projects with the "do nothing" option. Reducing the number of electricity cables in the landscape by allowing isolated farms to generate their own electricity.
S-120-22	1368991	Marsh Farm Development Co Ltd	5.4	Protecting the visual landscape, use of redundant quarries.
S-113-20	1369153	Edale Parish Council	5.4	Does not think this should be mapped since it discourages imaginative solutions, local decision making and potentially local community energy initiatives.
S-104-40	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	5.4	Should not be prominent from a distance in the landscape.
S-98-32	1368689	Greater Manchester and High Peak Area of the Ramblers	5.4	do not adversely affect landscape character, cultural heritage assets, special qualities or other established uses of the area. They also reduce the need for transmission cables and other infrastructure.

S-73-8	1368375	Bradwell Community Land Trust	5.4	The respondent suggests that when identifying areas for renewable energy development, the local plan should balance the global environmental benefits of renewable energy against local visual impacts, acknowledging that wind turbines and solar panels outside settlements will cause some visual intrusion. The plan should clearly define "small-scale generation" and include supportive design policies that are not overly restrictive, ensuring the trade-offs are understood and not preventing the achievement of objectives.
S-71-17	1368373	Tideswell Parish Council	5.4	The criteria could align with the Natural Zones? e.g., areas outside the Natural Zones are OK for small scale renewables, but within the Natural Zones they are not acceptable. We have policy as existing to protect natural zones.
S-69-36	1368325	Derbyshire Dales District Council	5.4	Renewable energy methods are temporary and should be allowed with a flexible approach, particularly for wind turbines and solar panels, even if they slightly affect valued characteristics.
S-68-5	1368264	Bakewell Resident	5.4	The respondent suggests that it would be more effective to identify areas where low carbon and renewable energy development would not be acceptable, as this would provide clearer guidance for developers. This approach would allow for more flexibility in incorporating renewable energy features into their projects while still respecting areas where such development could cause harm. Additionally, providing clear guidance on what qualifies as "small-scale" development would help set expectations and assist developers in making appropriate decisions.

S-67-13	1367857	Over Haddon Parish Council	5.4	Over Haddon Parish Council emphasizes that efficiency should be the main factor when selecting renewable energy sites. They propose harnessing hydroelectric power from the Lathkill River and using wind energy, noting that wind turbines are increasingly accepted and less intrusive than other structures like pylons. They also suggest the PDNP should expand its acceptance of renewable technologies beyond just solar.
S-65-6	1368271	Individual	5.4	To identify areas for renewable energy development, the focus should be on efficiency and minimizing visual disruption. Upland areas could be prioritized for wind farms, given their cost-effectiveness, while solar farms should be limited due to their visual impact. However, solar panels should be the default choice for buildings, as they utilize existing structures without further disruption to the landscape.
S-62-27	1368170		5.4	To identify areas for renewable energy development, consider landscape character, habitat preservation, and visual impact. Incorporate local community input to ensure the development aligns with public sentiment and strives for local benefits. This approach ensures both environmental and social sustainability in renewable energy projects.
S-59-18	1368081	SMDC	5.4	To identify areas suitable for renewable energy development, focus on sites outside of SSSI and conservation areas, with special attention to minimizing visual impact. Prioritize land that is distanced from listed buildings to reduce aesthetic concerns, ensuring a balance between energy generation and heritage protection.

S-57-9	1368149	Great Longstone Parish Council	5.4	Criteria for identifying areas for renewable energy development should focus on supporting small-scale, low-carbon projects with local benefits. The PDNPA should be more flexible, particularly regarding solar installations on listed buildings and in conservation areas, ensuring these developments are sensitive to the environment and heritage while still contributing to sustainability.
S-50-24	1367561	Peak Park Parishes Forum	5.4	The approach should focus on assessing each renewable energy development on a case-by-case basis, rather than predefining "acceptable" areas. This ensures that the impact on local residents and the environment is carefully considered for each proposal.
S-44-33	1367865	Eyam Parish Council	5.4	The focus should be on evaluating each case individually based on its specific merits, rather than relying on predefined mapped areas. This allows for a more tailored approach that considers the unique characteristics of each proposal and its potential impacts.
S-43-13	1367843	Natural England	5.4	Natural England suggests that, when identifying areas for renewable energy development, it is crucial to consider the impact on protected landscapes, nature conservation sites, and soils, particularly peat areas. To assess these impacts, Landscape Visual Impact Assessment (LVIA) and landscape sensitivity assessments should be conducted to evaluate how proposals would affect the landscape's character and views.

S-42-19	1367805		5.4	The criteria for identifying areas for renewable energy development should consider proximity to grid connections or areas with sufficient demand for the energy. It's essential to acknowledge that some new technologies may conflict with traditional planning values but are necessary for achieving a net-zero strategy. If these technologies are supported by residents and do not cause significant harm, they should be approved.
S-40-23	1367788		5.4	To identify areas where renewable energy development is more likely to be acceptable, consideration should be given to the potential secondary and induced impacts of connecting these installations to the grid. Policy should prioritize sites that are: Close to grid infrastructure for easy and efficient connections. Capable of being connected with minimal negative impacts on the landscape and natural environment. This approach ensures that the installation can contribute positively to national energy supply while mitigating adverse effects.
S-32-24	1367524	Bamford with Thornhill Parish Council	5.4	To identify areas where renewable energy development is more likely to be acceptable, it may be more effective to avoid broad area designations. Instead, each application should be assessed individually based on its merits.
S-30-18	1367447	Country Landowners Association	5.4	Thank you for your response. The park will need to make a trade-off, as with all items, between protecting the landscape but providing enough development to meet society's needs, in this case renewables and associated infrastructure.

S-29-9	1367323		5.4	To identify areas for renewable energy development, the criteria should focus on: Ease of installation : Simplify the process for residents to install technologies like solar panels, air source heat pumps, and small wind turbines. Retrofit potential : Make it easier to retrofit older properties, such as fitting double glazing. Clear guidelines : Move beyond vague "no adverse effects" rules and map areas where renewable energy projects with proven technologies are acceptable.
S-24-3	1367240		5.4	The co-chair of Derbyshire Dales Community Energy Ltd expresses frustration over the lack of flexibility in defining "small" renewable energy projects. Their organization is working on feasibility studies for wind turbines, solar panels, and biomass in the Peak District, and they may find suitable sites for larger projects that meet local needs. They argue that if the plan is too rigid, such projects could be automatically rejected. The co-chair stresses the importance of community involvement and collaboration to ensure the success of these sustainable initiatives, highlighting the need for support rather than obstacles. Thank you for your response, we will consider your point carefully in relation to renewable energy, and in regards to this issues and options consultation.

S-19-3	1367234		5.4	Mapping areas for renewable energy development approval is unrealistic, as each site should be evaluated based on its unique circumstances rather than predefined areas.
S-17-2	1367217	Staffordshire Police	5.4	To identify areas where renewable energy development is more likely to be acceptable, the local plan could include criteria such as minimizing impacts on landscape and cultural heritage, as well as considering security provisions for installations like ground-mounted solar PV arrays. Due to past issues with theft at rural solar farms, it may be appropriate to include security requirements in the plan, ensuring that developments address risks like copper wiring theft.
S-13-4	1364893		5.4	Response noted. Developments should focus on areas where existing infrastructure already affects the landscape - reuse redundant masts as windpower, use quarries for solar power or water power.
S-9-3	1364715		5.4	Response is noted thank you.
S-8-9	1364695	-	5.4	Response noted: The criteria for identifying areas where renewable energy development is more likely to be acceptable should focus on supporting small-scale, community-based projects. These developments should be encouraged, provided they respect the landscape, and not be dismissed due to design concerns related to local architecture.

S-7-33	1364251		5.4	Response noted. The criteria for identifying areas suitable for renewable energy development should focus on locations near existing commercial, industrial, or agricultural buildings and infrastructure, as well as proximity to grid connections. These areas would likely be the most appropriate for such developments.

Q5.5 Do you think the new local plan should set out in principle policy support for carbon capture and storage?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-22	1369632	Hartington Town Quarter Parish Council	5.5	Hartington Town Quarter Parish Council states that the Authority should probably set out in principle policy support for CCS.
S-221-21	1369595		5.5	The responder thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage in order to act as a voice of reason into what they believe can be a very complex and fractious debate.
S-214-22	1369550	Hope with Aston Parish Council	5.5	Yes set out policy on CCS. Only for industrial uses that generate inherent CO ₂ , not power generation via fossil fuels. Plan should also encourage alternatives to carbon capture. PDNPA: Note comments. No viable alternative to CCS for industrial decarbonisation at present time. Advancement of alternative technologies is outside control of the Local Plan, notwithstanding, they would likely constitute major development which the NP would not wish to encourage.

S-210-19	1369546		5.5	Yes agree LP should set out in principle policy support for CCS. Any policy should require significant biodiversity gain as a result of development and it should not be a cover for the cement industry to expand. PDNPA: Acknowledge comments, enhancements (including biodiversity) would be sought for any major development and is required through existing policy. Consideration will be given to the strategic impact of any such CCS policy.

S-206-5	1369541	Peak Cluster	5.5	Yes agree LP should set out in principle policy support for CCS. PDNPA vision sets goal that by 2043 the Authority is exemplary in its response to climate change. Cement and Lime industry in and around the Peak District emits 3 million tonnes of CO2 per annum. Decarbonising these key national industries through the development of carbon capture and storage (CCS) would, therefore, reduce national emissions by around 1%. The sites produce 40% of the UK's cement and lime, which are critical materials used in construction to support the economy. In order to address the issue of embodied carbon in the construction sector it is critical to decarbonise the cement and lime industry. Carbon Capture and Storage (CCS) has been designated as a Critical National Priority (CNP) in the UK. This strategic move is crucial for decarbonising the UK's hard to abate emissions and meeting its climate change targets. National Policy Statement EN-1 recognizes the critical national priority for the provision of nationally significant low-carbon infrastructure. While it acknowledges the potential impact of such projects on designated landscapes, it also states that the urgent need for these projects, along with their national security, economic, and net zero benefits, will generally outweigh other residual impacts that cannot be avoided, reduced or mitigated. Strongly support the inclusion of in principle policy support for CCS in the Peak District Local Plan. By embracing CCS, the Peak District can play a vital role in achieving net zero targets while stimulating economic growth and providing good green jobs for the future. The Local Plan should also recognise the CNP status of CCS projects and set out how the National Park Authority will work with applicants to ensure the mitigation hierarchy is applied to avoid, reduce or mitigate effects on the environment. The Local Plan should recognise that, where the mitigation hierarchy has been applied, the need for CCS infrastructure will generally outweigh the remaining residual effects. By incorporating these recommendations, the Peak District Local Plan can position the region as a leader in sustainable development and contribute to a greener future. PDNPA Response: Acknowledge comments and will consider further in policy formulation.

S-203-13	1369536	Tarmac	5.5	Yes support policy supporting CCS. Although not the determining Authority for NSIPs some collaborative working with operators to ensure a wider understanding of proposals and delivery would be supported. PDNPA: comments noted.
S-200-18	1369531	Stanton in Peak Parish Council	5.5	Yes support policy supporting CCS. If set the policy position now, clearly indicates NP position for future proposals. PDNPA: Comments noted.
S-199-13	1369530	Environment Agency	5.5	The representation thinks that the new Local Plan should set out in principle policy support for Carbon Capture and Storage as it would help to highlight future expectations and contribute to constructive discussions around Carbon.
S-195-15	1369526	Derbyshire County Council	5.5	Unsure whether CCS should be supported through policy. Need to differentiate between large scale CCS e.g. Peak Cluster and small scale on site developments e.g. on farm anaerobic digestions. Suggest include biochar in CC4. PDNPA Response: Acknowledge comments and will incorporate into any policy development. Idea of inclusion of biochar in CC4 will be considered.
S-194-22	1369525	Derbyshire Dales District Council	5.5	Unsure if policy should be developed. Should not include a policy unless certain such proposals would come forward in plan period. PDNPA: Given government support (identified as Critical National Priority) in National Policy Statement 1 (Energy) it is reasonable to expect proposals for CCS to come forward in the plan period and developing a policy would allow for clear guidance for developers and decisions makers.

S-192-12	1369523	Mineral Products Association	5.5	Yes agree LP should set out in principle policy support for CCS. The Peak Cluster will decarbonise 40% of the UK cement and lime industry. The Peak Cluster is the world largest cement decarbonisation project, will capture, transport and permanently store CO ₂ , emissions from the five producers of cement and lime across Derbyshire and Staffordshire. The extractive sector is a significant piece of the jigsaw for delivering Carbon Capture and Storage. PDNPA: Comments noted.
S-188-13	1369508	Staffordshire Moorlands District Council	5.5	Support development of a policy supporting CCS. This will be beneficial to industry in the Staffordshire Moorlands and adjoining authorities and the Council supports a policy position which would not hinder the implementation of this scheme. PDNPA: Comments noted.
S-185-21	1369502	Devonshire Group	5.5	Difficult to comment given absence of details as to what CCS would entail - form of development, impacts. Areas of the Chatsworth Estate (woodlands and peat moorland) act as a carbon sink. Management of these important natural capital resources will become increasingly important in addressing climate change. PDNPA: Note comments and will consider widening any policy on CC to include proposals for natural capital resources.
S-184-16	1369500	Hope Valley Climate Action	5.5	Unsure on policy proposal. We think therefore that the new local plan should specify stringent conditions, which will include extensive requirements for changes to have been implemented in the construction industry, before CCS can be supported. PDNPA: Note comments and agree with principle but it is beyond the scope of the LP to impose changes on the wider construction industry to use alternative building materials to cement and concrete. CCS is supported by National Policy Statement 1 (Energy) so it is reasonable to expect such proposals to come forward in the plan period.

S-166-8	1369468	Breedon	5.5	Carbon Capture and Storage (CCS) has been identified as a means of achieving de-carbonisation of the UK cement industry. Approx. 3 million tonnes p/a of CO2 emitted by the cement/lime industry in the wider Peak District region as an inherent by-product of the chemical reaction required to produce cement clinker. Only a proportion of the total CO2 is emitted from Hope Works and this should be explained in the plan. It is therefore received knowledge that CCS will be needed to achieve deepemissions reductions in the UK as the scope for achieving reductions by current techniques is limited. Breedon believes that the PDNPA should support the development of CCS, but that any planning application should address the environmental effects on a project specific basis. The Government has published the National Policy Statements for Energy (EN-1 to EN-5). EN16 at paragraph 3.5.1 states: There is an urgent need for new carbon Capture and Storage (CCS) infrastructure to support the transition to a net zero economy. The Critical National Priority (CNP) is discussed. At 3.5.4 it identifies a target date of 2030; As set out in the Net Zero Strategy, our aim is to use CCUS technology to capture and store 20-30MtCO2 per year by 2030, which will require the timely development and deployment of CCS infrastructure. National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development. At 5.10.32 it states; When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Therefore Government Policy by no means excludes CCS projects from National Parks as a matter of principle. It may be that The Peak Cluster could commence commercial operations as early as 2030 if permitted, however, for it to be financially viable the project may need to continue beyond 2042. This could have implications for the projected end date of the Hope Cement Works and the PDNPA Plan must have flexibility for such CCS timescales to

				ensure compliance with climate change objectives. PDNPA Response: Comments noted. Recognise national policy position and government support for CCS and CNP.

S-163-18	1368617		5.5	Policy should be included if position would be more robust and carries greater weight. If the policy is subject to public consultation through the local plan process the pros and cons will have been widely discussed. PDNPA Response: Comments noted.
S-162-11	1369460	High Peak Borough Council	5.5	Support a policy position that would not hinder the Peak Cluster Project as it would be beneficial to industries in High Peak and adjoining Authorities. PDNPA: Noted.
S-161-23	1369459	CPRE Peak District and South Yorkshire	5.5	Unsure whether a policy to support CCS is appropriate. The charity reserves the majority of its comments pending the commission of expert advice on this specialist area of planning. Nevertheless, the CPRE PDSY recognise that major development for carboncapture will involve the need for pipelines and also is likely to include new large buildings and plant at existing cement production sites. PDNPA Response: Comments noted.
S-157-14	1369450	Holme Valley Parish Council	5.5	Yes agree LP should set out in principle policy support for CCS. CC is only realistic method of dealing with CO2 emissions from industries that find it difficult or impossible to eliminate emissions. No obvious alternatives to decarbonise the cement industry. UK has favourable geology to store CO2 in the North sea. Proposals would be NSIPs. PDNPA Response: Note comments. Policy could apply to NSIPs when PDNPA acting as statutory consultee or in relation to smaller scale proposals submitted to the PDNPA under the TCPA as determining authority.
S-153-19	1369437		5.5	The responder thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage in order to indicate the NP position for the future.
S-151-19	1369433		5.5	The responder thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage.

S-150-22	1369431		5.5	Yes, set out policy on CCS. The CCS of the peat moors, and woodlands needs to be carefully protected and grown. Redundant mines and quarries could come under pressure to be used for a dirty form of CCS where CO and CO₂ are bound to other chemicals and dumped as landfill this must be resisted due to habitat loss and pollution risk from leaching PDNPA: Note comments. CCS policy would relate to CO₂ emitters only and not allow for mineral carbon sequestration within the NP itself, notwithstanding, existing waste policies would preclude this. Proposal to grow the peat moors could be taken forward in CCS policy formulation.
S-137-14	1369370	Derbyshire ALC	5.5	Unsure. CCS should be tightly controlled and only permitted where it creates the lowest landscape impact. Consideration to be given to future of infrastructure once decommissioned or no longer needed. PDNPA: Note comments. Planning application process would assess landscape impact and decommissioning requirements.
S-136-31	1369368		5.5	Yes agree LP should set out in principle policy support for CCS. However, support should be dependant on strong criteria outlined for the actual case. Each proposal to be determined on its own merits and clearly evidenced that proposal will be effective. PDNPA Response: Comments noted. Technical feasibility of a project would be reviewed at planning application/DCO stage.
S-128-9	1369275	Rural Action Derbyshire	5.5	The responder thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage as a means to find a solution for storing carbon from cement production within the park.

S-113-21	1369153	Edale Parish Council	5.5	Unsure if a policy supporting CCS should be developed. NP has no control over SNIP decisions, the infrastructure could conflict with NP purpose. Need to be careful to consider if CCS technology is delaying real action on climate change.
S-110-12	1369133	Middleton and Smerrill Parish Council	5.5	Yes agree LP should set out in principle policy support for CCS. Even though the issue of carbon capture proposals would be regarded as Nationally Significant Infrastructure Project it would be good for the National Park Authority to have a stated position on carbon capture and storage. PDNPA: Comments noted. Policy position would guide response to NSIP proposals as a statutory consultee.
S-104-16	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	5.5	Yes agree LP should set out in principle policy support for CCS. However, concerns that it could adversely effect the natural environment. CC facilities should not be used to replace current high carbon industries with new ones. Pipeline routes should be used to develop nature corridors between habitats. PDNPA: Acknowledge comments. Existing policies would prevent/control impacts on the environment. Nature corridors along potential pipeline routes could be explored further, may be possible under existing policy.
S-98-19	1368689	Greater Manchester and High Peak Area of the Ramblers	5.5	The responder believes that the Authority should set out in principle policy support for Carbon Capture and Storage stating that this has been signalled to be a priority for government. They feel that the Local Plan policy should direct any developments to be sensitively located and work with the character of their surroundings and protect rights of way and help to link people with nature.

S-86-17	1368682	The National Trust	5.5	The need for relevant infrastructure should be balanced against the special qualities of the NP. Recognise the pressing impact of matters such as climate change and the need for sustainable adaptation. However, impact on the setting and significance of the historic and natural environment needs to be considered carefully. PDNPA Response: Note comments. A balanced view would be taken when assessing such proposals. Existing policies exist to protect the historic and natural environment, as well as the special qualities of the NP.
S-69-9	1368325	Derbyshire Dales District Council	5.5	No, should not develop policy supporting CCS. Hope Works has limited life span - impact of Peak Cluster project would have adverse impact on landscape and wildlife purely to protect profits of a polluting sector. Investment better spent in developing less carbon intensive construction materials. PDNPA Response: Acknowledge comments. Effectiveness of technology to decarbonise industry will be considered. However NPS1 supports CCS. Note and agree with point suggesting development of alternative construction materials with lower carbon footprint, however this would require a strategic direction from the Government via policy or legislation and therefore falls outside the scope of the LPR.
S-68-45	1368264	Bakewell Resident	5.5	The responder believes that the new local plan should set out in principle policy support for Carbon Capture and Storage but that the Authority should ensure that CCS should only be accepted in the National Park if it does not compete with the National Park purposes.
S-67-4	1367857	Over Haddon Parish Council	5.5	Over Haddon Parish Council believes that all avenues must be explored to mitigate the effects of industry on the environment.

S-66-13	1368276		5.5	Does not support policy supporting CCS. Questions over implementation and effectiveness of CCS. Should look to implement alternatives that already exist. Suggest mandate low carbon building materials for use in the NP and close Hope Cement Works. PDNPA Response: Note comments and concern re CCS. However CCS is identified as a matter of CNP and is supported in NPS1 (Energy) so it is likely proposals for CCS will come forward in plan period. Alternative low carbon building material are an option, but currently not enough available on a commercial scale to meet all development needs.
S-62-44	1368170		5.5	The responder believes that the new local plan should set out in principle policy support for Carbon Capture and Storage as they feel it is a key aspect of sustainability.
S-59-9	1368081	SMDC	5.5	The representation thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage as all authorities need to consider it to plan for the future.
S-50-36	1367561	Peak Park Parishes Forum	5.5	The representation states that they think that the new local plan should set out in principle policy support for Carbon Capture and Storage, they support carbon capture in principle but caveat it saying that there must be no damage to landscape character as a result.
S-44-51	1367865	Eyam Parish Council	5.5	The response thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage. Although they believe that the extent of carbon capture in the Peak Park will inevitably be limited.

S-43-14	1367843	Natural England	5.5	Unsure whether policy should be developed. Any such proposals should look to follow the mitigation hierarchy in which the development should seek to: Avoid impacts; Minimise impacts; Remediate/restore habitats affected by impacts; and as a last resort, compensate for any residual harm through habitat creation or restoration. Natural England expects sufficient evidence to be provided with any proposal to ensure irreversible impacts on landscape or nature conservation designations are avoided. End date of 2042 at Hope Works may impact on the viability of the Peak Cluster project. Would not wish to see the introduction of CCS at the site justify and extension to the limestone quarry. PDNPA: Comments noted and recognised. Strategic issues will be considered in any response provided during the DCO process as a statutory consultee and in policy formulation.
S-42-3	1367805		5.5	The responder think that the new local plan should set out in principle policy support for Carbon Capture and Storage provided there is no expense to the PDNPA and that the storage and process is guaranteed. They do not feel the CC process should be supported if storage is not 100% effective.
S-40-24	1367788		5.5	Support policy supporting CCS but subject to caveat that no development will be permitted unless proposed technology proved to be sound and operate on net benefit basis. PDNPA: Comments noted and will be considered in policy formulation.
S-32-10	1367524	Bamford with Thornhill Parish Council	5.5	Do not support development of policy supporting CCS. Local plan should state a position, but it should be a neutral one given the pros and cons of CCS are not yet fully clear. PDNPA Response: Comments noted and will be considered in policy formulation.

S-31-7	1367452		5.5	No need for policy as matter is a national issue rather than local. Including reference in the plan will complicate the issue. PDNPA: CCS is identified as Critical National Priority and supported by National Policy Statement 1 (Energy) which provided guidance for LPAs and the SoS. CCS proposals are likely to come forward in the plan period, some of which would be smaller scale and determined by the PDNPA under the TCPA, a policy would give clear guidance to developers and decision makers. It would also be used as a principle when the PDNPA acts as a statutory consultee in the DCO process relevant to any CCS projects submitted under as NSIPs.
S-29-10	1367323		5.5	CCS is not yet a proven technology and could be considered 'green washing' to allow heavy industry to continue producing CO2. Time and money should be spent on the roll out of proven technologies. PDNPA: Note comments and concerns. Technology is proven and implemented elsewhere, but not on the scale that is now being proposed. Concerns valid, but National Policy Statement 1 supports CCS.
S-13-27	1364893		5.5	The responder thinks that the new local plan should set out in principle policy support for Carbon Capture and Storage.
S-9-1	1364715		5.5	The responder believes that the new local plan should set out in principle policy support for Carbon Capture and Storage. They do state, however, that despite their own reservations about CC for major infrastructure they support what they view as natural ways of capturing carbon such as avoiding ploughing up the land and encouraging tree planting.

S-8-12	1364695	-	5.5	Unsure if policy supporting CCS should be developed. Yet to see good evidence that CCS technology actually works. Future promise of technology may be used to justify continued use of fossil fuels. Could policy include caveat requiring demonstration that technology is actually worthwhile. PDNPA Response: Comments noted. CC in relation to the cement and lime industry seeks to capture carbon that is emitted through the chemical process required to create cement clinker/lime, so not directly related to fossil fuel use. Policy could include caveats to demonstrate effectiveness of technologies proposed. These matters would be considered at application stage.
S-7-34	1364251		5.5	No need for CCS policy as technology could only apply to one site in the NP (Hope Works). Decision would be taken by SoS via the DCO process. PDNPA would not be decision maker so no need for a specific policy to cover one site that would be outside the PDNPAs control. PDNPA Response: Note comment and will consider further. PDNPA would be a statutory consultee in the SNIP process however, so setting out a policy position would guide the response from the NP when engaging in the DCO process.

Q6.1 Do you agree with the proposed Local Plan spatial objectives for recreation and tourism?

Submission Responses				
#	Consultee Id	Consultee Organisation	Q point	Summary and PDNPA response
S-224-14	1369634	Sheffield City Council	6.1	Unsure Suggests that more flexibility in the location of recreational and tourist attractions may be appropriate. This is probably partially covered by the Rec Hubs work. Suggests that the approach to accommodation is sound, but suggests that equity should be considered, are ethnically diverse groups attracted to existing / preferred provision A good point and one to consider going forward. Re: PROW and multi-user trails, the objectives could consider links into urban centres to provide active travel alternatives. Agree, this falls under the development of the Peak District Cycling, Wheeling and Walking Infrastructure Plan. The Statement of Common Ground should offer a focus. We have met with SCC to discuss opportunities for connecting routes. The respondent advocates gateway sites with possible Park & Ride in the Peak District urban fringes to promote active travel to and from the National Park. Agree that this is a good option and falls within the Recreation Hubs approach.

S-223-23	1369632	Hartington Town Quarter Parish Council	6.1	The respondent agrees with the proposed objectives Reason a) We support the majority of the stated objectives but discretion must be taken in encouraging even more tourist traffic and growth in a few settlements such as Hartington. b) Hartington already has enormous tourist numbers by car and coach. We also have more overnight camper vans. This village certainly doesn't require any more direction of tourists towards us. Planners need to be aware in granting further retail type or cafe type facilities within the village that these bring almost exclusively car borne traffic, many of whom we are certain do not leave the centre of the village. We know Visitor Centres have enjoyed only a temporary reprieve, so more effort should go towards funding existing out of village facilities with adequate car parking.
S-222-14	1369631	TPT & Sustrans	6.1	The respondent agrees with the proposed spatial objective. They believe that the objective applies to the Trans Pennine Trail and National Cycle Network within the Park. The objective should also include accessibility throughout. They also believe that it is essential that multi-user trails and other rights of way network are given the appropriate funding for maintenance to ensure they remain fit for use at all times. The respondent believes that this approach encourages the priority for active travel to be the first choice. The points made are all valid, the proposed spatial objectives show the intended direction of the Recreation and Tourism policies.

S-221-22	1369595		6.1	The respondent agrees with the spatial objectives...but only Reasons But only if it reduces the public pressure on the open country outside the honey pots, no if it encourages more day visits. Most ecological problems are directly related to the number of humans and the demands they make on any given area. It could be argued that the National Park is the product of the destructive effects of the human species over thousands of years. Man is an apex predator and as such has a profound effect on whichever ecosystem he occupies, The impact of small numbers of people can often be absorbed by an ecosystems natural resilience, (which differs profoundly according to habitat). Large numbers of people inevitably overwhelm a natural habitats capacity to maintain the status quo, hence a reduction in biodiversity and habitat quality. The relationship between public pressure and its effect on the environment has been documented for decades, Local examples are legion, The simple presence of a single human in a large field can affect a whole range of different organisms. Management of visitors to semi-natural areas is crucial and the fewer the numbers and the less destructive their activities the better. The effects of activities such as Off-roading, Mountain biking, Climbing, game shooting, canoeing, to name just a few, are well known, but even large numbers of walkers have an impact on the vegetation several metres on either side of a path: the soil is compacted, the vegetation is physically damaged, certain animal life is destroyed, litter becomes a problem, also the "if I only pick one wild flower it won't make any difference" attitude has led to species extinction close to some well used paths. Based on my observations as an Ecologist and someone who has lived within 5 miles of the Park for six decades I do not believe that encouraging more visitors is compatible with the core principles to conserve and enhance natural, wild life and cultural heritage. To me it seems that the Statutory Purposes are in conflict with each other and while the intentions are commendable they are irreconcilable with the fundamental principles of biology.

				The Sandford principle needs to be taken more seriously and applied more rigorously. Whilst the points raised are valid, to an extent, visitor management lies outside of the direct scope of the document. However the Recreation Sites and Recreation Hubs approach does seek to restrict recreational development to those sites best able to allow such development without impacting on the special qualities of the National Park. The Sandford Principle is key in assessing such development.

S-214-23	1369550	Hope with Aston Parish Council	6.1	The respondent does not agree with the proposed Local Plan spatial objectives for recreation and tourism. The respondent believes that the wording should be more restrictive and do more to manage and mitigate impacts of recreation and tourism (landscape impacts and local amenity). The respondent is concerned that new and improved facilities will encourage greater recreational use in locations that are at or near capacity. The respondent is also concerned about the affect on local farming and housing on the conversion of farm buildings to holiday accommodation. The National Park has a Statutory purpose to promote opportunities for the enjoyment and understanding of the National Park, which carries equal weight with the purpose to conserve and enhance. It is only where there is conflict that the first purpose takes precedence. The spatial objectives seek to meet both purposes.
S-213-2	1369549	The British Horse Society	6.1	The respondent did not provide a specific answer to this question; however the accompanying text indicates support for: - To support work that maintains and enhances the rights of way network. To safeguard the multi-user recreational trails, and to expand this network. To support the change of use of traditional buildings (heritage assets) for visitor accommodation, primarily on farmsteads. Would like to see this apply to provision for horses and horse riders. The reference to support for elements of 12.1 has been ascribed to Consultation point 12.1 by this respondent.
S-210-20	1369546		6.1	The respondent agrees with the proposed spatial objectives. However, they expressed concern about the phrase "to support the change of use of traditional buildings for visitor accommodation primarily on farmsteads". The reason given is that often where conversions occur, they then lead to modern replacement buildings to support the ongoing agricultural business. The respondent raises a valid concern. However, in many cases the traditional buildings are considered unsuitable for their original purpose due to changes in animal welfare legislation.

S-207-19	1369542	Youlgrave Community Land Trust.	6.1	The respondent agrees with the proposed objectives, including it's several facets.
S-200-19	1369531	Stanton in Peak Parish Council	6.1	
S-199-14	1369530	Environment Agency	6.1	The respondent did not give any specific answer to question 23. However, they do state that Objective 8 should be more ambitious to include educating people; particularly with regard to threats facing National Park habitats and species, and so guide behaviour. This is a very good point and will be taken forward during the development of the Plan.
S-195-16	1369526	Derbyshire County Council	6.1	The respondent was unsure whether they agreed with the spatial objectives. The respondent generally supported spatial objectives for recreation and tourism, particularly the safeguarding and expansion of multi-user trails network. However, they expressed concern in relation to directing recreation development towards settlements and certain existing recreation attractions and hubs. The respondent favours an approach of more even distribution and relieving pressure at entry points. The respondent raises some good points that will be considered as the Plan develops. However, there is a balance to be struck between what visitors expect to be provided to enhance their visit and the appropriate locations where such facilities can be provided. This includes, but is not limited to parking and toilets.
S-194-23	1369525	Derbyshire Dales District Council	6.1	The respondent is unsure. They state that they support directing recreation and tourism development to sustainable locations will minimise impact upon the wider National Park. However, they state that focusing on hubs should be better defined within the Local Plan and appropriate criteria set out for supporting their development. As the Plan is developed it is anticipated that policy for Recreation Hubs will be brought forward, subject to this consultation.
S-193-15	1369524	Winster Parish Council	6.1	The respondent does not agree with the proposed Local Plan spatial objectives for recreation and tourism. They believe that priority should be given to permanent residences, including on farmsteads, especially where they are close to villages.

				This issue is covered in more detail within Chapter 7, question 29 of this consultation. As the respondent has only referred to one of 4 spatial objectives in their respons, it is unclear whether or not any of them are supported.
S-189-5	1369519		6.1	Therespondent does not agree with the proposed spatial objectives. The reasons given are: - Castleton has a problem at the moment and its designation as a hub would make it worse. The balance between visitors and existing community is out of sync. There are already plenty of facilities in Castleton for visitors including a visitor centre and a museum. Visitors need to be encouraged away from Castleton as it's overloaded Castleton does not need more short term accommodation for visitors it needs homes for permanent residents Promotion of footpaths should not result in overuse e.g. the Great Ridge and the destruction through visitor pressure of the scheduled monument of Mam Tor. The points raised show genuine concern for the effects of visitor pressure on Castleton. The Authority has recognised that some locations are negatively affected by user pressure, and has begun work to better understand the issue. The approach set out within the issues and options document seeks to focus recreational development in suitable locations. The focus is in acheiveing a suitable balance between our two statutory purposes of conserving and enhancing the National Park, whilst offering opportunities for understanding and enjoyment. In doing so, we look to secure the social and economic well being of our communities.

S-187-4	1369506	Sheffield Parks and Countryside Service	6.1	The respondent did not give a specific reply to the question. They did provide the following comment: - The approach to accommodation in the NP sounds sound , but concerns of equity...who is attracted to this style of accommodation, and what would facilitate a more diverse audience - does the accomodation on offer suit a more diverse audience? More could be done on PROW and multi-user trails - providing connections into urban centres. Can the PDNPA make the Park more people rather than car friendly? NP urban / Sheffield fringe offers scope for visitor facilities that are gateway sites for recreation and tourism that can also act as Park & Ride or active travel links into the NP. The respondent raises valid points that will be considered in the development of the Plan. Other areas of work such as the National Park equivalent of a Local Cycling & Walking Infrastructure Plan will also pick up on some of the suggestions within these comments. However, for this particular question, as it is unclear, whether the respondent agrees or not with the spatial objectives, the response will be recorded as 'No specific reply'.
S-186-10	1369505		6.1	The respondent specifically does not agree with the first objective The respondent referred to answers to Q24, which are also provided below: - Listing sites with large car parks as recreation hubs will draw increasing numbers of visitors to them and increase pressure for yet more parking. Despite good intentions, the proposed objective for recreation and tourism would lead to intensification of development at these locations The respondent is opposed to Fairholmes being identified as a recreation hub in the way intended in this objective. The respondent suggests an additional objective 'Strategic green routes for walking and cycling into and within the Park and for increasing opportunities for local

				people to access local amenities and longer distance commuting e.g. on an e-bike will be sought.' The comments provided by the respondent will be considered during the development of the Plan. The suggested additional objective will also be covered during the development of the National Park's equivalent to a Local Cycling & Walking Infrastructure Plan.
S-185-22	1369502	Devonshire Group	6.1	The respondent agrees with the proposed objectives. However, they state that the Plan shoudn't unreasonably suppress low impact recreation-related development the opportunities for which may arise in diverse locations. They also note that the objective does not reference hotels, for which they belive there is an opportuntly to provide additional bed spaces.
S-184-17	1369500	Hope Valley Climate Action	6.1	The respondent does not agree with the proposed spatial objectives. The respondent favours placing greater importance on shifting to more sustainable forms of transport. Recreation development should only be permitted in locations where there is good public transport from surrounding large conurbations. The reason for the response does not really address the proposed spatial objectives, two of which specifically relate to maintaining or improving oppoertunities for walking, wheeling, cycling and horse riding. It is unclear whether the respondent objects to all of the objectives or specific ones.

S-182-4	1369498	Hathersage Parish Council	6.1	The respondent doesn't agree with the spatial objectives, saying that they lack clarity and recognition of the steps required. The reasons given include: - Things have move on since 1951 and again since COVID and the happy concept of light touch managed coexistence is no longer appropriate in the interests of the wild countryside, and, ultimately, residents and visitors. Trying to meet both the ecological needs of the Park and human expectations (residents and tourists) becomes harder. Human penetration into the wild is getting out of hand (as visitor and motor numbers increase). We need to see positive proposals for countering trends for visitors to park and / or camp in the wild (be that in tents, campervans or motor homes) but at the same time, recognising that we need to accommodate such visitors, and provide the necessary facilities at lower levels of the Park. It will be far from simple to achieve the changes, but we need to see evidence of active planning ; for temporary and permanent facilities - underway. Note should be taken of how our European neighbours manage these problems. Cycling is widely covered elsewhere in the draft Plan but many ; if not all - visitors are tourists and have no place legally within designated access areas other than on bridleways and or if permitted by landowners. Some of the points raised fall outside of the scope of the Local Plan; relating more to Visitor Management, but there is a connection to both transport and recreation hubs policy areas. It is unclear what is meant by 'lower levels of the Park'; does this relate to designation of altitude?

S-180-3	1369496	Castleton Parish Council	6.1	The respondent doesn't agree with the spatial objectives - the reasons given are: - To direct recreation development towards settlements and certain existing recreation attractions and hubs. At these places development will be focussed on new or improved facilities that promote understanding and enjoyment of the National Park, sustainable travel and significant enhancement of the National Park's special qualities. The question requires more definition. We understand from this Local Plan document that Castleton is defined as both a settlement and a recreational hub. We know it is a major visitor destination. What developments... focused on new or improved facilities... are inferred here? Castleton already has a Visitor Centre, refurbished in only 2017, that has functioned very well due to its excellent location, staff and facilities (display area, museum, cafe, toilets), is strongly supported by the community (see Appendix 1) and should be retained. Is the proposed development aimed at attracting yet more visitors to the area? Rather than increasing the gross overcrowding efforts should be made to disperse the visiting public to other less well-known Peak Park destinations that could benefit economically. Castleton village and its surrounding landscape are losing their special qualities due to over-promotion ;they are at saturation point and the balance has gone too far in favour of business economy vs conservation of the landscape and of a thriving and sustainable community. Sustainable transport developments would however be welcomed To support the change of use of traditional buildings (heritage assets) for visitor accommodation, primarily on farmsteads. Why should traditional buildings only be directed to visitor accommodation? In Castleton we need long-term residents who will contribute to the community rather than more short-term lets. To support temporary overnight tourist accommodation that is well-suited to its location. It depends on the nature of this accommodation and where it is, and how much pressure is already placed on that recreation hub. Castleton already has enough. The PDNPA should not continue to support more development in response to demand, whether this is holiday lets, caravan or campervan sites, or O/N parking on roads

				To support work that maintains and enhances the rights of way network. Yes, agree, to promote responsible enjoyment of the countryside in areas that are not vulnerable to continuing erosion. To safeguard the multi-user recreational trails, and to expand this network. Yes, with the same caveats as above. A tourist tax should be considered that would go directly into sustainability measures to address visitor impact in the PDNP. Castleton has been visited for hundreds of years and tourism as a business is a key part of its economy. However the village and surrounding area has reached saturation point, change has accelerated since the pandemic and we are at a tipping point. Residents are choosing to leave because of erosion of quality of life. The respondent does agree with two of the spatial objectives; however, the response will be recorded as 'no' as per the response to the question.

S-171-1	1369485	Forward Land	6.1	The respondent was unsure, stating that they partially agreed: - Fundamentally concentrating the development towards settlements is sound however the opportunistic nature of development often presents prospects beyond the traditional settlements that are often away from farmstead. Furthermore, it's crucial to assess the carrying capacity of these areas to avoid overcrowding and negative environmental impacts. Consider implementing measures to disperse visitor pressure, such as promoting lesser-known areas or encouraging peak visits. Our recommendation would be to remove the focus on farmsteads and remain open to the change of use of buildings for visitor accommodation across all settings to broaden the overall offering which in turn diversifies the markets reduced seasonality. This would also allow the other policy safeguards to take effect to ensure the development is suitable and inline the national park's central objectives. Increasing overnight accommodation will maximise economic benefit at the heart of the sensitive rural economies. The use of the term and definition of "Well-Suited" to its location is not overly helpful in our view as the term is too subjective. To ensure that temporary accommodation aligns with the National Park's character and environmental values, it's important to define clear criteria for "well-suited" locations. It would be worth establishing guidelines for the design and materials used in temporary structures to specify how they would be well suited. Owing to the changing nature and evolution of tourist overnight accommodation forms, structures and service levels, policies need to be flexible enough to work across all forms and yet maintain the essence of the policy objective. Well suited to its location may also consider the market conditions ; whether it is responding to a gap in provision, market failure or purely opportunistic. As a general note we would encourage the adoption of data-based analysis of the current provision within the national park to allow informed weighting to be given to forms of accommodation that are in demand and those that are over supplied. In guidance first established by The Good Practice Guide on Planning for Tourism (2006), it is stated that local planning authorities should maintain a dialogue with representatives of the tourism industry, using their knowledge to support data on tourist trends and habits in the

				area when considering planning applications. Key trends in rural settings ; from remote countryside locations to sites outside settlement boundaries and additions to existing attractions, facilities and other rural infrastructure ; reï¬ect the growing market interest in countryside escapes, eco-friendly holidays, experiential breaks, health and wellness and renewed interest in the outdoors, leading to: The development of different resort offerings that provide a choice of accommodation alongside on-site eating and drinking options, leisure activities and guest experiences. Continuing investment in luxury spas and other wellness facilities and experiences. The development of contemporary, relaxed lifestyle accommodation offers. Emerging new zero carbon eco-accommodation offers. The opening of luxury and boutique country house hotels. The emergence of deconstructed hotels with guest bedrooms/units spread across an estate, supported by a central restaurant, bar, spa and leisure complex. The development of hotels and/or golf lodges on golf courses. Outdoor activity centres adding accommodation e.g., fishing lakes adding fishing lodges, water sports centres adding holiday lodges, touring caravan and camping sites and/or hotel accommodation. The continuing development of boutique inn and pub accommodation in rural villages. The development of wedding resorts with on-site accommodation, indoor and outdoor ceremony spaces and function facilities. Continued interest in the conversion of redundant farm buildings to self-catering holiday accommodation. The continuing development of holiday lodge parks, in many cases with central restaurant and leisure facilities. The development of eco lodge parks with zero-carbon, off-grid accommodation units. The emergence of lifestyle resorts as a product, offering relaxed, contemporary guest accommodation, on-site dining options, spa and leisure facilities, and a

				choice of on-site guest experiences e.g., yoga classes, craft workshops, bushcraft courses, cookery classes, art classes. The upgrading of touring caravan and camping sites. The development of motorhome Aires on existing car parks and attached to pubs, attractions and other facilities. The continuing growth of glamping. The emergence of glamping resorts offering a choice of glamping units and on-site guest experiences. Increasing numbers of treehouses. The development of further spa and wellness retreats. The response largely focusses on accommodation and does not offer comment on those objectives that do not relate to accommodation. The points raised are useful feedback in the development of policies related to visitor accommodation. However it is important to note that policy must take account of the balance between our two statutory purposes.
S-170-6	1369472	Historic England	6.1	The respondent stated that they were unsure, requesting that heritage tourism be included in the spatial objectives. The suggestion will be considered as the plan is developed.

S-168-4	1369470	Railfuture	6.1	The respondent agrees with the spatial objectives, but clarifies that they do not support any policy "that would prevent futurereinstatement for rail use of the present Monsal and Longdendale Trails." They do however state that reinstatement must be accompanied by the "reprovisioning of the recreational trails in waysthat allow continued leisure access."
S-167-2	1369469	Hotel Solutions	6.1	
S-165-22	1369466	Taddington and Priestcliffe Parish Council	6.1	The respondent doesn't agree with the spatial objectives. The reasons given are: - First bullet point needs redrafting for clarity as it is not clear about the difference between recreation and tourism facilities. There is nothing about the impact of tourism on nature or on local communities, and focussing (for example) on sustainable travel will not materially affect the problems of parking or public nuisance that clearly arise across the National Park damaging landscape and community life. The second two bullet points are in conflict because support for temporary overnight accommodation could happen in non-traditional buildings. To restrict visitor accommodationto heritage assets does not make sense. The overall approach to visitor accommodation should be to encourage it in a way that reduces pressure on housing for local communities, and provide it where it does not harm the landscape or the built environment. Making use of non-heritage assets can achieve considerable enhancement. Vacant buildings, with no realistic use unless they are deemed to be heritage assets, cannot be justified. More attention is needed to maintaining rights of way. The points raised will be considered as the Plan is developed further. Whilst the Plan can seek to ensure the continuation of rights of way, responsibility for maintenance lies outside it's scope.

S-163-19	1368617		6.1	The respondent agrees with the proposed spatial objectives, but added: - Where traditional buildings are to be used for other purposes, this needs to be in line with guidance on conversion (future Design Code) and this should be explicit. There is increasing pressure on our designed landscapes from ever expanding car parking ; I think we need a policy position on this. The respondent raises valid points, which will be picked up as the Plan progresses. The car parking one is linked to existing visitor parking policy and proposed Recreation Attraction / Hub policy.
S-162-12	1369460	High Peak Borough Council	6.1	The respondent gave no specific reply to the question, but did state under 'reason for answer': - The Council suggests that it would be appropriate to mention nutrient neutrality within bullet 3 as this is linked to overnight stays and these stays could have an adverse impact on the Peak District Dales Special Area of Conservation (SAC) which would require mitigation measures if the accommodation (including campsites) falls within the catchment area. The respondent raises a valid point that will be addressed in the development of the Plan. The response is recorded as 'No specific reply'.
S-161-19	1369459	CPRE Peak District and South Yorkshire	6.1	The respondent does not agree with the spatial objectives, but focuses on what is missing rather than what is included - their reason for their answer is: - Strategic green routes should be identified and promoted by the Local Plan for walking and cycling into and within the park, and for increasing opportunities for local people to access local amenities and longer distance commuting e.g. on an e-bike. An objective to this effect should be added to the spatial objectives. Work with surrounding local and mayoral authorities should be carried out to this end. This work is ongoing as the National Park Authority develops its Local Cycling, Walking & Wheeling Infrastructure Plan. An appropriate amendment to the current policy might be appropriate in support of the delivery work, but to an extent it is covered by Policy DMT5 Part D, which states - The development of new routes for walking, cycling and horse riding including multi-user trails will be

				supported, provided that they conserve and enhance the valued characteristics of the area - this is also subject to some specific criteria.
S-159-7	1369454	Staffordshire County Council	6.1	The respondent is unsure if they support the spatial objectives - under reason for answer they refer to an ongoing visitor accommodation study for Staffordshire. They state: - The study should help understand the nature of demand, where the market is going, and gaps in provision as perceived by the tourism industry. We would therefore welcome an on-going dialogue with you as the Plan progresses. The suggestion is that the accommodation part of the objectives is the primary reason for the response.
S-158-13	1369452	Trans Pennine Trail and Sustrans Joint Response	6.1	The respondent agrees with the proposed spatial objectives. The reason given is: - This is also applicable to the Trans Pennine Trail and National Cycle Network within the Park. This should also include accessibility throughout. It is essential that multi-user trails and other rights of way network are given the appropriate funding for maintenance to ensure they remain fit for use at all times ; this also encourages the priority for active travel to be the first choice. The respondent makes good points, however the funding of maintenance lies largely outside of the scope of this Plan. The developing Peak District Local Cycling and Walking Infrastructure Plan equivalent, should be able to help with improving accessibility; along with the 'Miles without stiles' programme.

S-157-15	1369450	Holme Valley Parish Council	6.1	The respondent agrees with the proposed spatial objectives. Under reason for answer they added: - We agree that the National Park should be open for all to enjoy but perhaps with more emphasis on sustainability, respect for both the environment and the residents and mitigation measures for the impacts.
S-154-17	1369442		6.1	The respondent doesn't agree with the spatial objectives, but only provide comment on one - To safeguard the multi-user recreational trails, and to expand this network. They were concerned that expansion shouldn't result in new or expanded car parks. They added that this section of the Plan should refer to environmental impact assessment. The respondent raises a valid point - the intent behind the expansion of the Trail network would be to better connect to settlements within the National Park and urban centres outside; enabling more car-free journeys. Where development has the potential to have an environmental impact, EIA regulations will be followed and screening undertaken.
S-153-20	1369437		6.1	The respondent is unsure, citing a lack of clarity over visitor numbers (estimates of between 13 million and 26 million as stated). They add: - The danger is that the elements of a Theme Park become the norm. Protecting the current trails is already difficult enough, reductions in funding will continue to impact the ability to maintain current levels. Implementing a policy that invites additional more visitors to an area that at times is at saturation point will destroy the very landscapes the NPark is in place to protect. Is it 13 million or 26 million? The visitor numbers are based on 13 million visitors who stay for more than 3 hours and an approximately equal number who stay for less than 3 hours. Ongoing visitor surveys will provide clarity.

S-152-4	1369434		6.1	The respondent gave no specific reply, instead under reason for answer they made the following points about wild camping: - The suggestion to permit wild camping should be rejected. I have direct experience of the problems caused by wild camping in Scotland close to Glasgow. As it is groups of people wild camp unofficially in the Peak Park in the summer, leaving fires smouldering, tents and beer cans in the wooded areas. Wild camping does not form part of this consultation, the response will be recorded as ' No specific reply '.
S-151-20	1369433		6.1	The respondent agrees with the spatial objectives.
S-150-23	1369431		6.1	The respondent doesn't agree with the proposed objectives. The reasons given are: - overtourism is damaging the Peak Park, and negatively impacting the lives of those living there, human or animal. It is just too busy now and paths trackways are worn out. Wildlife constantly disturbed, roads blighted by tourist traffic and parking. A different path for the local economy MUST be found. Recreation facilities are poor for anything other than walking and climbing. Even cycling is poorly addressed.
S-145-4	1369422		6.1	The respondent did not give a specific reply to the question, but did provide a request for better public toilet provision, both in villages and in the open countryside. This point falls outside of the specific scope of the question, but is relevant to the proposed Recreation Hubs policy.
S-142-5	1369419		6.1	The respondent didn't provide a specific answer. Under reason for answer they indicate that they support the following: - Agree with directing any development towards visitor hubs with a focus on sustainable travel. Supporting work maintaining rights of way is welcome. Safeguarding the multi-user trails and especially expanding this network is essential.

				The response will be recorded as support for the individual objectives..
S-141-1	1369412	Hope and Derwent Woodlands Parish Council	6.1	The respondent does not agree with the spatial objectives, focussing on the 'To direct recreation development towards settlements and certain existing recreation attractions and hubs'. Under reason for answer, the respondent directs us to the response to the Recreation Hubs question - Q24. It is unclear whether the respondent supports any of the other objectives.
S-137-3	1369370	Derbyshire ALC	6.1	The respondent agrees with the proposed objectives. Reason Where change of use from farming use to tourist use is to be permitted, it will be necessary to be satisfied that the need for the building to be used for farming purposes has gone away completely and will not return (or there is a risk of new farm buildings being scattered around the landscape). On the other hand, some farm buildings may well not be suitable for modern farming use. The two issues should be considered together. Temporary overnight tourist accommodation should be permitted, but will need some control. Increased tourism needs some consideration of rights of way. Multi-user trails are beneficial, but can also cause issues between different users.

S-136-38	1369368		6.1	The respondent doesn't agree with the proposed spatial objectives. Agree with much of it The focus primarily on farmsteads is counter-productive, particularly in the light of our policies on climate change. Many farmsteads are away from settlements and development of tourist accommodation near to other infrastructure may be more effective. We should have a call for sites for hotel accommodation in acceptable locations.
S-128-19	1369275	Rural Action Derbyshire	6.1	The respondent agrees with the proposed spatial objectives. There needs to be a greater understanding of the impact on local residents of rising numbers of visitors and the Destination Management Plan needs to provide a focus for sustainable tourism within the park. Increasing the number of temporary overnight accommodation and barn conversions into B&B without incentivising green travel will increase pollution and congestion, losing the very nature of the park and creating pressure on "honeypot" destinations.
S-120-10	1368991	Marsh Farm Development Co Ltd	6.1	The respondent agrees with the proposed spatial objectives
S-118-12	1369267	Haddon Estate	6.1	The respondent agrees with the spatial objectives Reason Reference should also be made to supporting the development of associated infrastructure to enable sustainable tourism. This includes the provision of EV charging points in suitable locations given the likely growth in electric car usage. The point is valid and will be considered as the Plan is developed.

S-113-22	1369153	Edale Parish Council	6.1	The respondent agrees with the proposed spatial objectives Reason Yes, to an extent. There is nothing wrong with the principles. But they will be hard to implement in a way which supports other parts of this plan eg for biodiversity, climate change and thriving and sustainable communities. Those of us living in the hubs ; Edale is a good example ; are adversely affected by visitors (as mentioned in Issue 24). Problems with visitor behaviour include: Congestion; cars parked outside the car parks provided, including on wildflower-rich verges.; litter; wild camping and wildfires; unruly dogs; not keeping to designated paths (which affects farmers land, livestock and biodiversity).
S-104-7	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	6.1	The respondent doesn't agree with the proposed spatial objectives. Reason This needs redrafting for clarity as it is not clear about the difference between recreation and tourism facilities and why recreation development for visitors have only to be in settlements, hubs etc. There is nothing about the impact of tourism on nature or on local communities, and focussing (for example) on sustainable travel will not materially affect the problems of parking or public nuisance that arise across the National Park damaging landscape and community life. There is conflict in these proposals as support for temporary overnight accommodation could happen in non-traditional buildings. It is not clear whether the the change of use is one of limitation, ie only heritage assets, but to restrict visitor accommodation to heritage assets does not make sense. The overall approach to visitor accommodation should be to encourage it in a way that reduces pressure on housing for local communities through second homes, and provide it where it does not harm the landscape or the built environment. Making use of non-heritage assets, when allowed, has worked well, and can, as has been demonstrated on some projects already, achieve considerable enhancement. Vacant buildings, with no realistic use unless they are deemed to be heritage

				assets, cannot be justified and will do nothing to meet National Park purposes. The points raised will be taken into account as the Plan is developed.
S-101-4	1369010	Business Peak District	6.1	The respondent is unsure. Reason I will defer to colleagues at Visit Peak District and Derbyshire to input their thoughts in respect of tourism and the visitor economy, suffice to say that it may have been worth including an explicit reference to the need to work collaboratively with the Local Visitor Economy Partnership (LVEP) and the East Midlands Combined County Authority (EMCCA). Indeed, the Local Plan could usefully make some reference to the priorities set out in the announcement made following a meeting of the EMCCA Board on November 4th. Reference could have been made to a commitment to engaging with local communities in support of their recreational needs. This could have referenced the health dividends of recreational activities, including the benefits of nature connectedness , an area of specialist research focus at

				theUniversity of Derby. The points raised will be taken into account as the Plan is developed.
S-98-46	1368689	Greater Manchester and High Peak Area of the Ramblers	6.1	The respondent agrees with the proposed spatial objectives. Reason Walking in nature is a key component of the statutory purpose of the Park Authority, we therefore strongly endorse inclusion of a specific objective; To support work that maintains and enhances the rights of way network. There should be a presumption that landowners and other responsible authorities will be enabled by the plan to undertake necessary work to maintain the network of footpaths and rights of way to ensure that public access is protected and that harmful habitat erosion resulting from neglect is reversed. Subject to the overriding test that there be no or minimal detrimental impacts on long open views and on the quiet enjoyment of the landscape. Flowing from our own recent strategic thinking we would also support policy to create opportunities for young people and those from under-served communities to connect with and enjoy the National Park. This should include safe and attractive walking routes direct from peripheral towns and villages but also from public transport hubs to enable independent young people, especially those of limited means, to access the National Park on foot.

S-86-13	1368682	The National Trust	6.1	The respondent agrees with the proposed objectives. Reason As a key recreation stakeholder in Peak District the National Trust welcomes discussion of the relevant challenges and potentially progressive methods of mitigating impacts. The principle of identifying recreation attractions and hubs is welcome alongside the wider objectives discussed. At this stage we note that this emerging policy area will require some flexibility. This is to allow for potential adaption in demand and impacts where, for example, new or enhanced infrastructure is required at smaller locations. As such those sites outlined in Appendix 3 will need to be given careful consideration and the relative status of the different site types (e.g. sites attracting large numbers of visitors and sites that are popular with visitors) clarified. A clear methodology and the related policy implications are required. The National Trust would be willing partners in helping to shape this policy area with the PDNPA and wider stakeholders. The feedback provided is useful and will be taken into account as the Plan is developed.
S-81-1	1368658		6.1	The respondent is unsure Reason Visitor numbers - At all times of year visitor numbers in the Peak District can be too large. Roads get clogged up, car parks full and illegal parking becomes common. People camp or stay in campervans on roads or the sides of roads leading to inappropriate disposal of waste, including human waste. Villages become full of visitors and incidents of anti-social behaviour increase. Ironically, if the Peak District is to continue to be an attractive place to visit something needs to be done to reduce the number of visitors at peak times.

S-73-9	1368375	Bradwell Community Land Trust	6.1	The respondent agrees with the proposed spatial objectives Reason National parks inevitably and rightly attract visitors, including for overnight stays. This demand should be provided for (and managed) to support the purposes of the national park and the local economy. The difficult issue is how to achieve this without undermining viable communities through the excessive loss of housing stock to tourist accommodation and second homes. Planning controls are fairly limited here but it makes sense to support the provision of tourist accommodation which does not further erode the stock of in-village housing. The proposed spatial objectives do this but they could go further. For example, there may be non-traditional buildings which could be converted to tourist accommodation on farmsteads and in other locations. There is no good reason to prevent this happening by restricting changes of use to traditional buildings. The points raised will be considered as the Plan progresses.
S-71-18	1368373	Tideswell Parish Council	6.1	The respondent agrees with the proposed spatial objectives. Reason re: the objective "support temporary overnight tourist accommodation that is well-suited to its location" - it's unclear how the term "well-suited" is defined. Who defines "well-suited"?

S-70-2	1368372		6.1	The respondent does not agree with the proposed objectives. Reason Inclusion of the multi-user trail and rights of way network spatial objectives under Recreation and Tourism is supported (with suggested wording amendments) The available information and use of language in the two consultation documents suggests that the primary purposes of the multi-user trails and rights of way network are recreation and tourism: There is a corresponding pair of spatial objectives under Travel and Transport. The two multi-user trail objectives appear to share the same aim but are expressed with different wording, and the same for the two rights of way network objectives. I cannot discern any reason for the different wording in each pair, and propose that the wording is combined. Summary of what I would like to see: 1. Combine the wording of the following pair of objectives: From Travel and Transport:- To safeguard and extend the existing strategic multi-user trails.; From Recreation and Tourism:- To safeguard the multi-user recreational trails, and to expand this network. Using the following suggested wording (intended to clearly differentiate this objective from the objective and policy to safeguard the routes used by two particular multi-user trails for railway re-instatement) To protect the multi-user recreational trails for their own purposes, and to expand this network. as the multi-user trail spatial objective for Recreation and Tourism. 2. Combine the wording of the following pair of objectives: From Travel and Transport:- To protect existing, and create new routes for walking, cycling, wheeling and horse-riding.; From Recreation and Tourism:- To support work that maintains and enhances the rights of way network. Using the following suggested wording - To support the maintenance of and protect the rights of way network for walking, cycling, wheeling and horse riding, and to create new routes. as the rights of way network spatial objective for Recreation and Tourism. The respondents comments will be considered as the Plan is developed.

S-69-37	1368325	Derbyshire Dales District Council	6.1	The respondent agrees with the proposed spatial objectives. Reason Fine as a statement of principle change of use of buildings for tourist accommodation needs to be very carefully balanced with permanent housing needs. Some barn conversions are perfectly suitable as permanent homes or long term residential tenancies. While existing homes are rapidly leaking away into the tourist/second home sphere, let's not create an expectation that barn conversions will also be permitted for tourism above permanent residential. The points raised will be considered as the Plan is developed.
S-68-44	1368264	Bakewell Resident	6.1	The respondent doesn't agree with the proposed objectives The provision of a sustainable transport networks, that enables me and my family to travel out of the peak district park by more sustainable methods than private car use and get back into Bakewell on a Saturday, Sunday or Monday without having to queue for an hour is more important to me than preserving the Monsal Trail for recreational use. I would like the Park to do more to support sustainable transport and provide more suitable multi user recreational trails which connect communities like Ashford, Bakewell, Rowsley, and Edensor. I would like provision for biking and walking separately as the Monsal Trail is not fit for purpose because it is just too busy to have walkers and cyclist sharing the same route. The National Park Authority is currently preparing a National Park equivalent of a Local Cycling & Walking Infrastructure Plan. This will initially focus on a Strategic Network of routes, but the process will include consultation enabling respondents to identify the secondary network. It is worth noting that many respondents value the Monsal Trail as a route or walking, cycling and horse riding.

S-65-4	1368271	Individual	6.1	The respondent agrees with the proposed objectives
S-62-16	1368170		6.1	The respondent agrees with the proposed spatial objectives
S-59-28	1368081	SMDC	6.1	The respondent agrees with the proposed spatial objectives. Reason Its critical that recreation and tourism are well managed
S-57-10	1368149	Great Longstone Parish Council	6.1	The respondent is unsure Reason Recreation and Tourism, the meeting was supportive of this high level proposal to direct recreation development to existing recreation attractions and address specific issues around improved facilities, such as parking and amenities. However, some specifics within this question that were not universally supported.
S-51-6	1368085		6.1	The respondent agrees with the proposed spatial objectives Reason It plays to the Peak Districts strengths a lot of visitors come to hike and to cycle, and to otherwise be 'active'. This increases the health of the population, increases appreciation of nature and the tourism brings money into the area. Building on this strength by safeguarding 'rail-trails', by linking up trails and rights of way to work for a wider variety of users and linking them to more places will protect and enhance these activities while providing reassurance for local businesses dependant upon them. Allowing some traditional buildings on farmsteads to be used for overnight accommodation will help farmers diversify their income, which is sorely needed.

S-50-8	1367561	Peak Park Parishes Forum	6.1	The respondent doesn't agree with the proposed spatial objectives. Reason We do not support recreation hubs, as development of adequate infrastructure to cope is, realistically, unlikely to happen. Spreading tourists more thinly over a broader area seems more practical. We contend that "use of traditional buildings for visitor accommodation" should instead read "use for visitor accommodation of any building unsuitable for permanent residential occupancy". This change will maximise the amount of permanent homes available. We are slightly puzzled by the use of the terms "recreation and tourism" without it being made clear what PDNPA regards as the difference between the two.
S-44-52	1367865	Eyam Parish Council	6.1	The respondent doesn't agree with the spatial objectives. Reason Do not support recreation hubs Buildings suitable for homes should be used for homes and not for tourism
S-43-15	1367843	Natural England	6.1	The respondent agrees with the proposed spatial objectives Reason We particularly welcome the enhancement of Public Rights of Way and multiuser trails that that can increase access to nature and enjoyment of the countryside.
S-42-28	1367805		6.1	The respondent agrees with the proposed spatial objectives. Reason The needs of visitors at recreation hubs must be fully catered for otherwise impact is felt through residential settlements that can be to the detriment of life within the settlement. Having specific objectives to contain the visitors in hubs will minimise impact on village life. Effective transport policies will assist reducing impact, the current service through the area I live in is currently inadequate

S-40-25	1367788		6.1	The respondent agrees with the proposed spatial objectives Reason I suggest that Policy should be widened to enable a mechanism whereby existing adverse impacts, notably traffic generation and car parking are assessed with accompanying provision for studies to be undertaken to inform suitable mitigation measures.
S-32-6	1367524	Bamford with Thornhill Parish Council	6.1	The respondent doesn't agree with the proposed spatial objectives. Reason We should be encouraging tourists to visit all parts of the Park (there are many places which they rarely seem to reach at present) in order to spread the burdens of tourism more thinly across the whole Park and thus not overburden specific locations. Concentrating visitors into hubs is not the way to go, given (a) the adverse effects on residents there and (b) the unlikelihood that sufficient infrastructure will ever be created in those hubs to cope satisfactorily.
S-30-19	1367447	Country Landowners Association	6.1	The respondent supports the proposed spatial objectives Reason We support the delivery of recreational and tourism spaces, especially on farms. Where the policy supports both local farms and the objective of enjoying the park.

S-26-2	1367244	Great Longstone Parish Council	6.1	The respondent didn't provide a specific response to the question. Reason More apart - hotels and specific holiday let accommodation should be encouraged such as the Rock Mill site in Stoney Middleton and The Bike and Boot accommodation in Bamford. It was incredulous to me that the proposal to build a 13 apartment self catering apart-hotel on Deepdale Business park in Bakewell wasturned down. There is already residential accommodation on this site and directlyopposite Thornbridge Tap which is essentially a hospitality venue operates out of Riverside Business park so precedent for mixed use exists on business parks and Deepdale Business Park is the perfect location for this type of development . It is unclear from the above whether the respondent supports or not any or all of the proposed spatial objectives - the response is recorded as 'No specific reply'.
S-13-19	1364893		6.1	The respondent doesn't agree with the proposed spatial objectives Reason Existing planning rules allow for the developments suggested in the plan. Not sure what is gained by designating some areas as recreational hubs. Would worry that these areas become 'anything' goes areas as they are developing at present. The recreational hotspots are located in areas of important natural landscape and cultural heritage. They need more protection and education and management of visitor flows and numbers. It is unclear if all of the objectives are objected to or specifically the one related to recreation attractions and recreation hubs.

S-10-1	1364790		6.1	The respondent agrees with the spatial objectives. Reason I would like to see the Monsal Trail which is loved by residents and visitors alike safeguarded from future rail use. They are not recreational trails, the Monsal Trail in particular is used by local people for short everyday journeys to the shops, employment and other services. If the network can be expanded it will provide more opportunities for people to choose walking and cycling options in place of car journeys.
S-9-54	1364715		6.1	The respondent agrees with the proposed spatial objectives.
S-7-45	1364251		6.1	The respondent agrees with the proposed spatial objectives.
S-6-3	1364014		6.1	The respondent is unsure Reason Not sure if it comes here but more needs to be done to reduce waste - see e.g. what Exmoor National Park to be Plastic Free as part of Surfers against Sewage - Castleton seems to be the only community in the Park looking at this The comments are valid, but do fall outside of the scope of this Plan.

Q6.2 Do you think that the new Local Plan should define Recreation Attractions and Recreation Hubs on a map and develop specific planning policies for these areas?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-15	1369634	Sheffield City Council	6.2	The respondent supports defining Recreation Hubs and attractions on a map and developing specific planning policies. The respondent has no objection to the list of sites, but does not believe that recreational development should be limited to those sites. There may be new recreational sites over time, but the principles within the Rec Hubs policy would apply. The respondents suggest that a distinction might be made between recreation within and without the Natural Zone and / or the SPA/SAC; including types of recreation to reduce pressure on the most ecologically sensitive sites. The suggestion above is one for consideration, as the plan is developed.

S-223-24	1369632	Hartington Town Quarter Parish Council	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reasons a) No unless you have a planning policy to mitigate visitor numbers in many of these locations. b) We cannot see how a map will change anything. If it is for planners use only, so be it, but any publication is likely to simply draw more people to the area designated. Social media has transformed tourist and visitor patterns (see the post covid numbers at Dovedale and Thors Cave). c) This is just a list. What does it achieve? And why exclude settlements which often have the highest volume of visitors, completely disrupting the local community. There are no measures on the list. For example, Hartington car parks are not shown on the list whereas Hartington Station is included. Hartington village centre is often swamped with cars and coaches whereas the Station Car Park is lightly used. This clearly substantiates that many visitors are here for the retail/cafe; facilities, with the landscape best viewed through a coach or car window! The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. Settlements such as Hartington are not included on the list because the existing policy is already geared towards dealing with applications within or on the edge of settlements.

S-222-15	1369631	TPT & Sustrans	6.2	The respondent does think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. They believe that this approach could then attract funding in own right and be protected. The proposed approach seeks to provide a level of certainty for possible recreational development; especially in areas outside of settlements.
S-221-23	1369595		6.2	The respondent does think that new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason Because current policies aren't working. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-214-24	1369550	Hope with Aston Parish Council	6.2	The respondent opposes defining Recreation Hubs on a map and writing specific planning policies. The respondent is concerned that the suggested approach will increase recreation impact. They also suggest defining 'hubs' as 'pressure points'. Rather than naming Recreation hubs and attractions, the respondent favours an approach focussing on dispersal. The points in favour and those opposed to the defining of Recreation Hubs will be considered over the development of the Plan.

S-210-21	1369546		6.2	The respondent does not think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The reason given is that as well as definitions in local plans accompanying documents need to outline how such places are managed and what resources are identified to do this and in the current economic climate this seems unrealistic. Without complementary documents any identification of recreation hubs may result in development without resources to ;manage ; visitors. The points raised are valid, however, the principle behind the suggested approach is not a visitor management one. It is based on providing clearer guidance to owners of recreation hub sites on which sites might be suitable for development for visitors in areas where the presumption is that development will not normally take place.

S-207-20	1369542	Youlgrave Community Land Trust.	6.2	The respondent did not provide a specific answer to the question, but did say: - Get visitors to leave their cars at a visitor / transport hub for dispersal via minibuses or taxis. These sites would be identified on a map, sites with current random problematic parking should be considered. The response indicates some level of support for identifying and mapping hubs. This would be a new policy area, but based on previous work on a Recreation Hubs Supplementary Planning Document. The response will be recorded as 'Yes' in favour of new policy.
S-200-20	1369531	Stanton in Peak Parish Council	6.2	The respondent believes that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The respondent added that should also be backed by detailed descriptions of what facilities are available, it should also be accompanied by some guidelines for visitors (on behaviour). This approach builds on previous work aimed at developing a Recreation Hubs Supplementary Planning Document.

S-195-17	1369526	Derbyshire County Council	6.2	The respondent supports defining Recreation Hubs and attractions on maps and developing specific policies. The respondent references the County Council's mobility hub implementation plan and possible synergies between the two workstreams. One of the key issues of recreational access is transport and the reliance on the private car. The mobility hub plan may help to address this in some locations.
S-194-24	1369525	Derbyshire Dales District Council	6.2	The respondent is unsure. They state that Recreation Attractions and Hubs should only be defined on a Policy Map if they are likely to be deliverable during the defined plan period. If there are no definitive proposals likely to come forward during the plan period then criteria that would support their development should be set in the policies in the event that they do come forward. It is anticipated that policy related to Recreation Hubs will be brought forward, dependent on the results of this consultation.
S-193-16	1369524	Winster Parish Council	6.2	The respondent did not give any specific reply to this question, but provided text stating 'Not sure it is necessary'. The answer will be recorded as 'unsure'

S-186-11	1369505		6.2	The respondent does not think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The reason given is that: - Listing sites with large car parks as recreation hubs will draw increasing numbers of visitors to them and increase pressure for yet more parking. Despite good intentions, the proposed objective for recreation and tourism would lead to intensification of development at these locations. Sustainable travel measures according to the sustainable travel hierarchy should be implemented at all recreation hubs and major attractions. The respondent is also opposed to Fairholmes being identified as a Recreation Hub. Instead the respondent favours: - A holistic approach towards managing visitor travel within the whole of the Upper Derwent, including from Bamford (railway station and bus stops, and Heatherdene), should be taken in order to reduce existing car traffic and its impacts. The measures should include traffic management schemes, integration of all modes (e.g. a mini-travel hub at Bamford station), innovative mobility schemes, travel plans and assessing the environmental capacity of the Upper Derwent. With 2 million visitors a year the area would be suitable as a & smarter travel National Park ; pilot to test new types of on-demand app-based shared services and the use of travel demand management measures, as proposed by Campaign for National Parks (National Parks for All ; Making car free travel easier, 2018). Severn Trent Water as a sponsor, and the PDNPA as the lead authority, in the PDNP Management Plan should be considering and implementing/ supporting all of these. Local Plan policy should reinforce this. The respondent's suggestions touch on wider user management work currently being undertaken by the Authority. The comments provided will be considered as this area of the Plan is developed.

S-185-23	1369502	Devonshire Group	6.2	The respondent did not specifically reply to the question, but does state that it could be beneficial in identifying such features, if then linked to effective policies. The respondent goes on to state that not all sites would require specific policies; stating that Chatsworth would be dealt with under the 'Chatsworth Whole Estate Plan'. The respondent identified Chatsworth House as a Recreation Attraction. The respondent raises valid points and the role of Estate Plans in replacing any Recreation Hubs policy is an important consideration. On the basis of the text provided, the respondent appears to support defining recreation attractions and hubs if accompanied by appropriate policy - the response is recorded as 'Yes'.

S-180-4	1369496	Castleton Parish Council	6.2	The respondent is unsure, the reasons being: - Concern about whether policies would be more restrictive or relaxed. Concern that villages would no longer be thriving communities, instead catering for visitors. Castleton is a Recreation Hub / Attraction The initial work on Recreation Hubs focussed on those areas away from communities, as these are areas not already covered by existing policy. This focus was aimed at ensuring that landowners / developers had some certainty as to what might or might not constitute acceptable / appropriate development for recreational visits. Under that approach Castleton Village would be covered under a separate policy. However, the area around Mam Tor and Mam Nick would be considered a Recreation Hub.

S-167-3	1369469	Hotel Solutions	6.2	The respondent did not give a specific reply to the question. Unders 'reasons for answer they said: - The focus on recreation attractions and hubs as well as settlements could be a positive A wider policy that sees the value in piggy-backing visitor accommodation development onto existing attractions and facilities, large and small, could help increase the supply of visitor accommodation whilst utilising existing access and services and helping underpin the longer term viability of an attraction, pub, wedding venue, or even generate income for a local Council on its car parks (motorhome aires) and country parks (aires, camping, pods). The proposed policy aims to ensure that appropriate facilities for recreational access are provide at sites that would currently fall outside of existing policy. It is possible that in some locations, overnight accommodation might form part of that offer, but this is likely to be in exceptional circumstances and of an appropriate scale. The response is recorded as 'No specific reply'.

S-165-23	1369466	Taddington and Priestcliffe Parish Council	6.2	The respondent did not give a specific reply to the question but stated under 'reasons for answer': - possibly, where they create a very significant and particular issue, e.g. Derwent Valley, but it should be sufficient to have general policies. Consideration should be given to tolls into the more heavily used locations. Under areas / sites for consideration, the respondent suggested villages. At the current time there is no policy that allows for recreational development outside of settlements. This area of policy seeks to address that. Within villages, there is already existing policy that is available to respond to planning applications. The use of tolls for busy areas is outside of the scope of this Plan, and does not lie within the power of the National Park Authority to deliver. The response is recorded as 'Unsure'

S-163-20	1368617		6.2	The respondent does think that new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The reason given is that this is an objective in the NPMP and it clearly an issue that needs to be addressed. Site-specific policies would be an appropriate way to do this, within a holistic understanding of the particular circumstances of each place. The proposed policy aims to ensure that appropriate facilities for recreational access are provide at sites that would currently fall outside of existing policy.
S-158-14	1369452	Trans Pennine Trail and Sustrans Joint Response	6.2	The respondent thinks that new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The reason given is that these areas could then attract funding in their own right and be protected. The proposed policy aims to ensure that appropriate facilities for recreational access are provide at sites that would currently fall outside of existing policy.

S-157-16	1369450	Holme Valley Parish Council	6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Under resaon for answer they also belive that more encourgament should be given to smaller sites to aid dispersal from honeypot sites. During the recent pandemic large numbers overwhelmed the major attractions. Under areas ans sites they suggested that both Torside and Dunford Bridge had fwe facilities other than campsites. The proposed policy aims to ensure that appropriate facilities for recreational access are provide at sites that would currently fall outside of existing policy.

S-156-10	1367563		6.2	The respondents doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. They prefer sticking with current policy, that directs development away from open countryside locations. The respomndent favours minimising development, stating: - Current policy has kept things pleasant up until now, so no need to reinvent things. The proposed policy aims to ensure that appropriate facilities for recreational access are provide at sites that would currently fall outside of existing policy.

S-154-18	1369442		6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The reasons given are: - No re the mapping because that just increases demand. T Traffic congestion and parking are fundamental issues ; exacerbated by social media. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-153-21	1369437		6.2	The respondent thinks that new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. The respondent adds: - existing attractions and hubs should be identified, but that should also be backed by detailed descriptions of what facilities are available, it should also be accompanied by some guidelines for visitors. ie there is very limited parking, please do not park in front of old gates, farm entrances, respect the access needs of residents and potential emergency vehicle access routes. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. The proposed policy is however, a planning policy and not a visitor information tool. Visitor information should be provided by a number of bodies including, principally, the owner / manager of the site.

S-150-24	1369431		6.2	The respondent gave no specific reply to the question, stating under reason for answer - 'I don't think that the thought here is adequate to deal with Over Tourism' The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. The response suggests that the respondent does not think that the new local plan should define 'Recreation Attractions' and 'Recreation Hubs' on a map and develop specific planning policies for those areas. The response is recorded as 'No'

S-142-6	1369419		6.2	The respondent did not give a specific reply, despite their support under the spatial objective. They did raise concern about precedents for car parking, and 'enabling increased/uncapped visitor development (and therefore more mass private car travel)'. They added that they 'could see a benefit if we were talking about linking to these places with new or better bus services or active travel routes'. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. In the case of a desire to expand a car park within a recreation hub, that would still be subject to our Visitor Parking policies and any other appropriate policies. The response is recorded as 'No specific reply'

S-141-2	1369412	Hope and Derwent Woodlands Parish Council	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Under reason for answer, the respondent makes the following points: Despite good intentions, the proposed objective for recreation and tourism would lead to intensification of development at these locations. This will harm National Park purposes and the experience of being in the National Park. In Appendix 3 Fairholmes is listed as a site attracting a large numbers of visitors and Heatherdene is listed as a site popular with visitors. Neither location should become a recreation hub. The Parish s view on new facilities at Fairholmes was tested when Severn Trent Water proposed a new cafe; and toilet on site. The whole community bar one objected to the new cafe,, particularly on grounds of traffic impact, and mounted a strong campaign of objection. At the PDNPA meeting on 8th March 2019 the minutes state ;Members were concerned about the traffic problems, the impacts on the local community, the lack of sustainable transport, whether or not there was a need for a large cafe and the lateness of engagement with the local community by the applicant. ; A decision on the application was deferred and subsequently withdrawn. Furthermore, the PDNPA s own research, undertaken in 2016 (Planning Design and Access Statement para 6.46-6.61) to inform a future Gateways and Hubs SPD, found that 92% of people thought the visitor facilities at Fairholmes were satisfactory and only 22% thought that new/additional cafe;/food/drink facilities were required. The Parish is therefore wholly opposed to Fairholmes being identified as a recreation hub in the way intended in this objective. We recognise it is a location to which people drive in private cars to access the Derwent Valley and Dark Peak Moors for leisure. This is unsustainable as it worsens the climate emergency; undermines public transport use; does not offer a means of access for those who cannot or do not wish to drive a car; creates traffic congestion and impacts negatively on National Park purposes. It does not enhance natural beauty, wildlife or cultural heritage, nor does it increase public understanding of how important the National Park is for the environment and society.

				Fairholmes should be supplied now with high quality public transport that is reliable affordable and frequent, with regular services that go to both Manchester and Sheffield. A shuttle service to the Bamford rail station should be offered for those arriving by train. Walking and cycling facilities between Bamford station and Fairholmes should be improved. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. It should be noted that the response is specifically related to Fairholmes and the Upper Derwent Valley.

S-138-3	1369372		6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Under reason for answer they state: - It's important that these sites have suitable public toilet provision, which is an equalities issue and inconsistent across the park. Toilet provision is very poor in existing sites such as the Goyt Valley. Planning can mandate this in development conditions. This is also an opportunity for planning to enhance connections to rights of way and public transport For locations, the respondent says 'Those attracting significant numbers of visitors.' The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-137-42	1369370	Derbyshire ALC	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason Attractions can change over time (e.g. social media, changed tastes etc. can increase the popularity of an attraction or create an attraction, or have the opposite effect). The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. In most cases, the sites under consideration have acted as recreational destinations for a number of years. However, policy can be reactive to changes in popularity of such sites.

S-136-22	1369368		6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason There should be specific planning policies for these areas to minimise their impacts, particularly around transport. Areas / Sites We should look at sites from a strategic point of view, as there may be opportunities to reduce the impact of visitors by thinking about this holistically. Small existing village sites are unlikely to be the most sustainable locations. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.
S-128-43	1369275	Rural Action Derbyshire	6.2	

S-120-18	1368991	Marsh Farm Development Co Ltd	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason These are in danger of becoming 'theme parks' we should encourage visitors to enjoy all the countryside and not coral them into specific areas. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-113-23	1369153	Edale Parish Council	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason If hubs are defined, they may become even more overwhelmed than they already are. Policies for tourism should be for the Park as a whole ; there may be some areas which become hubs in the future due eg to more publicity on different media. Moreover, there need to be far more resources to ensure that visitors keep to regulations. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. Generally speaking settlements are already covered by existing policy. The suggested approach aims to address a gap in planning policy.

S-110-13	1369133	Middleton and Smerrill Parish Council	6.2	The respondent did not give a specific reply to the question Reason Defining Recreation Attractions and Recreation Hubs on a map and having specific planning policies for these areas would help in managing visitor numbers, facilities and access issues but the prevalence of shared information on social media is still likely to make this difficult. The information provided above implies support for the defining and mapping or recreation attractions and recreation hubs. The response will be recorded as 'Yes'. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-104-47	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	6.2	The respondent doesn't think that new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason The Parish Council considers that policy should favour transport hubs that provide access to the Park and distribute visitors etc. to wider area. These should have excellent transport links from the major catchment areas and then there should be good links to the wider Park. The designation of specific Recreation Hubs will exacerbate the current difficulties by attracting more visitors to these locations rather than encouraging them to spread over the wider Park, thus reducing overcrowding. Where necessary, consideration should be given to providing additional infrastructure to make attractions into transport hubs, but the Parish Council would not be in favour of communities being surrounded by large cap parks, as has happened in some cases in Cornwall. Recreation Hubs / attractions Chatsworth Haddon Hall Castleton village Bakewell Curbar Gap Stanage Dovedale Derwent reservoirs The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-98-21	1368689	Greater Manchester and High Peak Area of the Ramblers	6.2	The respondent is unsure Reason It needs to be clarified in the text that the current policy stance to restrict all inappropriate development in the Natural Zone will remain a key feature of the refreshed Local Plan. There may be value is seeking to identify current pressures and opportunities, however the illustrative list set out in Appendix 3 is unhelpful as it isn't clear what is being proposed for quite diverse areas. However, there may be merit in carefully designating areas, including within the Natural Zone that could benefit from a clear statement that development could be permitted that was consistent with the Park's statutory duty to promote understanding and enjoyment of its special qualities. Whatever the detail of any final set of proposals the test must always be no or minimal detrimental impacts on long open views, on rights of way and on the quiet enjoyment of the landscape. In most instances a specific area management plan would be needed supported by the provisions of the Local Plan. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-86-14	1368682	The National Trust	6.2	The respondent does think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason We welcome recognition of the National Trust as a stakeholder within the context of this policy area. We also note the focus given to sites in the open countryside and the associated need for a positive, balanced planning policy framework. This is to help mitigate visitor impact whilst helping to deliver landscape, community and environmental benefits. As noted above the sites identified in Appendix 3 will require greater clarity from a policy perspective. We would however be supportive in principle of defining recreation attractions and hubs on a map, with relevant supporting policies. A bespoke policy framework, potentially by area and/or site, will allow for greater clarity on appropriate infrastructure and help facilitate a strategic approach to recreation. For example, opening wider conversations around connectivity and sustainable transport access. The risk of not being pro-active in this policy area is the relative loss of ability to respond to changing visitor pressures. In relation to visitor parking issues. We note the continued proposed requirement to demonstrate need for new parking and agree that further clarity is required here to support any change in policy approach. This is with consideration given to the emerging options around recreation attractions and hubs. Given the challenges identified, at this stage, it would seem sensible for the PDNPA to continue to develop further rationale, clarity and evidence around a less restrictive visitor parking policy option. This would help retain the potential for new or enlarged parking facilities but supported by a positive, sustainable framework seeking to achieve local benefit or ;wider environmental benefit ;. Also, allowing for better visitor management, maintaining the safe and efficient

				operation of highways and help with local community relations. As noted above, this should be linked to wider recreation policy areas and help open a wider, mutually supportive, discussion around sustainable travel and access. The National Trust would welcome being a part of future discussions around these policy areas and will comment further based on the evolution of options. Which areas/sites do you consider to be Recreation Hubs and Attractions? From a National Trust perspective, we recognise the inclusion of Ilam, Lyme Park and Longshaw as sites attracting large numbers of visitors ;. However, we consider that reference to ;Ilam Hall ; should be changed to ;Ilam Park ; as this better reflects the management of the site as an outdoor parkland Furthermore, we request that Ilam Park and Dovedale are linked as a single site ;attracting a large number of visitors ;. This relates to the management of the area by the National Trust. Also, reflecting the practical, close physical and visitor links between both Ilam Park and Dovedale. Moving forward, the National Trust are also seeking to further integrate these links. We also consider that the Mam Nick Car Park may warrant inclusion as a &site attracting large numbers of visitors ;. This is reflective of its popularity to access Mam Tor, Great Ridge and wider areas for recreation. Local property counts for 2024 (to date) indicate some 800,000 visitors have walked from the car park onto the nearby summit of Mam Tor. Therefore, making Mam Nick Car Park a significantly visited National Trust site. Furthermore, it is helpful to see wider acknowledgement of car parking facilities in Appendix 3. Those parking areas that are more informal will require pro-active consideration within this emerging policy area. This is partly addressed in the discussion around visitor parking. Recognising, for example, that demand for car parking can outstrip the supply of spaces. This can create pressures on informal parking and as noted by the PDNPA, illegal parking. The National Trust also recognise and support the aspiration to encourage travel by sustainable means. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy.

				The policy would also provide clarity on scale of development, and sites where development would not be appropriate. The points made are noted and will be considered as the Plan is developed. The site names will be amended as requested. </div> </div> </div>

S-73-10	1368375	Bradwell Community Land Trust	6.2	The respondent did not provide a specific answer to the question. Reason This seems a sensible option, particularly if it is possible to ease the current concentration of tourist visits and to spread the benefits more widely, where this would help support local shops, pubs, cafes and hot food outlets in less-touristed locations. It would also be helpful to promote and support the use of public transport to lessen the downsides of vehicle visits. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate. Although the respondent did not give a specific reply to the question, the text provided indicates support for the policy approach. The answer is recorded as 'Yes'.

S-69-4	1368325	Derbyshire Dales District Council	6.2	The respondent thinks that new policy should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason Tourist hotspots need to be thought about and managed, particularly with regard to promoting sustainable public transport. The main problem is car traffic. We have to do better at getting people on to buses, and getting bus operators to provide reliable, joined up and well publicised services. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-68-1	1368264	Bakewell Resident	6.2	The respondent thinks that new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason Mapping out recreation attractions and hubs is the start of developing a sustainable transport network that connects hubs, attractions and neighbouring cities by active travel routes, bus routes and mass transit or rail options to promote opportunities for people to understand and enjoy the peak district and enjoy the benefits in a more sustainable and equitable way. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-67-9	1367857	Over Haddon Parish Council	6.2	<p>The respondent stated that they thought that the new local plan should define ;Recreation Attractions ; and ;Recreation Hub ; on a map</p> <p>Reasons</p> <p>This would help to aim a percentage of visitors directly to a certain location. However, those locations must have adequate facilities and parking. Park and ride facilities should be made available and encouraged as the current infrastructure of public transport is not good and not reliable. The Monsal Trail is one of the National Parks most famous and visited attractions but one of the largest car parks on its route is at Monsal Head where access to the trail is difficult.</p> <p>The idea of a shuttle train from Buxton to Blackwell Mill is a no brainer. Also, a shuttle train from Buxton to the end of the High Peak Trail near Dowlow should be investigated and considered.</p> <p>However, both of these could pose an issue with parking in Buxton where a multi-story car park might be an option.</p> <p>Curbar Gap and Padley Gorge are hotspot hubs with inadequate parking facilities. The car park at Curbar Gap needs to be extended and a new car park installed somehow at Padley Gorge. Perhaps this could be made possible by widening the road into the Longshaw Estate, allowing a continuous string of roadside parking but without impacting on two-way traffic as it is at the moment.</p> <p>The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.</p> <p>Possible named hubs were: -</p> <p>Monsal Trail, Curbar Gap and Padley Gorge</p> <p>The respondent also supplied text that appears to relate to the proposed Spatial Objectives - this will be ascribed to the Spatial Objectives question.</p> <div class="QuestionsetReaderstyled__QuestionContainer-kcl__sc-fyu74k-1 kUjqRm" id="540_351_1714655869593_669318"> </div>

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S-65-10	1368271	Individual	6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason Tourism needs to be planned for The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-62-52	1368170		6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason Support for farm diversification, recognise value of trails, Need new facilities. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-59-30	1368081	SMDC	6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason With the arrival of social media, there are a significant number of areas in the Peak Park that are becoming over run with large visitor numbers. this needs to be recognised and well managed. Chrome Hill is a case in hand. Four years ago, pre Covid, it was hardly visited. Now, the paths around the hill are badly worn and the parking in Hollinsclough is unsightly and damaging to the environment. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.
S-57-11	1368149	Great Longstone Parish Council	6.2	

S-50-50	1367561	Peak Park Parishes Forum	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason We do not support the concept of recreation hubs (though Chatsworth is maybe a rare exception). The only types of hub we consider to be useful are transport hubs. There should be consistent Planning policies across the Park, not location-specific ones. Areas / sites Chatsworth The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-44-48	1367865	Eyam Parish Council	6.2	The respondent does not think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason Recreation hubs are not favoured although Chatsworth may be an exception Areas/sites Chatsworth The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-43-16	1367843	Natural England	6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason This is a sensible approach to the mitigation of recreational disturbance on or close to designated sites so that mitigation measures could be considered to reduce adverse impacts. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-42-35	1367805		6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason minimise impact on village life, improve public toilet facilities Areas / sites Monsal Head Monsal trail access hubs at Hassop Monsal trail access hubs at Great Longstone where parking regularly obstructs roadways and junctions. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-40-26	1367788		6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason putting a red line around an area and designating it a National Park is detrimental in the sense that physically creating and identifying a natural landscape serves only to intensify the negative impacts of tourism. Visitors tend to keep going until they have crossed that magical red line, and only then do they stop and create impact, be it parking, litter, old BBQ s, fires, degradation of the natural landscape etc. Absent the red line the degree of impact would be more dispersed and hence reduced. De facto identifying attraction hubs will serve only to create more potentially impactful and intensive use within an area that is heavily impacted. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

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S-32-21	1367524	Bamford with Thornhill Parish Council	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason We do not agree with concept of encouraging visitors towards hubs Areas / sites None

S-30-20	1367447	Country Landowners Association	6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason Different individuals value the National Park for different reasons. Some wish to visit and stay in remote areas while others desire to be in close proximity to larger settlements like Bakewell, Buxton or Glossop. The policy should be appropriately flexible to respond to quality sustainable applications that contribute to recreation and tourism across the whole area. The authority shouldn't hold an overly firm view that only certain locations are more appropriate or should be earmarked as hubs. Having a good geographical spread of development may reduce travel across the park to visit hubs that are only in a handful of location, leading to increased local pressures at these hubs. The focus should be on the quality of the proposal, taking into account the scale of the development relative to the certain location and not to provide too much weight to the proposals location. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-20-6	1367235	Oldham Council	6.2	The respondent didn't give a specific answer to the question. Reason Oldham Council notes Appendix 3 makes reference to: • Dove Stone in the table listing sites that are popular with visitors ; • Binn Green in the table for car parks and sites popular with visitors for the access that they provide into open countryside ; and • the A635 in the table for Informal parking facilities ;. It may be useful to include column with the local authority / area that the sites / roads fall within. As this is a cross boundary issue, we would welcome continued engagement with all relevant officers from Oldham on the development of any specific planning policies for recreation attractions and hubs that fall within Oldham Council. Whilst planning within the PDNP falls within the responsibility of the PDNPA this type of policy may also have implications for other services within Oldham Council, such as parking and highways. It will therefore be important to ensure all relevant services are engaged. The response doesn't indicate either support or not for either option. The response is recorded as 'No specific reply'.

S-13-30	1364893		6.2	The respondent doesn't think that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason If the overall plans protect all the landscape, and cultural heritage, and promote education and understanding by visitors, there's no need to designate a different type of area with different planning rules. The only reason for doing so would be to encourage development that is not in keeping with the existing rules. Areas / sites The consultation document has identified recreational hotspots, but visitors should be discouraged from only going to these places The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-9-46	1364715		6.2	The respondent is unsure Reason There are definite honeypots, but other previously quiet locations have recently become so due to Instagram/Facebook. Wetton is now plagued with car parking issues due to people wanting to visit Thor s Cave and previously quiet places are now busy. Most visitors do not walk far from their cars. I ;m not sure Wetton merits a special policy whereas Castleton and Bakewell do. Areas / sites Castleton, Hope, Edale, Hathersage, Bakewell, Monyash (motorbikes!!!), Chatsworth, Haddon Hall, Hartington, Ashford, Monsal Head The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-8-3	1364695	-	6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas. Reason Whilst I can see the dangers of identifying hubs, I can also see the dangers of not having policies to deal with such sites. Areas such as the Upper Derwent and Stanage need policies to protect and enhance them. Can planning conditions be used to ensure appropriate staffing levels are included for these areas - whether this is by the NPA, or another provider such as the National Trust or others? In my experience, the presence of Rangers or Wardens is a crucial aspect of enhancing the visitor experience whilst protecting the environment. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

S-7-25	1364251		6.2	The respondent thinks that the new local plan should define 'Recreation Hubs' and 'Recreation Attractions' on a map and develop specific planning policies for those areas Reason Good opportunity to develop an holistic plan to address the social and environmental impact of increasing visitor numbers. The proposed policy aims to ensure that appropriate facilities for recreational access are provided at sites that would currently fall outside of existing policy. The policy would also provide clarity on scale of development, and sites where development would not be appropriate.

6.3 Do you think we should apply for an article 4 direction to remove permitted development rights for temporary camping and caravan sites?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-226-3	1369530	Environment Agency	6.3	Respondent provide text stating that for Q25 (temp camps), Q26 (camp/ caravan sites), Q27 (static caravans) No preference on options. However, the respondent further stated that for all three topics: - Concerns of such developments and appropriate foul sewage disposal facilities overloading and problematic flow fluctuations of new/existing septic tanks and package treatment plants. We would look to this Plan having consideration to our groundwater position statements in ;The Environment Agency approach to groundwater protection, available from gov.uk. This publication sets out our position for a wide range of activities and developments, including discharge of liquid effluents to ground. This is a valid point and will be taken into account as the Plan is developed.
S-225-1	1370310	Fawfieldhead Parish Council	6.3	The respondent thinks that we should apply for an article 4 direction. The respondent believes that permitted development rights should be removed entirely. The respondent favours removing permitted development rights across the whole of the National Park. Problems have arisen at Fawfieldhead Parish and Hulme End, causing problems for local residents, but the nature of the problems was not specified. The responses to this question will be taken into account as the Plan is developed and the possibility of seeking an Article 4 direction assessed.

S-223-25	1369632	Hartington Town Quarter Parish Council	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Permitted development right should be removed entirely What area Throughout the National Park. What problems Many have very basic facilities. Many of these have They change the visual nature of the landscape. They impact on the businesses who have gone through the cost of planning permission and the good facilities this entails. It is also almost impossible to monitor which are complying in timeframe or facilities. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-222-16	1369631	TPT & Sustrans	6.3	The respondent is unsure, stating that Restrictions could impact on business revenue, tourism and purplepound spending within the region. This area of policy requires a balance between the two statutory purposes of the National Park. There is concern that the current permitted development rights for temporary camping and caravan sites is having a negative affect on the Park's Special Qualities. An article 4 direction would not prevent temporary camp sites, but would allow some control on where such sites were located, their size and amenity.

S-221-24	1369595		6.3	The respondent thinks that we should apply for an Article 4 Direction If Yes Permitted development right should be removed entirely What are All areas Problems Greater impact on the surrounding areas of natural beauty The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-220-10	1369594		6.3	The respondent thinks that we should apply for an Article 4 direction. Problems unsuitable and unsightly developments arising in sensitive locations. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-214-25	1369550	Hope with Aston Parish Council	6.3	The respondent favours an Article 4 direction restricting operation to 28 days. The respondent believes that the direction should apply to sites that are visibly intrusive; with poor access; those adjacent to or of nuisance to local communities. The respondent believes that the 60 day rule has encouraged too many sites to be opened for too long a period in some areas. This impacts visual quality and generates traffic in inappropriate locations.
S-210-22	1369546		6.3	The respondent favours applying for an article 4 direction The respondent states that there are several locations where infrastructure is introduced to support 'temporary' campsites and never removed. Applying for an Article 4 direction would enable the National Park Authority to better control the location and impacts of temporary campsites; including the management of associated infrastructure.

S-200-21	1369531	Stanton in Peak Parish Council	6.3	The respondent thinks that we should apply for an Article 4 direction. They think that permitted development rights should revert to 28 days Problems identified are: - some visitors believe that they can camp anywhere, camper vans are parked up in car parks for days on end where there are no facilities increase in temporary camp sites leads to more and more visitors which if numbers are overall not understood, increases the pressure on all aspects of the National Park and its management. Permitting for 28 days would allow some flexibility for specific events or low-level income generation This approach would seek to manage temporary sites and their facilities to ensure the right balance between the two statutory purposes can be achieved. This approach would also help to manage impacts on residential amenity.
S-199-15	1369530	Environment Agency	6.3	Note water sensitivities that are acknowledged and set out in the policies of the current adopted Local Plan; Policies DMC14 (Water) and DMC 15 (Contaminated Land), with supporting Plan paragraphs 3.130 and 3.135 [p49-51]. This current plan review indicates in Appendix 1, that neither of these two policies is subject for review on this occasion. Existing Policy DMC 14 also links water resources to supporting water dependent ecosystems. Note water sensitivities within the context of temporary camp sites. Check current policies that are being carried forward are robust.
S-194-25	1369525	Derbyshire Dales District Council	6.3	The respondent does not think that an application for an article 4 direction should be made. The reason given, being that this falls outside of the Local Plan process. Whilst the application for an Article 4 direction falls outside of the Local Plan process, it is possible to include the intention to seek one within the Local Plan, where harm is possible. Previous Peak District Local Plans have included this approach in respect of take-off and landing sites for helicopter leisure flights. The consultation seeks public opinion on this approach for temporary camping and caravan sites.

S-189-6	1369519		6.3	The respondent thinks that the Authority should apply for an Article 4 Direction. The respondent thinks that permitted development rights should be removed entirely. The respondent believes that this should apply to the whole of the National Park. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-188-14	1369508	Staffordshire Moorlands District Council	6.3	The respondent did not give a specific reply to the question, stating that they supported the tourist economy, whilst recognising that some issues might necessitate the removal of permitted development rights. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation. This response will be recorded as 'No specific reply'.
S-185-24	1369502	Devonshire Group	6.3	The respondent does not believe that we should apply for an Article 4 Direction. The reason given is the economic benefit to farmers of the existing situation. There is a balance to be struck between the economic benefits to landowners / farmers and the harm to the Special Qualities of the National Park as a result of this activity. The use of an Article 4 direction would not prevent diversification, but would ensure that temporary campsites were in locations best suited to the activity.
S-180-5	1369496	Castleton Parish Council	6.3	The respondent thinks that we should apply for an Article 4 Direction. They favour a return to the 28 days rule - but only with effective monitoring...without effective monitoring it should be a complete removal of permitted development. They believe that the Article 4 direction should apply to any areas where a planning application is unlikely to be successful if the normal criteria were to be applied. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-165-24	1369466	Taddington and Priestcliffe Parish Council	6.3	The respondent thinks that we should apply for an Article 4 Direction to remove permitted development rights for temporary camping and caravan sites.

S-163-21	1368617		6.3	The respondent thinks that we should apply for an article 4 direction. They believe that permitted development right should be removed entirely. Problems caused include: - Even temporary sites can have infrastructure such as levelled areas, hard standing etc that can adversely impact upon heritage features Some temporary sites may be harmful to the settings of heritage assets. If Article 4 directions were in place, they would need to remove the right entirely, otherwise any protective benefits (for physical impacts) would be lost. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-162-13	1369460	High Peak Borough Council	6.3	The respondent gave no specific reply to the question, instead stating under 'what problems are caused.....': - The Council supports the tourist economy as well as recognising there can be issues which may necessitate the removal of permitted development rights. The response is recorded as 'No specific reply'.
S-158-15	1369452	Trans Pennine Trail and Sustrans Joint Response	6.3	The respondent is unsure, stating: - Restrictions could impact on business revenue, tourism and purplepound spending within the region. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-157-17	1369450	Holme Valley Parish Council	6.3	The respondent did not specifically reply to the question, but did state that they thought that 'Permitted development right should revert to 28 days'. It is assumed that they wish the Authority to seek an Article 4 Direction and is the response recorded as 'Yes'. The respondent stated that it should apply to all areas. Under problems caused by the current 60 day permitted development, they stated: - Potentially unfair competition with existing sites and a constant presence of sites in popular areas.

				The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-153-22	1369437		6.3	The respondent thinks that we should apply for an Article 4 Direction to remove permitted development rights for temporary camping and caravan sites. The respondent favours a return to 28 days. Under problems being caused, they list: - The belief by some visitors is that they can camp anywhere, camper vans are parked up in car parks for days on end where there are no facilities for day visitors let alone long stay. The increase in temporary camp sites leads to more and more visitors which if numbers are overall not understood, increases the pressure on all aspects of the NPark and its management. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-150-25	1369431		6.3	The respondent didn't provide a specific answer, stating under 'what problems are being caused - 'I dont think that the thought here is adequate to deal with Over Tourism' The response is recorded as 'No specific reply'.

S-140-6	1369412	Hope and Derwent Woodlands Parish Council	6.3	The respondent doesn't think that we should apply for an Article 4 Direction. Problems 28 days is only 14 weekends. This should be 60 days at any time of the year. If a site is causing a nuisance, then the permit could be withdrawn or restricted. See ques 44. Q44 answer This is wholly inconsistent with ques 25 & 26 and how would you force campervans to use those car parks? Campervans are causing a huge nuisance in some villages and along narrower roads where they are trashing the road sides and dumping their rubbish including toilet waste. There should be more height barriers at car park entrances and road sides should be protected with stones and posts to prevent more damage and allow recovery. Campervans should have to pre-book touring sites and if they are full, encouraged to visit other areas. This situation is out of hand, is adversely affecting residents and the environment and is therefore at odds with PDNPA purposes. The respondent submitted a response to Q44 which is different to this one provided in support of the response to this question. The two responses will be compared to see if there is a common theme between them. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-137-35	1369370	Derbyshire ALC	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Revert to 28 days What area Consider effect on people, nature, biodiversity What problems from 60 day Can cover all summer can be used all through the year for certain days (i.e. weekends). 60 days per year is too long for temporary. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-136-10	1369368		6.3	

S-128-40	1369275	Rural Action Derbyshire	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Permitted development right should revert to 28 days What area The whole of the PDNP area. What problems congestion litter adversely affecting the business of quality camp site owners who have invested in quality facilities. The quality of these unregulated sites does not give users a good experience Detracts from the image of the destination causing an eyesore, damage to sensitive habitats adverse impact on local residents. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-127-11	1369287		6.3	
S-120-17	1368991	Marsh Farm Development Co Ltd	6.3	The respondent thinks that we should apply for an Article 4 Direction. If yes Permitted development right should revert to 28 days What area All areas The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-113-24	1369153	Edale Parish Council	6.3	The respondent doesn't think that we should apply for an Article 4 Direction to remove permitted development rights for temporary camping and caravan sites. Reasons These sites may discourage wild camping in warmer months The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-108-5	1369131	Youlgrave Parish Council	6.3	The respondent doesn't think that we should apply for an Article 4 Direction Problems We believe that temporary camping and caravan sites offer a valuable source of income for farmers and landowners and there should continue to be the unrestricted opportunity for local people to make income in this manner for up to 2 months of the year. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-106-9	1369124	Stanton in Peak PC	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Permitted development right should revert to 28 days What area all areas within the PDNP Problems Temporary sites seem more likely to cause conflict and inconvenience as they dont necessarily have the same thought, preparation and engagement when setting up. However, permitting for 28 days would allow some flexibility for specific events or low-level income generation, without impacting excessively on local communities. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-104-12	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	6.3	The respondent thinks that we should apply for an Article 4 direction. If yes Permitted development right should revert to 28 days What problems from 60 days It allows prominent sites to be used for camping at less popular times when it would be better and more environmentally friendly for it to be restricted to less prominent areas. The PC therefore considers that an Article 4 direction should be made to restrict permission to 28 days as was the case previously, which would provide adequate facilities during the peak camping season planning permission or exclusion from the Article 4 direction be applied to places where camping is less obtrusive in the landscape. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-98-6	1368689	Greater Manchester and High Peak Area of the Ramblers	6.3	The respondent is unsure The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-69-6	1368325	Derbyshire Dales District Council	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Should be removed entirely What area Unclear whether this relates to geographical "area", or type of camping. There is a huge difference between tents and motorhomes / caravans. Sites for hikers with tents, and a limited number of cars, should be allowed under permitted development, but not motorhomes and caravans which need careful consideration of access routes through narrow villages. What problems In Youlgrave there have been problems with motorhomes navigating the extremely narrow streets, and concerns have been expressed about the advertising of campervan parking at the Farmyard Inn. In general terms, tent camping should be encouraged as a very sustainable form or tourism. Sites for motorhomes and caravans need careful consideration of access issues to avoid routes through narrow village streets. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-68-43	1368264	Bakewell Resident	6.3	Unsure
S-62-33	1368170		6.3	The respondent thinks that we should apply for an Article 4 Direction. If yes Permitted development right should revert to 28 days The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-60-5	1368155		6.3	The respondent thinks that we should apply for an Article 4 Direction Problems It allowed sights that were far too invasive to spring up in inappropriate places. very small low impact sites near to farms, with up to 5 units should be allowed as permitted development. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-59-19	1368081	SMDC	6.3	
S-57-12	1368149	Great Longstone Parish Council	6.3	The respondent didn't offer a specific response, stating: - opinion from the floor generally supportive of the right for farmers to establish camp sites, however, not debated or voted on. The response will be recorded as 'Unsure'. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-50-39	1367561	Peak Park Parishes Forum	6.3	The respondent is unsure Reason We have ticked Unsure because we do not believe this is a one-size-fits-all issue. In some locations the rights need to be removed or reduced; in others few problems are caused, so removing the rights seems unnecessary. Problems (i) ongoing nuisance to residential neighbours and (ii) damage to the environment. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-45-22	1367903	Froggatt Parish Meeting	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Permitted development right should revert to 28 days What area All areas What problems Blots on the landscape, interrupted views urbanisation of places of tranquility. There was also reference to inappropriate parking of motorhomes. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-44-47	1367865	Eyam Parish Council	6.3	The respondent is unsure Reason Should be determined on a case by case basis The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-43-17	1367843	Natural England	6.3	The respondent didn't provide a specific reply, but offered the following advice: - Whatever method is selected regarding temporary camping sites that any impacts on designated nature conservation sites are fully considered and Habitat Regulations Assessments carried out where necessary. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation. The response is recorded as 'No specific reply'.

S-42-2	1367805		6.3	The respondent doesn't think that we should apply for an Article 4 Direction Problems none that I am aware of. There are bigger problems caused by unauthorized overnight parking of motorhomes and caravans in areas not designated for camping causing litter and spillage of sewage The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-40-27	1367788		6.3	The respondent thinks that we should apply for an Article 4 Direction If Yes Permitted development right should be removed entirely What area I am an advocate of removing all permitted development rights within the national park. Problems including on visual amenity, environmental impacts impacts upon flora and fauna. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-32-19	1367524	Bamford with Thornhill Parish Council	6.3	The respondent thinks that we should apply for an Article 4 Direction If yes Permitted development right should revert to 28 days What area The whole of the National Park Problems An appreciable increase in camping sites, damage to landscape, nuisance to nearby residents). The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-30-21	1367447	Country Landowners Association	6.3	The respondent doesn't think that we should apply for an Article 4 Direction. Reason As it provides sustainable and affordable fun accommodation options for visitors to the park and reduces the pressure to turn houses into holiday homes. The rights are only utilised from Easter to the end of Summer. A sustainable and proportionate right that Parliament approved. The Permitted Development right is essential for brining tourists into the Park and having them spend their money in the Park. If the right was removed, then it could lead to reductions in visitors as they may be unable to find/afford other accommodation and reduced spending. This would harm local business who may have invested in the aim of utilising this right. If the permitted development right was removed, then there would be apotential flood of planning applications. Creating unnecessary costs for applicants and an increased planning burden for the National Park. Removing the right would be contrary to the park statutory purpose in making it easy for visitors to enjoy the park It's understood why there would be calls to use Article 4, but it wouldlikely be disproportionate. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-13-37	1364893		6.3	The respondent thinks that we should apply for an article 4 direction. If yes Permitted development right should revert to 28 days Area The 60 day rule has allowed many temporary sights to develop to detriment of the purposes of the NP. These temporary camps and 'free' parking on roadsides around Mam Tor and the 'old' road. are visible from many obvious viewing spots affecting the quiet and peace of the landscape. Problems Increased vehicle traffic on very minor roads where communities need to walk to access facilities such as a playing field and a graveyard in Castleton; Night pollution of dark skies; affect on wildlife, (natural badger routes being obstructed.); noise late at night; and evidence of campers using hedges and bushes rather than designated toilet facilities. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-9-51	1364715		6.3	The respondent is unsure If yes Permitted development right should revert to 28 days The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-8-4	1364695	-	6.3	The respondent thinks that we should apply for an Article 4 Directions If yes Permitted development right should revert to 28 days Areas areas with particular landscape impacts, impacts on the local waste water systems and water quality in our local streams and rivers. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.
S-7-29	1364251		6.3	The respondent thinks that we should apply for an Article 4 Direction. If yes Permitted development right should be removed entirely Area They should granted at the discretion of and for a period determined by the Authority. Problems Impact on landscape. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

6.4 Do you agree that operation of touring camping and caravan sites should be restricted to certain months of the year in order to address the increased landscape impact in the winter months?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-226-4	1369530	Environment Agency	6.4	The respondent stated Q25 (temp camps), Q26 (camp/ caravan sites), Q27 (static caravans) ; No preference on options. However they did provide the following comment: - Q25, 26, 27 - All relating to camping/caravaning/touring/permanent sites. Concerns of such developments and appropriate foul sewage disposal facilities ; overloading and problematic flow fluctuations of new/existing septic tanks and package treatment plants. We would look to this Plan having consideration to our groundwater position statements in TheEnvironment Agency approach to groundwater protection;, available from gov.uk. This publication sets out our position for a wide range of activities and developments, including discharge of liquid effluents to ground. The respondent makes good points and these will be takebn into account as the plan is developed.

S-225-2	1370310	Fawfieldhead Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year. The respondent agrees that occupancy of touring camping and caravan sites should be restricted to no more than 28 days per year by any individual. The respondent believes that such restrictions should also apply to caravan and motorhome club sites etc. Allowing more than 28 day occupancy restricts space available to other users and drives the need for further sites Leaving caravans for long periods has an impact on the landscape, as many sites are not adequately screened even in summer. Restricting sites during the winter months is welcomed, but does not fully address the issue. In Fawfieldhead Parish and its immediate surrounds over the last 15 years there has been an tremendous expansion in sites both large and small, which has had a very significant negative impact on the character of the area and local residents. Hulme End, a once quite hamlet, with a small amount of provision is now completely dominated by camping and caravan provision. The Manifold Valley and area surrounding Hulme End is gaining an increasing number of sites. In addition in Fawfieldhead Parish we have two very large campsites owned by external companies to the Peak Park, that contribute little to the local economy. Although your plan suggests occupancy and seasonal restrictions, it does not address or adequately restrict the proliferation of camping/caravan sites as a whole. The negative pressures caused by tourism on local residents, landscape and wildlife are really considerable and are not fully understood by the Peak Park. The respondent raises a number of concerns, some of which lie outside of the Authority's remit as a planning authority. The responses to the questions will be considered as the Plan is further developed.

S-223-26	1369632	Hartington Town Quarter Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason These sites are not an answer to cheap housing and currently without some form of restriction to timeframe and length of occupancy we can see developers seizing upon the opportunity to develop high intensity sites with a resident population. This will impact adversely on the landscape and local communities. It also brings into question issues such as waste and sewage disposal and the protection of biodiversity. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-222-17	1369631	TPT & Sustrans	6.4	The respondent was unsure whether the operation of touring camping and caravan sites should be restricted to certain months of the year. The reason given was that 'Restrictions could impact on business revenue, tourism and purple pound spending within the region.' The respondent was unsure whether touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person? The reason given was that 'Restrictions could impact on business revenue, tourism and purple pound spending within the region.' The respondent raises interesting points; however, the in policy terms, National Park purposes (and special qualities) outweighs the statutory Duty to have regard to the economic well-being of residents. In this particular instance, there is also a balance of social well-being of residents, which may also be negatively affected by the unrestricted operation of touring camping and caravan sites.

S-221-25	1369595		6.4	The respondent is unsure whether the operation of touring camping and caravan sites should be restricted to certain months of the year Reason Unclear from response The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. Reason Because of the visual impact - it is unclear if this is the intended answer The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-220-11	1369594		6.4	The respondent agrees that operation of touring camping and caravan sites should be restricted to certain months of the year. The respondent agrees touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. Reason To mitigate the impacts upon the landscape of such sites, especially in winter when they detract from the natural beauty of the landscape They also may also cause significant light pollution in an otherwise dark sky. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-214-26	1369550	Hope with Aston Parish Council	6.4	The respondent favours restricting occupancy to certain months, as this can reduce landscape impacts. The respondent also supports limiting occupancy to no more than 28 days per year by any individual. The response is supportive of the current policy approach.
S-210-23	1369546		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person This approach is in line with current policy.
S-200-22	1369531	Stanton in Peak Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any individual. Reasons given include: - Possible reduction in traffic volumes The focus should be on protecting the environment so managemnt in wet summer waether should also be considered. The resepondent supports the current policy approach, but would wish to see measures to address damage to fields in wet weather caused by vehicles access sites.

S-194-26	1369525	Derbyshire Dales District Council	6.4	No specific reply was given to the question. The respondent stated that ever approach is taken needs to be fully justified and evidence presented. They also said that there might be some areas where landscape impact might be less. Agreed, it is important that any policy approach is evidenced. The response is recorded under 'no specific reply given'
S-189-7	1369519		6.4	The respondent agrees that operation of touring camping and caravan sites should be restricted to certain months of the year The respondent stated - Local community views should have high priority. The nature of camping sites makes them visually harmful. Under the first point, it is unclear whether 'Local community views' relates to scenic views or opinions, although the second sentence might suggest the former. The suggested approach is in line with our current policy.

S-185-25	1369502	Devonshire Group	6.4	The respondent does not agree that operation of touring camping and caravan sites should be restricted to certain months of the year - if landscape impacts can be addressed. The respondent does not agree that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person - however it may be reasonable to limit the maximum duration of a single stay to 28 days, with a minimum period between stays, so as to discourage any trend towards permanent occupation. The respondent cites the extended holiday season as a reason for both responses. The respondent prefers a shift towards a more relaxed policy approach - the points made will be taken into consideration as the plan is progressed.
S-167-4	1369469	Hotel Solutions	6.4	The respondent gave no specific reply to the question. They did however state under 'reason for answer': - The flexibility around lifting seasonal occupancy restrictions where appropriate and more focus on occupancy conditions is welcomed in terms of the contribution to delivering a year-round tourism industry that can employ staff as well as bringing wider benefits of spend all year. The response is recorded as 'No specific reply to the question'.

S-165-25	1369466	Taddington and Priestcliffe Parish Council	6.4	The respondent does not agree that the operation of touring camping and caravan sites should be restricted to certain months of the year. They believe that if properly located, there will be a minimal impact on the winter landscape. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person? The response favours a relaxing of current policy in a move away from seasonal operation of campsites, but supports the current policy on length of occupancy.
S-158-16	1369452	Trans Pennine Trail and Sustrans Joint Response	6.4	The respondent is unsure. The reasons given are: - Restrictions could impact on business revenue, tourism and purplepound spending within the region. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-157-18	1369450	Holme Valley Parish Council	6.4	The respondents agrees that operation of touring camping and caravan sites should be restricted to certain months of the year. The reason given was the impact on the environment in winter months and owner preference. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-153-23	1369437		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year. The reasons given are: - The impact on local traffic volumes would be eased by such restrictions, it would give some local communities a break from constant traffic issues, the use of unauthorised camping areas may increase so measures would need to be in place to restrict that usage as well. The respondent also agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-150-26	1369431		6.4	The respondent gave no specific reply to the question; under reason for answer they said - I don;t think that the thought here is adequate to deal with Over Tourism. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed. The response is recorded as 'No specific reply'.

S-140-7	1369412	Hope and Derwent Woodlands Parish Council	6.4	The respondent doesn't agree that the operation of touring camping and caravan sites should be restricted to certain months of the year in order Reason No to certain months of the year and no to 28 days. This is extremely unfair when considering ques 44. 60 days with no restriction on the time of year would be more appropriate since PDNPA are keen to attract tourist all year round. Peak Park notes that campervans are an eyesore ; perhaps sites could plant hedges/trees to mitigate this? And if they are an eyesore, why is Peak Park suggesting issue 44? The respondent doesn't agree that touring camping and caravan sites should be restricted to no more than 28 days per calendar year by any one person. Reason As for the previous question. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-137-13	1369370	Derbyshire ALC	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year. Reason Needs to ensure that touring camping and caravan sites are not hosting permanent homes The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. Reason There could be discussion about maybe raising the threshold to a bit more than 28 days per year. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed. The idea of slightly longer than 28 days is an interesting one and could be considered as the Policy is developed.

S-136-42	1369368		6.4	The respondent doesn't agree that the operation of touring camping and caravan sites should be restricted to certain months of the year. Reason There should be better guidance on the requirements for touring campsites, in order to minimise their visual impacts. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.
S-127-5	1369287		6.4	The respondent agrees with the current approach to restricting operation in winter months, because of the increased visual impact. The respondent also agrees with the current approach of limiting occupancy by one person to no more than 28 days per calendar year. the reasons given being to avoid increased pressure on amenities and the use of sub-standard accomodation for year-round occupancy. The response supports current policy.

S-120-24	1368991	Marsh Farm Development Co Ltd	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason Giving nature and the local communities some peace The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed
S-113-25	1369153	Edale Parish Council	6.4	

S-108-6	1369131	Youlgrave Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year in order Reason Primarily to relieve pressure on resident communities such as Youlgrave where touring caravans causes traffic congestion and access problems, winter conditions means that minor roads can be unsuitable for inexperienced drivers towing large holiday vehicles. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed

S-106-11	1369124	Stanton in Peak PC	6.4	The respondent doesn't agree that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason provided that any site puts in place appropriate arrangements to ensure that the landscape is protected (within the site, entrance and exit, and immediate surrounding access) from damage. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason My focus is on protecting the environment and this needs proper arrangements rather than just a focus on seasonal use (it can be wet during summer, and the landscape damaged if it is not suitable for the traffic). I would prefer length of stay to be restricted to keep the distinction between visitors enjoying the PDNPA (and bringing income to the area) and avoiding the risk of caravans being left permanently or being used for permanent homes because there are no limitations. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-104-17	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason There are sites that are suitable for camping etc. throughout the year, this is not true of the majority of the higher areas of the Park, where damage to the landscape and wildlife will often be serious. When longer term camping and motor homes are allowed it is essential that adequate facilities are also provided. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. Reason Temporary facilities should not be used for longer term accommodation. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-98-47	1368689	Greater Manchester and High Peak Area of the Ramblers	6.4	The respondent is unsure Reason We believe that these developments should be required to have no detrimental impacts on long open views, on rights of way and on the quiet enjoyment of the landscape. The point is noted, and forms part of the decision making process around campsites.
S-69-18	1368325	Derbyshire Dales District Council	6.4	The respondent is unsure Reason As a Councillor I have not been informed of any concerns about seasonal restrictions on camp sites. The respondent is unsure about limiting the number of days per year. Reason this has never been raised with me as a concern The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-67-18	1367857	Over Haddon Parish Council	6.4	The respondent doesn't think that we should apply for an Article 4 Direction Reason Farmers should be allowed up to 60 days per calendar year for temporary camping facilities. This should be recorded by the farmer on their website or social media with specific dates when the site is open and when it is not. A record of the dates should be kept and made available for inspection. A record should be kept on the number of tents, motorhomes and campervans that stayed on the site. No large touring groups or festivals should be allowed without permission from the PDNPA and local council. The Authority will assess the desirability of seeking an Article 4 direction based on the opinions expressed by this respondent and others during this consultation.

S-62-2	1368170		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.
S-57-13	1368149	Great Longstone Parish Council	6.4	The respondent didn't provide a specific answer, stating:- 'generally supportive of the right for farmers to establish camp sites, however, not debated or voted on' The response will be recorded as 'Unsure'

S-50-4	1367561	Peak Park Parishes Forum	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason To reduce landscape impact. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason We don't want this accommodation to drift towards becoming permanent homes. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-45-24	1367903	Froggatt Parish Meeting	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason To prevent impact on landscape to allow land to recover to remove permanency of occupancy - many are converted into second homes/holiday homes with full time or extended occupancy. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-44-21	1367865	Eyam Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason To reduce landscape impact The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason Preventing from moving towards permanent accommodation The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-42-10	1367805		6.4	The respondent doesn't think that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason Only restrict when the land (maybe grass) is unsuitable due to mud, otherwise you are restricting the opportunity to bring in visitors at off peak times when local businesses need the income The respondent doesn't agree that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason there is not enough low cost housing in the area, so this may be an option that some must take for seasonal employment The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-40-28	1367788		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year in order Reason landscape impact The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason Landscape impact The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-32-7	1367524	Bamford with Thornhill Parish Council	6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason To reduce adverse landscape impact. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason To avoid creation by stealth of quasi-permanent homes. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-13-15	1364893		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year. Reason Unless the site has been developed well with screening by trees and bushes, the sites are visual eyesores affecting the views the NP is well known for. Most new temporary sites have no visual screening. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason The NP is becoming known as a place to live off grid. Restrictions to sites along with LA highways traffic orders to restrict parking could help to address this problem. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-9-20	1364715		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person Reason To prevent permanent residency The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

S-7-39	1364251		6.4	The respondent agrees that the operation of touring camping and caravan sites should be restricted to certain months of the year Reason The Authority should require landowners to plant hedgerows and trees to screen sites, which would also improve biodiversity. The respondent agrees that touring camping and caravan sites should be restricted to no more than 28 days occupancy per calendar year by any one person The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.

6.5 Do you agree that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used a holiday accommodation.

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-226-5	1369530	Environment Agency	6.5	The respondent stated Q25 (temp camps), Q26 (camp/ caravan sites), Q27 (static caravans) No preference on options. However, they folowed thsi with the following statement: - Q25, 26, 27 - All relating to camping/caravaning/touring/permanent sites. Concerns of such developments and appropriate foul sewage disposal facilities overloading and problematic flow fluctuations of new/existing septic tanks and package treatment plants. We would look to this Plan having consideration to our groundwater position statements in The Environment Agency approach to groundwater protection, available from gov.uk. Thispublication sets out our position for a wide range of activities and developments, including discharge of liquid effluents to ground. The respondent raises valid concerns that will be taken into consideration as the Plan is developed.

S-223-27	1369632	Hartington Town Quarter Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions Isolated environmentally friendly single, simple structures in locations with no impact on the landscape or biodiversity Criteria Isolated environmentally friendly single, simple structures in locations with no impact on the landscape or biodiversity. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-222-18	1369631	TPT & Sustrans	6.5	The respondent was unsure whether new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. The reason given was that restrictions could impact on business revenue, tourism and purple pound spending within the region. Whilst the economic well-being of residents is important, it is outweighed in policy terms by the Park's statutory purposes and the balance between them.

S-221-26	1369595		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Exceptions Any structures in woodlands should be avoided at all costs. Woodlands are very valuable and fragile ecosystems. Many woodland plants and animals are extremely susceptible to human disturbance, Many woodland plants such as bluebells cannot tolerate the effects of trampling. Criteria A detailed Environmental impact assessment by Park Officers or independent local experts. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-220-12	1369594		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Exceptions There is no need for any exceptions to this policy Even small structures in woodland locations may have a severe impact on the wildlife and woodland habitats The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-214-27	1369550	Hope with Aston Parish Council	6.5	The respondent supports the restriction of static holiday accommodation; also advocating 'very few exceptions'. The preference expressed is for "a single unit in an appropriate location and of a particular type." The response is supportive of current policy, but favours a more restrictive approach to exceptions.
S-210-24	1369546		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. They stated that the PDNPA needs to define restrictions on such structures. They also believe that woodland sites may not be best due to leaf fall over winter. They also stated that often the supporting infrastructure is more unsightly than the structures themselves. This approach would be a continuation of existing policy. However, recent challenges to decisions made by the Authority means that if this approach continues into the new plan, then the policy will need to be clearly defined.
S-200-23	1369531	Stanton in Peak Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. The use and expansion of holiday sites could effectively form small villages They add nothing to the landscape, involve additional traffic volumes and affect many residents, communities who gain nothing from such accommodation. Some structures almost become second homes; many have features better than affordable housing within the Park. The sites could be used for affordable housing rather than for holiday parks. This approach would seek to add further clarity to existing policy, making it clear that such structures are exceptions to policy.

S-194-27	1369525	Derbyshire Dales District Council	6.5	No specific reply given The accompanying text stated 'any restrictions on development that could have a beneficial effect to the local economy within the National Park should be proportionate. There is a balance to be struck between the 2 statutory national park purposes, but with acknowledgement of the priority given to 'conserve and enhance' over 'opportunities for enjoyment and understanding' where there is conflict. The statutory duty to foster economic and social well-being' is within the pursuance of statutory purposes and does not take precedence. The response is recorded under 'no specific reply given.'
S-185-26	1369502	Devonshire Group	6.5	
S-179-3	1369495	Charlesworth Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges etc. used as holiday accomodation. The suggested approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-171-4	1369485	Forward Land	6.5	The respondent does not agree that new policy should restrict static caravans, chalets, lodges etc. used as holiday accomodation. The respondent belives that this restriction is neither helpful or required. It is too cumbersome owing to its overtly negative construction. The key to a modern, year-round tourist destination which the Peak District National Park is, is a diverse range of accommodation that appeals to a broad audience who travel atdifferent time of the year. The suggested approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-165-26	1369466	Taddington and Priestcliffe Parish Council	6.5	The respondent does not agree that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation? They suggest that exceptions should be site specific and based on visibility in the landscape and impacts on roads, nature and residential amenity. The respondents preferred approach would represent a significant shift away from current and past policy. There have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-159-8	1369454	Staffordshire County Council	6.5	The respondent does not agree that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Their reasons for their answer are: - The blanket restriction on static caravans, lodges and other permanent structures with an exception set out in the supporting text would seemingly dissuade any sort of consideration for this type of accommodation as there is little clarity on what would meet the exception criteria. Perhaps a more nuanced approach should be considered. We are mindful that visitor accommodation offer is evolving and new forms are entering the market. Policies should be flexible enough to consider these, considerations should be given to the critical purposes of the National Park in policy formation and decisions. It is noted that the tone of the existing policies is negatively worded, whilst this may be still necessary in some circumstances the review should consider whether positive wording can be applied subject to meeting other Plan policies and design requirements. Our study may also assist in strategic planning, with Staffordshire Moorlands for example thinking about the role market towns or key sites might play in serving the national park. We are willing to facilitate such discussions. The suggested approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers. We welcome the opportunity to work with Staffordshire County Council as this policy area is developed and would also like to learn more about the Study when it is available.

S-158-17	1369452	Trans Pennine Trail and Sustrans Joint Response	6.5	The respondent is unsure, the reason given is that: - Restrictions could impact on business revenue, tourism and purplepound spending within the region. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-157-19	1369450	Holme Valley Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Exceptions - Where impact is negligible, close to existing farmstead and restricted to one or two units Criteria - Structures should be traditional in nature to the area Reason for answer - to retain the character of the PDNP. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-156-11	1367563		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions - None Criteria - preferably no exceptions, but if necessary then: - short-lived single structures rather than field full of them The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-153-24	1369437		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. The reasons given are: - restrict large permanent structures used as holiday accommodation, the use and expansion could effectively form mall villages they add nothing to the landscape, involve additional traffic volumes affect many residents, communities who gain nothing from such accommodation. The growth of such structures has seen them become almost 2nd homes, many have features better than affordable housing within the Park. With the infrastructure necessary to support these sites, why should they be allowed when affordable housing could be another option. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-150-27	1369431		6.5	The respondent gave no specific reply to the question, stating under exceptions to principle - 'I don't think that the thought here is adequate to deal with Over Tourism' The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers. The response is recorded as 'No specific reply'.

S-140-9	1369412	Hope and Derwent Woodlands Parish Council	6.5	The respondent doesn't agree that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Exceptions IF the new policy lists our specific exceptions, then it will be too restrictive. There should be robust guidelines which apply and which align with Peak Park purposes. E.g. screening, woodland, use of natural topography rather than specifically restricting structures close to the facilities of a farmstead to one in number. And why only farmsteads? What about private residences, hotels, pubs and their car parks etc etc if structures are for holidayaccommodation? Criteria As per above response to exceptions. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-137-20	1369370	Derbyshire ALC	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions The policy should be rather restrictive. A connected to farmsteads restriction might work. This would also allow the use by the static caravans etc. of farmstead facilities (i.e. water or sewage). Any permitted exceptions should impose a time limitation on the duration of use during the year. Criteria Impact on landscape, people, nature, and biodiversity Reason Static structures should not be able to replace housing, i.e. should not be suitable for use as permanent dwellings. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-136-18	1369368	6.5	<p>The respondent agrees that policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation.</p> <p>Exceptions</p> <p>Should not focus on farmsteads, Should include a sustainability assessment. Can they be accessed by public/ active transport? How visible are they? What proximity is there to facilities (pubs, shops etc) to reduce transport emissions.</p> <p>Criteria</p> <p>Small and simple needs good clarification and ideally definition. Temporary structures, such as yurts, should be acceptable.</p> <p>Reason</p> <div >="" <p="" class="question-sentiment" data-id="540_354_1714663393459_166325" data-type="tiny_mce" id="540_354_1714663393459_166325">We should be encouraging screening of sites in a way which enables nature's recovery and should be covered by BNG. Clarification over what is and what isn't acceptable would reduce the uncertainty that developers and land owners perceive. We need to recognise that staying in the National Park would increase income in communities, making them more sustainable. </div> <div >="" <p="" class="questionset-question-controls response-sentiment">The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers. </div>

S-128-26	1369275	Rural Action Derbyshire	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Exceptions None Reason There has been an explosion of these type of structures and they look out of place within the national park. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-127-7	1369287		6.5	The respondent supports current policy except that they believe that there should be no exceptions. This approach would stricter than our current policy, which does allow for exceptions, where they are screened; or for small simple structures. The current policy has seen some issues, and we need to provide greater clarity as to what is and isn't appropriate / acceptable in the National Park.
S-120-32	1368991	Marsh Farm Development Co Ltd	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions Temporary use where building work is being used The policy covers the use of static structures for holiday use only. Temporary structures to support development would be covered within planning conditions for the development. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-113-26	1369153	Edale Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions The sites must be very well screened and not in open country. Criteria Landscape impact (visibility from all angles and at all seasons of the year), biodiversity impact, no new roads or other structures apart from the accommodation. Reason While these structures may be acceptable in some locations close to existing facilities and other buildings, their impact must be minimised. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-104-46	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Criteria any such structures should not impact on the landscape and character of the National Park. Larger developments should also generally be located close to transport hubs to limit the necessity for additional vehicle movements. Additional units should be allowable around farmsteads where they do not intrude into the landscape. Visitors expect at least minimal facilities which can be provided without detriment to the landscape so long as controls are placed on the size and design of the structures proposed. Reason This is to preserve the special qualities of the National Park, while providing the facilities that visitors expect during their stay. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-98-18	1368689	Greater Manchester and High Peak Area of the Ramblers	6.5	The respondents agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation. Criteria we believe that these developments should be required to have no detrimental impacts on long open views, on rights of way on the quiet enjoyment of the landscape. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-69-11	1368325	Derbyshire Dales District Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions Small pods and shepherd huts are usually unobtrusive, but size criteria and materials guidance should be specified. Criteria Size, materials, facilities e.g. sustainable sewerage treatment, keep these developments as unobtrusive and easily removed as possible. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-62-28	1368170		6.5	The respondent thinks that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-60-6	1368155		6.5	The respondent thinks that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Reason There should be strong restrictions on the development of sites for permanent lodges. They are too invasive and the park has a lot of visitors already. No to yurts and shepherd's huts. Woodlands need to be protected and these structures are inappropriate in open spaces. There are already large camp sites in the park which are well used. The current policy approach is believed to offer a balance between offering a reasonable length season, allowing for the site to recover from use, preventing harm in wet weather offering respite for residents minimising landscape impact during winter, when tree cover is reduced. The current approach allows for exceptions where the above can be managed / mitigated / removed.
S-59-3	1368081	SMDC	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-51-3	1368085		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Criteria A maximum number of structures at any one site Assessing the impact on nature Ensuring that structures don't encroach upon the amenity of other users of the park and they do blend seamlessly with the surrounding area from surrounding viewpoints. Reason Businesses need overnight accommodation, but at the same time an overly intense development will impact upon the landscape, the wildlife and the serenity of the park. The impacts aren't just the structures themselves, but also intensification of car traffic around any large site. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-50-6	1367561	Peak Park Parishes Forum	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions A less restrictive regime could be applied to sites which are 'out of sight' in the overall landscape Criteria Biodiversity Reason There clearly need to be some controls on this type of accommodation. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-45-29	1367903	Froggatt Parish Meeting	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions None The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-44-30	1367865	Eyam Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions Where the sites are hidden from public view Criteria Where the sites are hidden from public view Reason Does not detract from the landscape The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-42-33	1367805		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions They need to be acceptable to the local environment - recognizing that we have a great variety of landscapes across PDNPA, and be fully plumbed in for waste The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-40-29	1367788		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exception Existing well managed and suitably located sites. Criteria Landscape impact, traffic impact, impact on water quality (adequacy and capacity of sewage treatment facilities) amenity of nearby homeowners. Reason no new sites should be permitted in the interest of landscape and wider impact. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-32-9	1367524	Bamford with Thornhill Parish Council	6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions None Criteria None Reason There is a clear need for control over the numbers of this type of accommodation. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-30-22	1367447	Country Landowners Association	6.5	The respondent doesn't agree that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions The use of structures that serve another purpose such as for seasonal work (such as on farms, construction work including for Net Zero) should be supported. Particularly when development is hidden or overshadowed by existing development. Criteria They positively contribute to help meet housing needs, they contribute to the economy and have a minimal visual impact. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers. The question relates purely to holiday accommodation, not to accommodation for agricultural workers.
S-13-21	1364893		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions Developments that are in keeping with and are not intrusive to the landscape should be permitted. Criteria Developments should complement the local vernacular building style and be well screened to avoid intruding on the landscape Reason Developments must prioritise the biodiversity and natural landscape The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

S-9-19	1364715		6.5	The respondent agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation Exceptions at the edge of the park if well screened in existing woodland with good road access. The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.
S-7-42	1364251		6.5	The respondents agrees that new policy should restrict static caravans, chalets, lodges and other large, permanent structures used as holiday accommodation The suggested policy approach is in keeping with current policy. However, there have been some recent challenges to decisions made under this policy. Therefore, we will seek to update this area of policy to add clarity for developers.

7.1 Do you agree with the proposed spatial objectives for housing?

Submission Responses				
#	Consultee Id	Consultee Organisation	Question no.	Summary and PDNPA response
S-224-16	1369634	Sheffield City Council	7.1	Sheffield City Council support the approach identified in Issue 28. Support noted.
S-223-28	1369632	Hartington Town Quarter Parish Council	7.1	Hartington TQPC - Supports the spatial objectives for housing. The proposed objectives seem rational, and numbers seem fairly distributed. Raises concerns over viability and legal agreements for housing development citing Dove Diary as an example where the developer made significantly more profit than predicted and the affordable housing was not adequately secured. Comments noted.

S-221-27	1369595		7.1	No. Additional development is contrary to conserving and enhancing the natural beauty wildlife and biodiversity. Comments noted. In response, development is not contrary to conserving and enhancing the natural beauty wildlife and biodiversity when it is in the right place. The National Park vision and circular (2010) supports the provision of housing in response to local need.
S-218-1	1369554		7.1	Lack of information in the plan. Some basic information, such as how much brownfield land is available or how much greenfield land could be turned over to housing development without contravening the Parks legal framework, is not provided. The subject of new housing for open market sale is skirted around without being clearly addressed. In response - the evidence to support the Issues and Options consultation was available on line and linked to. E.g housing topic papers and population projections and housing need study (Lichfields). A call for sites will occur in Spring 2025 whereby people will be invited to submit sites for housing development to be considered. References the need for a serious brownfield land and greyfield land register. In response - greyfield is in Green Belts - the NP does not have a Green Belt. The brownfield land register is a list of sites with planning permission because the NP is not an appropriate location to give permission in principle and therefore restricts the entries on this list to those that have received planning permission. No discussion on empty homes. Comments noted. In response this is not an issue that can be addressed by the Local Planning Authority.

S-214-28	1369550	Hope with Aston Parish Council	7.1	Support for housing spatial objectives. The spread and the range of guideline numbers for different areas seem to be carefully thought through, and the objectives are suitably detailed. Comments noted.
S-210-25	1369546		7.1	Does not support the spatial objectives for housing. The PDNPA is situated in a free economy afflicted by the many conflicting national policies and decisions. In such a situation there should be no divine right for local people to have a house in the protected area. It is unfortunate but we are not a closed economy adrift from the national economy. If the local plan deems it acceptable to allow for the building of 960 and 2000 homes by 2045, that this will sustainably protect the national park in landscape settlement terms? What happens after 2045 do we have another 2000 homes? How could this sit in the landscape? The PDNPA should be seeking far more radical solutions through government and partners where existing homes (as they come on the market), for example on old council houses in the Peak District are brought back into public ownership? There are no easy answers but the planning for increased housing in each new plan will eventually render the national park as redundant and permanently scar historic landscapes. Note the concerns, however our duty is to support the socioeconomic wellbeing of national park communities and local affordable housing need. The focus is to respond to local housing need, not to respond to general housing need hence a indicative housing figure not a housing target like other Local Planning Authorities.
S-207-21	1369542	Youlgrave Community Land Trust.	7.1	Support the spatial objective for housing. Support noted.

S-205-3	1369539	Kingsman Homes	7.1	Supports the spatial objectives for housing. There is clearly a need for a controlled amount of housing to come forward within the plan period to ensure the sustainability of the Peak District over the plan period. The proposed allocation of specific housing sites within sustainable Tier One settlements would be an appropriate way to address this issue. Kingsman - references proposed residential development at Newholme Hospital. Support noted.
S-200-24	1369531	Stanton in Peak Parish Council	7.1	If only 22% are new build local needs housing, the % needs to increase. if 66% are conversions then they need to have some form of local need stipulation. Comments Noted.
S-199-16	1369530	Environment Agency	7.1	Consideration could be given to need for discussions with Severn Trent Water as some villages (within the central section of the White Peak) have established foul sewerage systems, and therefore potential capacity to accept extra volumes of foul drainage. Some of these medium tier villages, such as Tideswell and Taddington, maybe of a scale to justify development boundaries, as Bakewell and Bradwell. Making use of managed sewerage systems could also increase likelihood of controlling pollutants of concern in seeking to meet the requirements of nutrient neutrality. Noted and take forward comments.

S-195-18	1369526	Derbyshire County Council	7.1	Commends the evidence to understand future population and housing need, in particular section 7.1 of the Issues and Options document, which clearly justifies the need for a new approach in the NP and the Local Plan to address this challenge, which is welcomed and supported. Potential concern about identifying a housing requirement and the pressure that puts the LPA on to demonstrate a 5 year supply. The housing requirement set out is considered to be a well justified and robust approach and is supported as it would appear to provide for an appropriate balance between seeking to provide for increased levels of affordable housing in the NP whilst also seeking to meet National Park purposes. The spatial distribution appears to be a well justified approach but will require careful consideration and discussion between the PDNPA and the respective local planning authorities to consider whether the housing provision requirements are likely to be deliverable and arrangements for monitoring, particularly if these housing provision requirements will contribute to meeting housing needs within these LPA areas. Given the age of much of the existing housing stock in the National Park, ASCH are concerned that many older adults may dwell in unsuitable properties, potentially leading to increased stresses on health and social care services due to hazards and thermal inefficiencies of existing stock. Whilst we support delivering the lower number of houses as having least impact on the Parks special qualities, we would like to see developed dwellings being affordable, meeting M4(2) standards and being subject to local connection criteria. Additionally, we would like to see the development of some affordable housing with support schemes for older people, to address specialist accommodation needs. In response - Noted the support from DCC and take forward comments regarding national park purposes, duty to co-operate, and need to be mindful of the housing needs of an ageing population and those in housing need in general.

S-194-28	1369525	Derbyshire Dales District Council	7.1	In light of the proposed revisions to the NPPF in respect of housing requirements, it is possible that the spatial objectives for housing may well need revising. It is suggested that this requirement should be kept under review pending further advice from the Government. It is considered that in order to achieve sustainable development across the National Park that there should be an increased level of development supported over the plan period. The evidence published suggests that this is the approach being heeded, however, in light of the NPPF proposals this level may not be sufficient. Noted. In response, the NPPF has been published (Dec 24) and the approach to National Parks remains as is in that we can choose an alternative approach to calculating housing figures. We will work with our constituent authorities through our duty to cooperate regarding these issues.
S-193-17	1369524	Winster Parish Council	7.1	Prioritise multi housing conversion. Comments noted. In response, we continue to support conversions where they are appropriate.
S-192-13	1369523	Mineral Products Association	7.1	Supports the spatial objectives for housing. There needs to be a focus on maintaining local vernacular using local sources building materials. Comments noted and issue addressed within the minerals section. This is a local plan policy approach that exists and will be maintained.

S-191-1	1369522		7.1	Does not support the spatial objectives for housing. The reasons for justifying new house building are misguided (1) and unattainable (2,3). The Authority should not be trying to reverse the declining population as the National Park is primarily about the natural landscape. We need some people to live there to help maintain it and service visitors coming but having people live in the National Park is not desirable in its own right. There is no correct number of permanent residents, so it is not necessarily a problem if the current number that is significantly lower than it was a generation ago. There is no justification for the assertion that depopulation must be reversed. If the Park seeks to justify additional housebuilding to reverse depopulation, it needs to show that the depopulation has caused bad consequences that can be permanently reversed by providing more housing. We do not have abandoned properties. We have not seen a reduction property numbers because of demolition. What we have is properties that are occupied, but not by permanent full-time residents. The consultation document does not provide evidence for this, and I do not believe that there is such evidence to find. Accepts there is an issue of housing affordability and we need to meet the needs of people who need to live here. There is also a good argument to hope to continue to accommodate those who have worked in the Park and want to remain in the same community when they retire. There are enough suitable properties in existence to accommodate these groups through intervention - support RSLs to acquire existing properties as the need arises. This allows: Protection of the Park landscape: no loss of countryside for housing Relatively quick resolution of housing need: months, not years Granular provision: if you need one property, you buy one property Recycling of funds: when a worker moves away and you have no ongoing need in that location, the property can be sold back into the open market and the funds used to purchase a property suitable for the next need-to-live housing demand elsewhere in the Park. Comments noted. In response - we do not have a housing target like other local authorities and do not respond to market demand. However, we are required by Government to calculate the housing need for the National Park and justify our approach. There is not a moratorium on housing development in the National Park. We do respond to local affordable housing need (NP duty) and support housing that conserves and enhances the National Park. RSLs do buy existing properties for social housing but they are constrained by what their budget allows. The right to buy has seen the loss of a number of social houses and the ability to use a property as a holiday home without needing planning permission has resulted in a loss of many properties in the National Park that could have been homes. These are decisions made by Central Government.

S-188-15	1369508	Staffordshire Moorlands District Council	7.1	SMDC supports housing development in appropriate locations. The proposed development levels will make a valuable contribution towards Staffordshire Moorlands development requirements.
S-185-27	1369502	Devonshire Group	7.1	Devonshire Grp- Reserve comments on numbers. Acknowledge focus on meeting 'local need'. Across policies that influence the delivery of new homes, decisions should therefore: be led by analysis of relevant demographic, supply & demand factors; avoid a myopic focus on social affordable housing. Suggests looking at opportunities for 'in-kind' 'affordable housing' to help meet local needs e.g. The Devonshire Group is not a RSL but provides below market cost housing for rent. This role could be increased if this RSL type function was recognised. Comments noted. In response - The NPPF defines what affordable housing is. There are routes to providing affordable housing without being an RSL - build to rent is an example of this.
S-182-5	1369498	Hathersage Parish Council	7.1	Hathersage PC - supports the spatial objectives for housing. We have no practicable alternatives to offer. Current Affordable housing eligibility policy may not be ideal, but we cannot suggest one likely to gain more support. Comments noted.
S-174-1	1369489	Labour Party - Bakewell and Northern Dales branch	7.1	Labour Party - Bakewell and Northern Dales Branch. No. Lack of information in the plan. Some basic information, such as how much brownfield land is available or how much greenfield land could be turned over to housing development without contravening the Parks legal framework, is not provided. The subject of new housing for open market sale is skirted around without being clearly addressed. In response - the evidence to support the Issues and Options consultation was available on line and linked to. E.g housing topic papers and population projections and housing need study (Lichfields). A call for sites will occur in Spring 2025 whereby people will be invited to submit sites for housing development to be considered. References the need for a serious brownfield land and greyfield land register. In response - greyfield is in Green Belts - the NP does not have a Green Belt. The brownfield land register is a list of sites with planning permission because the NP is not an appropriate location to give permission in principle and therefore restricts the entries on this list to those that have received planning permission.

				No discussion on empty homes. In response this is not an issue that can be addressed by the Local Planning Authority.
S-170-7	1369472	Historic England	7.1	HE - unsure about the spatial objectives for housing. HE - Issue 28 use 'appropriate' as a more suitable term. HE - Housing section we would anticipate to see the historic environment fully considered within any proposals for housing development, including heritage impact assessment for any proposed site allocations. See HE Advice Note 3. Comments noted. Review section to ensure approach on cultural heritage aligns with HE guidance.
S-168-5	1369470	Railfuture	7.1	Railfuture Yes. However, they do not go far enough. There is recognition in the policy objectives of the need for more affordable housing to counteract the decline in the young and working age population. However, another important factor is access for these groups to amenities, education and employment opportunities. The spatial objectives should more directly recognise lack of transport as a barrier to young and working-age people remaining in the National Park when seeking education and employment. Comments noted. The Authority will continue to promote a settlement first approach to new development, in particular direct development to the most sustainable settlements.

S-165-27	1369466	Taddington and Priestcliffe Parish Council	7.1	Taddington and Priestcliffe PC: Policy should take account of the options for environmental improvement through housing development in suitable locations outside named settlements. Response: the purposes of policy is to promote sustainable development by directing the majority of development to named settlements, these are settlements that have amenities. It does not prevent low levels of development elsewhere but the key issue is sustainability in accordance with the NPPF.
S-162-14	1369460	High Peak Borough Council	7.1	HPBC - The Council supports housing development in appropriate locations and notes that the proposed development levels will make a valuable contribution towards High Peaks development requirements.
S-161-8	1369459	CPRE Peak District and South Yorkshire	7.1	CPRE are unsure of the challenges and spatial objectives. They would like to see more evidence on the limits of growth given the pressure neighbouring authorities are under and the pressure they will put on the PDNPA to help them meet their housing targets. Comments noted. The Call for Sites and further evidence work on settlement landscape sensitivity will provide further detail on this matter.
S-157-20	1369450	Holme Valley Parish Council	7.1	Holme Valley PC support the spatial objectives for housing. We incline towards the lower figures quoted for each spatial area, given that this figure will still reverse the population decline and restore a more balanced population, in terms of age and economic status. Comments noted

S-156-12	1367563		7.1	Does not support the spatial objectives for housing. Even the lower number of houses is too high in this context and that greenfield should not be built on as it runs counter to the special purpose of the national park. Supports parish first approach to local needs housing. Conservation and enhancement must come before trying to cram hundreds or thousands of developments onto the Peak Park greenfield sites. Comments noted.
S-154-19	1369442		7.1	Yes. The number, type and tenure of new homes we expect to be delivered in the next plan period to 2045 must be: well-evidenced and compatible with prescribed methodologies deliverable address population and labour force decline meet the local need for affordable homes compatible with national park purposes. Comments noted.
S-153-25	1369437		7.1	Unsure about the spatial objectives for housing. If only 22% are new build local needs housing, the % needs to increase. if 66% are conversions then they need to have some form of local need stipulation. Comments noted.

S-152-1	1369434		7.1	Concerned that the unique features of the NP are at risk if planning regulations are changed/relaxed. Housing should be near a medical facility. How will the Authority restrict building of oversized homes on privately owned land that produce lots of carbon? How are you going to address climate issues and carbon reduction? Refers to flooding in Grindleford. There are brownfield sites that could be used for building before green spaces are used. Could Hope cement works be used for housing? Hope has a railway and a doctors surgery. In response the Authority is required to calculate housing need using the Standard Method set by the Government. The Authority can use a different approach if it chooses to. Information on this is set out in the Lichfields report on Population Projections and Housing Need (2023) and available on the Authority website. As a National Park we do not have a housing target for general market housing demand. Market housing is delivered through opportunities to conserve and enhance buildings/land. We do respond to local affordable housing need. Whilst it would be good for each village to have a medical facility, villages do not support enough housing for this to happen. For example a doctor has on average 1500 patients 'assigned' to them. Any new housing site would be of a scale that is proportionate to the size of the settlement. Grindleford is a village with a bus service and a train station. The Authority does not support housing on land that is susceptible to flooding. A new Strategic Flood Risk Assessment will be produced which will identify where development would not be acceptable.
S-151-21	1369433		7.1	Unsure about the spatial objectives for housing. Only on brownfield sites, then consider compulsorily purchasing sites that are unused brownfield sites. Comments noted.
S-150-28	1369431		7.1	I dont agree with the proposed objective here. If all new housing is focussed on affordable and local needs, then the ultimate effect will be increased deprivation. There needs to be a balanced approach to help make the local economy more vibrant. Comments noted. Not all new housing is affordable. Market housing is created through the conservation and enhancement of brownfield sites.

S-144-1	1369422		7.1	Unsure. The Park should play its part in adding some new housing units into the Park's land area. It is not appropriate for each settlement to have the same target but rather that the entire Park should be considered as the home of the overall target and the decisions about where to put the extra housing rightly belongs with the Park. This should emphatically not mean ducking the need to commit to the overall target additional units in the Park and implementing it. In reponse. The Park will have an overall indicative housing figure which is then split between the landscape areas. This is the same approach as was used for the Core Strategy. Development must be of a scale that is respectful of the size of the existing settlement and the settlement's capacity to receive more housing in the landscape. Evidence of settlement capacity will be forthcoming. The Authority is required to evidence through the Local Plan process how it plans to deliver the number of houses proposed.
S-137-32	1369370	Derbyshire ALC	7.1	Derbyshire ALC - unsure - Lower figures should be used due to impact on and special character of the National Park. Comment noted.
S-136-46	1369368		7.1	Unsure - Broadly yes, but there are significant communities in the Dark Peak in Derbyshire Dales (Eyam, Hathersage). Comments noted.
S-128-8	1369275	Rural Action Derbyshire	7.1	The lower figure of 960 new homes is insufficient to address the acute shortage of affordable homes in the area. This should at least match current achievements of 72 dwellings per year which would equate to 1440 as the lower figure. The distribution will be challenging for Derbyshire Dales given the availability of sites and needs to be re-considered to ensure a more even spread across the three areas, the south west Peak in particular. Comments noted. In response, the split of housing is based on the sustainability of the settlements across the National Park. The majority of settlements and sustainable settlements are located within the DDDC area of the national park. It would not be appropriate to direct housing towards less sustainable locations.

S-120-7	1368991	Marsh Farm Development Co Ltd	7.1	Yes
S-118-13	1369267	Haddon Estate	7.1	The Local Plan would fail to meet the needs of those with a local connection and desire to stay in the area, but who do not meet the necessary criteria for affordable housing in terms of income. House prices are partially driven by a lack of supply, which is inevitable given the national park purposes. However, it has the potential to drive local people in employment away, particularly if they need to move to a larger home to accommodate a growing family. The provision of some market housing, subject to local eligibility criteria, would mean that local people would have the first opportunity to buy these homes and therefore stay in the local area. In general, the Estate believes that there needs to be more emphasis on the role that the delivery of market housing can play in diversifying the existing stock, reversing population decline and ensuring the needs of the local community are met. For clarity, this housing would most likely be subject to local occupancy restrictions. Comments noted. Local occupancy conditions are used for people building their own home which is considered to be intermediate type housing and as such does bridge this gap. Principal residence is an Issue as part of the reg 18 consultation.
S-115-2	1369156		7.1	There is a desperate need for social housing and affordable homes. There needs to be tighter restrictions on how, how many and how homes go from homes to holiday lets. Comments noted. In response, the Authority can impose conditions to restrict new properties to permanent residences. However, the Authority has no control over the loss of housing to holiday lets. This is reliant on the Government making changes to the Use Class Order.
S-113-27	1369153	Edale Parish Council	7.1	Edale PC support the spatial objectives for housing. The objectives are comprehensive. Comments noted.

S-104-52	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	7.1	Support the spatial objectives for housing. But the numbers are probably out of date considering recent announcements. The Parish Council generally supports the numbers proposed so long as conversions are included, as they could provide a significant proportion of the homes needed (this includes shop conversions etc as well as new uses for valued vernacular and listed buildings. Comments noted. In response - the Authority will update its housing figures in response to the new revisions of the NPPF (Dec 2024).
S-103-14	1368574	Marshalls plc	7.1	Positive consideration should be given to the promotion, supply, conservation and use of indigenous building stone which not only is a low carbon building product and if quarried locally has a low carbon footprint in comparison to other building materials, over hundreds of years has contributed significantly to the beauty and the character of the Peak Park. The use of building materials imported into the Peak Park simply exports carbon emissions and does not fulfil the Park's stated 2043 objective. Comments noted. The minerals section of the Issues and Options addresses local building stone. The Local Plan will continue to promote the use of indigenous building stone.
S-101-5	1369010	Business Peak District	7.1	Unsure about the spatial objectives for housing. Commend the focus on maximising the potential for locally-needed homes. Please fully address the Peak Districts affordable housing needs to retain young people, avoid further shrinking of the working age population within the Peak District. Without measures to address affordable housing needs it will be difficult for employers to recruit staff, increasing the costs of delivering public services and raising questions over the sustainability of some rural communities, further social and economic polarisation of communities within and across the Peak District, exacerbating current health inequalities. Please prioritise a need for accessible housing and the deployment of building techniques that minimise the carbon footprint of new build properties, as well as support for retrofit work aimed at increasing the energy efficiency of existing homes. Comments noted. These issues are largely considered in the Issues and Options consultation. Our priorities are focused on the purposes and duty of the National Park and delivering these through the English National Parks vision and circular (2010)

S-98-10	1368689	Greater Manchester and High Peak Area of the Ramblers	7.1	No specific comments to make on the issue. Noted.
S-81-2	1368658		7.1	Building new houses in a national park should either not be allowed at all or be severely restricted. Existing housing and buildings which could be converted to housing should be reserved for use by local people or those who wish to live in the park. The current situation where existing buildings are converted to accommodation and then used as short term holiday-lets is detrimental to the health of communities in the park. Many villages have seen significant falls in the number of permanent residents which has led to the quality of community life being reduced and issues over whether schools have enough pupils to be sustainable. Holiday lets offer a good return on investment and the current poor regulation leads to more and more buildings are being used for this purpose and this will not change if a free-market is allowed to continue. We know many local people who cannot afford to live in the park any longer. The sustainability and vitality of communities across the National Park is severely threatened. Comments noted.

S-73-11	1368375	Bradwell Community Land Trust	7.1	The assumption that greenfield development is inevitably harmful isn't justified by evidence. The Peak Park has a number of larger settlements with capacity to absorb some housing without adverse effects and where new housing would help support communities and the provision of viable services it's a question of choosing the right sites, allowing the right scale of development and requiring good design. It is also worth noting that, while the National Planning Policy Framework seeks to limit the scale and extent of development in national parks, it does not preclude greenfield development. It's also important to stress that housing need is not solely confined to affordable housing. There will also be some need for market housing and the latter can help deliver the former. The plan should recognise this and clearly state the size of the need for both market and affordable housing and how this need will be met. In this context, we support planning for a higher figure. The lower one is unlikely to deliver sufficient market and affordable housing and will therefore undermine the achievement and retention of thriving communities. A higher figure would also reflect national policy given it is stated that it reflects the Government's standard methodology for assessing housing need. It is difficult to comment on the proportional split between the 3 areas without knowing the potential capacity of the settlements within each, including on any potential larger brownfield sites. Comments noted. The figures provided do include market housing provision that is provided through conversion or enhancement sites, not exception sites. The National Park does not have a housing figure and is not subjected to the same housing requirements as other local planning authorities. Further evidence work through the call for sites and preferred approach will provide further detail.
S-71-19	1368373	Tideswell Parish Council	7.1	The targets for affordable housing are too low. Young people are moving away from the villages due to lack of suitable housing. They want to get on with their lives, so choose to move away from family ties etc to neighbouring areas (outside of the PDNP) such as Buxton, Sheffield, Chesterfield etc. The alternative would be for them to remain with family and go onto a waiting list for a house to come available - which invariably it doesn't. More housing would mean more young families stay within the Park - which will strengthen Peak District villages and communities and help ensure the ongoing viability of local services (schools, doctors etc). Comments noted. The National Park Authority does not have a housing target for general market housing and instead responds to local housing need where a need is demonstrated and it can be accommodated within the landscape.

S-69-19	1368325	Derbyshire Dales District Council	7.1	DDDC - unsure as not clear how the figure of 960-2000 has been calculated. This is a wide range of figures. In response - the Lichfields report and the topic paper sets out the reasoning behind the figures.
S-68-34	1368264	Bakewell Resident	7.1	We need direction for developers to deliver low carbon affordable homes for our communities. The decision to identify targets will work well with development boundaries and spatial planning strategies. Comments noted.
S-67-32	1367857	Over Haddon Parish Council	7.1	It supports development boundaries for all settlements to be agreed with each parish council. If the status quo remains, each application should be assessed on its own merits and the decision as to whether the site is within a settlement should be discussed in detail with the relevant Parish Council and not be decided by the Authority alone. The Parish should have a major input into this. There should be provision for open market, workers in agriculture and forestry. Clarity needed on what rural enterprises means. Greenfield sites - restrict to affordable housing. Brownfield sites - for open market and/or affordable housing. Protected open space and local green space should be identified, discussed and agreed with the relevant PCs and identified on the policies map. Comments noted. In response - Parish Council's are consulted on planning applications and they have an opportunity to comment on the Plan making process. The Parish Council is not the decision making authority. The call for sites process will identify local green space. Note request for clarity on rural enterprises definition.
S-62-46	1368170		7.1	Appears logical and clearly significant change on this dimension is needed. Comments noted.
S-60-7	1368155		7.1	Restrictions should be very strong. New buildings should be very limited and allowed only to meet local needs (including essential workers). Comments noted.

S-59-10	1368081	SMDC	7.1	We need more affordable homes within the PDNP so that people can live and work in the area as well as contribute to a thriving economy. Comments noted.
S-57-14	1368149	Great Longstone Parish Council	7.1	Great Longstone PC were unsure about whether more affordable housing was needed in the area. Comments noted. In response the Lichfields report sets out affordable housing need for the National Park and drills this down the local authority area.
S-50-26	1367561	Peak Park Parishes Forum	7.1	Broadly support the proposal. However, we consider that the calculation of number of homes should include number of homes taken into/out of use as permanent dwellings, i e it's not just about new build. Comments noted. In response, the only way we would know if a holiday home has become a permanent dwelling is if planning permission is sought and a condition is attached to restrict the property to a permanent residence.
S-45-30	1367903	Froggatt Parish Meeting	7.1	Froggatt PM do not support the spatial objectives for housing. An issue with completing the online form (?) Comments noted.
S-44-5	1367865	Eyam Parish Council	7.1	Eyam PC support the spatial objective for housing. However, it is important to monitor net home availability as homes are being increasingly lost to holiday lets. Comment noted. In response, at present we cannot monitor the number of existing properties lost to holiday lets other than through the census.
S-42-11	1367805		7.1	Agree that robust action is needed to reverse the changing demographics. So 100% behind the need for more affordable houses and for the rights of smaller settlements to propose their own strategy through neighbourhood plans or similar. Comments noted.

S-40-30	1367788		7.1	Flexibility is key to meeting housing needs, notably for affordable use. In response, not sure what flexibility is referring to.
S-32-1	1367524	Bamford with Thornhill Parish Council	7.1	Unsure. We do not accept that the government's Standard Methodology should apply in the Peak Park, and a lower figure should instead apply. But we do not feel we have enough expertise re the merits of the numbers shown to be able to say whether they are the 'right' numbers for the Peak Park. Comments noted.
S-30-23	1367447	Country Landowners Association	7.1	Do not agree with spatial objectives for housing. We would press the authority to strive to deliver and support applicants in the delivery of housing as far as possible. In response, we have to work within the constraints of a protected landscape and the legislation that governs this desination.
S-18-4	1367233		7.1	Brownfield sites must be used for new homes, or conversions from old farm buildings, not greenfield land to be used. Housing should also incorporate an area for boots, coats, bikes, storage - this is the peak district. All affordable housing should remain in perpetuity. Comments noted.
S-13-8	1364893		7.1	The population of the NP needs housing to enable younger cohorts to move into or stay working in the NP. Comments noted.

S-12-1	1364877		7.1	Lack of population and diversity within the population. Without population the Park does not function, and we are heading that way. Recommends self build as the main type of affordable housing that is possible and should be supported across all tiers. Policies to favour local affordable housing, above all else, are a contributory factor to the continuation of this [ethnic diversity]. In response, self build housing does not meet the needs of people on the housing register who are in genuine affordable housing need.
S-9-43	1364715		7.1	Yes
S-7-16	1364251		7.1	Support - no reason

Q7.2 What is your preferred option for holiday homes and permanent homes?			
Submission Responses			
#	Consultee Id	Consultee Organisation	Summary and PDNPA response
S-225-3	1370310	Fawfieldhead Parish Council	A dispersed and isolated community therefore all new properties be for the sole use as residential use - settlement and countryside. Holiday accommodation creates more noise and disturbance than primary residence. Note the request for buildings in the open countryside to be for permanent residence due to their contribution to dispersed communities. Note the comment that holiday accommodation has no less impact than residential - high occupancy per unit of accommodation, more noise and disturbance than residential which is highly detrimental to the open countryside.
S-223-29	1369632	Hartington Town Quarter Parish Council	Support a parkwide permanent residence clause. Less than 70 % of homes in Hartington are a primary residence, with a further 10% in long term lets. It would be difficult to impose a primary residence clause on those already let, but any new build should certainly contain this clause. Comments noted
S-221-28	1369595		Park-wide permanent residence clause because it aligns more closely to the core principles. Comments noted.

S-220-13	1369594		Support a park-wide permanent residence clause in order to prevent the further decline of rural settlements, particularly the smaller settlements and the impacts of holiday homes on schools, shops, pubs and traffic within those settlements, whilst still allowing the building of holiday accommodation which would not be suitable for permanent residences within or close to settlements. I believe a greater impact on the damaging effects of holiday homes on rural communities however would be the removal of permitted development rights relating to already existing dwellings, were the Government to change the law in line with the previous Government's proposals. Comments noted.
S-218-4	1369554		The plan should consider ways of encouraging small hotels, B&Bs and other serviced accommodation in the tourism chapter rather than concentrating on camp sites. There is a clear case for an Article 4 direction to be implemented on short-term lets when/if it becomes possible. Support permanent residence. Comments noted. Issue 25 addresses temporary camp sites and an Article 4 Direction.
S-214-29	1369550	Hope with Aston Parish Council	Support for park-wide permanent residence clause. No support for more holiday homes. There is adequate provision. Any exemptions should be tightly controlled to ensure that these exemptions do not lead to wholesale diversion of accommodation in these categories from the local community to holiday homes. Note comments and concern about controls around exemptions and concern about wholesale diversion of accommodation in these categories from the local community to holiday homes.
S-210-26	1369546		Support for park-wide permanent residence clause. Noted.

S-207-22	1369542	Youlgrave Community Land Trust.	Support for park-wide permanent residence clause. Some properties no longer provide the space or accessibility that is wanted for current family living and are only fit for holiday accommodation. There is a lack of distinction between second homes and holiday homes. Holiday homes provide work and have a valuable effect on the economy of the settlement through use of shops, pubs and other sporting/cultural activities. Second homes, may only, at best, be 1/3 occupied over a year. Comments noted. Note that there are occasions where some existing houses are not suitable for residential use.
S-200-25	1369531	Stanton in Peak Parish Council	Option 2 is preferred and it needs to be a clause Park wide. If you bring in permanent residence clause in selected settlements, the problem will just increase in those settlements not covered. There are far too many holiday homes in villages. Communities are being decimated, the winter months can see many houses stood empty and many users of holiday homes do not actually aid the local economy as they bring provisions with them rather than using local shops etc. Smaller communities are being impacted adversely by extensive numbers of homes that are largely unoccupied or not occupied by residents that contribute over the long term to the community. This still provides flexibility for diversification and some buildings that are not suitable for permanent housing. Comments Noted.
S-194-29	1369525	Derbyshire Dales District Council	Support for option 2 or 3. Comments noted.
S-193-18	1369524	Winster Parish Council	Policy should go further in encouraging family development on farms with same clauses. Most buildings can be adapted/extended for permanent residency so this should be prioritised. Option 2 Must go further restrictive covenants on all sales no more second homes. Encourage existing holiday lets to become permanent residences. Encourage residents to put covenants onto their own homes before they die. Note comments regarding permanent residency on farmsteads. In response, planning permission with primary residence restrictions would not require further covenants. Planning policy can only effect planning issues, not private/personal issues.
S-189-8	1369519		Support for park-wide permanent residence clause. Permanent residency clause for homes for local people who support the community. It's vital to get families back into communities to stop them dying out. Registration scheme for short term lets supported.

			Comments noted. In response to the registration scheme, this would be implemented and managed by the Local Authority.
S-188-16	1369508	Staffordshire Moorlands District Council	SMDC supports a park-wide permanent residence clause. There is clearly a need for homes for local people. Comments noted.
S-180-6	1369496	Castleton Parish Council	Castleton PC support a park wide permanent residence clause. The only logical reason for new builds is to support those who will live in them on a permanent basis and with whom there is a high chance of supporting the traditions and culture of the national park. Comments noted.
S-179-4	1369495	Charlesworth Parish Council	Charlesworth PC support a permanent residence clause applied to specific settlements where the concentration of holiday homes is high, although we recognise that implementing this will not be easy. Comments noted.
S-176-1	1369492	Chelmorton Parish Council	Chelmorton PC support a park-wide permanent residence clause (Option 2 preferred or Option 3). There is an urgent need for housing policy to be tightened up to enable local people to live locally. Comments noted.
S-174-4	1369489	Labour Party - Bakewell and Northern Dales branch	Support park wide permanent residence clause. Support an Article 4 direction for short term lets if/when legislation allows. Suggest ways to encourage small hotels, B&Bs and other serviced accommodation in the tourism chapter which currently concentrates on camp sites. Comments noted.
S-165-28	1369466	Taddington and Priestcliffe Parish Council	Taddington and Priestcliffe PC support a park-wide permanent residence clause to help house local people. Comments noted

S-163-22	1368617		I think it would be a good idea to impose a residence clause as this will address a clearly identified problem. I am undecided on the merits between option 2 and 3. Comments noted.
S-162-15	1369460	High Peak Borough Council	Parkwide permanent residence clause. There is clearly a need for homes for local people (as explained in the consultation document) so a park-wide permanent residence clause would help to address this issue. Comments noted.
S-157-21	1369450	Holme Valley Parish Council	Support park wide permanent residence clause. Too many such short-term, holiday lettings damage the viability and sustainability of villages and hamlets but it is a balancing act. Option 2 is preferred to Option 3, as having different rules in different areas of the PDNP would be invidious and more complicated to enforce. Comments noted.
S-154-20	1369442		Support for park wide permanent residence clause. Comments noted.
S-153-26	1369437		Support for park-wide permanent residence clause. If you bring in permanent residence clause in selected settlements, the problem will just increase in those settlements not covered. Communities are being decimated, the winter months can see many houses stood empty and many users of holiday homes do not actually aid the local economy as they bring provisions with them rather than using local shops etc. Comments noted.
S-151-22	1369433		Supports a park wide permanent residence clause. All homes for sale should be for residence first, only allowable for holiday home if unsold after a length of time. Comments noted.
S-150-29	1369431		No policy change. There will be unexpected consequences of the more onerous proposals/options. Other actions can be taken, such as applying Council Tax and Council Tax multipliers, CGT Property relief is also already not applicable. However Self Investing Pension Plans will still invest in Peak Park property to achieve capital growth. Proposal 2 and 3 will worsen the impact on local communities, because the houses will just maintained and left empty. Comments noted. As the National Park Authority we cannot apply Local Administrative Authority measures.

S-149-2	1369430		A reduction of second homes and holiday lets should be strived for. The prescriptive view by the National Park Authority to authorise outbuildings on a farm as holiday lets is mistaken as opposed to permanent occupation or residence. Years ago, there was a family on a farm who wanted their son to live in a converted outbuilding but encouragingly stated it could be a holiday let. Introduce permit or licensing and quotas for each area. Tourism is beneficial to the economy. Comments noted. In response, the current local plan supports tied accommodation for farming families where a need is demonstrated. We are aware that situations have occurred where farms have diversified and converted barns to holiday accommodation but then been unable to convert to permanent residential accommodation because the conservation/enhancement has been realised. We will look into this issue further. The National Park is not the Local Administrative Authority and cannot impose permits and licensing.
S-140-10	1369412	Hope and Derwent Woodlands Parish Council	Hope and Derwent Woodlands PC - support a park-wide permanent residence clause. Option 2. New build houses should be permanent homes. The permanent resident clause could have an expiry time such as 20/30 years or more? Comments noted. Planning conditions or S106 do not have expiry times. They are imposed to make development acceptable.
S-137-9	1369370	Derbyshire ALC	Support park-wide permanent residence clause. Option 1 (the existing policy) has led to some concentration of holiday homes - with negative effects. Option 3 would potentially just shift the problems from one place to (and concentrate it in) another (neighbouring) area. Comments noted.
S-136-2	1369368		Park-wide residence clause - need clarification around appropriate exceptions. Comments noted.
S-129-10	1369199	Rowsley Parish Council	Supports a park-wide residence clause. All new residential property should have a permanent residence clause applied to prevent the creep of holiday homes wiping out villages and their local assets such as schools. Comments noted.
S-122-1	1369282		Support for park wide permanent residence clause. New homes for local people have a really good reason; new holiday homes do not, when there are already enough or too many. Comments noted.

S-120-29	1368991	Marsh Farm Development Co Ltd	Support permanent residence clause to specific settlements. Comments noted.
S-115-1	1369156		Tourism can be a complete boost to our local economies but there needs to be balance and local residents need to become before holiday makers. Comments noted.
S-113-28	1369153	Edale Parish Council	Support a park-wide permanent residence clause. There are too many holiday homes to let and second homes already, in the Hope Valley generally and in Edale. This pushes up house prices, making the area unaffordable for many. They do not contribute to thriving and sustainable communities, in particular driving out local young people. Those who use them do not generally contribute much to the local economy, bringing with them their requirements. Comments noted.
S-110-14	1369133	Middleton and Smerrill Parish Council	Middleton and Smerrill PC support a permanent park-wide residence clause applied to specific settlements as it would target areas where there is already a high concentration of holiday homes. Comments noted.
S-108-7	1369131	Youlgrave Parish Council	Support Park-wide permanent residence clause. The severity of the problem caused by holiday homes in villages such as Youlgrave requires a new policy approach that puts supporting thriving communities and safeguarding the long-term future of resident communities first and foremost. Comments noted.
S-106-5	1369124	Stanton in Peak PC	Support a park-wide permanent residence clause. Reason being that some communities are being impacted adversely by extensive numbers of homes that are largely unoccupied or not occupied by residents that contribute over the long term to the community. This still provides flexibility for diversification and some buildings that are not suitable for permanent housing. Comments noted.

S-104-45	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Support a park-wide permanent residence clause with the proviso that an exception should be made for specific holiday accommodation where a justifiable need can be established. The growing proportion of holiday homes within small villages is causing serious problems. Increase in property prices, reduction in the use of local amenities such as schools, shops, community centres, local transport etc. Many villages are becoming little more than holiday parks. The PC does not support the statement that holiday accommodation may be more suitable than permanent accommodation in the open countryside. Other policies are better suited to controlling this type of development. Comments noted.
S-98-28	1368689	Greater Manchester and High Peak Area of the Ramblers	Unsure. Comments noted.
S-85-2	1368680	Grindon Parish Council	Support permanent residence clause being applied to specific settlements. Comments noted.
S-81-4	1368658		Support permanent residence clause applied to specific settlements. The sustainability and viability of communities (like Castleton) are severely affected. Ideally existing holiday lets would be changed back to permanent residencies. It may not be appropriate to have this approach in settlements where holiday lets are not an issue. Comments noted.
S-79-1	1364877		Support a more radical plan to change the status quo would be to allow properties to move from the holiday let sector to become permanent residences. This will increase the volume of properties for sale and exert a downward pressure on pricing. Note comments. In response we can review current policy on holiday accommodation to make it more permissive to change to a permanent residency.
S-73-12	1368375	Bradwell Community Land Trust	Support a park wide permanent residence clause. Prefer option 3 (permanent residence clause in defined settlements). It would make sense to restrict the occupation of new residential properties to permanent residential use in locations where there is evidence that the loss of housing stock to tourist accommodation is causing problems.. However, if a policy of this sort is introduced, it should include some flexibility.

			Comments noted.
S-71-20	1368373	Tideswell Parish Council	Support a park-wide permanent residence clause (option 2) as if the "selected settlements" option was chosen, how on earth would the criteria be set? Comments noted.
S-69-7	1368325	Derbyshire Dales District Council	Support a park-wide permanent residence. Comments noted.
S-68-37	1368264	Bakewell Resident	Support park wide permanent residence clause. The large number of holiday homes are not serving the local economy at the moment. Comments noted.
S-67-8	1367857	Over Haddon Parish Council	Support a permanent residence clause applied to them. Comments noted.
S-66-7	1368276		Policy change - permanent residence clause applied to specific settlements. Where there is a problem restrict it. House prices are still wildly expensive for local people to stay in the National Park. Comments noted.
S-65-5	1368271	Individual	Impose park-wide permanent residence clause. Second homes destroy communities and drive out young people. Comments noted.
S-62-4	1368170		Support for permannet residence claused applied to specific settlements. Comments noted.

S-59-5	1368081	SMDC	SMDC - park-wide permanent residence clause. The number within each village should be more closely managed, particularly with regard to new builds. Comments noted.
S-57-15	1368149	Great Longstone Parish Council	Support a permanent residence clause in Great Longstone. Comments noted.
S-50-53	1367561	Peak Park Parishes Forum	Support Park-wide permanent residence clause. With a caveat that we wish the final 10 italicised words of that Option to be deleted. The policy will however need enforcement if it is to be of any value. Comments noted.
S-45-1	1367903	Froggatt Parish Meeting	Support Park-wide permanent residence clause. Comments noted.
S-44-20	1367865	Eyam Parish Council	Support a park wide permanent residence clause. Communities are being damaged by increasing number of holiday lets and will eventually become unsustainable. Comments noted.
S-42-23	1367805		Support for park wide permanent residence clause applied to specific settlements. Fully behind the need to retain community assets and stop the conversion of buildings for holiday lets, or new builds for holiday homes. Each settlement has the right to determine for themselves, but, the overriding direction must be to support a permanent residence clause with significant penalties. Comments noted.
S-40-31	1367788		Support Park-wide permanent residence clause. It will strike a balance in terms of enabling existing holiday homes to continue to be used as such but preventing more homes. Land for new homes is constrained within the National Park and where it is available it must be used to meet permanent local need, both private and affordable. Comments noted.
S-32-30	1367524	Bamford with Thornhill Parish Council	Support park-wide permanent residence clause. To maximise the number of homes available for permanent residence. Comments noted.

S-30-24	1367447	Country Landowners Association	Support no policy change. Holiday homes can be an essential income that support local business. The issue is years of under supply of development, creating new houses and wider economic development (providing incomes so individuals don't feel the need to turn property to holiday lets). There is no reason why there can't be enough beds for local residents and visitors. Comments noted.
S-29-3	1367323		All new build should have a permanent residency clause and if possible this should be protected if the property is sold or bought under RTB. Comments noted.
S-26-1	1367244	Great Longstone Parish Council	All housing stock in the NP should have local occupancy clauses or be restricted to permanent residence clause. Holiday lets should require planning permission. Local communities should be encouraged to write neighbourhood plans. Comments noted. In response - As yet the Use Class Order does not differentiate between permanent homes and holiday homes. Until this happens the Authority can only use conditions to impose permanent residence clauses on new dwellings. The Authority encourages and supports communities to write their own Neighbourhood Plan. It is up to the community to determine whether they want one.
S-18-3	1367233		Holiday Homes: Some of these are smaller than National Space Guidelines (7.5) and so may only be fit for holiday letting. Not everyday life or long term. A degree of flexibility might be needed when reviewing use of current housing stock. - Holiday homes for farming ok with business diversification and must be supported/encouraged. Comments noted
S-13-51	1364893		Support no policy change. Many who make the NP their permanent home commute to nearby towns and cities on the edge of the park, yet these people ensure a steady stream of employed younger people and children who grow up in the NP. Therefore the option for new homes to be permanent market purchases as well as holiday homes does not undermine other efforts to build local affordable housing. The NP needs a mix of socio-economic groups and employment experiences. Comments noted.

S-12-3	1364877		Supports imposing permanent occupancy restrictions. Suggests replacing the 28 day occupancy condition with permanent residence conditions. Current policies have contributed to [proliferation of holiday accommodation] and retrospective action is needed. Comments noted. In response - the Authority cannot retrospectively change planning consents, therefore any conditions imposed cannot be amended by the Authority.
S-9-42	1364715		Support permanent residence clause applied to specific settlements. The effect of holiday homes is not equal across the whole Peak Park. A threshold of more than 10% of homes being holiday lets/Air BnBs might be appropriate to decide which settlements the policy should apply to. It is appropriate that farmers can diversify by offering holiday accommodation on their farms utilising existing farm buildings, but less appropriate for locals to be denied cottages in villages. The preponderance of holiday homes in villages has a significant negative impact on local shops, pubs, doctors surgeries and schools. Comments noted.
S-7-30	1364251		Supports no policy change. Comment noted.

Q 7.3 Affordable housing eligibility

Submission Responses			
#	Consultee Id	Consultee Organisation	Summary and PDNPA response
S-224-17	1369634	Sheffield City Council	Support a widening in the eligibility for affordable housing to include those who work in the National Park or have an immediate family connection to maintain sustainable communities. Comments noted.
S-223-30	1369632	Hartington Town Quarter Parish Council	Supports widening the eligibility criteria for affordable housing for social and private affordable housing. The quoted examples of those working in the National Park and Immediate family connection should be added to the list. Does not agree with exploring new policy on tied accommodation. The demand for affordable housing in general is so high and the availability so scarce, it should be for those with a genuine local connection. Comments noted.
S-221-29	1369595		No to any widening. Alternative policies could be implemented to eliminate the need to build new houses on green field sites. Comments noted.
S-218-5	1369554		Work in 'essential services' be added to existing affordable housing eligibility criteria and that persons in this category should not have to demonstrate a local connection, but that otherwise eligibility and local connection criteria should remain unchanged, at least until clear evidence can be presented of insufficient demand for affordable homes from households in existing categories. Comments noted.

S-214-30	1369550	Hope with Aston Parish Council	Support to widen eligibility criteria for RSL homes. Support to wide eligibility criteria for privately owned and managed affordable homes. Support to explore new policy on tied accommodation. Need to meet existing demand for affordable accommodation and those with family links. Increase eligibility (RSL and private) to include hospitality, care, emergency services to address housing inaffordability for these sectors. Comments noted.
S-211-1	1369547		Does not think that 5 years living in an area to obtain local status is enough. Supports returners who grew up in the NP. The NP is a beautiful place to live and visit and must remain so. A smaller population is one of the attractions. The NP is commutable to nearby cities. Comments Noted.
S-210-27	1369546		Does not support widening the eligibility for RSL or privately managed affordable housing. What does 'support sustainable communities' mean? Schools are sustained by pupils outside of the NP and the Pub is sustained by visitors. Comments noted however, the use of and support for community assets by others and visitors helps to sustain their presence for locals.
S-207-23	1369542	Youlgrave Community Land Trust.	Support to widen eligibility criteria for RSL and private affordable housing accommodation and tied accommodation to build and maintain thriving communities that need to be diverse (beyond economic and age considerations). Specifically widen to include NHS and LA workers. Support ability to downsize. Note comments on a diverse community and key workers not just for land management. Downsizing is already supported and will continue to be supported in policy, as is supporting people in unsatisfactory housing.
S-200-26	1369531	Stanton in Peak Parish Council	Support to widen RSL eligibility for essential workers, such as community nurses, care workers, currently they are priced out of housing and rentals. Comments noted.

S-196-3	1369527	Peak District Rural Housing Association	Support to widen eligibility criteria (RSL and private) for people who have an employment connection to it, for example, key workers employed in essential services such as care or education. Communities must be allowed to grow so that they become thriving, sustainable locations. Comments noted.
S-194-30	1369525	Derbyshire Dales District Council	Support to widen eligibility for RSL and private managed affordable homes. Reduce the local connection to 5 years instead of widening eligibility criteria. Revise the cascade approach to be based on housing need rather than geography or parish boundaries. Comments noted. Note the issues of the complexity of the cascade policy (time and location) and the needs of adjacent parishes who are in need but are disadvantaged by the policy approach of parish first. Note the request to base eligibility on need rather than on geography.
S-193-19	1369524	Winster Parish Council	No question set response to render. Noted.
S-188-17	1369508	Staffordshire Moorlands District Council	Eligibility for social housing should be based on housing need rather than parish boundaries and cascade mechanisms. The introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities. Eligibility criteria for privately owned and managed affordable should be the same as social housing. Comments noted. Any introduction of additional eligibility criteria would have to be clearly set out to avoid misunderstanding/misuse.
S-185-28	1369502	Devonshire Group	Support if it allowed necessary flexibility around the ability to provide and retain, as part of a broad portfolio, new affordable homes as a private housing provider. Comments noted.

S-179-5	1369495	Charlesworth Parish Council	Support widening the eligibility criteria for social and private affordable homes to include those working in the National Park and/or with an immediate family connection. This is particularly pertinent on the western side of the Park, where there is developer-led commercial open market pressure on housing from those choosing to live the Park and commute to Greater Manchester and beyond. Comments noted.
S-174-5	1369489	Labour Party - Bakewell and Northern Dales branch	Unsure about widening the eligibility criteria. Could widen to include person working in essential services (evidence required) without requiring local connection. Otherwise eligibility and local connection criteria should remain unchanged, at least until clear evidence can be presented of insufficient demand for affordable homes from households in existing categories. Comments noted.
S-172-3	1369486	Grindleford Parish Council	Support widening eligibility criteria for social affordable housing and some relaxation to criteria to support continuous local employment as a qualifying criterion. Comments noted.
S-165-29	1369466	Taddington and Priestcliffe Parish Council	Support widening of eligibility criteria for social and private affordable homes and explore new policy on tied accommodation. References various housing 'needs' that are already covered by policy that are not proposed to change. Include employment. Note comments.
S-162-16	1369460	High Peak Borough Council	The current 10 year local connection requirement is too restrictive and should be reduced. Eligibility for social housing should be based on housing need rather than parish boundaries and cascade mechanisms. The introduction of a separate criteria relating to employment could be difficult to implement and manage. , Eligibility criteria for privately owned and managed affordable should be the same as social housing. Comments noted.

S-157-22	1369450	Holme Valley Parish Council	Support widening eligibility for RSL and private owned affordable housing and new policy on tied accommodation. Support widening eligibility criteria to include workers (eg teachers, nurses, care workers) within the PNDP and achieve of balanced and sustainable communities. This provision will reduce car travel by commuting workers. Comments noted.
S-156-13	1367563		Does not support widening eligibility criteria. The authority would be, by default increasing demand on greenfield and undermining the PDNPA special purpose. Comments noted.
S-153-27	1369437		Support to widen affordable social and private affordable housing eligibility. The current criteria is restrictive. Both eligibility criteria should be widened. There needs to be provision for essential workers who may be able to take up a role within the Park but dont qualify under the current criteria as they may not have a local connection but could be able to carry out essential work within a community, such as community nurses, care workers, currently they are priced out of housing and rentals. Comments noted.
S-150-30	1369431		Does not support widening the eligibility criteria. Support tied housing. Comments noted.
S-149-1	1369430		Refers to policy DMH2 and the need to replaced it with meaningful eligibility criteria. Is new build the only solution to provide affordable housing? Can existing properties be bought? There will never be enough affordable dwellings in the NP. There are people who work in the NP but are priced out and have to live in cheaper accommodation outside of the NP. Comments noted. In response Local Housing Authorities may buy existing properties to add to their portfolios.

S-137-22	1369370	Derbyshire ALC	Supports widening the eligibility criteria for RSL and private affordable homes for support workers, carers and teachers to keep schools viable, feeding into thriving and sustainable communities. Require affordable housing to be tied to the employment. Comments noted.
S-136-40	1369368		Support widening eligibility across social and private affordable housing. There are good reasons for people to move into our communities and that should be supported. Does not support new policy on tied accommodation. Comments noted.
S-128-1	1369275	Rural Action Derbyshire	Support widening the eligibility criteria for social affordable homes and reducing the 10 year local connection to 3 years. Widen the eligibility to beyond immediate parish to a commutable distance (e.g. 10 miles). Support widening the eligibility criteria for private affordable homes. Include essential workers or key occupations within the hospitality and tourism industry subject to having a permanent contract of employment or length of time in the role. Immediate family connection should include parents or children. Unsure about tied accommodation as details are unclear. Employers within certain sectors such as care, hospitality and tourism and farming would support positive policies around the provision of quality tied accommodation for workers. Comments noted.
S-124-1	1369282		Support to widen eligibility criteria for social and private affordable housing. Reduce local connection to 5 years and relax parish-first approach and include people who work but don't live in the area. Unsure about exploring new policy on tied accommodation. Comments noted.
S-123-1	1369282		Support for widening eligibility criteria for social and private affordable housing. Reduce local connection to 5 years. Unsure about tied accommodation. Comments noted.

S-122-2	1369282		Support to widen affordable housing eligibility criteria for social and private affordable housing. Reduce local connection to 5 years. Unsure about tied accommodation. Comments noted.
S-120-30	1368991	Marsh Farm Development Co Ltd	Support to widen to include neighbouring parishes for social and private affordable housing. No to exploring new policy on tied accommodation. Comments noted.
S-118-14	1369267	Haddon Estate	Support widening RSL and private affordable home eligibility including those who work in the NP and immediate family connection to ensure the continued viability of local schools, and other services, as well as forming the future labour force. Comments noted.
S-113-29	1369153	Edale Parish Council	Support widening the eligibility criteria for RSL and privately managed affordable homes. Unsure about exploring new policy on tied accommodation. Support people who work in the NP to live in the NP. Support young people with family connections. For sustainable communities, we need a mix of ages, professions etc, and this means homes which are affordable as first homes, and homes for elderly people or those less well-off who satisfy other criteria. Comments noted.
S-110-15	1369133	Middleton and Smerrill Parish Council	Support the opportunity to review the criteria for eligibility as the current situation has proved to be too restrictive. Comments noted.
S-108-8	1369131	Youlgrave Parish Council	Consider current parish first approach for affordable housing eligibility is appropriate in Youlgrave and should remain. Comments noted.

S-107-9	1368485	NCHA	Support reducing local connection and amending the cascade policy to reduce time constraints to 6 weeks. Unsure about approach on private and tied accommodation. Comments noted.
S-104-18	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Support widening eligibility for social and private affordable housing to 5 years over the past 10 or before the age of eighteen. Give weight to essential workers other than farm workers who are already covered by agricultural tenancies. Unsure about tied accommodation because they don't think it effects their villages. Comments noted.
S-98-40	1368689	Greater Manchester and High Peak Area of the Ramblers	Unsure Noted
S-73-13	1368375	Bradwell Community Land Trust	The eligibility criteria should be widened to include people who work in the national park. Changing the criteria would support the development of more balanced communities, as well recognising the contribution of those who wish to live and work in the area. Review the local connection for people with infirmity, it should be 3 years at most. Comments noted.
S-71-21	1368373	Tideswell Parish Council	Support widening the eligibility criteria for RSL and private affordable homes to include those who have an immediate family connection to people in the Parish or Neighbouring Parish (not to the PDNP overall). Comments noted.

S-69-33	1368325	Derbyshire Dales District Council	Support widening the eligibility criteria for RSL and private managed affordable housing. 10 years is too long and key workers should be allowed to move into the area. For affordable homes to buy the 10 year local connection is creating problems with obtaining mortgages to buy homes. Unsure about a new policy on tied accommodation as no information has been provided. Comments noted.
S-67-19	1367857	Over Haddon Parish Council	Support an approach to retain eligibility to at least ten years within the past who wish to return to their community (parish or adjoining parish. They support 'local' to be amended to (not now living in the Parish , but having resided in the Parish or adjoining Parishes for at least 10 years in the past, who wish to return to their community). The 10% extension does not work and should be removed and common sense should prevail. Comments noted.
S-62-19	1368170		Unsure about eligibility. Supports exploring new policy on tied accommodation - nature of employment and society in general is changing. Comments noted.
S-59-15	1368081	SMDC	Support widening eligibility criteria for social and private affordable housing. The present criteria is too limiting and does not recognise the needs of a diverse and mobile community. Ten years is a significant period of time. Policy needs to be flexible to allow a diverse range of people to live in the area. Comments noted.
S-57-16	1368149	Great Longstone Parish Council	Support for conditions on eligibility to be in perpetuity, a balance of social rent and purchased affordable housing, the continued suppression of market value to allow for ongoing affordability. Unsure about widening the eligibility criteria for privately and managed affordable homes. Comments noted.

S-50-20	1367561	Peak Park Parishes Forum	Support widening eligibility criteria for RSL and private affordable housing as it is currently too restrictive. Unsure about tied accommodation as don't know enough about the topic to comment. Comments noted.
S-45-25	1367903	Froggatt Parish Meeting	Do not support widening the eligibility criteria for RSL affordable housing. As per issue 30. They do agree with widening it for private affordable housing (issue 30) and that we should explore new policy on tied accommodation (issue 30). Comments noted.
S-44-7	1367865	Eyam Parish Council	Support widening the eligibility criteria for RSL managed homes as it is currently too restrictive. They are unsure about widening it for privately owned affordable homes or exploring new policy on tied accommodation. Comments noted.
S-42-46	1367805		Support widening eligibility for social and private affordable housing. We must be able to give affordable housing opportunities to people who hold critical positions within our community, who may not otherwise be able to work here. Unsure about tied accommodation. Comments noted.
S-40-2	1367788		Supports widening eligibility criteria for RSL and private affordable housing to permit key workers to live in affordable housing (health care and social workers, police, fire persons, those employed in conservation within the National Park and such like). Flexibility is key to meeting housing needs, notably for affordable use. Is comfortable with the current arrangement on tied accommodation. Comments noted.
S-32-16	1367524	Bamford with Thornhill Parish Council	Do not support widening eligibility for social or private affordable housing. The existing criteria are felt to be reasonable. Change from parish or adjoining parish to (for example) within 5 miles. We don't know enough about tied accommodation to comment. Comments noted.

S-31-8	1367452		Supports widening eligibility criteria. Policy DMH2 is too restrictive and makes it more expensive or even impossible to borrow money for locals to buy a local needs home. Comments noted.
S-30-25	1367447	Country Landowners Association	Unsure about widening eligibility for RSL affordable housing. Increasing the supply and availability of housing will help make housing more affordable. A balance must be struck between providing opportunities for locals and making housing accessible to those who wish to move in and contribute to the area, and to feel welcomed. The authority should avoid becoming too prescriptive in its requirements as this can undermine confidence and add hurdles to the delivery of much needed housing. Comments noted. In response as a national park our purposes take priority and our focus for new housing is towards affordable housing as per the direction in the national parks vision and circular (2010).
S-13-10	1364893		Supports widening eligibility criteria for RSL and private housing. Affordable housing needs to support new job opportunities which may be taken up by new younger people choosing to relocate to the NP. The NP needs policies to support inward migration of younger people to jobs that may not be highly paid in public services or related tourism. Unsure about tied accommodation - Tied accommodation can be difficult for employees to progress in their careers. Comments noted.
S-9-31	1364715		Yes. Reduce the period from 10 years to 5 years for social affordable housing. I also think that another reason someone may have a compelling reason to live in the national park is marriage, civil partnership with someone who meets the residence requirements. Support widening privately owned affordable homes. where people are building their own homes I do not think they should be defined as affordable homes as this unfairly prejudices them. The local connection is fair enough, but this is also tied up with a size restriction which makes no sense in the context of self-build housing. Unsure about exploring a new policy on tied accommodation. Comments noted - In response when applying for a property, only one person in the family is required to demonstrate they meet the local connection requirement. The purposes of allowing people to meet their own need is that the size of property is based on need. This is also being reviewed.

S-7-8	1364251		Supports widening eligibility criteria for social and private affordable housing. The current definition interprets 'local needs' to mean people with local connections, rather than people from whatever region, who meet local needs. Amend the definition to include key workers, including care workers and those working in tourism and hospitality whose work involves anti-social hours. The current system of hereditary access to the housing market is perpetuating a population within the National Park that is not representative of the nation as a whole. Comments noted.

Q7.4 Affordable housing – local connection

Submission Responses			
#	Consultee Id	Consultee Organisation	Summary and PDNPA response
S-223-31	1369632	Hartington Town Quarter Parish Council	Unsure about retain or reduce the local connection for social affordable housing, although recognise that five years can seem a long time. Unsure about the approach to private developers concerned that reducing the requirement would lead to speculative development. No change to the local connection for returners. Unsure about any exceptions - possibly if there is a compelling case for key workers whose occupation cannot easily be filled within the national park. It is extremely hard for genuinely local people to get a foothold on the housing ladder. Top priority should be given to local people. There should be greater emphasis on rental properties. Comments noted.
S-221-30	1369595		Supports the reduction of the local connection for social and private affordable housing. Does not think the local connection for returners should be redefined. There are no exceptions. Comments noted.

S-220-14	1369594		Retain the current 10 year rules for local connection but change the definition of a "local connection". Possible criteria to consider could include whether people were born in the Peak district; have family in the Peak District; have or are taking up a job within the Peak district or had moved away to work elsewhere but wish to retire back to the Peak District. Perhaps a requirement for more than one category to be fulfilled could be considered too. Comments noted.
S-218-6	1369554		Work in essential services (evidenced by a permanent contract for employment in a listed occupation with an employer in the Park and entailing employment of more than 16 hours per week) be added to existing affordable housing eligibility criteria and that persons in this category should not have to demonstrate a local connection, but that otherwise eligibility and local connection criteria should remain unchanged, at least until clear evidence can be presented of insufficient demand for affordable homes from households in existing categories. Comments noted.

S-214-31	1369550	Hope with Aston Parish Council	Reduce the 10 year local connection to 5 years for RSL and private affordable housing. Support to redefine 'local connection' by extending it to incorporate issues raised in Question 30. Support exceptions to the requirement for a local connection. Vibrant local communities need to have a more liberal policy framework on local connection. Other policies can be used to determine whether this development is locally appropriate. Any policies set should be sufficiently flexible to recognise the specificity of individual locations and their needs, and to be responsive to local consultation about the priorities for the communities involved. In response - The Local Plan will provide the policy framework for local connection across the National Park. A parish council may prepare a Neighbourhood Plan if they wish to respond specifically to the needs of their community providing it aligns with the Local Plan. Note the request for flexibility for consideration.
S-211-2	1369547		5 years living in an area to obtain local status is just too little as this can be done fairly easily by lodging, or camping in the area. Any children who were born, educated and brought up in but have left the area (possibly to buy independence more cheaply elsewhere or to go to university), should most definitely qualify for any affordable housing in order to return to the area, should they wish. The original agreed building line should be honoured. If you wish to own property in any National Park, it should not be as cheap as living in a terraced house in e.g. Chesterfield. Just because someone would like to live in a national park, it shouldn't mean they necessarily can, if they cant afford to. Since the Peak Park Planning Board was founded, the proof of its success is it is still a beautiful place to live and visit and its beauty and eco systems should be protected. A smaller population is one of the attractions and isnt always a bad thing. Comments noted.
S-210-28	1369546		Support to retain the 10 year local connection. Do not redefine the local connection for those wishing to return. Reference to local community facilities being supported by people who live outside of the local community. More houses does not equal sustainable communities. Comments noted.

S-207-24	1369542	Youlgrave Community Land Trust.	Retain the 10 year connection. Introduce an exception that health workers, Council House staff, PDNPA workers and to improve ethnic diversity of communities. It should also be noted that as a result of the Derbyshire Clause mortgages can be difficult/impossible to obtain as this status is not recognised by many mortgage companies. Comments noted.
S-200-27	1369531	Stanton in Peak Parish Council	Reduce the 10 year local connection for RSL and private developers. Redefine 'local connection' for returners to include past connections. There should be exceptions to the requirement for a local connection - vital workers (nurses, care workers etc) as they support the local communities, not just the workers associated with managing [the landscape of] the Park. Comments noted.
S-196-4	1369527	Peak District Rural Housing Association	Supports a reduction to the 10 year connection to 5 years for social and private affordable housing. Redefine the returners criteria to 5 out of the last 10 years. There are no exceptions. Comments noted.
S-194-31	1369525	Derbyshire Dales District Council	Support to reduce 10 year local connection to 5 years for social and consider reducing for private. The justification for a local occupancy is accepted and well understood, however it is considered that the cascade system should be refined in conjunction with the review of the length of the 10 year local connection criteria local connection and cascade to ensure that properties when they do become available can benefit the local community. Also need to consider the long term provision of services to support older people needing care. Comments noted.
S-193-20	1369524	Winster Parish Council	The local connection is too restrictive but have no suggestions. Comments noted.
S-189-9	1369519		Local connection is vital and needs to be strengthened to avoid abuse. Comments noted.

S-188-18	1369508	Staffordshire Moorlands District Council	Reduce the local connection for first occupation to 5 years as the current policy is too restrictive. Comments noted.
S-185-29	1369502	Devonshire Group	Decisions regarding estate homes should be made by the Estate. Comments noted. In response, all new affordable homes built will be subject to the same allocations policy as set out in the Local Plan.
S-179-6	1369495	Charlesworth Parish Council	Support the retention of the 10 year local connection requirement and support exceptions where new homes are needed to support farming and other local enterprises. Include public services also to these exceptions (education, health, care, emergency services). This recognises the difficulty for many in the workforce in finding suitable housing, often forcing a lengthy commute consequently. Comments noted.
S-174-6	1369489	Labour Party - Bakewell and Northern Dales branch	Unsure for social and private affordable housing. Work in essential services (evidenced by a permanent contract for employment in a listed occupation with an employer in the Park and entailing employment of more than 16 hours per week) be added to existing affordable housing eligibility criteria and that persons in this category should not have to demonstrate a local connection, but that otherwise eligibility and local connection criteria should remain unchanged. Comments noted.
S-172-4	1369486	Grindleford Parish Council	Support reducing the 10 year local connection. Support criteria which takes account of local roots as well as continuous length of residence. Comments noted.
S-162-17	1369460	High Peak Borough Council	Reduce the local connection from 10 years to 5 years for social and private housing. Support redefining the local connection test to allow people who grew up / went to school in the park to return. There should be no other exceptions to the local connection. Comments noted.

S-157-23	1369450	Holme Valley Parish Council	Support the retention of the 10 year local connection requirement for RSL and private affordable housing. Do not support redefining 'local connection' for returners. Support looking into policy on tied accommodation. A local connection needs to be meaningful, with a long personal or family connection. Five years is insufficient to demonstrate this, so the ten year qualification should remain. A tightly drawn employment qualification will contribute to the health of the local economy and the existence of sustainable communities. Comments noted.
S-156-14	1367563		Retain the 10 year connection. Do not decrease it. Comments noted.
S-153-28	1369437		Reduce the 10 year local connection requirement for social and private affordable housing. Redefine local connection for returners to include past connections. There are exceptions to the requirement for a local connection. Vital workers such as nurses, care workers should be included as they support the local communities, not just the work associated with managing the Park. Comments noted.
S-150-31	1369431		The 10 yr local connection requirement for first occupation of RSL homes MUST stay at 10 yrs or more. Building on Green Field sites must be an absolute last resort, or what is all this planning control about. Comments noted.

S-137-6	1369370	Derbyshire ALC	Unsure. Use a wider and more flexible concept of local connection rather than the present rigid parish and adjacent parishes concept, would be helpful. This should reflect the geography, transport links and practical everyday connections between settlements in different parts of the Park. Recommend no requirement for tied accommodation. Comments noted.
S-136-45	1369368		Reduce. 10 years is too restrictive. Redefine local connection for returners to 5 years. Regarding exceptions - Ideally, we would like to see an increase in sustainable rural initiatives. These should not be tied to agriculture, but should support all management plan objectives. Comments noted.
S-129-6	1369199	Rowsley Parish Council	Supports the retention of a 10 year local connection requirement for social and private affordable homes. Comments noted.
S-128-35	1369275	Rural Action Derbyshire	Reduce 10 year local connection. Patterns of settlement, employment etc have changed over the years and people have become more transitory as they seek employment or educational opportunities. Policy for returners should be reduced and widened to include birth, family, school or work connections. There are exceptions to the policy Farming, forestry, hospitality and tourism and care sector are all struggling to recruit and would benefit from a relaxation in the local connection rule. The relaxation should be for family homes rather than single person accommodation. Comments noted. In response,
S-120-20	1368991	Marsh Farm Development Co Ltd	Retain local connection for social and private affordable dwellings and for returners. There are exceptions. We are short of key workers, these need to be added to the list where appropriate. Comments noted.

S-118-15	1369267	Haddon Estate	Reduce the local connection for social and private affordable housing. The policy position has not addressed a decline in population. There is an ageing population. The changes have placed pressure on existing local services and schools are well under capacity. The closure of schools would mean that pupils would likely have to travel further for their education and result in less sustainable travel patterns. The widening of the local connection criteria would assist in addressing this population decline by allowing more people to stay within the Peak District and result in a more diverse and resilient community. It is considered that there is not currently enough evidence available to make a judgement on the precise number of years someone would need to be a resident in the Peak District to qualify. However, the current 10 year rule is clearly not working and so the figure should clearly be less than this. The Strategic Housing Market Assessment (or similar) that informs the new Local Plan should contain evidence around this. Comments noted.
S-113-30	1369153	Edale Parish Council	Support reducing local connection to 5 years for all. For returners they support 10 years before leaving (including as a child). The only exceptions should be for roles where people must live in a community and the roles cannot be filled by those who already have a local connection (social carers could be an example). Comments noted.
S-110-16	1369133	Middleton and Smerrill Parish Council	Local connection should be reviewed in the light of current conditions and with reference to future developments within the Peak District. Comments noted.
S-108-9	1369131	Youlgrave Parish Council	Retain 10 year local connection. There should still be a local connection requirement for privately developed affordable homes, but a more flexible or relaxed approach should be taken if it secures more affordable housing in perpetuity for a community. Comments noted.

S-107-3	1368485	NCHA	Reduce the 10 year connection for social affordable housing. To reduce this would still provide housing for local people, supporting the community. But by making development and occupation easier this would enable more development to progress to match Peak Park requirement for Development and aspiration on programme. Unsure about the approach to private developers. Affordable housing, according to the figures present, only constitutes 22% of the provision of housing. To reduce the criteria of private housing would have a significant impact on development of houses but may not assist in developing sustainable communities. Yes to redefine local connection for returners. The definition should include for people who are still working within the Peak Park but have had to move out since housing was too expensive or not available. Unsure about any exceptions. Comments noted.
S-104-8	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Reduce the 10 year local connection to 5 years over the past 10 years or before the age of 18 to attract back children who have left the area for study and gain work experience for both social and private affordable housing. There should also be weight given to essential workers other than farm workers who are already covered by agricultural tenancies. For returners the residence qualification should apply to time spent living in the Park up to the age of eighteen. Yes there should be an exception to the requirement for a local connection for doctors, nurses, dentists, specialist trades etc. that are essential for ensuring the vitality of the National Park. Comments noted.
S-98-12	1368689	Greater Manchester and High Peak Area of the Ramblers	Recognise the need for affordable housing but would also want policy to protect landscape character, rights of way, and access. Comments noted.

S-73-14	1368375	Bradwell Community Land Trust	a and b - the 10-year requirement is too restrictive and should be reduced to 3 or 5 years. Many people may have very good reasons for moving (work, family etc) and 3 to 5 years is enough to demonstrate a commitment to an area. c this is also too restrictive and could be amended to something like 3 years out of the last 6, for the same reason. D accommodation allowed on exception to provide housing for those working in agriculture etc. should not also be restricted to those qualifying for affordable housing. An overly restrictive approach could place unnecessary constraints on agricultural enterprises. Comments noted.
S-71-22	1368373	Tideswell Parish Council	Support reducing the 10 year local connection requirement for RSL and private affordable homes to 7 or 5 years. Comments noted.
S-69-26	1368325	Derbyshire Dales District Council	Reduce 10-year local connection for social and private affordable housing. 10 years is too restrictive, and prevents key workers moving into the area. It appears to be getting harder to find mortgage finance for these properties. Redefine local connection for returners. There are exceptions -although farming, forestry and rural enterprises are no more important than schools, shops, GP surgeries and emergency service workers, which should also be exempt from local connection requirement. Comments noted.
S-68-9	1368264	Bakewell Resident	Retain the local connection criteria as they are for all options. There are exceptions for people who have jobs at other public services, post people, teachers, doctors, dentists, nurses. Comments noted.
S-67-15	1367857	Over Haddon Parish Council	Local Need Affordable criteria should remain as is with the exception of the Local criteria being amended to (not now living in the Parish , but having resided in the Parish or adjoining Parishes for at least 10 years in the past, who wish to return to their community.) Yes - redefine 'local connection' for people wishing to return to the Peak District. Comments noted.

S-62-38	1368170		Retain the 10 year connection for all that live within the National Park. Redefine 'local connection' for people wishing to return to the National Park. Yes to exceptions to the requirement for a local connection in response to the change in nature and the economy. Comments noted.
S-59-2	1368081	SMDC	Support to reduce the local connection across social and private affordable housing as 10 years is too long. And redefine local connection for returners. Supports exceptions. Comments noted.
S-57-17	1368149	Great Longstone Parish Council	Supportive of having a local connection. Comments noted.
S-50-21	1367561	Peak Park Parishes Forum	Reduce the 10 year local connection for RSL and private affordable homes. 5 years would be a sensible requirement. Redefine local connection for returners - use criteria similar to the LDNP. There are exceptions - Providing accommodation in the Park for a range of workers whose roles are within the Park is important for maintaining thriving and sustainable communities and for supporting the local economy. Comments noted.
S-45-11	1367903	Froggatt Parish Meeting	Support the retention of the 10 year local connection, but could reduce it to 7 years to encourage RSL homes. Retain it at 10 years for private developers. Redefine 'local connection' for returners to encourage people who have relatives and family infrastructure in the area to return to the Peak Park. Also slightly redefine for children of local residents who want to return to their home after a period of work or education. Unsure of any exceptions to the requirements. Comments noted.

S-44-53	1367865	Eyam Parish Council	Support the retention of the 10 year connection for social managed affordable homes. Unsure about privately owned/managed affordable homes. Support redefining 'local connection' for returners. There may be exceptions to the requirement. There must always be provision for exceptions. Comments noted.
S-42-25	1367805		Support a reduction in the 10 year local connection requirement for social housing. We need key workers in the farming, care, and hospitality businesses that cant afford to live here, they should be considered for affordable housing as well as people with local connections. Unsure about reducing it for private affordable housing and returners, only in connection with key workers. Key workers should be an exception. Comments noted.
S-40-32	1367788		Retain the 10 year connection for social and private affordable housing with the exception for key workers. Our communities must be able to house people who deliver essential key services [without] which they will be compromised in terms of their wellbeing, safety and amenity. Don't redefine 'local connection' for returners. Comments noted. In response to comment on rent - rents are not set by the NPA.
S-32-3	1367524	Bamford with Thornhill Parish Council	Retain 10 year local connection for social and private affordable housing as it is a reasonable requirement. There is a clear need for exceptions for essential workers who need to live close to their work, e.g. care workers. In order to decide who qualifies for an exception (and given the difficulty of creating an exhaustive list of occupations), we suggest creation of a points system for applicants. Comments noted.
S-31-9	1367452		Reduce the 10 year connection for social and private affordable housing. Policy DMH2 is too restrictive and makes it more expensive or even impossible to borrow money for locals to buy a local needs home. Comments noted.

S-30-26	1367447	Country Landowners Association	Unsure about changing the local connection requirement. Its recommended to not enact any restrictive policy. Bearing in mind the authority's vision to foster caring and welcoming communities. As the policy is highly sensitive to what is considered to be local. With an ageing population its important to ensure that working age individuals can move into areas. The authority should refrain from looking at symptoms and focus on the fundamental issue. The inability to supply enough housing to meet demand in the National Park. Supports there being exceptions to the requirement for a local connection. Comments noted.
S-29-4	1367323		Retain the 10 year local connection for social and private affordable homes. Perhaps the local connection could be spread to a slightly wider area. Comments noted.
S-18-5	1367233		Support redefining local connection for returners. All occupants should have local links for perpetuity. Also those who were educated locally should have a permeant link to the area even if they moved away for early career development. Comments noted.
S-13-23	1364893		Supports a reduced local connection for social and private affordable housing and for returners, to enable a more dynamic housing market. Local connection should include being locally employed. There should be exceptions to enable more inward migration of younger people. Comments noted.

S-9-2	1364715		Supports reducing the local connection for social and private affordable housing. People move around more than they used to. 10 years is a threshold that might be hard for people with a local connection to maintain. 10 years out of the last 20 years might be hard for someone who was born in the Peak Park to comply with if they move away for work and then wish to return home in later life. 5 years may be more appropriate. And for returners 5 years in last 25, or proof that the person was born and raised locally. There should be exceptions to support local amenities (e.g. medical and care sectors), rural business and farming. Comments noted.
S-7-9	1364251		Retain the 10 year connection. The current definition of local connection is appropriate but this should not be the sole criterion for eligibility for affordable housing. Do not change the definition for returners. There are exceptions to the requirement for local connection - One of the policy objectives for the provision of affordable housing should be to address the ageing demographic and lack of diversity in the resident population of the National Park. In addition to farming, other occupations that involve erratic or long working hours, such as healthcare and hospitality, should be considered when considering eligibility for affordable rental accommodation. Comments noted.

Q7.5 Affordable housing – house size

Submission Responses		organisation	Summary and PDNPA response
#	Consultee Id	Consultee Organisation	Summary and PDNPA response
S-225-4	1370310	Fawfieldhead Parish Council	Does not support the retention of a size restriction on new affordable homes. The current size restrictions for affordable homes should not be retained. If any size criteria are kept at all, they should be increased very significantly. The current guidelines lead to small and cramped accommodation and discourage people from building this type of accommodation, and provide a poor quality of life for occupants. The current size restrictions dont allow for people to: a) Work from home b) Have friends and families to stay overnight and care for grandchildren overnight. c) Allow for growing families d) Allow older people to have live in carers and to adapt accommodation as they get older. There was no mention of how this would affect existing affordable homes and this should be addressed. Affordable homes should provide a reasonable standard of comfort and quality of life. Comments noted. Note the comment that current size restrictions do not allow for people to have space to work from home, have visitors to stay, allow for growing families, any need for care provision. Note the request for previously built affordable homes be able to adapt to any new standards set that are more flexible/permissive.
S-224-18	1369634	Sheffield City Council	No. Recommend using the full minimum NDSS range to social and private market homes to ensure all homes are built to a standard fit for purpose but need to be mindful of not delivering residential development in excessive provision of overly size homes and that sites are used efficiently (NPPF 128). Yes the same NDSS standards should be applied to RSL and privately developed homes. Comments noted.

S-223-32	1369632	Hartington Town Quarter Parish Council	Support to retain a size restriction within limits. There should be some flexibility providing they can be delivered at a price that ensures they remain is affordable. Everyone deserves as good a house as is possible, and size is a key element in this. Does the size make the house unaffordable to rent or buy for first and subsequent tenants? All prices must be at an agreed discount against a price agreed by the District Valuer . Comments noted.
S-221-31	1369595		Retain a size restriction for RSL and private affordable homes. Comments noted.
S-218-7	1369554		The Plan should make clear whether its present standards are both minimums and maximums or whether a new minimum standard has been applied. No general problems appear to arise from its application as both a minimum and maximum (if this is the case). If the problem with space standards enforced in the Park applies only to self-builds by (at the time childless) couples, then the most sensible solution would be to apply the standard more flexibly in this scenario, rather than to make further-reaching changes to the standard. Comments noted.
S-214-32	1369550	Hope with Aston Parish Council	Support for no size restrictions on all new affordable housing. Affordable homes need to offer an appropriate variety of housing. Comments noted.
S-210-29	1369546		Support to retain a size restriction for new affordable homes, both RSL and privately developed as it is a way of continuing to make them affordable. Comments noted.
S-207-25	1369542	Youlgrave Community Land Trust.	Design of housing should perhaps pay heed to the recommendation of the new Rural Housing document in terms of use of rooms, layout and safe space for children to play. Note comments and review Rural Housing document referred to.

S-200-28	1369531	Stanton in Peak Parish Council	Support to retain a size restriction on new affordable homes for RSL and privately built but review them as they are outdated. Allow for a margin of expansion when first built to allow for families to expand when they have a family. Size restrictions can help affordability in many ways. Comments noted.
S-196-5	1369527	Peak District Rural Housing Association	No to retaining a size restriction. Have the same standards for social and private affordable homes. The NDSS should only be considered as a minimum standard for the development of affordable homes that meet the demands of modern society and allow greater flexibility in living standards. Comments noted.
S-194-32	1369525	Derbyshire Dales District Council	No to retaining a size restriction. The ability of people to afford the rents and equity stakes of affordable housing are driven by other factors. The Nationally Described Space Standard (NDSS) is the standard method for ensuring those who have the least housing choices are provided with a minimum standard that promotes a healthy family home where families can eat together and children can grow and study in quiet spaces within the home. Relying on fixed floor areas is an outdated way of trying to manage the affordability of social housing and does not reflect the needs of modern families. NDSS also has more categories of sizes. Commented noted.
S-193-21	1369524	Winster Parish Council	Must allow for single person to start a family, or for a family to grow. Some smaller houses, by extending, could become suitable for families where they arent currently. Some of the suggested sizes are very small and could at least be increased. Comments noted. Note the request for flexibility to extend as circumstances change.
S-188-19	1369508	Staffordshire Moorlands District Council	Do not support a size restriction on new affordable homes. The NDSS should be seen as the minimum standard acceptable not the maximum to ensure healthy living conditions in social housing. Impose the same standards for social and private affordable housing. Comments noted.

S-185-30	1369502	Devonshire Group	Support a size restriction on new affordable homes but the same standards should not be applied to RSL and privately development homes. Flexibility is required to meet 'need'. Comments noted.
S-174-7	1369489	Labour Party - Bakewell and Northern Dales branch	The Plan should make clear whether its present standards are both minimums and maximums or whether a new minimum standard has been applied. No general problems appear to arise from its application as both a minimum and maximum (if this is the case). If the problem with space standards enforced in the Park applies only to self-builds by (at the time childless) couples, then the most sensible solution would be to apply the standard more flexibly in this scenario, rather than to make further-reaching changes to the standard. Comments noted.
S-172-5	1369486	Grindleford Parish Council	Unsure about retaining a size restriction on new affordable homes. Would support some careful relaxation of the rules restricting size of affordable housing. There is a gap in the market between small starter home suitable really for a couple and perhaps a small child, and affordable family accommodation. Comments noted.
S-165-30	1369466	Taddington and Priestcliffe Parish Council	There may be a case for a maximum size on new housing. RSL should be able to determine their own requirements. Privately developed homes should be limited to a single maximum size plus any reasonable accommodation for garaging, outside storage, homeworking etc. References a need to review extensions - Response: this is in the review. Comments noted.
S-162-18	1369460	High Peak Borough Council	No. NDSS should be seen as the minimum standard acceptable not the maximum to ensure healthy living conditions in social housing. Have the same standards for RSL and private affordable homes. Comments noted.
S-157-24	1369450	Holme Valley Parish Council	Support to retain a size restriction for RSL and private affordable housing. Size restrictions are more likely to keep housing affordable, in the longer run. It is also an efficient use of green field land. Comments noted.

S-153-29	1369437		Supports a size restriction on new affordable homes for both social and private affordable homes, but should be updated. A margin of expansion should also be allowed when first built, to allow for families to expand without the need to be moving as soon as they have a family. A size restriction can help with affordability. Comments noted.
S-150-32	1369431		Retain a size restriction on new affordable home but review it. Private affordable developments should have a different, larger size restriction than RSLs. A private affordable home could be on land already owned by the person needing the home, or their family. This will help achieved visual higher standards in the built environment. Comments noted.
S-137-29	1369370	Derbyshire ALC	Support to retain a size restriction, but not the same for social and private affordable housing. Maximum permitted sizing for affordable housing may need to be adjusted (upwards) somewhat to accommodate the increased incidence of working from home. For privately developed homes affordability should limit the size but should be somewhat more flexible to allow some future proofing, otherwise the restrictive approach could lead to overcrowding in privately developed housing. Comments noted.
S-136-48	1369368		Support to retain a size restriction for RSL and private affordable housing. We try to minimise development within the National Park to protect its Special Qualities. This means that each property which is developed needs to work hard. Increase property density within developments, albeit with communal open spaces, to create more affordable homes per unit area. Comments noted.

S-128-13	1369275	Rural Action Derbyshire	Support a size restriction. It helps to ensure they remain affordable in perpetuity. Need to consider the space taken up by super insulating materials are used in construction in size restrictions. Unsure about whether the same standards apply to RSL and private homes. Some privately developed homes are of a scale and size that is disproportionate to what is actually needed. We would suggest that the same standards apply for RSL developments but perhaps a maximum size set for private developers. The size does need to take account of the rise in home working. Comments noted.
S-120-27	1368991	Marsh Farm Development Co Ltd	Unsure about a size restriction on new affordable homes. Yes the same standards should apply to RSL and privately developed homes. Comments noted.
S-113-31	1369153	Edale Parish Council	Support to retain a size restriction on new affordable homes for social and private affordable homes but that it needs revising to reflect working from home and to growing families. To maintain thriving communities, some restriction is need so that we do not end up with too many large homes which end up being unaffordable for local people. Comments noted.
S-108-10	1369131	Youlgrave Parish Council	Although the size restriction on new affordable homes is well intended it shouldn't be a block for those local people who have the opportunity and means to build their own local affordable homes. There must be flexibility in this policy so that local families satisfying the local connections test can be allowed to build larger family homes intended for long term use. This would allow local families to secure long term inter-generational homes and so remain in communities. Comments noted.

S-107-13	1368485	NCHA	Yes. The restrictions are easy to follow since they are compatible with Homes England Criteria at present. By offering a maximum gross internal floor area they do restrict the value of the property being built ensuring they remain affordable with regards to open market value. Under allocation criteria the houses can not be under occupied so provision expansion of family does not have to be accounted for. Unsure about RSL and private homes having the same standards. As described in the description if a person has built their own property, even as affordable, they would be looking to accommodate for future expansion of the family. To support a sustainable community Peak Park need to support families being able to stay in their properties even if they expand. Comments noted.
S-104-1	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Support a size restriction be retained on new affordable homes where the provider can offer homes of various sizes in the same locality and occupants can move to more appropriate properties as their needs change. The same approach should not apply to private affordable housing. It needs to be flexible so that a family can expand to meet their long term expectations. Comments noted.
S-98-43	1368689	Greater Manchester and High Peak Area of the Ramblers	Unsure Noted.
S-73-15	1368375	Bradwell Community Land Trust	Don't think there is a need to apply an upper size limit to new affordable housing because the retention of affordable housing in perpetuity is most effectively secured by planning condition and /or planning obligation. Limiting size is unlikely to be an effective mechanism. The Local Plan should set out minimum space standards. The same standard be applied to RSL and privately developed homes. Comments noted.

S-71-23	1368373	Tideswell Parish Council	Unsure about retaining a size restriction on new affordable homes. More leeway is needed on the initial house size, or perhaps a more generous "extension allowance" could be permitted as families grow. Comments noted.
S-69-3	1368325	Derbyshire Dales District Council	Retain the size restrictions on affordable homes whilst allowing two people living together to start a family without having to move. Not sure if the same standards should be applied to RSL and privately developed homes. Comments noted.
S-68-7	1368264	Bakewell Resident	
S-66-14	1368276		
S-62-30	1368170		No to retaining a size restriction on affordable homes. Need to be more flexible. Why differentiate between RSL and private affordable homes?
S-59-7	1368081	SMDC	SMDC - retain size restriction for social and private affordable housing. There needs to be some way of ensuring that the houses remain affordable. Size restriction can enable this.
S-57-18	1368149	Great Longstone Parish Council	Great Longstone PC are supportive of retaining a size restriction on new affordable homes and to prevent extensions that may impact on affordability in perpetuity.
S-50-47	1367561	Peak Park Parishes Forum	Peak Park Parishes Forum - Does not support a size restriction on new affordable homes. Communities need a range of sizes of homes for differing needs. The current rules are too rigid to satisfactorily achieve that range of sizes - which is not necessarily about who the current occupants of dwellings are, but may be more about the range of future housing needs which might reasonably arise in that community. The same standards should apply to RSL and private affordable homes. Eligibility needs to be wider than what the Housing Acts states.
S-45-17	1367903	Froggatt Parish Meeting	Froggatt PM support the retention of a size restriction on new affordable homes to prevent overdevelopment of plots. The same approach should be take for RSL and private affordable homes.
S-44-32	1367865	Eyam Parish Council	Eyam PC does not think there should be a size restriction on new affordable home as communities need a range of home sizes. Comments noted.

S-42-42	1367805		Yes to social and private size restrictions. The houses need to remain affordable - if you increase the size, the cost increases.
S-40-33	1367788		An up-to-date Housing Needs Survey is a prerequisite to any consideration of this question. House size can only be informed by understanding where the demand falls. The same standards shouldn't be applied to RSL and private - There must be a flexible approach albeit within a range. Comments noted. In response the evidence is provided in the Lichfields report (Population projections and housing need study 2023)
S-32-14	1367524	Bamford with Thornhill Parish Council	Bamford with Thornhill PC - Support to retain a size restriction for RSL and private affordable homes however, the current rules are too rigid and in need of improvement.
S-31-10	1367452		Does not support a size restriction on new affordable homes. We discriminate against locals in the National Park by using the government rule on minimum size for floor space per person and then Peak Park have swopped it to the maximum floor space allowed per person. Minimum limits were set up by the government for a reason, it is for families to live in a happy and healthy environment and not to be shoe horned in to a small space; we now also need to add in working from home as these numbers are rising. The planning department make their own interpretation of policy DMH1 and say 3 persons can only have a 70m sq. home. People used to buy a home and then prepare to start a family under DMH1 we know of where a family have had planning permission to build a new home and had a baby before they started to allow them to build the next size up, whereas they would have preferred to build the house bigger and then had the baby giving them more time to enjoy the baby and putting less pressure on them. Comments noted.
S-30-27	1367447	Country Landowners Association	Country Landowners Association - does not support a size restriction. The policy negatively impacts the dwellings that can be delivered and the ultimate quality for the occupant. While its understood that theres a desire to keep prices down and limit the visual impact. The authority has a duty to provide quality housing. Small changes in the size of the dwelling is a small factor when considering the cost of housing
S-13-39	1364893		Unsure- People's expectations of what is acceptable accommodation for a family are changing. Comments noted.

S-9-44	1364715	Unsure about retaining a size restriction. If it is retained for RSLs it should be more generous. The same standards should not be applied to RSL and private affordable housing. People are restricted to a small home forever. The size restraints do not work for conversions, especially those with limited openings. The current size standards may work for starter homes but not for families. Comments noted.
S-7-23	1364251	Does not support retaining a size restriction on privately developed affordable homes. The current size restriction should be retained for RSL rental properties, on the understanding that landlords will build a diverse portfolio of properties of different sizes, and tenants are able to upsize or downsize as their requirements change during the course of their lives. Greater flexibility on size might be considered for single self-build properties, where the current and foreseeable future size requirements of the owner might be taken into consideration. Comments noted.

Q8.1 Do you agree with the proposed spatial objectives for shops, services and community facilities?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-33	1369632	Hartington Town Quarter Parish Council	8.1	key word being appropriate.
S-221-32	1369595		8.1	Agrees.
S-214-33	1369550	Hope with Aston Parish Council	8.1	Agrees.
S-210-30	1369546		8.1	The respondent raises concerns about the definition of "sustainable communities" in the context of the local plan. Using Stanton as a case study, they question whether the community assets, like the pub and school, can truly be considered sustainable. The respondent argues that the pub relies on visitors rather than the local community, and the school is sustained by parents driving from outside the national park. They suggest that before implementing policies on affordable housing, the NPA needs to clearly define what constitutes a "sustainable community."
S-207-26	1369542	Youlgrave Community Land Trust.	8.1	Agrees.

S-200-29	1369531	Stanton in Peak Parish Council	8.1	The respondent supports the objectives but expresses concern about the difficulty of ensuring businesses remain in certain locations. They emphasize the importance of supporting vital community services, as their loss can significantly alter the character of a village.
S-194-33	1369525	Derbyshire Dales District Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, as they align with the principles of sustainable development. However, they suggest there should be more cross-referencing with the objectives of the Management Plan to ensure thriving communities.
S-193-22	1369524	Winster Parish Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They suggest exploring additional measures, such as influencing government policy to impose taxes on larger supermarkets, which could help subsidize rents or rates for community shops. These are helpful suggestions, however as a planning authority we wouldn't be able to implement for example, taxes as a county council might.

S-191-2	1369522		8.1	Unsure about the spatial objectives for shops and communities. Whilst supporting 'thriving and sustainable communities', the respondent is opposed to the implications of this - used as a justification to build more homes in the National Park. The number of new houses needed to be built to support services would not be realised in villages across the National Park, only in Bakewell. No village is anywhere near the size it would need to be to achieve a 'sustainable community'. Building more houses to bring in age groups and income groups that are under-represented sounds a noble aim. But it is simply not achievable. There are not the facilities to support the needs of families. DCC is not going to be able continue funding significant numbers of small schools when there are substantial savings to be had from running larger schools. Chasing the dream of economic sustainability will see countryside sacrificed for properties that, even if uncomfortably many in number, can make no difference to the economic viability of education and transport. Comments noted. In response - the PDNPA definition of a thriving and sustainable community is the focus for how our communities would like to be and how we direct development to support this. We are a living National Park and it is right that we support our communities (within our means) to have access to the facilities they need to exist and thrive, that is the purpose of the planning system.
S-188-20	1369508	Staffordshire Moorlands District Council	8.1	Agrees.

S-185-31	1369502	Devonshire Group	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, stating that they would make a positive contribution toward achieving sustainable development.
S-184-18	1369500	Hope Valley Climate Action	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, supporting the development and retention of local community services in a way that reduces the need to travel and promotes sustainable travel options.
S-165-31	1369466	Taddington and Priestcliffe Parish Council	8.1	The respondent disagrees with the proposed spatial objectives for shops, services, and community facilities, citing a lack of clarity regarding the references to travel and transport, which could be interpreted as implying that community facilities would not be viable without bus services. I will add these are references for the next consultation
S-162-19	1369460	High Peak Borough Council	8.1	Agrees.
S-158-18	1369452	Trans Pennine Trail and Sustrans Joint Response	8.1	Supported with further emphasis on the provision required for cycle parking / storage.
S-157-25	1369450	Holme Valley Parish Council	8.1	The respondent advocates for planning policies that support local self-sufficiency in villages and settlements. They suggest reversing the trend of service centralization and rationalization, focusing on prevention rather than treatment. Encouraging local work, economic activity, and the use of local services will reduce travel, alleviate stress, and promote general wellbeing. Supporting local businesses, protecting community services, and helping local shops compete with online retailers are key priorities.

S-154-21	1369442		8.1	The respondent agrees with the proposed spatial objectives, emphasizing the risk of villages becoming "hollowed out" without local facilities. This could lead to demographic changes, including an influx of holiday homes and commuters, rather than permanent residents. The absence of local services makes living in these areas less attractive, especially with changing work patterns. The issue of needing to travel for basic services is highlighted as a key concern.
S-153-30	1369437		8.1	The respondent agrees with the proposed spatial objectives, noting that while it may be difficult to enforce the retention of businesses in certain locations, every effort should be made to support vital community services. The loss of such services could fundamentally alter the character and essence of a village.
S-151-23	1369433		8.1	Agrees
S-150-33	1369431		8.1	Agrees. Notes on local conomy.
S-146-2	1369425		8.1	The respondent highlights the challenge of finding rentable workspace as a sole trader within the National Park. They stress the importance of prioritizing such spaces in new developments, like Hannah Bowman Way Phase 2 in Youlgrave. The respondent emphasizes the growing demand for workspaces as more people move into villages and the need for reliable, long-term office spaces with essential amenities like heating and internet.

S-142-7	1369419		8.1	The respondent supports the idea of having local shops and facilities to reduce the need for car use, emphasizing the importance of secure cycle parking/storage at destinations. They also recommend specifying the measures required to "enable active travel," instead of using vague terms like "enable active travel." Additionally, they advocate for creating cross-boundary access routes into the park in collaboration with neighboring authorities, as currently, it can be challenging to access the park from nearby areas. They also point out that some trails within the park are contributing to car traffic, which should be addressed.
S-138-6	1369372		8.1	You re unsure because you value shops, services, and community facilities, but feel the policy should limit large-scale retail developments to protect small independent businesses.
S-137-1	1369370	Derbyshire ALC	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities because retaining and creating new ones can be beneficial. If an existing site is no longer viable, a change of use combined with new development can support sustainable growth and help maintain facilities, particularly in smaller settlements.
S-136-15	1369368		8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities because sustainable communities require accessible community facilities. Ideally, these facilities should be reachable with reduced car use to support sustainability.
S-128-33	1369275	Rural Action Derbyshire	8.1	Retaining local businesses and community facilities is key to the sustainability of communities.
S-120-4	1368991	Marsh Farm Development Co Ltd	8.1	Shops are not always in the best place consideration should be given for reciting shops and converting redundant shops to accommodation.

S-113-32	1369153	Edale Parish Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, as they are essential for communities. However, they express concern about how these objectives will be achieved in smaller settlements and how planning can help revive services that are disappearing, such as post offices and banks, which are often beyond the National Park's remit.
S-107-15	1368485	NCHA	8.1	Agrees.
S-104-53	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, as smaller villages often have fewer community facilities like pubs, village halls, and churches. These facilities are at risk of being converted into housing, which offers higher profits to developers, ultimately leading to the loss of valuable assets that help the village thrive.
S-98-2	1368689	Greater Manchester and High Peak Area of the Ramblers	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, noting that shops, cafes, and similar facilities also benefit visitors. However, they emphasize that these developments should be sensitively located, harmonizing with the character of the surroundings, protecting rights of way, and enhancing connections to nature.
S-84-2	1368677	Langsett Parish Council	8.1	The residents of Langsett Parish face significant challenges due to very low broadband speeds, which negatively affect both residents and businesses. The slow internet speeds make working from home extremely difficult, forcing some residents to commute for work. This exacerbates travel issues for the community, further contributing to congestion and transportation challenges.
S-73-16	1368375	Bradwell Community Land Trust	8.1	Agrees and refs issue 32.

S-71-25	1368373	Tideswell Parish Council	8.1	Agrees.
S-69-34	1368325	Derbyshire Dales District Council	8.1	Supporting thriving shops and small businesses in the Park has numerous benefits. They help keep villages vibrant and active, providing essential services to both local residents and tourists, particularly during the tourist season.
S-68-30	1368264	Bakewell Resident	8.1	You agree with the proposed spatial objectives for shops, services, and community facilities. The key is ensuring that these facilities are accessible via sustainable networks, and once they are in place, efforts should focus on encouraging their use by locals and visitors. If facilities close, it is essential to find alternative provisions or improve transport options to maintain access.
S-67-3	1367857	Over Haddon Parish Council	8.1	The respondent disagrees with the proposed spatial objectives for shops, services, and community facilities. Over Haddon Parish Council notes that many villages in the Peak District National Park, including theirs, have lost essential services such as schools, shops, and public transport. The increase in second homes and holiday homes is putting local services at risk. They suggest implementing a cap on second homes and holiday homes, providing regular bus services, and supporting community-run shops with funding and favorable planning consent.
S-62-36	1368170		8.1	Agrees.
S-59-21	1368081	SMDC	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They believe that encouraging thriving communities is essential and that reducing carbon emissions related to travel to services outside of the area is important.

S-57-19	1368149	Great Longstone Parish Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. The Parish Council strongly supports the position, emphasizing the need to develop and support existing facilities. There is a general consensus that the current provisions are inadequate for the community's size and force residents to travel outside the village.
S-51-2	1368085		8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They believe that having these locally creates a more friendly, human-centered village, reducing traffic and carbon emissions. They suggest active steps like requiring safe and secure cycling parking, such as Sheffield stands, instead of insecure wheel-only racks.
S-50-41	1367561	Peak Park Parishes Forum	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They believe that planning policy should support shops and facilities, as they are essential for maintaining thriving and sustainable communities.
S-44-2	1367865	Eyam Parish Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They emphasize that shops and community facilities are essential for a thriving community.
S-42-1	1367805		8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They believe that retaining community services and facilities is crucial for promoting village life, as settlements need hubs to meet, talk, and support each other. Losing these facilities would lead to the loss of these essential aspects of community life. Therefore, retaining and enhancing community facilities is seen as essential.

S-40-34	1367788		8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities. They believe that local facilities are essential for thriving communities and for reducing vehicular use, which helps mitigate negative climate impacts.
S-32-12	1367524	Bamford with Thornhill Parish Council	8.1	The respondent agrees with the proposed spatial objectives for shops, services, and community facilities, but suggests that the policy should explicitly allow for the "swap" of changes of use. For example, if a village shop closes and returns to a home, a home elsewhere in the settlement should be able to be converted into a village shop without contention or complications.
S-30-28	1367447	Country Landowners Association	8.1	The respondent disagrees with the proposed spatial objectives for shops, services, and community facilities, arguing that limiting development based on the capacity of public transport in rural areas is unsustainable. They believe that to reverse depopulation, support local businesses, and promote green growth, the authority must recognize the role of transport and allow for broader development. Planning controls on areas that are seen as unsustainable will worsen the situation, so they advocate for allowing appropriate development, including replacement shops and community facilities, to ensure vibrancy and sustainability.
S-13-9	1364893		8.1	Response noted: The reason for agreeing with the proposed spatial objectives for shops, services, and community facilities is that, similar to urban areas, village communities in the National Park should have core facilities accessible within a 10-minute walk, by cycling, or through frequent bus routes.
S-9-5	1364715		8.1	Agrees.
S-7-5	1364251		8.1	Agrees.

Q8.2 Do you agree with our proposal to expand the list of protected community services and facilities?

Submission Responses			
#	Consultee Id	Consultee Organisation	Summary
S-223-34	1369632	Hartington Town Quarter Parish Council	Do you agree with our proposal to expand the list of protected community services and facilities? Yes: - The respondent agrees with the proposal, stating that expanding the list of protected community services and facilities helps support local employment opportunities.
S-222-19	1369631	TPT & Sustrans	The respondent agrees with the proposal, supporting it with the additional emphasis on the need for cycle parking and storage provision.
S-221-33	1369595		
S-214-34	1369550	Hope with Aston Parish Council	The respondent disagrees with the proposal, stating that local communities primarily need essential services, and that caf��s, restaurants, offices, and light industry seem like unnecessary additions. However, they agree that any conversion of such services into residential accommodation should be restricted to meeting local residential needs, rather than being converted into holiday accommodation.

S-207-27	1369542	Youlgrave Community Land Trust.	The respondent agrees with expanding the list of protected community services, emphasizing the need for housing for older people in villages. They suggest that a community-focused approach, such as blocks of flats where older people can care for each other, would improve mental health, reduce loneliness, and enhance overall well-being. This would also free up housing for younger families, addressing both the aging population and housing needs. The respondent highlights the importance of facilitating downsizing for older individuals.
S-200-30	1369531	Stanton in Peak Parish Council	The respondent agrees with expanding the list of protected community services and facilities. They believe this could increase opportunities for local residents and prevent properties from being left vacant. They emphasize the importance of protecting a wider range of premises, but acknowledge that this should be flexible, allowing applicants to demonstrate when a service is no longer needed, viable, or available elsewhere.
S-194-34	1369525	Derbyshire Dales District Council	Agrees, th list is important to a sustainable community.
S-193-23	1369524	Winster Parish Council	Agrees.
S-189-10	1369519		Agres - Existing facilities need protection.
S-184-19	1369500	Hope Valley Climate Action	The respondent agrees with expanding the list of protected community services and facilities. They support the proposal, as the loss of any services in the extended list would likely increase the need for travel, which they believe should be avoided.
S-165-32	1369466	Taddington and Priestcliffe Parish Council	Agrees.

S-157-26	1369450	Holme Valley Parish Council	The respondent agrees with expanding the list of protected community services and facilities, citing the need for villages to remain self-sufficient. They support policies that encourage local business growth and protect community services, reducing the need to travel and promoting well-being. Additionally, they suggest that community groups may need assistance to take ownership and operate services, including funding for feasibility studies and start-up costs.
S-154-22	1369442		Agrees.
S-153-31	1369437		The respondent agrees with expanding the local list of protected community services and facilities, as it may increase opportunities for local residents and is preferable to leaving properties vacant.
S-150-34	1369431		The respondent does not agree with expanding the list of protected community services and facilities, as they believe that without a viable business case, such facilities will remain empty. They argue that imposing restrictions could potentially cause harm.
S-137-50	1369370	Derbyshire ALC	
S-136-30	1369368		Yes, expanding the list of protected community services and facilities is crucial for sustainable communities and a thriving economy in the National Park. In addition to the proposed services, tourist accommodations like hotels and hostels should also be included as vital assets that contribute to local sustainability.
S-129-7	1369199	Rowsley Parish Council	Yes, small local businesses are vital to community cohesion and should be protected where possible. Any new use should be required to demonstrate that it meets a clear community need, ensuring the continued vitality of the area.

S-128-44	1369275	Rural Action Derbyshire	Yes, retail and cafes/restaurants support the local economy by driving footfall, which helps sustain other businesses and community facilities. Retaining light industry, office spaces, and other suitable premises is equally important, as it helps keep local jobs, reduces the need for commuting, and creates opportunities for people to live and work in the area.
S-120-45	1368991	Marsh Farm Development Co Ltd	Agrees.
S-110-17	1369133	Middleton and Smerrill Parish Council	Yes, it is essential to retain policies that protect community facilities from being lost. We support the new policy that will require applications for change of use to prioritize community needs.
S-107-8	1368485	NCHA	Agrees.
S-106-6	1369124	Stanton in Peak PC	Agres with the proposal to expand the list of protected community services. It will help protect a broader range of premises from being lost where it could negatively impact the community. However, it still allows for flexibility, permitting changes where it can be demonstrated that the uses are no longer needed, viable, or available elsewhere.
S-104-13	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Agrees.
S-98-33	1368689	Greater Manchester and High Peak Area of the Ramblers	The respondent agrees with the proposal to expand the list of protected community services and facilities. They support these objectives, emphasizing that shops, cafes, and similar facilities also serve visitors. However, they stress that such developments should be sensitively located, align with the character of their surroundings, protect rights of way, and contribute to connecting people with nature.

S-76-5	1368482	Sport England	The respondent requests a policy review of Paragraph 8.7, which includes sports facilities. They highlight that the policy is inconsistent with the NPPF and does not consider developments that could impact sports use. They suggest updating the policy with an evidence base, such as a Playing Pitch Strategy, and using Sport England's Active Environments Framework for consultancy. Additionally, they recommend creating a separate sports policy to distinguish formal sport from informal recreation, referencing relevant NPPF sections and Sport England's guidance. We will take a look at this as response to your comment.
S-73-17	1368375	Bradwell Community Land Trust	The respondent suggests extending the list of protected community services to include shops, cafes, restaurants, offices, and light industrial premises to support local services, businesses, and jobs. However, they emphasize the need for flexibility in the policy, as it would be unreasonable to prevent a change of use if the existing use is not viable.
S-71-24	1368373	Tideswell Parish Council	The respondent is unsure about the proposal, questioning how business premises can be protected if the proprietor is relocating or retiring, as they cannot be forced to remain in business if it is not viable. The policy would work to secure the use of the building as a community facility rather than keep the business in situ.
S-69-30	1368325	Derbyshire Dales District Council	Agrees.

S-68-40	1368264	Bakewell Resident	The respondent agrees with the proposal to expand the list of protected community services and facilities, emphasizing that viable communities rely on the provision of services. Without these services, settlements risk becoming dominated by holiday homes. They also support limiting the number of holiday and second homes, as this would ensure that local services are better utilized by permanent residents.
S-67-25	1367857	Over Haddon Parish Council	Over Haddon Parish Council agrees with the proposal to expand the list of protected community services and facilities. They emphasize that once such services are lost, it is unlikely they would be restored as new businesses. The Council advocates for funding and grants to support small businesses that are struggling but are vital to the community, as their closure would significantly impact both residents and visitors.
S-62-51	1368170		The respondent agrees with the proposal to expand the list of protected community services and facilities, emphasizing the importance of examining current and future service needs and demands due to societal changes.
S-59-33	1368081	SMDC	The respondent agrees with the proposal to expand the list of protected community services and facilities, stressing that local services must be supported and protected to ensure thriving and healthy local communities.
S-57-20	1368149	Great Longstone Parish Council	The respondent agrees with the proposal to expand the list of protected community services and facilities, emphasizing that the range of supported community facilities within the planning policy should be extended.
S-50-17	1367561	Peak Park Parishes Forum	The respondent agrees with the proposal to expand the list of protected community services and facilities, highlighting that planning policy must support shops and facilities essential for maintaining thriving and sustainable communities.

S-44-1	1367865	Eyam Parish Council	The respondent agrees with the proposal to expand the list of protected community services and facilities, emphasizing that it is essential to maintain thriving communities.
S-42-20	1367805		The respondent agrees with the proposal to expand the list of protected community services and facilities, highlighting that community facilities serve as hubs for social engagement. With aging communities, these facilities become even more crucial in providing support within settlements.
S-40-35	1367788		The respondent agrees with the proposal, stating that greater diversity in community services and facilities leads to a stronger local community, more local employment opportunities, and the benefits of economies of scale.
S-13-1	1364893		Response noted: Agreeing to expand protected community services due to the loss of face-to-face banking and lack of basic recreation facilities, especially for young people, which are often funded locally.
S-9-18	1364715		Response noted: Agreeing to expand protected services to maintain the vitality of villages, which rely on a critical mass of services.
S-7-1	1364251		Respondent is unsure.

Q9.1 Should the new local plan include a Bakewell specific chapter than would include policy on landscape and special character?

#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-36	1369632	Hartington Town Quarter Parish Council	9.1	The respondent agrees that a Bakewell-specific chapter should be included in the new local plan due to the town's unique size within the National Park. They also confirm that the qualities making up Bakewell's special character are properly included in the list of Special Quality Key Features shown in Appendix 2: Special Quality Key Features
S-210-31	1369546		9.1	The respondent believes that a Bakewell-specific chapter should be included in the new local plan due to the potential development pressures on the town. They argue that this would be consistent with the goal of retaining the identified communities for settlement.
S-200-31	1369531	Stanton in Peak Parish Council	9.1	The respondent suggests that the decision should be left to the residents of Bakewell and their representatives on the Town Council. They point out that Bakewell already has its own plan and emphasize the importance of balancing commerce for both year-round residents and tourists.

S-194-35	1369525	Derbyshire Dales District Council	9.1	The respondent is unsure about the inclusion of a Bakewell-specific chapter, questioning whether Bakewell should be the focus for new development due to its status as a Market Town, which is inherently more sustainable than other settlements. They express concern about the potential for this policy approach to limit development in Bakewell, which they see as the most sustainable settlement in the National Park, and suggest that this approach should be justified and applied consistently across the entire plan area.
S-192-14	1369523	Mineral Products Association	9.1	The respondent believes that a Bakewell-specific chapter should be included in the local plan, with a focus on maintaining the local vernacular and using locally sourced building materials to preserve the town's character.
S-185-32	1369502	Devonshire Group	9.1	The respondent believes that a Bakewell-specific chapter is unnecessary due to the existing extensive controls through other policies. They also agree that the qualities making up Bakewell's special character are adequately included in the list of Special Quality Key Features in Appendix 2.
S-170-10	1369472	Historic England	9.1	The respondent is unsure about including a Bakewell-specific chapter but suggests that if such a policy is included, additional wording related to heritage should be incorporated.
S-165-33	1369466	Taddington and Priestcliffe Parish Council	9.1	The respondent argues that if the Special Qualities outlined in section 2.3 of the consultation are insufficient for Bakewell, they are likely inadequate for other settlements as well. The special qualities of the National Park should be carefully drafted to avoid the need for a separate special appraisal for Bakewell.
S-151-24	1369433		9.1	Disagrees. Does not beleive bakewell spcial.

S-137-52	1369370	Derbyshire ALC	9.1	The respondent believes a Bakewell-specific chapter is unnecessary, as similar issues apply to other areas, and suggests that Bakewell's character should be protected from large-scale developments that could urbanize the town and overwhelm its infrastructure. They agree that the qualities making up Bakewell's special character are properly included in the list of Special Quality Key Features but stress that definitions and key features should be consistent across all areas of the Park.
S-136-29	1369368		9.1	The respondent supports a Bakewell-specific chapter in the local plan, citing pressure on the town and the potential for sustainable development. They suggest increasing housing density due to the town's low population. They're unsure if the special character of Bakewell is properly reflected in the Special Quality Key Features list.
S-128-18	1369275	Rural Action Derbyshire	9.1	The respondent agrees that the new local plan should include a specific chapter for Bakewell, citing its unique landscape setting, development pressures, and importance to the agricultural community. They believe that the qualities making up Bakewell's special character are not fully captured in the current list, specifically suggesting the inclusion of the Agricultural Business Centre and Farmers Market.
S-120-21	1368991	Marsh Farm Development Co Ltd	9.1	The respondent agrees that the new local plan should include a Bakewell-specific chapter, highlighting its status as the largest town. They also confirm that the qualities defining Bakewell's special character are properly included in the list of Special Quality Key Features.

S-118-16	1369267	Haddon Estate	9.1	The respondent does not believe a Bakewell-specific chapter is necessary, as the qualities defining Bakewell's character are already included in the Special Quality Key Features in Appendix 2 of the Local Plan. They argue that a specific policy for Bakewell would be redundant and that development pressure can be managed through existing policies on housing and recreational uses, particularly via allocations for development.
S-113-33	1369153	Edale Parish Council	9.1	I do not see why Bakewell is a special case.
S-107-4	1368485	NCHA	9.1	Agrees.
S-103-1	1368574	Marshalls plc	9.1	The respondent supports the inclusion of a Bakewell-specific chapter, emphasizing the importance of promoting, conserving, and using indigenous building stone. They highlight the low carbon footprint of locally quarried stone, which has contributed to the aesthetic and character of the Peak Park and Bakewell over centuries. They note that recent developments in Bakewell have successfully used this material to preserve the town's special character.
S-101-6	1369010	Business Peak District	9.1	The respondent acknowledges the debate over a separate chapter for Bakewell but suggests that if such a chapter is included, there could be a case for a separate chapter dedicated to the Peak District's village communities. This chapter would focus on principles for ensuring sustainable village communities. They also raise the possibility of including chapters for each settlement tier, depending on the outcomes of earlier discussions in the plan.

S-98-16	1368689	Greater Manchester and High Peak Area of the Ramblers	9.1	The respondent agrees that the new local plan should include a Bakewell-specific chapter due to its unique role as the key market town in the area, which faces specific pressures. They support the aim of designating Local Green spaces to preserve the town's character, as seen in previous efforts to create a Neighbourhood plan. They also note that other major settlements may benefit from similar designations, but that would be for those communities to decide.
S-71-26	1368373	Tideswell Parish Council	9.1	The respondent is unsure about including a Bakewell-specific chapter in the local plan, expressing curiosity about whether such a chapter would prevent residents from developing a Neighbourhood Plan in the future and whether it would override the chapter in the Local Plan.
S-68-32	1368264	Bakewell Resident	9.1	The respondent agrees that a Bakewell-specific chapter should be included in the new local plan to provide appropriate planning guidance. They believe that the list of Special Quality Key Features in Appendix 2 does not adequately cover market towns and townscapes, and should include these aspects.
S-67-33	1367857	Over Haddon Parish Council	9.1	Over Haddon Parish Council disagrees with the idea of Bakewell taking on affordable housing developments just to meet targets for the wider area, arguing that such housing should be built with local needs in mind. They express concern over the already strained traffic situation in Bakewell. Additionally, they suggest that more should be done to encourage a wider variety of local shops, as Bakewell's town center currently lacks diversity and quality in its shopping experience, being dominated by charity shops, outdoor wear stores, and coffee shops.

S-62-48	1368170		9.1	The respondent agrees that a Bakewell-specific chapter should be included in the new local plan to address its landscape setting and special character, recognizing that Bakewell is a key "honey pot" site under significant pressure. They believe it makes sense to include such policy to prevent further development from detracting from the community's well-being. However, they are unsure if the qualities that make up Bakewell's special character are properly included in the list of Special Quality Key Features shown in Appendix 2.
S-50-51	1367561	Peak Park Parishes Forum	9.1	The respondent does not believe the new local plan should include a Bakewell-specific chapter on landscape setting and special character.
S-46-3	1367784		9.1	The respondent believes the new local plan should include a Bakewell-specific chapter on landscape setting and special character, highlighting the need to consider the impact of development on road traffic congestion. They suggest reinstating the railway to improve public transport links, particularly for young people. They agree that the qualities making up Bakewell's special character are properly included in the list of Special Quality Key Features shown in Appendix 2.
S-44-23	1367865	Eyam Parish Council	9.1	The respondent believes that Bakewell should not be treated differently from other communities in the local plan, questioning the need for a specific chapter on landscape setting and special character. They are unsure whether the qualities making up Bakewell's special character are properly included in the list of Special Quality Key Features shown in Appendix 2.
S-42-13	1367805		9.1	The respondent believes a Bakewell-specific chapter should be included in the local plan but suggests that the main change they would like to see is for the town to not have the smell of chip fat during the summer months.

S-40-36	1367788		9.1	The respondent is broadly comfortable with the current policy position regarding Bakewell and does not see a need for a Bakewell-specific chapter in the new local plan.
S-15-2	1364436		9.1	Response noted: Opposes a Bakewell-specific chapter, emphasizing that Bakewell, as a key market town and visitor center, should remain under national park policies and controls. It is vital that it is not exempt from these broader regulations.
S-9-29	1364715		9.1	Agrees on both.
S-7-6	1364251		9.1	Agrees.

Q10.1 Do you agree with the spatial objectives for the rural economy?			
Submission Responses			
#	Consultee Id	Consultee Organisation	Summary and PDNPA response
S-223-35	1369632	Hartington Town Quarter Parish Council	Support the spatial objectives for the rural economy. a) Yes providing that any new development is required and appropriate in size to the settlement. b) This is an overarching description and the larger settlements by population, could accommodate a larger development than Hartington. Comments noted.
S-221-34	1369595		Doe not support the spatial objectives. Slow sustainable growth is preferable for stability. Comments noted.
S-214-35	1369550	Hope with Aston Parish Council	Support for the spatial objectives. Add phrases relating to nature recovery, climate change, landscape and cultural heritage to make objectives more compatible with government guidance. Comments noted. In response - Policies are read in combination to prevent repetition. Note to align objectives with NPPF paragraph 88 to address comment.
S-207-28	1369542	Youlgrave Community Land Trust.	Support the spatial objectives for the rural economy. It allows flexibility and free market expansion. Comments noted. In response, Local Plan policies constrain development and do not allow for free market expansion. As a National Park our first purposes to conserve and enhance takes priority.
S-203-14	1369536	Tarmac	Support for the spatial objectives for the rural economy in principle. Should make reference to/acknowledge the mineral industry and the contributions made to the local economy through business rates and local employment. Comments noted. Whilst minerals has its own section within the Local Plan we note the need to reference the contribution the minerals industry makes to the economy in this section.

S-202-1	1369534	Deepdale Business Park	Supports an employment land review as current documents are out of date and do not reflect changes in employment patterns, demand, need since covid. Welcomes the update of policies relating to safeguarded employment sites. Does not concur with the proposition that no issues have been identified with regard to Bakewell's safeguarded employment sites. The policies which safeguard employment sites in the Peak District, and specifically in Bakewell, are currently too restrictive and should be amended to provide more flexibility for alternative uses to come forward where B1, B2 and B8 uses have-not come forward. Comment noted. Current planning policy is permissive of other uses to support employment sites but applicants must demonstrate there has been no demand for the site for B1, B2 or B8 uses, this includes evidence of marketing at reasonable rates. The Authority has local plan policy in place to protect safeguarded sites and in cases where alternative uses are proposed, there is clear criteria to assess any loss against so that current and future need is protected.
S-200-32	1369531	Stanton in Peak Parish Council	Support for the rural economy spatial objectives. Whilst rural enterprise should be encouraged, there is a need to ensure the agricultural heritage of Bakewell and surrounding areas and settlements retain their rural roots as limited expansion takes place. Comments noted.
S-194-36	1369525	Derbyshire Dales District Council	Support for the rural economy spatial objectives. The objectives provide encouragement for economic development across the National Park, however it is imperative that the supporting policies in the Local Plan do not have the effect of restricting development important for the local economy by way of for example imposing additional costs due to the design, and materials of construction. Comments noted. In response, development in the National Park is only acceptable if it does not harm the special qualities of the National Park, good design and suitable materials are imperative to achieving this.

S-192-15	1369523	Mineral Products Association	Does not support the spatial objectives for the rural economy. Does not consider the contribution mineral extraction in the National Park makes to well paid jobs as the aim of the objective is to end extraction beyond 2042. Comments noted. In response, this wording is in relation to B1, B2 and B8 uses, not mineral extraction which is addressed in a separate chapter. However, we accept that mineral extraction does contribute to the economy and going forwards it will be considered within the context of the rural economy.
S-188-21	1369508	Staffordshire Moorlands District Council	Support the spatial objectives for the rural economy. Comments noted.
S-185-33	1369502	Devonshire Group	All of the spatial objectives are appropriate. May be opportunities to provide flexibility. Comments noted.
S-184-20	1369500	Hope Valley Climate Action	Do not agree with the spatial objectives for the rural economy. There should be inclusion of reference to promoting businesses and industries that help address the climate emergency, either by reducing greenhouse gas emissions or promoting sequestration. Reference should also be made to the wider environmental impact of new developments increased traffic etc. which must be minimized. There should be a requirement for the separation of rainwater from dirty water, and adequate sustainable drainage systems to allow for infiltration of stormwater rather than flash run-off, which contributes to pollution and flooding. Comments noted. In response, other policies will address climate change. To avoid repetition, policies should be read in combination.
S-179-7	1369495	Charlesworth Parish Council	Support the spatial objectives for the rural economy. For the northern and western parts of the Park, the central town of Buxton, and the peripheral towns of Glossop, New Mills and Whaley Bridge, are much more important. Comments noted.

S-173-11	1369488	Land & Nature Team - PDNPA	Whilst farming underpins a lot of the PDs landscapes and economy, not all farming practices deliver NP purposes (e.g. wall removal/field enlargement, habitat loss, modern agricultural buildings, plastic silage bales, run-off etc). The support for farming should be qualified and should focus on sustainable and environmentally friendly that maintains/enhances the special qualities and valued characteristics of the National Park. Suggest add a new bullet measures that would result in enhancement of the National Parks valued characteristics. Comments noted and taken forwards.
S-170-11	1369472	Historic England	Would welcome heritage included in the spatial objectives. Comments noted. Will look to address this.
S-165-34	1369466	Taddington and Priestcliffe Parish Council	Do not support the spatial objectives for the rural economy. They need to reflect the ambitions of thriving and sustainable objective (circular 2010 appendix 4) - Innovative workplaces and the need for local people to compete in the national and global market for jobs. As written they continue a reliance on tourism and lower paid jobs. There could be business opportunities in the re-use of non-heritage buildings where such use will have limited impact on a village, the surrounding landscape or roads. Comments noted. Take forward a clearer approach to respond to 'innovative workplaces' NP circular 2010, Appendix 4. Some modern agricultural buildings have planning conditions attached to remove them after they are no longer required for agricultural purposes. These conditions were imposed to make the development acceptable.
S-163-23	1368617		Supports spatial objectives for rural economy. They sounds reasonable and address the special qualities of the National Park. Comments noted.
S-162-20	1369460	High Peak Borough Council	Support. Noted.

S-153-32	1369437		Supports the spatial objectives for the rural economy. Whilst rural enterprise should be encouraged, there is a need to ensure the agricultural heritage of Bakewell and surrounding areas and settlements retain their rural roots as limited expansion takes place. Comments noted.
S-151-25	1369433		Does not support spatial objectives for the rural economy. I do not think developments on the edges of settlements is appropriate in a National Park. Comments noted. Review approach to edge of settlement.
S-150-35	1369431		Supports the spatial objectives for the rural economy. Need to be more pro-active for businesses. This reality needs to change or all you will get is tourist related activity. Comments noted.
S-137-46	1369370	Derbyshire ALC	Support. Noted.
S-136-43	1369368		Generally in agreement. Need to also support new businesses, if they are sustainable. Comments noted.
S-128-14	1369275	Rural Action Derbyshire	Support spatial objectives for the rural economy. The Peak District needs to be a living and sustainable place and that includes a diversity of small businesses rather than focusing entirely on the visitor economy. Support for agricultural businesses, SMEs, artisan producers and digital businesses should be encouraged through planning policy. Comments noted.
S-118-17	1369267	Haddon Estate	Yes. Recognition of the key role of Bakewell is specifically welcomed. Comments noted.

S-113-34	1369153	Edale Parish Council	Do not understand why Bakewell is a special case. A general support for new development may help the local economy but without further safeguards it risks negative impact on landscape and biodiversity. It may also mean that a very few the business owners benefit while local people do not. We would prefer to see developments within existing settlements or around farmsteads. Comments noted.
S-107-16	1368485	NCHA	Yes. Noted.
S-104-38	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Support the spatial objectives for the rural economy. Support high yielding low environmental impact businesses within villages. Provide excellent suitable accommodation including high speed internet, adequate and affordable transport, capacity to grow. Development should be encouraged where it is achievable, sustainable and meets the NP objectives. Comments noted. In response, the Local Plan supports SMEs and will retain it's stance that should a business grow beyond this it will need to move to more appropriately sized accommodation outside of the national park if there is no suitable sites within.
S-103-9	1368574	Marshalls plc	No. It is a selective and half-hearted approach to supporting businesses and the economy is at odds with the NPPF. Comments noted. In response, the next stage of the Local Plan preparation will address your concerns.
S-101-8	1369010	Business Peak District	Do not agree with the spatial objectives for the rural economy. Please refer to the Business Peak District priorities agreed with the PDNPA. Make an explicit commitment to designated locations for new business starts and grow-on sites. Reference the value of social enterprise and partnership working (e.g. Rural Action Derbyshire). A review of PDNPAs planning policy that extends beyond a focus on affordable homes (referenced on page 25) would be very much welcomed. Comments noted. The Authority will liaise further with Business Peak District.

S-98-23	1368689	Greater Manchester and High Peak Area of the Ramblers	Support the spatial objectives for the rural economy. Business development should conserve and enhance the Peak District Special Qualities. Comments noted.
S-94-3	1367847	Wharfe Rural Planning	Does not agree with the spatial objectives for the rural economy. The objectives do not fully support sympathetic and sustainable conversion of newer agricultural buildings for farm diversification/tourism development. Newer agricultural buildings, if carefully converted could support the rural economy, reduce the need for new constructions, limit waste of embodied carbon, and help preserve the landscape. A missed opportunity to promote sustainable development and economic growth. Comments noted. In response, newer agricultural buildings have planning conditions attached to require their removal when no longer required for the purpose they were erected. The open countryside is not usually an appropriate location for general business activity as there are more sustainable locations. There is no reason why materials cannot be recycled to avoid wasted embodied carbon.
S-88-4	1368685	Rainow Parish Council	The need to support nature recovery should be balanced with the growing need to produce more of our own food. More support needs to be given to farmers which helps them in producing more food but also by looking at alternatives. Encouraging diversification should be championed more widely by the PDNPA. Both mobile phone and broadband coverage continues to be a problem for many in and around the village. Attracting new businesses to the area enables not just the creation of more jobs but supports the local community but cannot be achieved if the infrastructure to support new businesses is not there. Comments noted. In response, the Authority does support farm diversification and will continue to do so. Broadband rollout and access is not within the gift of the National Park, however, the Authority will continue to support its delivery.
S-73-18	1368375	Bradwell Community Land Trust	Yes, it is important to provide business and employment opportunities in key settlements, such as Bradwell. The plan needs to be flexible enough to allow business and employment development within and on the edge of settlements, including on greenfield sites where this would not cause harm (e.g. to landscape etc). Comments noted.

S-71-27	1368373	Tideswell Parish Council	Do not agree with the spatial objectives for the rural economy. More emphasis is required in the objectives on non-farming and non-Bakewell businesses. The business objective is very passive in comparison to the other rural economy objectives which mention farming and Bakewell. Suggest "To support new and existing businesses on employment sites that are well-located, enabling them to expand to provide employment opportunities for all our communities." Comments noted.
S-68-31	1368264	Bakewell Resident	Yes. To ensure that digital and creative enterprises can be pursued full fibre provision should be on the spatial objectives. Comments noted.
S-62-5	1368170		Support for spatial objectives for the rural economy. Noted.
S-59-32	1368081	SMDC	Support for the spatial objectives for the rural economy. Noted.
S-57-21	1368149	Great Longstone Parish Council	Support the spatial objectives for the rural economy. Noted.
S-50-49	1367561	Peak Park Parishes Forum	No. There needs to be more focus on attracting innovation businesses - to help sustain the area's future. Comments noted. Local plan evidence will advise on how we can support innovative business.
S-44-6	1367865	Eyam Parish Council	No. There needs to be focus on attracting new businesses. Comments noted. Local Plan evidence will advise on how we can support innovative business.
S-42-27	1367805		Yes. Support new and existing businesses within communities that give varied employment opportunities for all generations. There should be a proactive approach to encouraging new and high tech businesses to the area. Comments noted.

S-40-1	1367788		Yes. The proposal will enhance economic activity and promote greater employment opportunities. References The Rural Premium: Exploring the Impact of the Cost-of-Living Crisis in Rural Areas (published by the All-Party Parliamentary Group for Rural Business and the Rural Powerhouse April 2023). Unleashing Rural Opportunity (published by H M Government 2023). Levelling up the Rural Economy: An Enquiry into Rural Productivity (published by the All-Party Group for Rural Business and the Rural Powerhouse April 2022). They each explore a range of issues and provide a well-informed insight alongside recommendations which, in part, are capable of being addressed at the Local Plan level, including through the review process. Comments noted.
S-30-29	1367447	Country Landowners Association	Yes. Support for the spatial objectives for the rural economy. Extend the policy to allow for growth that could be invested into the NP purposes. Make the area greener. New development must be supported beyond positive policy e.g. new sensitive rural buildings that can provide economic and housing opportunities. The rural economy is facing labour shortages, increasing regulatory, tax burdens and economic challenges. It is vital that the National Park uses all of its levers to support the rural economy. Comments noted.
S-15-3	1364436		Supports the spatial objectives for the rural economy. We need to support and develop local business and local employment opportunities. Comments noted.
S-13-28	1364893		Yes. Noted.
S-9-53	1364715		Yes. Noted.
S-7-2	1364251		Support Noted.

Q10.2 What other tests (other than those listed in Policy DME7 B should we apply to ensure that the piecemeal expansion of business does not harm the landscape and the special qualities of the National Park?

Submission Responses			
#	Consultee Id	Consultee Organisation	Summary
S-223-37	1369632	Hartington Town Quarter Parish Council	Any business which requires piecemeal expansion should be forced to consider relocation which would of course release the site for other uses that accord with policy. Comments noted.
S-214-36	1369550	Hope with Aston Parish Council	A definition of piecemeal is needed. Other tests relating to the crises of climate and nature are also needed. The current focus is only on landscape. In the light of central government guidance this needs to be broadened. Comments noted. In response, policies are to be read in combination to prevent repetition. Note the need to define what piecemeal is and the need to widen focus to include climate change and nature.
S-207-29	1369542	Youlgrave Community Land Trust.	The tests are subjective. They cant be made objective as each situation differs. However, piecemeal development may impede future venture by removing flexibility, creating buildings or features not easily removed or adapted to new/different use. Comments noted. In response, we need to be careful about the impact cumulative piecemeal development has on encroaching on the countryside.

S-194-37	1369525	Derbyshire Dales District Council	The policy approach needs to support economic development in the National Park in order to meet the statutory duty of social and economic well being, as well as the aims and aspirations of the National Park Management Plan. Where existing Economic Development in situ it is considered better to support expansion (of correct scale) rather than potentially support new development in sensitive locations. Direct economic development to existing sites rather than potentially support new development in sensitive locations. Comments noted. In response, the first National Park purposes takes precedence over economic aspirations of business.
S-184-21	1369500	Hope Valley Climate Action	Priority should be given to promoting businesses and industries that help address the climate emergency, either by reducing GHG emissions or promoting sequestration. Businesses that are damaging to the climate should not be allowed to expand. Comments noted. In response, make clear in the Local Plan the links between business development and climate change targets and National Park purposes.
S-165-35	1369466	Taddington and Priestcliffe Parish Council	The tests are adequate. Comments noted.
S-153-33	1369437		Whilst rural enterprise should be encouraged there is a need to ensure the agricultural heritage of Bakewell and surrounding areas and settlements retain their rural roots as limited expansion takes place. Comments noted.
S-150-36	1369431		The tests are sufficient, and a growing business must be encouraged. As long as it is not extractive industry. The Park needs all the quality jobs, and economic activity it can get. Comments noted. In response, the National Park is not a suitable location for unrestricted growth.

S-137-53	1369370	Derbyshire ALC	Could additionally consider the likely life of any new buildings constructed as expanded premises for an existing business, and how embedded in the environment they would be. Genuinely piecemeal development over a long period of time is different from piecemeal development over a period but implementing a masterplan made on Day One and staged in order to circumvent strict rules. Comments noted.
S-136-7	1369368		The informal expansion of existing businesses is problematic and has a significant impact of the Special Qualities of the National Park. It should be more difficult to "regularise" unpermitted development; business expansion should be encouraged if undertaken in a planned way. Comments noted.
S-128-25	1369275	Rural Action Derbyshire	Unsure. Noted.
S-120-8	1368991	Marsh Farm Development Co Ltd	No. Noted.
S-113-35	1369153	Edale Parish Council	All tests should apply to any business development. Expansion should not adversely affect, and wherever possible, secures the enhancement of the site, as well as the future management of the valued characteristics of the site and adjoining land, along with other criteria within this document for landscape, biodiversity, climate change etc. If these are applied rigorously and enforcement is sufficient, we should not need new tests. Comments noted.
S-107-14	1368485	NCHA	Unsure. Noted.

S-106-2	1369124	Stanton in Peak PC	Support the use of tests to apply. Where any expansion is sought, the test should be to outline the total consolidated changes up to and including the current request and consider whether it would be permitted if it had been applied for in one go. (b) If so, then the piecemeal approach would seem irrelevant. If permission would not have been granted, then it should not be bypassed simply because it has been requested as piecemeal expansion. Comments noted.
S-104-51	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Any extension to a business must pass the test of being in an appropriate location whether within a DS1 settlement or in the open countryside. All extensions should be required to demonstrate a net gain in the special characters of National Park. Comments noted.
S-98-42	1368689	Greater Manchester and High Peak Area of the Ramblers	Yes, businesses should be helped to ensure developments and extensions of businesses are sensitively located and work with the character of their surroundings and protect rights of way and help to link people with nature. Comments noted.
S-71-28	1368373	Tideswell Parish Council	Employment opportunities are essential to support the special quality of "Characteristic settlements with strong communities and traditions". Without a mix of employment opportunities, people leave and communities are hollowed out. Any new policy to address this issue needs to allow for some flexibility to ensure businesses are encouraged to grow. Comments noted.
S-68-22	1368264	Bakewell Resident	Yes. Business expansion should be done on the basis of a needs assessment prepared by the business through the standard planning application process. Then the benefits which the business must be able to provide evidence of can be weighed against the potential impacts. Comments noted.

S-62-22	1368170		Unsure. Noted.
S-59-4	1368081	SMDC	Unsure. Noted.
S-57-22	1368149	Great Longstone Parish Council	Supportive of retaining and enhancing the business facilities within the Longstone area. Noted.
S-50-37	1367561	Peak Park Parishes Forum	Unsure because neither yes or no make sense. DME7 B needs also to consider, if the criteria which it lists are not met, what realistic alternatives exist for the business concerned. If the alternatives are very limited, it may be necessary for Planning policy to be more flexible - as it surely cannot be the role of PDNPA (an unelected body) to be obstructive to business growth? Comments noted. In response, if business growth is harmful to the special qualities of the national park then it is appropriate the business relocate to more appropriate premises.
S-44-10	1367865	Eyam Parish Council	Unsure about what tests should apply to protect the landscape and Special Qualities of the National Park from piecemeal expansion of businesses as whilst we should not harm the landscape we must work towards ensuring we have thriving communities and embrace all that means. Comments noted. In response, supporting the economic interests of business cannot be at the cost of the landscape.
S-42-30	1367805		Submission error
S-40-37	1367788		A test should be applied to assess whether relocation to a core employment site is not a better, more viable and less impactful option. Where such relocation takes place the release of the site may afford an opportunity for other forms of more acceptable development such as affordable housing. Comments noted. This is current Local Plan policy.

S-30-30	1367447	Country Landowners Association	Emphasis on sympathetic design. If there is a desire to foster positive economic growth. Growth that supports local wage, green development and the local tax base. Organic piecemeal development must be allowed without unnecessary hurdles being placed on development. Extensions do represent change but the can make a positive contribution to the landscape and allow increased investment towards the parks statutory purposes, with wider benefits to the park. The need to support appropriate development cannot be overstated in helping to make the park sustainable. Comments noted.
S-13-31	1364893		Unsure. Noted.
S-9-8	1364715		Yes. Noted.

Q11.1 Conversion of whole farmsteads to new uses			
Submission Responses			
#	Consultee Id	Consultee Organisation	Summary and PDNPA response
S-225-5	1370310	Fawfieldhead Parish Council	Strongly disagree as a parish that has no named settlement and is classed as open countryside. Fawfieldhead has good examples of converted buildings to private housing to serve and sustain the local community. Support farmsteads being used for business to support the local community. Holiday accommodation is not less intensive and brings much greater number of cars, noise, disturbance. Restrict outdoor space for residential if this is the issue. Comments noted. Note the contribution that converting farmsteads in the open countryside has on the community of parishes with no central village and consider whether we should have a different approach for parishes that have no named settlement. Note objection to the general consideration that holiday accommodation is less intensive than primary residence and that we can use conditions to restrict use of outdoor space.
S-223-38	1369632	Hartington Town Quarter Parish Council	Supports approach to conversion of whole farmsteads. Yes, in principle, as long as development is restricted to the existing build footprint. Rather than holiday accommodation, a conversion to a mixed development with a primary residence clause on any open market dwellings and affordable housing would be of greater benefit to the community. In the open countryside it supports low intensity uses providing access and services are in place. Comments noted.
S-221-35	1369595		Supports the approach to conversion of whole farmsteads. Other than allowing such farms buildings to become derelict (this has happened in previous centuries and is part of the economic history of the Peak) these are the most sensible options. Noted.

S-220-15	1369594		Supports both propositions in a) and b) regarding the conversion of whole farmsteads and think controls on such conversions will help to protect the special qualities of the National Park and also help prevent the piecemeal expansion of sites, especially those in open countryside, and the adverse impacts of such expansion on the landscape. Comments noted.
S-214-37	1369550	Hope with Aston Parish Council	Does not support the approach to conversion of whole farmsteads. The shift from not permitting holiday accommodation to supporting conversion in certain circumstances and where appropriate is too radical a change. A policy encouraging some diversification is needed, but we should not be encouraging more holiday accommodation given existing pressures. Comments noted.
S-210-32	1369546		Support. Noted.
S-200-33	1369531	Stanton in Peak Parish Council	Why cant whole farmsteads located in the open countryside and far from settlements also be considered for primary housing rather than holiday accommodation? Where villages and communities are overrun by 2nd homes and holiday lets, many residents would welcome the opportunity to move out of villages to remoter locations and run small holdings rather than farms. Note response. Current policy maintains a focus directing development to settlements for sustainability reasons and to protect the open countryside.
S-194-38	1369525	Derbyshire Dales District Council	The conversion of farmsteads provide opportunities for the reuse of buildings for a beneficial use for the local economy. However farmsteads are vary in location, and size, and just because they are a little way from existing development does not means that they are inappropriate for conversion. The suitability of each for conversion should be taken on its merits otherwise the potential benefits to the local economy will be limited. A flexible approach should therefore be taken. Noted. The approach aligns with the NPPF approach to business in the countryside.

S-185-34	1369502	Devonshire Group	Concerned that the premise of the question seeks to set overly simplistic assessment criteria. The alternative to sensitive and appropriate re-use will be inevitable decline and loss of that built heritage, and so diminution of NP key characteristics. The criteria stated can be useful indicators of a farmsteads inherent suitability, but should not be to the exclusion of all other considerations. Do not support the approach to farmsteads in the open countryside. Lower intensity uses are not exclusive to holiday accommodation. This is over simplistic and could stifle innovation and creativity in opportunities for their re-use and conservation - see Chatsworth Whole Estate Plan. Comments noted.
S-184-22	1369500	Hope Valley Climate Action	Yes, broadly agree. However the suggested requirement does not go far enough. Stringent measures for the elimination of carbon emissions from the development should be required. The minimization of carbon emissions in any existing building refurbishment should be required, and the change of use or development should demonstrably have adequate provision for active travel (such as cycle storage) and be served by adequate public transport. These requirements should be in place both in cases where farmsteads are physically well related to a settlement or in open countryside. Comments noted. Other policies will address climate change and sustainable travel to avoid duplication.
S-182-6	1369498	Hathersage Parish Council	Support the approach to conversion of whole farmsteads as long as they are close to a public highway. For farmsteads in the open countryside - support low intensity but could include storage space for local businesses eg tradespeople eg plumbers. If they can be converted and used for local needs use, they must not be converted to holiday homes as these give very little input to the local community. People do not have storage at home. Low cost/affordable/local needs housing is in desperate shortage in the Peak District National Park. Comments noted.
S-173-12	1369488	Land & Nature Team - PDNPA	Where conversion of whole farmsteads is proposed, are there mechanisms available to ensure the conservation and enhancement of landscape, biodiversity and cultural heritage features on associated land? Comments noted.

S-170-9	1369472	Historic England	Unsure about the approach to the conversion of whole farmsteads to new uses. Further information would be required to consider the potential impacts for the historic environment. Comments noted.
S-165-36	1369466	Taddington and Priestcliffe Parish Council	Do not support the approach to the conversion of whole farmsteads to new uses. The prime objective should be to conserve and where possible enhance the heritage asset. Is a settlement a named settlement or any settlement? Why a settlement, rather than a location that is well related to the landscape or other buildings. Why is it limited to main roads rather than roads in general? Comments noted. Response: Understand need for clarity and justification.
S-163-24	1368617		Unsure about converting whole farmsteads for business or residential in sustainable locations. A policy allowing whole farm change of use could have the effect of encouraging the sale of farms to non-farming owners, inflating prices and making farms less affordable for those who do still wish to farm the land ; it may also result in much farmland becoming divorced from the farmstead. It is unclear how it would be determined that a farm in /no longer in farm use ; how long would it have to be in the situation for? What would stop people landbanking farms and leaving them unused until that time duration had been reached? Comments noted.
S-157-27	1369450	Holme Valley Parish Council	Support the general approach to the conversion of farmsteads. Yes ; in part and in principle. However, the demand for business use is changing. Our landscape historically has been influenced by industrial use, as well as farming, for example mills, dye factories and quarries. There will be modern uses which demand large amounts of low cost space, for example warehousing and distribution and the push towards home based working could morph into local demand for office or workshop space. Will the new policy enable such changes to take place without losing valuable existing buildings? Comments noted. Response - new policy will respond to the local economy in a way that is appropriate in a protected landscape. We are commissioning a review of the local economy - both current and future needs - and will ensure that local plan policy responds positively in a way that supports national park purposes.

S-153-34	1369437		Does not agree with the approach to the conversion of whole farmsteads to new uses. Why cant whole farmsteads located in the open countryside and far from settlements also be considered for primary housing rather than holiday accommodation? Where villages and communities are overrun by 2nd homes and holiday lets, many residents would welcome the opportunity to move out of villages to remoter locations and run small holdings rather than farms. Comments noted. To support sustainable development, development is directed to settlements.
S-150-37	1369431		Yes I agree, and would remove the sustainable locations near to a main road restriction. Any obsolete farmstead anywhere should be considered on its merits. Don't agree on approach to farmsteads in the open countryside. They have been intensive businesses of a type, and could well provide valuable growth in the economy. The default to holiday accommodation should be a last resort due to over tourism issues discussed elsewhere. Comments noted.
S-140-11	1369412	Hope and Derwent Woodlands Parish Council	Does not support the approach to conversion of whole farmsteads to new uses either in or close to settlements or in the open countryside. Options are too specific. If a planning application fits with the purpose of the Peak Park and it can deliver on these aims and objectives, then it should be considered. Trying to list exactly what is a sustainable location with direct access and closeaccess to a main road for every possible type of development is almost impossible. Similarly physically well related to a settlement; you would waste time and money trying to list and then agree on this for each and every development. Comments noted.
S-138-13	1369372		Does not support the approach to conversion of whole farmsteads to new uses. Supports proximity to settlements but considers that 'direct and close access to a main road' should include access to cycle paths and bus routes to encourage green travel. Unsure about the approach to conversion of whole farmsteads to new uses in the open countryside. Supports the intention of low intensity development, but think development for local people is more important than yet more holiday accommodation. Comments noted.

S-137-24	1369370	Derbyshire ALC	Support approach to convert whole farmsteads with some limitations. Some more factory-style buildings may have to be removed rather than converted. The enhancement is an important factor, but needs a clear definition ; enhancement of what exactly? The overall effect on the environment needs consideration, such as traffic, infrastructure. In the countryside the enhancement criterion should apply here as well, potential use could also be for educational purposes or similar. The overall effect on the village/settlement and environment (built as well as natural) needs considering ; it may be beneficial for the environment to keep these as single units rather than splitting into many units. Comments noted. Note request to define enhancement.
S-136-16	1369368		Does not support the approach. This should be decided on a case by case basis. A well thought through scheme should be allowed, potentially with conditions relating to the designated use. This should include access, impact on local communities and a sustainability assessment. Comments noted.
S-129-8	1369199	Rowsley Parish Council	Supports the approach to conversion of whole farmsteads to new uses. Farmsteads should be allowed to diversity but only to support the main agricultural practice. Any developments should only be carried out to protect and preserve the traditional character of the area and should retain the heritage assets including the landscape around the farmstead. Each development should be viewed on its own merits. Any development should be based on local need as well as to preserve the traditional character of the area. Unsure that isolated whole farmsteads should be restricted to low intensity uses. Comments noted.

S-128-3	1369275	Rural Action Derbyshire	Support approach in/edge/well related/close to road. This would ensure that the impact on the local community, landscape etc and retain the character of the peak district. Do not support the approach in open countryside. This may be unduly prohibitive. Also we would suggest that the amount of holiday accommodation in the peak district may reach saturation point given the issues with traffic in the summer months in particular. Does the peak park need more holiday accommodation? Should we not be working with the farming community to ensure that farms are viable? The Peak District has a long history of small family farms ideally suited to the landscape and with changes to farming practices, falling farm incomes and limited alternative uses this important characteristic will be lost forever. Comments noted.
S-120-34	1368991	Marsh Farm Development Co Ltd	Yes to the approach in/edge/well-related/sustainable location. To protect the open countryside, however development where appropriate in hamlets should be allowed. Yes to the approach to farmsteads in the open countryside. Comments noted.
S-118-18	1369267	Haddon Estate	Support the approach to conversion of whole farmsteads (in/edge/physically well related/main road) that will ensure the continued presence of such buildings in the landscape, whilst meeting a need for housing. The list of criteria would be amended to add an or to ensure that it is clear that the requirements listed are discreet. Support the approach to conversion of whole farmsteads (open countryside) to ensure that the buildings continue to be present but used for less intensive purposes in order to maintain sustainable patterns of development. It is also considered that the use of these buildings for certain employment generating uses that do not result in excessive vehicular movements would also be appropriate. For example small workshops or art studios. This would increase the chances that disused isolated buildings would come back into use, whilst also supporting the local economy. Comments noted.

S-113-36	1369153	Edale Parish Council	Support the approach to the conversion of whole farmsteads. Residential buildings need to have road access and be as close as possible to amenities. Regarding 37b this depends on whether there are already usable roads to the farmstead, which could be a home. In all cases, preference should be given to housing since it is unlikely new builds can satisfy local housing need. We do not think that farms should be converted purely to businesses without any homes attached (cf thriving and sustainable communities and the idea that people should live closer to their work if possible.) Comments noted.
S-108-11	1369131	Youlgrave Parish Council	Agree with (a) we disagree somewhat with (b) in so far as where a more isolated farmstead has good road access or minimal landscape impact, then it may be suitable for more intensive use that may include business use or even light manufacturing that creates local jobs and services. Comments noted.
S-104-35	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Do not support the approach to the conversion of whole farmsteads to new uses in/edge/close to/main road. All such developments should be in a sustainable location and with reasonable access to a main road. The rest is over restrictive. In the open countryside - The key here is that the new activity must be sustainable. This could be appropriate commercial use, such as an office based activity or a mix including permanent housing. Comments noted.
S-98-48	1368689	Greater Manchester and High Peak Area of the Ramblers	Agree with the approach to the conversion of whole farmsteads to new uses. Such conversion could be beneficial and in addition should be sensitively located and work with the character of their surroundings and protect rights of way and help to link people with nature. Comments noted.

S-94-1	1367847	Wharfe Rural Planning	a) and b) not supported. Allowing conversion of remote farmsteads can help preserve historic buildings and be in a way that aligns with sustainable development principles, including renewable energy source and eco-friendly building practices. Commercial or tourist development can be designed to maintain character and heritage and contribute to National Park valued characteristics. Current phrases 'low-intensity and isolated whole farmsteads' are too vague. Introduce clearer guidance to make informed decisions that balance development with the preservation of the natural environment. Support sustainable tourism through the second purpose and business opportunities to champion locally produced food. Policy should be revised to allows for a wider range of uses providing they meet strict environmental and sustiainable criteria. Comments noted. Be more prescriptive about what low-intensity is.
S-71-29	1368373	Tideswell Parish Council	Each proposal to convert whole farmsteads that are no longer in farming use should be considered on a case-by-case basis, rather than a blanket one-size-fits-all policy. Comments noted.
S-68-6	1368264	Bakewell Resident	Yes and unsure. Where a business use is proposed that supports local needs and is not likely to result in a negative impact on the park these should be considered on an individual basis. Comments noted.
S-67-22	1367857	Over Haddon Parish Council	Unsure that the conversion of whole farmsteads should be limited to those in, edge, or nearby a settlement or close to a main road.The Authority needs to support farming. New farm complexes should be developed to enhance the development of farming in the area. Conversion of older farmsteads should only occur to protect and preserve the traditional character and retain the heritage asset, including the landscape around the farmstead. In some circumstances there is no reason why isolated farmsteads should not be converted to housing with good design and permanent residence clauses applied to them. All farmsteads should be looked at on their own merits and Parish Council's should be involved and have a strong view on the matter. Comments noted. Parish Councils are consulted on planning applications.

S-62-18	1368170		Yes and unsure. Noted.
S-50-22	1367561	Peak Park Parishes Forum	Do not agree with the approach to conversion of whole farmsteads in/edge/well-related/sustainable location as they contend that it is acceptable for the farmstead to be anywhere. Do not agree that whole farmsteads in the open countryside should be restricted to low-intensity uses and each application should be considered on its merits. Comments noted.
S-45-18	1367903	Froggatt Parish Meeting	Support approach to conversion of farmsteads if it results in better use of farm buildings for local needs but only those with little attached land. Comments noted.
S-44-29	1367865	Eyam Parish Council	Consider the location of the farmstead should not be an issue and that each application should be treated on its merits. Comments noted.
S-42-26	1367805		Does not support either approach to farmsteads. Farms should be retained for farming and there should be support to allow this to continue. Options for other development will only encourage the financial property speculators to buy up land and convert for personal gain rather than community benefit. Comments noted.
S-40-38	1367788		No - Not necessarily for farmsteads in/edge/close/road - Policy should be adaptive on a case-by-case basis as some farmsteads in such locations may not be suited to conversion. No to approach to farmsteads in the open countryside. In some cases, alternative uses beyond holiday accommodation may be suited and could have a lesser impact than the pre-existing use. The availability of an existing access and existing services could enable them to be brought forward more quickly and with a lesser overall impact than on alternative sites. Comments noted.

S-32-28	1367524	Bamford with Thornhill Parish Council	Agree with the approach to farmsteads in/edge/well-related/sustainable locations and in the open countryside. To be consistent with other aspects of the settlement strategy. Comments noted.
S-30-31	1367447	Country Landowners Association	Do not agree with the approach to farmsteads in/edge/well-related/ sustainable locations. As many farmsteads, even in current agricultural use, may not be appropriate for modern farming going forward and by their nature many are not in close proximity to a settlement or main road. That doesnt automatically mean they are unsustainable locations. The authority should support proposals that led to a net increase in productivity and efficient use of property. Each case will need to be determined on their own facts. Comments noted. Disagree that if a building is not close to a settlement or a main road it be in a sustainable location.
S-22-1	1367238		As IHT Bites into farming sustainability farms will possibly amalgamate. Consider Agricultural Ties to keep ownership of property within the holding down to a basic hectarage. i.e free to change use although not to sell unless/ until land has been farmed within main CPH for x years. Comments noted.
S-19-4	1367234		Delete restriction of small-scale renewables. Noted. In response, the national park is not the appropriate location for large scale renewables that can be delivered outside of the park.
S-13-33	1364893		Supports the approach to whole farmsteads. Noted.
S-9-41	1364715		Supports approach to farmsteads in/edge/close to settlements.Unsure about the approach in the open countryside as in some cases conversion to dwelling could be appropriate. Noted.

S-8-1	1364695	-	Supports approach to conversion of whole farmsteads to new uses. Define whether or not a farm is still farming (and thus development might be farm diversification) or whether it has gone beyond its primary agricultural use. This seems particularly problematic in any area where farming has often traditionally been part-time, and is likely to change slowly over time as well. So some clear distinctions need to be made to help farmers make their decisions appropriately. Define less intensive uses. Would low impact recreation include such things as wildlife watching - which are dependent on a healthy wildlife rich environment (so should be supported), but might need viewing hides or small car parking areas? As more public money is provided to farmers to make these changes, it would seem appropriate to support a nature-based economy at the same time. So appropriate policies are needed for reference. Comments noted. Define less intensive. Not reference to part time farming and diversification.
S-7-32	1364251		Support.

11.2 Do you think we should continue to require in all circumstances the primary land management business to retain ownership and control of the site and building when redundant farm buildings are converted for business use?

Submission Responses			
#	Consultee Id	Consultee Organisation	Summary
S-223-39	1369632	Hartington Town Quarter Parish Council	Primary business should retain ownership otherwise the land and infrastructure around it can be neglected. If a stand-alone business is acceptable maintenance of the land and infrastructure is essential. If individual buildings are sold off piecemeal there is no primary land management business to ensure the upkeep of the historical farm framework and the land around it. There may be totally conflicting views and requirements amongst owners to the detriment of ensuring the historical importance of the overall site is preserved. Comments noted.
S-221-36	1369595		Primary business should retain ownership. Comments noted.
S-220-16	1369594		With the changes in farming practice currently taking place it would appear to be inevitable that without stand-alone businesses being permitted in some circumstances the primary business may itself be in jeopardy. It is important however that the type of stand-alone business permitted is carefully considered to prevent negative impacts occurring such as increased traffic on narrow roads. Comments noted.

S-214-38	1369550	Hope with Aston Parish Council	Support. The risks are that farms become industrial units with no link to the landscape. Maintaining links to the landscape, preserving architectural context and cultural consistency with Park objectives. The Park is still predominantly a farming landscape, policies should seek to support this, not to encourage and support changes away from this cultural history and context. Comments noted. Note concern about farms becoming industrial units with no link to the landscape. Note the need to maintain links to the landscape, preserving architectural context and cultural consistency with Park objectives. The Park is still predominantly a farming landscape, policies should seek to support this, not to encourage and support changes away from this cultural history and context.
S-210-33	1369546		Support for primary business to retain ownership and control. The NPA should continue to require in all circumstances the primary land management business to retain and control the site as failure to do this may see buildings, homes and land separated in to different land ownerships with the possibility of increasing pressure for development. On the other hand, there may be opportunities for nature recovery and biodiversity on surrounding fields if stand-alone business are allowed to proceed. On balance I would retain core strategy E2B with any exceptions requiring a substantial increase in biodiversity. Comments noted.
S-200-34	1369531	Stanton in Peak Parish Council	Support to retain primary ownership. Yes, the primary land management business needs to retain ownership and control of the site and building if redundant farm buildings are converted for business use. There would be a clear risk that management of land could become redundant and the cherry picking of buildings within a farmstead could become an issue. Land management must be tied into property changes, otherwise the Park qualities will deteriorate. Comments noted.
S-194-39	1369525	Derbyshire Dales District Council	Does not support ownership retained by the primary business as it may stifle economic development. There would appear to be no land use planning reason for it when other measures can control the activities that take place in such buildings. Comments noted. In response, the purpose of the policy (as it exists in the current Local Plan) is to support farm diversification and ensure development support appropriate land management to conserve and enhance the National Park.

S-185-35	1369502	Devonshire Group	Do not support retaining primary ownership as there are no risks since the policies of the LP provide are a strong and robust framework for decision making around any development proposals, including matters around design and amenity. Environmental impacts can therefore be given due consideration through the development management process and appropriate controls imposed by way of conditions or, exceptionally, legal agreements. Constraints - The suite of controls available within the development management process, including aligned legal agreements, provide sufficient choice of controls. What matters is that the business(es) are sustainable (economically, environmentally) and operate within acceptable parameters (traffic, noise, landscape, building design etc). The largest proportion of a business assets (by area or value) may be the land but the use of the buildings could generate much greater value. Activities carried out in the buildings may or may not be linked to the agricultural business. The ownership structure of the land and buildings is irrelevant. Some link between multiple activities within a single land holding may be advantageous (supporting holistic management and cross subsidy) but this is not and must not be a prerequisite for policy support. A policy framework that sought to restrict ownership/control in this way would stifle innovation and ultimately be detrimental to the economic fabric of the NP, with negative consequences on social and environmental issues. Comments noted.
S-182-7	1369498	Hathersage Parish Council	Support to retain primary business ownership of buildings. The risks are expansion, outside clutter, staff car parking. Constraints should be local connection, protect variation of skills in the local community, maintain the integrity of the national park. Apply and enforce planning rules. Comments noted.
S-165-37	1369466	Taddington and Priestcliffe Parish Council	There is no obvious reason for a blanket policy requiring ownership and control of a site to be under one manager. The issues are site specific. Comments noted.

S-163-25	1368617		We could have more flexibility in this area. The risks are that multiple ownership could increase the need for more divided spaces or diverging palettes of materials and character (e.g. division of farmyards) which could be harmful to the heritage significance. Can see the value of being able to provide spaces for stand-alone businesses in these locations. Comments noted.
S-157-28	1369450	Holme Valley Parish Council	Supports the approach to primary business ownership. It is important to support the farming community and impede the purchase of land for selfish gain which is not connected with using, managing and protecting the landscape. Addressing climate change, this must be interwoven into all policies and actions. Decisions affecting the environment should be made by those who are committed and funded to protect and enhance it. If a stand alone business is allowed to develop buildings and land once used for agriculture, it must be bound by these parameters and principles. Comments noted.
S-153-35	1369437		Supports the retention of ownership and control of the site and building by the primary business. There would be a clear risk that management of land could become redundant and the cherry picking of of buildings within a farmstead could become an issue. Land management must be tied into property changes, otherwise the Park qualities will deteriorate. Comments noted.
S-150-38	1369431		No it should no longer be a requirement. In fact with the new IHT changes for farms, selling off redundant buildings with planning, may be a key way of keeping farming alive in the Peak District. My reasons are growing, or not further damaging the rural economy, and juts plain decency and fairness. I don't see any unique risks, unless they are tourism related and create low pay jobs and traffic issues. Why would constraints be applied beyond the current planning restrictions. It is no longer a farm, be happy it is not a derelict eyesore. Comments noted.

S-140-12	1369412	Hope and Derwent Woodlands Parish Council	Options are too specific and constraining. If a planning application fits with the purpose of the Peak Park and it can deliver on these aims and objectives, then it should be considered. Comments noted.
S-137-54	1369370	Derbyshire ALC	Yes. Ensure that this is only used for farm diversification, not development of new industrial or retail or accommodation uses. Need to distinguish between diversification of existing farm business and new business use. There are good reasons for farming businesses to diversify, but further diversification may be needed in the future. As we have said, the development of industrial estates through the back door should be avoided. This would be a complete change of use and should be dealt with as such. The risks - Not diversification of farms any more. This could lead to what had been farms turning into business parks or industrial estates. It also would take part of a farm out of farming without the possibility to take it back into farming use subsequently, at least if the change of use could not easily be reversed. Constraints - Should be farm related, related to farming business. Comments noted.
S-136-37	1369368		No. Farm diversification is important but we should also enable other people to join the business community of the National Park. Risks are - It could increase car use and other traffic to and from a particular location. Impose constraints - Limits on parking area and vehicle movements, with a need to ensure that, by allowing new businesses into the national park, new traffic is minimised. Comments noted.
S-128-41	1369275	Rural Action Derbyshire	No. Reducing this restrictive practice may attract and retain businesses to the peak district and provide employment opportunities for local residents. Risks - The business may sell the building on to another business whose use of the site may be incompatible with the location. Constraints - There should be some conditions applied to planning permission to prevent redevelopment or change of use of the site by a new owner. Comments noted.

S-120-9	1368991	Marsh Farm Development Co Ltd	Yes Noted.
S-113-37	1369153	Edale Parish Council	Each case should be judged in its own merits. The risks are that the new business owner does not recognise the needs of the farmer. It is hard to see how this could be in the long term (sustainable) interests of the farmer. The farm may become non-viable for future owners/farmers. Comments noted.
S-104-49	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	Unsure about primary business retaining ownership. Comments noted.
S-98-51	1368689	Greater Manchester and High Peak Area of the Ramblers	Unsure and have no comments to make. Noted.
S-71-30	1368373	Tideswell Parish Council	No to the primary business to retain ownership. Redundant farm buildings should be allowed to be brought back into use as another business enterprise either by the farmer or by a different business. Comments noted.
S-68-36	1368264	Bakewell Resident	Unsure - It should be considered on a needs basis but where ownership of land is broken up, access rights and management and resale will need to be laid out in great detail. An assumption that ownership and management is retained by main land owner is the simplest approach. Comments noted.

S-62-9	1368170		Unsure. Noted.
S-50-38	1367561	Peak Park Parishes Forum	Yes, usually as there might be circumstances where it is acceptable. Risks- It might create future problems (maybe unforeseeable at the time the Planning decision is made) for the site overall. Constraints - These will depend on the specific circumstances of the case. Comments noted.
S-45-9	1367903	Froggatt Parish Meeting	Support retention of primary use unless absolutely necessary to remove it. Risks to removing the connection would be overdevelopment and suitability without extensive modernisation. Impose constraints on extension, access, visibility. Comments noted.
S-44-11	1367865	Eyam Parish Council	Each case should be decided on its merits. Comments noted.
S-40-39	1367788		Yes. Noted
S-32-4	1367524	Bamford with Thornhill Parish Council	Yes. Cohesive control of the whole site becomes too difficult otherwise. Do not agree to constraints as the premise is not accepted. Comments noted.
S-30-32	1367447	Country Landowners Association	No. The authority should view that its more important to have the right people managing property, and not getting too preoccupied with specific connections between different definable property. Any risks should be dealt with at application stage. No constraints beyond what are normally required for new development. Comments noted.
S-9-39	1364715		Yes. Noted.

S-8-10	1364695	-	Unsure. Is this not related to the policy above? And I would support the same approach, on the edge of settlements, and in the open countryside, requiring two different approaches. Noted.
S-7-7	1364251		Unsure. Noted.

12.1 Do you agree with the proposed spatial objectives for travel and transport?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-19	1369634	Sheffield City Council	12.1	Respondent agrees with spatial objectives. Refers to Sheffield CC / PDNPA Statement of Common Ground including the improvement of sustainable travel options; stating: - "To ensure a connected network of multi-user trails are established from Sheffield into the National Park the Peak Parks Local Plan must also support their delivery within its boundary." The policy seems to be working, so has not been included within the current consultation. Current Local Plan Policy DMT5D supports the development of new routes subject to specified criteria.
S-223-40	1369632	Hartington Town Quarter Parish Council	12.1	Respondent agrees with proposed objectives. Reason Concerns about how easy it is to achieve Believe nothing tangible delivered under last Core Policy
S-222-20	1369631	TPT & Sustrans	12.1	The respondent agrees with the proposed spatial objectives They believe that they will in turn protect the Trans Pennine Trail and National Cycle Network with potential to create new links for all users and improving accessibility. The proposed spatial objectives support policy aimed at achieving these aims.

S-221-37	1369595		12.1	The respondent agrees with the proposed objectives. Reasons More inter connecting traffic free routes are required to encourage cycling. I would use my bike much more frequently if there was a safe network of cycle routes rather than the fragmentary trails that exist at present. An uninterrupted cycle trail that extended along the whole length of the hope valley from Castleton to Rowsley and joined up with the Monsal and High Peak trails is sorely needed and should be a priority. Consider lobbying for a charge for all through traffic. Consider lobbying for weight limits for lorries travelling through the park. (with exemptions for locally based hauliers). Discourage businesses which generate high volumes of commercial transport. (Especially if these could operate outside the National Park). Some of the points raised above fall outside of the scope of this Plan. The National Park Authority is developing a National Park equivalent to a Local Cycling Walking Infrastructure Plan.
S-214-39	1369550	Hope with Aston Parish Council	12.1	Respondent agrees with proposed spatial objectives Would like to see 'Active travel' and 'integration of public transport services' included. These are good points and should be considered as the plan is developed.

S-213-3	1369549	The British Horse Society	12.1	Whilst the respondent has not specifically answered the question, within accomapning text, they do express support for the objective To protect existing, and create new routes for walking, cycling, wheeling and horse-riding. In addition, the respondent requests that horse box parking be included within the plan this will have a benefit to tourism. They alos suggedst that any paths within developments are of a minimum bridleway status. In responding to Consultation point 6.1, the respondent made reference to the support of the following in Consultation point 12.1 We support the following statements. safeguard and protect the rights of way network and multi-user trails protect, create and enhance routes for walking, cycling and horse riding Because support is only offered for two elements of the spatial objectives, the response will be recorded as 'Partial agreement'.
S-210-34	1369546		12.1	The respondent agrees with the proposed spatial objectives. They also stated that they support the spatial objectives as reducing carbon and car borne transport should be fundamental and we should work with partners to close or restrict roads as outlined above.
S-207-30	1369542	Youlgrave Community Land Trust.	12.1	The respondent agrees with the proposed spatial objectives because they support the need to reduce carbon production and meet the aims of the Park.
S-203-15	1369536	Tarmac	12.1	The respondent does not express a preference. They raise the issues associated with minerals being geographically limited, and that this will affect the appropriateness / deliverability of sustainable mnodes of transport. Whilst the concerns raised are valid, they are not necesarily in conflict with theproposed spatial objectives for travel and transport

S-200-35	1369531	Stanton in Peak Parish Council	12.1	The respondent agrees with the proposed spatial objectives. The reasons given are: - More emphasis on restricting traffic Improved rail hubs and Park Ride Re-opening cross-Park rail The makeup of small villages and demise of public transport also increases the need for car ownership and travel An impossible balance between ensuring sufficient infrastructure for users, whilst avoiding the expansion of roads and infrastructure. The additional information provided recognises some of the challenges in achieving the spatial objectives.
S-195-19	1369526	Derbyshire County Council	12.1	The respondent supports the objectives and specifically referenced the 6th, which emphasises working with highway authorities / partners.
S-194-40	1369525	Derbyshire Dales District Council	12.1	The respondent is supportive of the spatial objectives. The respondent added that it's imperative that the Plan support the delivery of sustainable and thriving communities, where opportunities to access services and employment opportunities are close to where residents live. This is a valid point and will be considered in the development of the Plan. However, some levels of accessibility are beyond the scope of the plan and change over time, including public transport and communication provision.

S-189-11	1369519		12.1	Respondent agrees with spatial objectives, although stated: - not sure of the need to extend trails or create new routes. traffic solutions including good public transport links need to be part of an integrated plan. perhaps car charging options should be considered (road user charging?) shuttle buses from park and ride areas Cross park and through traffic on less major routes needs to be discouraged The respondent makes some good points, but many of these lie outside of the scope of the Local Plan. They do however fall within the scope of the National Park management Plan which has a commitment to develop a Sustainable Travel Framework.
S-188-22	1369508	Staffordshire Moorlands District Council	12.1	The respondent did not give a specific answer to the question. They did however state: - The Council agrees that the Peak District National Park Authority should be promoting sustainable travel. The feedback provided suggests support for the spatial objectives for transport, so the response will be recorded as 'Yes'.
S-187-5	1369506	Sheffield Parks and Countryside Service	12.1	The responden agrees with the proposed spatial objectives. The respondent states that there should be an additional one for connectivity into urban centres (Sheffield, Glossop, Derby etc). Dedicated multi-user trails are needed to link with urban networks requiring good collaborative planning with neighbouring planning authorities. Outside of the scope of this consultation the National Park Authority is developing a National Park version of an Local Cycling Walking Investment Plan (to also include wheeling and horse riding). We are keen to work with our constituent highway authorities and other partners to plan connections from urban centres into the National Park.

S-186-12	1369505		12.1	The respondent agrees to the spatial objectives subject to the following amendments: - Add 'reduce carbon emissions' to first objective Replace 'resist' with 'oppose' in second objective The respondent offers good suggestions for amendments that will be considered as the Plan is developed.
S-185-36	1369502	Devonshire Group	12.1	The respondent agrees with the spatial objectives. The respondent believes that they would make a positive contribution towards sustainable development. However, they believe that demand for car based travel will remain high unless suitable alternatives are available. The respondent highlights the Chatsworth Whole Estate Plan as a means of taking a holistic approach.
S-184-23	1369500	Hope Valley Climate Action	12.1	Hope Valley Climate Action - No. Add reduce carbon emissions to the first objective; In the second objective the word resist should be replaced with oppose. It would therefore read To oppose proposals, including for new roads, that would lead to an increase in cross-park traffic. Anything less than opposition sends the wrong message that directly contravenes the first objective, encourages car dependency and makes it difficult to stop further road building in for example Longdendale.
S-182-8	1369498	Hathersage Parish Council	12.1	The respondent broadly agrees with the spatial objectives.

S-180-7	1369496	Castleton Parish Council	12.1	The respondent did not provide a specific answer to the question. However they provide the following under 'reasons for answer': - There is a perception in our community that traffic volume has increased in the Hope Valley and through Castleton. We strongly support developments that enable travel by sustainable means for both visitors and residents and reduce carbon emissions in the Peak Park. We have an active group (Better Buses for Castleton) supported by the Parish Council that tries to improve the existing services. The Parish Council is very active in initiatives to improve public transport links for residents and visitors to the Hope Valley. Without greater reliability and convenience they will not have the impact required to make a difference to the volume of car use in the PDNP. You do not specifically mention development of Transport Hubs to e.g. enhance train and bus connectivity, potentially enabling much more accessible public transport. The respondent raises a valid point re: Transport Hubs - this will be considered as the Plan is developed. The response will be recorded as 'no specific reply'

S-179-8	1369495	Charlesworth Parish Council	12.1	The respondent agrees with the proposed spatial objectives, but adds the following concerns about the A628: - The respondent looks for clarification of the need or otherwise to improve the A628 through Longdendale The Mottram byass will add to congestion and pollution through the valley. No consideration of a weight limit as an alternative solution. The Peak District NPA opposed the A57 Link Roads scheme due to it's impact on the National Park (induced traffic flows and their effects on the Park's special qualities. The current approach of opposing major road schemes is likely to continue through to the next Plan, (it is in keeping with National Policy). It has not been considered within this consultation, but will be consulted on as part of the overall Plan.
S-168-6	1369470	Railfuture	12.1	The respondent agrees with the proposed spatial objectives, but feels that there should be a more flexible approach to: - To safeguard and extend the existing strategic multi-user trails. To protect existing, and create new routes for walking, cycling, wheeling and horse-riding. Whilst not opposing the above, the erspondent belives that there should be flexibility to allow for possible rail reinstatement (especially for Monsal Longdendale Trails). The respondent advocates our current poliy approach re: rail reinstatement; this is specifically covered under 12.3.

S-165-38	1369466	Taddington and Priestcliffe Parish Council	12.1	The respondent does not agree with the spatial objectives, suggesting the following amendments: - The first bullet point should stop at need to travel add a new bullet point to deal with public transport and active travel. One aim should be to reduce the amount of heavy goods traffic Another should be to reduce on street/highway parking (especially in settlements or open landscape), and to new encourage parking solutions that people will use without damaging the land/village scape or the comfort and well-being of local communities. The suggestions will be considered as the Plan is developed
S-163-26	1368617		12.1	The respondent agrees with the spatial objectives, believing them to be sensible and aligned with PDNPA objectivesd
S-162-21	1369460	High Peak Borough Council	12.1	The respondent agrees with the proposed spatial objectives. The reason for their answer is: - The Council agrees that the Peak District National Park Authority should be promoting sustainable travel, in particular from the Hope Valley to Buxton. The promotion of public transport lies outside the remit of the Plan, but does tie into the National Park Management Plan and its Sustainable Travel Framework.

S-161-5	1369459	CPRE Peak District and South Yorkshire	12.1	The respondent doesn't agree with the spatial objectives for the following reasons: - These should include an objective to reduce carbon emissions Make it clear that the PDNPA will not just resist but will oppose proposals, including for new roads, that would lead to an increase in cross-park private vehicular traffic (and not public transport or active travel).(Question 40) The charity is particularly interested in knowing what work has and is being carried out with the Sheffield and Manchester regions and authorities on integrated transport, infrastructure, climate change and the mitigation of likely significant environmental effects. The respondent makes particular reference to an additional objective and the one relating to new roads. It is unclear whether they agree or not with the other objectives. Whilst implicit, thought will be given to an explicit carbon emissions objective as the Plan is developed.
S-158-19	1369452	Trans Pennine Trail and Sustrans Joint Response	12.1	The respondent supports the spatial objectives stating that they would protect the Trans Pennine Trail and National Cycle Network with potential to create new links for all users and improving accessibility.
S-157-29	1369450	Holme Valley Parish Council	12.1	The respondent supports the proposed spatial objectives stating: - The proposals address the challenges, in the context of rapidly increasing travel flows.

S-154-23	1369442		12.1	The respondent does not agree with the spatial objectives. The reasons given are: - To deliver a pattern of development for homes, businesses and community facilities that reduces the need to travel and enables travel by sustainable means (public transport and active travel). This is all fine except that buses are not reliable and well used (though good to see the open top buses being used). It is hard to see how this could be implemented in a meaningful way To resist proposals, including for new roads, that would lead to an increase in cross-park traffic. Resist does not mean avoid. Very vague To support facilities and infrastructure for the switch to low/zero carbon transport. It is not clear what this actually means in practice beyond avoiding car journeys To safeguard and extend the existing strategic multi-user trails. To protect existing, and create new routes for walking, cycling, wheeling? and horse-riding. Importantly, this needs to be where practical because there are suggestions for routes that are not practical in terms of clashes among users At recreation attractions and hubs, to work with highway authorities, landowners and residents to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on Special Qualities, is reduced. It would be interesting to have an example of an excellent solution that actually works in practice, rather than ticking a box that a document has been written.

				The respondent raises some valid points that wil be taken into consideration as the spatial objectives are developed further.

S-153-36	1369437		12.1	The respondent agrees with the spatial objectives, but made the following points: - Anything that reduces traffic levels must be pursued, much more emphasis is needed to restrict the amount of traffic in the first place. Improved rail hubs and park ride facilities closer to the major visitor hubs would help. Reopening of cross park rail would help.
S-150-39	1369431		12.1	The respondent is unsure, the reasons for their uncertainty include: - my concern is the proposals that increase cross park travel. Residents need to be able to access all sides of the Park, and adjacent cities. There is a trend for Chesterfield and Sheffield for example to place significant obstructions to reaching major routes like the M1 in place. These are rejecting traffic into the Park, and the elephant in the room is tourist traffic. Weekdays are pretty quiet, and calm, holiday weekends are sheer madness on the roads. I am an experienced cyclist and horserider, and I don't go out in the holiday traffic. In my teens I have been knocked off a horse, and two years ago on a bank holiday my girlfriend and I were deliberately knocked off our bikes (yes police were involved).

S-147-5	1369428	The Campaign for the Peak Line	12.1	The respondent does not agree with the proposed objectives. Under reasons for answer they provide the following: - The aims are laudable, but inconsistent and will not deliver the desired result. The Parks aims to move towards a low / no carbon emission transport world will be limited. Mass transit rail can transport high volumes of people in an efficient and comfortable manner that can get people out of their cars. But this can be difficult. The experience from providing an appealing free offer of local public transport in Luxembourg, commenced in 2020. It has not yet produced the level of step down in car hoped for. Goals to cut transport emissions by half by 2030 look challenging, since 2020 reductions of only 6% have been recorded. All of this indicates the difficulties in this Park, where free public transport will not be available. The Park should study the experience of locations such as Luxembourg: https://www.travelandtourworld.com/news/article/stunning-luxembourg-makes-public-transport-free-for-tourists-a-new-era-of-accessible-travel-awaits/. To make the point about efficient high volume transit by rail, the rail professional and author, Gareth Dennis was talking in this clip about urban use of rail. With the permanent, planned for inadequacies of the Parks road infrastructure, it is clear that rail should also form an integral part of a rural solution. This clip explains the natural efficiencies of rail, in an urban setting: https://x.com/AaronBastani/status/1861763328927797426 Rail can do the same job in a rural setting. Without a step change in use of mass public transport, with rail at its heart, the current aims lock the Park into a cycle of increasing congestion and more of the sort of gridlock shown up in Park visitor, James Staffords video clip during Easter, 2024 at Kinder Scout. Paste this clip into a fresh browser to enjoy his 35 second statement, summarising his excellent day out in the Peak District, travelling from Stockport. The contrast between the road user and his own rail experience could not be clearer: https://t.co/xLfrL2qgIl Bus usage in such conditions is unappealing. Experience also shows that as drivers de-carbonise, rather than any reduction in mileage, there is a tendency to drive more, not less. This is because of the removal of a perception of moral hazard and the cost constraint surrounding use of increasingly costly, high emission fossil fuels. By contrast, drivers of electric vehicles think it no longer matters as they have done all that is needed. None of this is factored into Park aims.

				Through the reliance on raising the number of recharging facilities substantially, a steady increase in parking spaces will be required, given the time required to charge batteries. Even as technology advances and charging time required is reduced, this will only be facilitated through the provision of additional power supplies. The power required for charging infrastructure is significant and can itself lead to significant development. Within a National Park, this is surely unacceptable. Such a strategy has the further disbenefit of reducing the perceived need or desire to use public transportation. Instead, it locks in a preference for use of the safe, cocooned use of private transport. The poor experience and reputation of the bus within the Park is a further deterrent to use. The lack of vision in placing a multi-user trail along precisely the infrastructure heritage best suited to a superior low carbon transport solution, namely the efficient use of space with lowered carbon emissions is unfortunate. There is nothing in the stated objectives that suggests the Park has yet succeeded in providing a viable alternative. The multi-user trail was created to suit a different set of needs from the ones that the Park is now planning for. From observation of such a deeply embedded driver culture, together with the experiences gradually being learned elsewhere in the world, it is inevitable that the objectives as stated, without a return to rail, will be inadequate. The present policies lead to embarrassing situations like the following case study. Case study: in September, a high profile and well documented journey was made by the then Secretary of State for Transport between Manchester and Sheffield. A senior government minister had to stand for the entire journey. The managing director of EMR was obliged to write to Louise Haigh, MP with an apology and explanation. Partly this was due to short length trains, caused by elderly and inadequate diesel rolling stock within the national UK fleet. However, this situation is aggravated by the continued absence of the previously direct and sustainable rail route between Manchester and the East Midlands (The Peak Line). Today, both Yorkshire and East Midlands travellers to Manchester are crammed onto the same train, using a single route, instead of separating the growing volumes across two acceptable main line routes. The respondent raises a number of points that will be considered along with those of other respondents in the further development of the Strategic Objectives.

S-145-1	1369422		12.1	The respondent did not specifically reply to the question, but did provide the following in a manual submission: - Overall aimThe aim must be to switch all trips within the National Park to sustainable modes so that transport plays its part in achieving the Park's goal of carbon neutrality by 2030. Traffic nuisancesAll traffic brings with it nuisances which have direct impacts particularly on people living or working near to transport arteries but also indirect effects on everyone. And as our knowledge increases so does awareness of the very real cost to us all of these nuisances. A good example of this is the growing awareness that constant noise has a definite negative effect on well-being. Likewise the effects of vibration are better understood. These nuisances are as follows:: • Vibration • Noise • Visual intrusion • Severance • Negative effect on bus schedules • Danger from road accidents • Anxiety and stress arising from potential danger • Inhibitory effect on active travel • Pollution from brakes and tyre wear • Pollution from the exhaust pipe will give an example of how profound these effects are and the huge benefit to be gained by removing them. A recent program on BBC Radio 4 featured a housing estate in the City of London. It was situated down a side road away from the principal road network. It was high density with not a lot of open space around the buildings but some. It was agreed by those talking about it that aesthetically it was pretty basic. The accommodation offered in the residential blocks was presumably adequate, but handsome or pretty it was not. And yet the residents reported high levels of satisfaction living there. How could this be? the program asked. And so they talked to residents to find out. The sole reason was given as the complete absence of the motor car or indeed the absence of any traffic whatsoever. Electric vehicles (EV's)Do not be led astray by any notions that electric vehicles will solve the problem of these nuisances. They will do no such thing. Only 1 nuisance out of the entire list will be mitigated by even the wholesale adoption of EV's and that is the last one - tail pipe emissions. Visitor traffic and resident trafficThe overwhelming majority of traffic in the Park is due to visitors coming and going in their cars. This fact offers a huge and unique opportunity to the National Park. It is ironic but also distressing to note that every work day people from Bamford commute into Sheffield in their cars, imposing as they do so the nuisances which I have mentioned upon the residents of Sheffield. It is particularly relevant to this consultation that one negative effect of more traffic in Sheffield is that the buses from Sheffield into the Peak District get held up in the traffic and become less reliable as a result. And then, at weekends in

				particular, but in fact on every day of the week, the city dwellers return the compliment in spades by trundling through our village in their thousands as part of their escape to the Peak District. And of course this scenario is played out in settlement after settlement throughout the area of the National Park. But as I have said this represents a huge opportunity for the Park Authority. I beg you to focus your efforts on shifting trips from outside the Park area into and out of the Park to public transport. This is where the vast majority of gains can be made in cutting carbon emissions. What you do to achieve this will benefit local residents also. They will feel these benefits, and they will see the measures and what they could mean for their own lives, and the way that they get about. By osmosis they will come to appreciate the new normality relating to transport and take part in this new normality themselves. The Park should not however take changes in residents' travel behaviour for granted, and the Park can and should support these likely changes by promoting and enabling active travel in particular but also local travel by public transport Step 1 - Data acquisition⁶. If your goal is to switch all trips within the Park to sustainable modes then you have to know the exact nature of these trips - their pattern through time, their origins and destinations, and ideally any flexibility attached to these trips by those making them. If you do not have this knowledge available to you already then it is a top priority to find out. If necessary volunteers could, I am sure, be found to assist with survey work, but I am well aware that they would need a fair bit of training to achieve the necessary reliability. Step 2 provision of good quality public transport options⁷. Once you know where people are travelling from and to, the times they are travelling, and the flexibility they attach to their trips then you can plan a public transport network which needs their requirements. This will require ongoing extensive and positive collaboration with the East Midlands mayor and any other bodies who are relevant. Given the sheer size of the National Park it is likely that part of the solution will be transport hubs such as that proposed by Hope Valley Climate Action for either Bamford or Hope railway stations. Such hubs are in effect mini interchanges allowing people to transfer from bus to rail or from rail to bus. It will not be easy to dovetail train schedules which are relatively difficult to adjust and bus schedules which are inherently more flexible, but it will have to be done. However it is quite likely that experience can be gained from successful implementation elsewhere in this country or in Europe. Cornwall and Switzerland come to my mind as possible exemplars. Any public transport provision should match up to the following criteria:⁸ • Affordable • Inclusive particularly with reference to older people and to disabled people • Reliable • Comfortable (and

				remember that the standard is the use of one's own car).i. Convenient and this includes the notion of transferring easily between modes.i. Real-time information available to passengers including transfer information Items 2 and 4 on that list lead me to put in a private and personal plea to you. It would be wonderful if the Peak District National Park were to lead the way in truly comfortable bus shelters. By that I mean at the very least a) seating at different heights for different lengths of people, and b) protection against wind and rain and c) warmth to be provided, preferably by heating powered by solar panels which could be mounted on the roof of the bus shelter. Maybe in Scandinavia they have already invented this? And maybe a progressive and innovative design company could think of other features which could be incorporated in the Peak District National Park patented bus shelter design! This matters for 2 reasons in particular. The first is that inclusivity is a really important thing to aim for, and the provision of cold and inhospitable bus shelters coupled with the somewhat inevitable uncertainty around when exactly the bus will arrive, is a very real deterrent two certain groups in a society such as the ill or the elderly to public transport use. And the second is the demonstration effect and the publicity which could be gained around this which would serve to promote the very idea of sustainable transport, and make clear your commitment to making it happen. Step 3 the pace at which this should happen 8. Clearly it is true that the steps i have outlined above could take a long time. However we do not have the luxury of 'a long time'. We need to cut emissions and we need to cut them fast. See section 4 above on the climate change imperative. This leads me to three conclusions which i hope you adopt. The first is that this entire program should be on rocket boosters. A real sense of urgency must pervade the process. Relationships need to be set up with the relevant parties immediately if that has not already happened. The data gap, if there is one, must be filled immediately. There needs to be an agreed timeline which, together with an appropriate management structure will drive the process forward. The second is that you should be mindful of the imperative to achieve emissions cuts sooner rather than later. This implies that you obtain some quick wins. The quick wins which will secure such cuts will also serve as a demonstration of your intent. The third conclusion is that early experimentation is needed in order again to convey the urgency of this issue and your commitment to tackling it. For example, working with supportive organisations and stakeholders you could program a series of "traffic-free days" or "Peak District special future days" in the National Park. If i may be so bold as to put forward a scenario for

				doing this the first step would be to call a meeting of all the various groups you can rely on to support you, (early early job if you have not already got it, is to establish a list of such organisations) and brainstorm what elements such days could include ! This would then of course have to be followed up with the organisational nuts and bolts. Action on freight9. Numerically freight traffic is a small part of total road traffic burden in the Park area. However its impact far exceeds that of all other traffic. (I believe that the Department for Transport still runs on the assumption in its models that a heavy goods vehicle equates to 2.4 pcu's (passenger car units) which is utterly absurd and bears no relation to the reality.) Every day in Bamford when I look out of the window or when the house shakes when a 40 ton lorry goes past, i am reminded of the massive impact of such vehicles on all the traffic nuisances which i have listed above. We now have at last an overtaking lane on the railway between Sheffield and Manchester. This will yield additional paths for freight trains. From my observations, I believe that the quarry near Hope is a principal source of such HGV's. Please include in your plan a firm intention to open an urgent dialogue with the cement quarry owners about why so much of their product leaves their facility by road. I believe that you are the permitting authority for the quarry and that part of the arrangement you have made in this permit is a constraint on how they ship goods away from their facility. With the enhanced availability of rail paths on the Hope Valley line, there should be scope for a very substantial improvement. The quarry is not the only source of these HGV's but it is the principal source and you could achieve a very rapid improvement in the situation. Following successful resolution of the issue of products being shifted out of the quarry, attention should be turned to the origin and destination of other large vehicles and whether those trips could now go by rail. The respondent raises some good points, some of which are outside of the scope of this Plan. However, they will be carefully considered as we progress the Plan and the Sustainable Travel Framework within the National Park Management Plan

S-142-8	1369419		12.1	The respondent did not specifically reply to the question, but offered the following under reasons for answer: Fully agree with first point, reducing need to travel and then focusing on active and sustainable means first. At recreation attractions and hubs, to work with highway authorities, landowners and residents to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on SpecialQualities, is reduced. This sounds positive, but what is meant by traffic? A new, bigger car park could reduce traffic while also inducing more traffic. This needs to state something like vehicle traffic numbers or volume of vehicle traffic. It could too easily be misinterpreted and be used by developers against the Authoritys true aims. The respondent makes a valid point that will be considered as the spatial objectives are developed. The response is recorded as partial agreement
S-141-3	1369412	Hope and Derwent Woodlands Parish Council	12.1	The respondent agrees with the proposed objectives, strongly agreeing with the 'recreation hubs' one, citing Fairholmes as a location that would benefit from the approach.
S-139-2	1369412	Hope and Derwent Woodlands Parish Council	12.1	The respondent does not make a specific comment on the challenges and objectives but does state that: - "continued extraction of limestone should be dependent on being able to use rail for the product and fuel." The respondent in a previous submission under a different consultation number indicated support for the proposed spatial objectives. No additional submission will be made under this particular response.
S-137-23	1369370	Derbyshire ALC	12.1	The respondent agrees with the spatial objectives, stating 'Changes to transport are needed to achieve net-zero, and these will not be happening (with the necessary speed) without some steer. This concerns visitors as well as locals.'
S-136-47	1369368		12.1	The respondent agrees with the spatial objectives

S-135-2	1369369		12.1	The respondent supports the proposed objectives Reason We absolutely need to reduce the emissions from travel and transport within the Peak District, but as the Park Authority you really need to wake up to what this means. We cannot reduce transport emissions without better transport infrastructure in the park, and this means better public transport involving both road and rail.
S-128-23	1369275	Rural Action Derbyshire	12.1	The respondent agrees with the spatial objectives but feel that it is incompatible with increasing visits from key conurbations.
S-126-1	1369282		12.1	The respondent agrees with the proposed spatial objectives.
S-120-6	1368991	Marsh Farm Development Co Ltd	12.1	The respondent doesn't agree with the spatial objectives. Reason We need a good network of road and rail to support business
S-113-38	1369153	Edale Parish Council	12.1	
S-106-4	1369124	Stanton in Peak PC	12.1	The respondent agrees with the spatial objectives. Reason The PDNPA is grappling with a difficult situation whereby the geographic and remote nature of the park necessitates travel often by car, and the makeup of small villages and demise of public transport also increases the need for car ownership and travel. There is an almost-impossible balance between ensuring sufficient infrastructure that roads and travel are tolerable for residents and visitors, whilst avoiding expansion of roads and infrastructure that merely invites increasing traffic contrary to environmental objectives.

S-104-15	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	12.1	The respondent doesn't agree with the proposed objectives Reason While we support the principle of transport hubs we do not support recreation hubs (although in some cases such as Chatsworth a location may be both). We support the policy to resist new roads but it may well be unachievable as this is outside the control of the National Park Authority. It may be better to aim to reduce cross park HGV traffic as this has a significant impact on the special qualities of the National Park. The Recreation Attractions and Recreation Hubs spatial objective sits outside of this topic area and is under Recreation and Tourism. The spatial objective in this Travel and transport section is to try and ensure that Recreation Attractions and Recreation Hubs are served by sustainable and active transport.
S-101-9	1369010	Business Peak District	12.1	The respondent did not provide a specific reply to the question Reason Whilst the PDNPAs responsibilities around travel and transport are limited, it is important that every effort is made to support effective and sustainable travel and transport solutions for those living, working and wishing to spend leisure time in the Peak District. This should include the PDNPA working with partners to identify innovative solutions that are the subject of rigorous cost/benefit analyses. Through this means, informed decisions can be taken to either support or reject a range of proposals, including that brought forward by MEMRAP. It is unclear whether the respondent agrees or not with the proposed spatial objectives - the response is recorded as 'No specific reply'

S-98-13	1368689	Greater Manchester and High Peak Area of the Ramblers	12.1	The respondent agrees with the proposed spatial objectives Reason We believe that walking in nature is a key component of the statutory purpose of the Park, we therefore strongly endorse inclusion of a specific objective to safeguard and protect the rights of way network and multi-user trails (Core Strategy Policy reference: T6) We also agree that the objective should be to protect, create and enhance routes for walking, cycling and horse riding (Core Strategy Policy reference: T6) We endorse the objectives. We note the intention that; At recreation attractions and hubs, to work with highway authorities, landowners and residents to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on Special Qualities, is reduced. Transport operators should also be included as the rail operators (e.g. Northern along the Hope Valley) and local bus companies have a major role to play. We welcome the clear statement of intent and whilst recognising the limited scope of the Plan to have a direct impact but feel that the aim should be much more ambitious than simply to reduce the negative impacts. The aim should be to manage and avoid the negative impact.

S-88-3	1368685	Rainow Parish Council	12.1	The respondent did not provide a specific reply to the question Reason 2.1 We support and encourage the PDNPA with its various initiatives to support access to the Peak District other than via a car. Rainow is well served by a bus service which provides a very important transport link from Macclesfield to New Mills. We think more government support for bus services would be welcome. In addition, Macclesfield train station is only 6 miles away. 2.2 Rainow is a gateway to the Peak District with good transport links to Manchester Airport and Greater Manchester and Cheshire. There is a very large population on our doorstep. We have nowish to encourage a greater influx of visitors to the area, but we are struck by how as a community, there is the opportunity to create an increasing awareness of the importance of protecting our landscapes while at the same time encouraging visitors to use local amenities such as our local pub, the Robin Hood. 2.3 We therefore believe that there is the opportunity for the PDNPA to recognise that villages such as RPC, which are on the outer limits of the PDNPA perimeter can play a part in welcoming visitors to the area but not always with their cars while at the same time educating them on the special qualities of the area. The respondent raises valid points that will be considered as the Plan is developed. There is also a role for the National Park Management Plan and its Sustainable Travel Framework going forward. It is unclear whether the information provided is supportive of the proposed spatial objectives, however the response opens with: - "We support and encourage the PDNPA with its various initiatives to support access to the Peak District other than via a car." So the response is recorded as 'Yes'.
S-86-16	1368682	The National Trust	12.1	

S-76-6	1368482	Sport England	12.1	The respondent agrees with the proposed spatial objectives Reason Sport England welcome the proposed spatial objective for travel and transport that could in turn promote active travel. Sport England consider active travel is the simplest and most inclusive way of getting people to incorporate activity into their daily lives and has numerous benefits for physical and mental health, the environment, the places we live, quality of life and social inclusion. Working with Active Travel England (ATE) and the Office for Health Improvement and Disparities (OHID), Sport England has produced an updated version of the Active Design guide. Please refer to our website - Theme 1 supporting active travel that provides further details about active travel as well as case studies.
S-71-31	1368373	Tideswell Parish Council	12.1	The respondent agrees with the proposed spatial objectives.

S-70-3	1368372		12.1	The respondent does not agree with the proposed spatial objectives Reason Protecting (for their own purposes) and extending the multi-user trails and the rights of way network are not valid spatial objectives and policies under Travel and Transport The aim of safeguarding land for future rail improvements has not been carried through into the list of spatial objectives under Travel and Transport, and this should be rectified An additional spatial objective under Travel and Transport is proposed, to promote and facilitate the expansion and delivery of sustainable transport solutions and encourage their use Paragraph 12.2 lists a number of Travel and Transport policy aims which amongst others includes three relating to the multi-user trails and the rights of way network:; safeguard and protect the rights of way network and multi-user trails (Core Strategy Policy reference : T6) protect, create and enhance routes for walking, cycling and horse riding (Core Strategy Policy reference : T6) ; safeguard land for future rail improvements (Core Strategy Policy reference : T5). From these three aims, two spatial objectives are presented under Issue 40, a multi-user trail objective and a rights of-way objective as follows: ; To safeguard and extend the existing strategic multi-user trails. ; To protect existing, and create new routes for walking, cycling, wheeling and horse-riding. As argued under my response to Issue / Question 42, protecting the multi-user trails for their own purposes and safeguarding the routes used by the Monsal and Longdendale Trails for future railway re-instatement are two distinct objectives and should be clearly differentiated. A spatial objective should be added under Travel and Transport: To safeguard land and infrastructure for future railway re-instatement of the Woodhead and Matlock Buxton routes, and further enhancement of the Hope Valley line. The above two spatial objectives presented under Issue 40 correspond to two very similar objectives under Recreation and Tourism, where they can be clearly seen to belong (please refer to my response to Issue / Question 23). However, I question the inclusion of these two spatial objectives under Travel and Transport. Spatial objectives under Travel and Transport are associated with the Management Plan objective, Objective 1: To lower greenhouse gas emissions significantly, focussing on the largest emitters within our influence and are for the derivation of policies [that] will reduce the need to travel and encourage sustainable means (paragraph 12.1).

				To clarify this matter we need to answer the question as to whether use of the multi-user trails and rights of way network is compatible with the aims of sustainable travel. Sustainable travel is taken to mean purposeful travel undertaken by a sustainable mode of transport (eg. commuting or daily travel by public transport in lieu of car usage). The trails and rights of way network connect towns and villages within the Park. Being well graded, the multi-user trails, in particular, offer the potential for sustainable travel on foot or by bicycle. However, this is only one of three use cases to consider: A. Where the use of a multi-user trail or the wider rights of way network is part of a sustainable travel journey, this will be in lieu of a car journey and so beneficial (compatible) to sustainable travel objectives. B. Where the use of a multi-user trail or the wider rights of way network is for recreation and the outward journey to, and return journey from the trail, foot-path or bridleway are by a sustainable mode of transport, this will be neutral to sustainable travel objectives. C. Where the use of a multi-user trail or the wider rights of way network is for recreation and the outward journey to, and return journey from the trail, foot-path or bridleway are by car, this will be detrimental (incompatible) to sustainable travel objectives. Under Challenges for Travel and Transport (page 138), we are told that Leisure cycling has increased. However, for most popular leisure cycling destinations such as the Trails network, the majority of visitors arrive initially by car. This will be even more true for walkers than for cyclists, as cycling is the more likely mode for the multi-user trails minority use for (purposeful) sustainable travel. With the well-graded trails predominant use for recreation, I would argue that the same will be the case for the wider rights of way network. The PDNPA would seem to agree; we are told in paragraph 2.32, Walking and cycling are popular leisure activities but not as a means of transport. Unless the PDNPA has other evidence to the contrary, we can say that the majority of visits (both walkers and cyclists) to the multi-user trails and rights of way network are not for sustainable travel, but rather for recreational purposes, arriving and departing by car, that is, use case C above. The State of the Park Report (2021) under Trends in Peak District Transport informs us that there are over half-a-million visitor movements over three of the multi-user trails each year. More generally, walking is described as the most popular recreational activity for the 13 to 26 million visitors to the Park each year, with over half of all visitors listing walking as their main reason for

				visiting, while four out of five go for a walk during their visit (SAR paragraph C197). If not the multi-user trails, many of these will be drawn to the wider rights of way network. The multi-user trails and rights of way network are in the main recreational and a valued component of the Parks attractions, promoting health and well-being. But visits to the multi- user trails and the rights of way network clearly give rise to a substantial volume of unsustainable car-borne travel into, out of, and within the Park. Their usage is incompatible with sustainable travel and they cannot realistically contribute to the PDNPAs policy solution for sustainable travel. Consequently, I find the inclusion of the multi-user trail objective and the rights of way network objective in the list of spatial objectives under Travel and Transport to be fallacious and misleading. We can see an example of the consequences of this in the SAR document (page 42) where length of cycleways created / enhanced is incorrectly proposed as a metric to measure the SA objective for sustainable travel, without excluding cycleways used predominantly for recreation, where we know the majority of visitors arrive initially by car. These two spatial objectives should be removed (while retaining them under the spatial objectives for Recreation and Tourism please see my response to Issue / Question 23). For the same reasons, Policy T6 is a Recreation and Tourism policy, derived from the spatial objectives under Recreation and Tourism. It is not a sustainable Travel and Transport policy; it should be repositioned as an RT policy under Recreation and Tourism. Finally, I refer to my response to Issue / Question 8 to include additional wording in policy T1 to promote and facilitate the expansion and delivery of sustainable means of transport, complementing existing policy wording to encourage a modal shift for its use. I propose an additional spatial objective under Travel and Transport to cover these aims. (I believe this to be distinct from the last objective in the list of spatial objectives under Issue 40 which is concerned with recreation attractions and hubs.) Sustainable transport will include public transport (principally bus and railway services) and purposeful active travel networks (as opposed to active travel for recreational purposes which, as discussed above, is in practice incompatible with sustainable travel). The development of purposeful active travel networks may deserve its own policy. Summary of what I would like to see:1. Remove the following from the proposed spatial objectives for Travel and Transport:; To safeguard and extend the existing strategic multi-user trails.; To protect existing, and create new routes for walking, cycling, wheeling and horse-riding.2. Add the following to the proposed spatial objectives for Travel and Transport:; To

				safeguard land and infrastructure for future railway re-instatement of the Woodhead and Matlock Buxton routes, and further enhancement of the Hope Valley line.; To work with transport authorities and other bodies to promote and facilitate the expansion and delivery of sustainable transport solutions, and encourage a modal shift for their use so that traffic and the consequent impact on Special Qualities are reduced.3. Reposition Policy T6 and its preamble as an RT policy under Recreation and Tourism. </div> <div class="questionset-question-controls response-sentiment">The respondent's comments will be considered as the Plan is developed.</div>
S-69-8	1368325	Derbyshire Dales District Council	12.1	The respondent agrees with the proposed spatial objectives

S-68-35	1368264	Bakewell Resident	12.1	The respondent doesn't agree with the proposed spatial objectives. Reason I don't believe the existing multi-user trails are strategic I would like to see them replaced with a sustainable transport network including active travel with segregated cycling and walking provisions, bus and mass transit options to connect recreation attractions and hubs enabling visitors to the peak district to do so without a vehicle making promoting opportunities for people to understand and enjoy the Park. Sustainable transport provision will not only deliver a significant reduction in carbon emissions within the Park but it will also deliver air quality improvements for the many houses that face endless queues of traffic like Bakewell and Rowsley. The points raised will be taken into account as the Plan is progressed. However, the provision of sustainable transport services lies outside of the scope of the Plan. The National Park Management Plan includes a Sustainable Travel Framework covering the National Park, with delivery across a range of partners.
S-67-1	1367857	Over Haddon Parish Council	12.1	The respondent did not give a specific reply to the question. Reason Seems appropriate for a national park The reason supplied suggests that the respondent agrees with the proposed objectives - the answer is recorded as 'Yes'.

S-66-3	1368276		12.1	The respondent agrees with the proposed spatial objectives Reason We should ensure people can travel to and through the National Park using active, shared and electric mobility. We should introduce a ULEZ-style charge for petrol and diesel cars coming into the National Park. We should introduce an Oyster-style travel ticket. Let's ensure car clubs are offered in all settlements. We should develop village-edge parking solutions to keep cars out of the villages. The respondents comments will be taken into consideration as the plan is developed. However many of the suggestions lie outside of the scope of the plan or the National Park Authority's ability to deliver them.

S-63-1	1368223		12.1	The respondent doesn't agree with the proposed spatial objectives Reason The Buxton-Matlock rail connection should be restored. Partly in the national interest as it would increase line capacity, particularly for freight, which in turn would free up pressure on the WCML and ECML. Also, it is very much in the local interest to reduce traffic on the A6. If we want people to move to public transport, it has to be easily available. Reinstating a direct rail connection between Manchester and Derby would be highly beneficial. A feasibility study in 2003 suggested that, given the big resurgence in rail passengers, the project would now be self financing from day one. Given the extraordinary capital value of the remaining infrastructure, much of it in good condition, it would be folly to now abandon it. There is considerable regret about the consequences of the Beeching closures. We should heed the lessons of history. The response is focussed on rail reinstatement, it is unclear whether the respondent has any thoughts on the other proposed spatial objectives.
S-62-50	1368170		12.1	The respondent agrees with the proposed spatial objectives.
S-51-1	1368085		12.1	The respondent agrees with the proposed spatial objectives: - Reason Preserving the parks landscape and character is key. A park full of cars does not do that. Besides safeguarding existing trails, work should be done to extend into areas outside the park. For example, a complete Matlock to Buxton cycle trail would move some of the car traffic to outside of the park, where it's more appropriate. Influencing railway operators to make bringing your bike into the park by train easier would also be an improvement. The respondent makes some good points.

S-50-7	1367561	Peak Park Parishes Forum	12.1	The respondent doesn't agree with the proposed spatial objectives Reason While we support creation of transport hubs, we reject the reference to recreation hubs, as we do not support the concept of these. The "no new roads" objective may well be unrealistic (an example being the now-approved Mottram bypass which will increase cross-Park traffic). A better objective may be to resist developments which will increase the volume of HGV movements within the Park. Most of the transport issue are outside the control of PDNPA, so the proposed objectives need to be seen in that light.
S-49-10	1367873		12.1	The respondent agrees with the proposed spatial objectives.
S-48-2	1368055	High Peak Business Club	12.1	
S-46-4	1367784		12.1	The respondent agrees with the propose spatial objectives. Reason Car usage within the PDNP needs to be reduced and appropriate development within the Peak District linked to public transport improvements. While PDNP has no direct responsibility for public transport provision it should use its influence to improve the co-ordination of public transport to avoid long waits between modes for key journeys. Car Parking costs should be increased to encourage migration to low / zero carbon modes and make the costs of driving into the PDNP more competitive with the costs of taking public transport (particularly for groups).

S-44-40	1367865	Eyam Parish Council	12.1	The respondent doesn't agree with the proposed objectives Reason Transport is largely outside the control of the Peak Park
S-43-18	1367843	Natural England	12.1	The respondent is unsure Reason Active travel policy should be included in the policy to encourage walking and cycling and link with green infrastructure. The Authority is currently developing a National Park equivalent to a Local Cycling Walking Infrastructure Plan. As the plan develops the links between the two will b embedded within the Local Plan.
S-42-17	1367805		12.1	 The respondent agrees with the proposed objectives Reason not sure they are deliverable with the totally inadequate public transport network across the area - that I understand PDNPA cant change? There is a significant need for a more frequent and reliable bus serve to connect existing rail hubs, visitor attractions and local communities - but this doesn't exist!
S-40-40	1367788		12.1	The respondent agrees with the proposed spatial objectives. Reason Each of these measures needs to be adopted to mitigate climate change.
S-32-13	1367524	Bamford with Thornhill Parish Council	12.1	The respondent agrees with the objectives Reason We agree with the objectives, subject to greater emphasis being needed on proactive management of multi-use trails to better segregate users who are potentially in conflict (e.g. cyclists vs pedestrians), because this is perceived to be a growing problem.

S-30-33	1367447	Country Landowners Association	12.1	The respondent doesn't agree with the proposed spatial objectives. Reason We are sympathetic to the authority's desire to provide more sustainable development. The rural low-density nature of the park, the businesses, residents and visitors are unable to rely on sustainable transport to maintain the current standard of living. The authority should take steps to improve infrastructure that would support business and visitors' experience to the park and would improve efficiency.
S-20-7	1367235	Oldham Council	12.1	The respondent did not specifically reply to the question. Reason Oldham Council support the objective at recreation attraction and hubs to work with highway authorities, landowners and residents to facilitate the delivery of comprehensive travel and transport solutions so that traffic, and the consequent impact on Special Qualities, is reduced at recreation attractions and hubs (such as Dovestones). Oldham Council support consideration of a policy which seeks to address car parking issues. We would welcome specific meetings / workshops with relevant officers regarding parts of Oldham within the PDNP, such as Dovestones, in relation to this policy. The response focuses on one objective, it is unclear whether the others are supported. The response will be recorded as 'partial agreement'

S-19-5	1367234		12.1	The respondent didn't provide a specific reply to the question. Reason To create new cycling routes is an improvement on existing policy. To support switch to low carbon transport, safe cycle routes between village to village to town as necessary. This should have emphasis in the new plan. It is arguable that such routes are more important than routes forenjoyment of scenery, leisure, cycling. I strongly support the provision of car charging points at destinations such as car parks. A potential benefit might be to encourage use of car parks. The proposed plan seems to incorporate a presumption that electrical power will be generated outside the park and transmitted but in a climate emergency, this is not adequate. National Park occupiers should be encouraged to generate what we need. Limitation of development to small scale infrastructure for energy generation is inappropriate. The response indicates a partial support for the proposed spatial objectives, and is recorded as 'partial agreement'.
S-15-5	1364436		12.1	The respondent agrees with the proposed spatial objectives. Reason Developing public transport using electric minibuses would help. For both residents and visitors we must protect existing multi-user trails (walking, cycling, horse-riding) and create more. The national park should resist proposals, including for new roads and rail, that would lead to an increase in cross-park traffic.

S-13-6	1364893		12.1	The respondent agrees with the proposed spatial objectives. Reason Increased traffic through the NP has been problematic _ eg. HGVs using Winnats Pass. Whatever can be done to reduce this traffic through signage and encouraging through traffic to use major A roads should be done. Speed is also an issue, the NP should encourage the LA Highways to set reduced speed limits on routes such as the Hope valley to discourage through traffic.
S-9-45	1364715		12.1	The respondent agrees with the proposed spatial objectives.
S-7-26	1364251		12.1	The respondent agrees with the proposed spatial objectives.

12.2 Which option to you prefer regarding visitor parking – retain current policy, more restrictive or less restrictive?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary

S-223-41	1369632	Hartington Town Quarter Parish Council	12.2	The respondent prefers Option 1 - retain current policy Reasons The centre of Hartington is daily completely covered with cars, as indeed are all our arterial roads. Visitors take advantage of the free parking and only use the DDDC pay and display car park if they literally cannot find a space anywhere. Coaches rarely use the paid for facility at Hartington Station having deposited their passengers remain parked in the centre of the village. Camper vans and overnight stays are increasing with seemingly no way of preventing them. Our neighbourhood plan suggests some increase in double yellow lines in order to preserve the view of the ancient mere and to tackle a couple of dangerous areas on Hall Bank, but this will not alter the volume of traffic. Some problems on extra busy days due to special events being held in the village, usually by third party organisers, local farmers may offer a field for pop-up parking on that particular day. We are not in favour of new car parks in general as they despoil the landscape but if unobtrusive means of replacing on street parking with off street could be found it would have our support. However as a caveat we wouldn't wish to see developers looking to gain permission for new building offering visitor car parking spaces as a reason for its acceptance, especially on any areas of green field. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-222-21	1369631	TPT & Sustrans	12.2	The respondent replied that they were unsure. The respondent recognises the need to provide specific parking locations to avoid inappropriate parking. However they believe that this should be alongside providing information on sustainable travel routes and offering cycle parking / storage. The current suite of policies aims to take a pragmatic approach to demand for visitor parking; whilst encouraging modal shift. Beyond the scope of the Local Plan, The National Park Management Plan also has an action to produce a Sustainable Travel Framework for the National Park.
S-221-38	1369595		12.2	The respondent prefers Option 2 - a more restrictive policy. Reason The emphasis should be on reducing car transport. Car parks seem to encourage more car journeys. The introduction of pay by phone may succeed in reducing the demand for parking (by discouraging the most vulnerable members of society), however it will also encourage inappropriate and illegal parking. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach would be more restrictive than the current policy, reverting to the past policy approach from the 2001 Local Plan.

S-220-17	1369594		12.2	The respondent prefers Option 3 - a less restrictive policy Reasons I see no problem with allowing some new car parking sites, such as those on brown field sites where both a demonstrable need and local benefit can be shown to exist. The type of parking i.e. free or pay and display is also important in my view. "pay by phone" only, excludes those without a smart phone, such as many older people, from accessing them and often has the unintended consequence of causing such people to park on roadside verges or other inappropriate locations thereby causing greater environmental damage as well as nuisance to others. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park. The type of car park (free or pay and display) and payment method (cash, card or by phone) falls outside the scope of this Plan. However, the points made are valid.

S-214-40	1369550	Hope with Aston Parish Council	12.2	The respondent wishes to retain the current policy. The preference is for policies encouraging modal shift rather than expanding visitor parking. Where new parking is allowed, it should only be where amenity for local residents is enhanced. Full consultation should be carried out where there are changes to parking provision. Response supports current approach.
S-210-35	1369546		12.2	The respondent prefers option 2, a more restrictive policy. The respondent believes that any expansion of car parks will soon see them filled and people continuing to park outside of them, as we have no controls on the highway. There are some links between the Visitor Parking policies and the possible Recreation Hubs policy. There are also links to the wider visitor management and sustainable travel themes within the National Park Management Plan. Visitor parking policy will need to balance the effects of providing parking in suitable locations against the negative effects of limited parking displaced parking where demand exceeds supply.
S-207-31	1369542	Youlgrave Community Land Trust.	12.2	

S-200-36	1369531	Stanton in Peak Parish Council	12.2	The respondent favours Option 3 - a less restrictive policy. The respondent gives the following reasons: - Obstructive and damaging parking must be managed Double yellow lines are not the preference Better layouts in existing car parks Better use of screening with hedges and trees for car parks More car parks are essential for both visitors and residents. The respondent also suggested that more up-to-date visitor data was needed. The proposed option would represent a shift in current policy and would still require suitable sites and an assessment of the balance between National Park purposes at each location. The National Park Authority conducted a Visitor Survey in 2024, so up-to-date data will inform the further development of the Plan.
S-195-20	1369526	Derbyshire County Council	12.2	The respondent expressed uncertainty, and made the case for an holistic approach, working with local authorities and promoting alternatives to car-borne journeys. The response appears supportive of the current approach, but the points about the outcomes of parking management having possibly unintended negative impacts are acknowledged.
S-194-41	1369525	Derbyshire Dales District Council	12.2	The respondent prefers the current policy. But alongside this, the respondent advocates appropriate traffic management alongside restricting parking outside of formal car parks to resident only; citing the Lake District as an example. There is a tie-in to the Recreation Hubs approach, Area Management and the Sustainable Travel Framework approach, as set out in the National Park Management Plan. Some of this is covered by the Local Plan, whilst other elements fall outside of its scope.

S-189-12	1369519		12.2	The respondent prefers retaining the current policy, stating that 'each car park or proposal needs to be considered on an individual basis and there may be a case for a small car park to relieve bad or illegal parking but very difficult to generalise.' The respondent wishes to see more control of camper vans taking up car parking spaces. The respondent also refers to the use of pop-up car parks in Castleton, but states that 'there is little evidence to suggest the provision of more car parking would be of benefit to residents.' The control of on-street parking falls to highway authorities, but unless there are specific regulations, camper vans are able to use parking spaces, provided that they can be accommodated within the bays. Enforcement of breaches of parking regulations are at the discretion of the owner / manager of the individual car park or highway authority. Pop-up car parks offer contingency on busy days, providing alternative parking for up to 28 days per year.

S-186-13	1369505		12.2	The respondent prefers Option 2, but without the expansion of existing car parks. The respondent's explanation for their choice is: - The more parking that is available at a destination, the greater the incentive to drive. Parking and planning policies should promote and support sustainable travel choices, reduce the land-take of development, and reduce reliance on the private car. Current policy is based on the ;Demonstrable need for new parking; without demonstrable need being explained. Developers in the National Park should contribute directly to sustainable travel and walking and cycling facilities including for visitors through s.106 agreements. The provision of visitor parking at the right locations and to an appropriate scale enables the public to access the National Park; particularly in those locations not served by public transport or 'safe' walking and cycling links. In some locations the provision of additional parking space plays a key role in managing user impact, whilst providing opportunities for a wider range of facilities and delivering National Park messaging. The current policy aims to achieve a pragmatic approach that links in with the proposed Recreation Hubs policy. The respondent's comments will be considered along with those of others during the development of the Plan.

S-185-37	1369502	Devonshire Group	12.2	The respondent favours Option 3 - a less restrictive policy. The respondent agrees that at a strategic level a restrictive approach is appropriate, but that flexibility is needed at the site level. They believe that Option 3 allows a balanced approach, able to deal with peak periods (overspill), whilst managing unsafe or obstructive verge parking. The current approach does allow some flexibility at a site level, and if coupled with a Recreation Hubs policy may achieve similar aims as those put forward by the respondent. Overspill parking is currently permitted under GPDO; provided that it does not cause harm.

S-184-24	1369500	Hope Valley Climate Action	12.2	The respondent favours Option 2 - a more restrictive policy. The reasons given include: - The more parking that is available at a destination, the greater the incentive to drive. Parking and planning policies should promote and support sustainable travel choices, reduce the land-take of development, and reduce reliance on the private car. ;Demonstrable need for new parking; needs to be defined. The approach should be aligned towards that for recreation hubs and attractions i.e. ;Work to facilitate the delivery of comprehensive travel and transport solutions; and ;Work with partners to encourage public transport and active travel; Any new parking must show the need for it through a failed trial of meeting the need with public transport, walking or cycling. Developers should contribute directly to sustainable travel and walking and cycling facilities including for visitors through s.106 agreements. Existing car parks should encourage people to travel onwards, particularly to remote and sensitive locations, by public transport or active travel: car parks might therefore become, or be part of, transport hubs. Park and Ride outside the National Park could encourage people to reduce the impacts of their car journeys on the special qualities. We would therefore support new park and ride outside the Park, with the public transport links needed to make it effective. We would support the transformation of suitable existing car parks within the Park into mini park and ride, with public transport and active travel links, particularly where parking + transport enables people to move into, or through, remote/sensitive areas [the Natural Zone] without their cars. We oppose any new park and ride sites within the Park. The respondent raises a number of points, some of which fall outside the scope of this policy. The respondent does point out the strong link between this area of policy and the developing Recreation Attractions and Recreation Hubs policy.

				Some of the comments fall within the scope of the National Park Management Plan and its Sustainable Travel Framework.

S-182-9	1369498	Hathersage Parish Council	12.2	The respondent does not agree with any of the options, favouring a park & ride approach that provides adequate visitor parking facilities at less sensitive locations and transport facilities to enable them to reach focal points such as Stanage Edge. The approach put forward falls partially outside of the scope of the Plan, but does tie in with both the Recreation Attractions & Recreation Hubs policy area and the National Park Management Plan Sustainable Travel Framework. The response will be recorded as 'None of the options'.
S-180-8	1369496	Castleton Parish Council	12.2	The respondent is unsure which option they prefer. The respondent is concerned about the removal of on-street parking in support of off-street, citing the need for on-street parking in Castleton - suggesting an Option 4 where on-street parking is retained. The respondent highlighted the issues of overnight parking of campervans, including loss of traditional parking, littering, vandalism and obstruction. Option 4 will be included as a response. The removal of on-street parking is more likely to be in locations where there are no marked bays and it is a nuisance. For example, the introduction of double yellow lines in the area around Mam Tor / Mam Nick has (in theory) removed unsafe, damaging or obstructive roadside parking.

S-168-7	1369470	Railfuture	12.2	The respondent replied that they were unsure, however, in the accompanying 'reason for answer' state that they would instinctively support Option 2. The respondent advocates better public transport (including reopening the former Matlock to Buxton and Chinley railway). They also add that demonstrating a need for extra car parking should include demonstrating that all potentially viable public transport options have been implemented. The latter is an important point, but does not necessarily mean that those public transport options can or will be implemented. For example, new bus routes must either be commercially viable or publicly subsidised. The response is recorded as 'unsure'.
S-165-39	1369466	Taddington and Priestcliffe Parish Council	12.2	The respondent prefers Option 3 - a less restrictive policy. Te reason given being 'Because the pressure on the landscape, villages and local communities is becoming intolerable.' The respondent's prefferred approach would repsresnt a relaxation of current policy. There would still be a need to identify suitable sites for new car parks.

S-163-27	1368617		12.2	The respondent prefers Option 3 - a less restrictive policy, stating that: - Option 3 also delivers benefit in landscape terms, one of the issues with insufficient parking at key visitor spots is the impact of parking randomly in the countryside The criteria of ;demonstrable need;is difficult as there will always be demonstrable need; if the parking spaces are there, people will come. Any changed policy must be clearly tied into proper sustainable public transport policy and infrastructure. The respondent's preferred approach would represent a change in current policy to a less restrictive approach.

S-161-15	1369459	CPRE Peak District and South Yorkshire	12.2	The respondent did not provide a specific answer to the question. Under reason for answer, they state: - Parking and planning policies should promote and support sustainable travel choices, reduce the land- take of development, and reduce reliance on the private car. The current policy does not provide enough clarity in respect of what a demonstrable need for parking means. There should be a clear policy in the plan for addressing travel demands through the application of the sustainable transport hierarchy. The approach should be to focus trips more towards recreation hubs and attractions by improved active and public transport i.e.; Work to facilitate the delivery of integrated travel and transport solutions;; and ; Work with partners to encourage public transport and active travel;. ;Pop up parking; under permitted development rights whilst of some utility needs to be addressed in the plan in respect of where and when it should be avoided or used e.g. it is not an appropriate way to serve development which is in a location inaccessible to active travel and public transport but might be appropriate at specific hubs and attractions during peak times of the year. The plan could indicate the circumstances in which the PDNPA would consider the use of an Article 4 direction to remove permitted development rights for temporary car parks and what would be taken into account, providing both clarity for the public and for enforcement. Park and Ride within the national park is not a solution, whereas frequent, affordable, flexible sustainable transport services including Park and Ride from outside of the national park to locations such as Snake Pass summit, Fairholmes, Bakewell and the Hope Valley are likely to be so. Existing transport governance is likely to be a barrier to

				achieving this and it is crucial that the park authority supports the Local Plans team in engaging with surrounding local and mayoral authorities on the matter of travel and transport. The provision of electric vehicle charging in car parks and on-street should be supported in the Local Plan and a policy is needed that specifically requires a proportion of new parking in developments including car parks, to provide such facilities where not adequately covered by Building Regulations. The respondent make a number of valid points, but many of them fall outside the particular context of both the question and the Plan. The points raised will be considered for the development of the Plan; or for the work of the National Park Management Plan Sustainable Travel Framework as appropriate. The response is recorded as 'No specific reply'.

S-158-20	1369452	Trans Pennine Trail and Sustrans Joint Response	12.2	The respondent prefers Option 3 - a less restrictive policy. The reason they give is: - There is a need to provide specific parking locations to avoid visitors parking unnecessarily in unwanted areas but this should be done alongside providing information on sustainable travel routes and cycle parking and storage should also be provided. Option 3 would see a relaxation of the current visitor parking policy. This approach would still require that any new or expanded car parks were in appropriate locations and did not negatively affect the Park's Special Qualities.
S-157-30	1369450	Holme Valley Parish Council	12.2	The respondent prefers Option 1 which is to retain current policy, stating that the current policy allows flexibility to deliver local benefit. Current policy alongside the Peak District National Park Parking Standards seek to balance the need for car parks, (and their benefits to visitors and residents) and the requirement to conserve and enhance the Park's special qualities.
S-156-15	1367563		12.2	The respondent prefers Option 2 - a more restrictive policy and believes that there are sufficient car parks in the National Park. This approach would represent a more severe policy than at present, consideration would need to be given to managing displaced parking when a lack of available parking capacity is problematic.

S-154-24	1369442		12.2	The respondent prefers Option 2 - a more restrictive policy. The reasons given are: - It is becoming chaotic with congestion, dangerous and thoughtless parking, risk of accidents, etc. The whole approach is not in keeping with conservation and has a big social impact. Definition of 'demonstrable need' is required It's vital that provision does not affect the Park's special qualities. The current policy aims to achieve a balance between the provision of suitable parking and the impact of unmanaged parking on roads, verges and in gateways. The response advocates a stricter policy stance than at present.

S-153-37	1369437		12.2	The respondent favours Option 3 - a less restrictive policy. The reasons given are: - the level of parking that takes no notice of access points / emergency access, the damage to roadside verges and the environmental impact that has must be managed better. But yellow no parking lines throughout the NPark is not something residents would want to see. Better layouts of existing parking areas could increase spaces, screening in some more remote areas by use of hedges and trees could allow additional visitor parking without leaving a blot on the landscape. The current influx of visitors to honey pot locations even when there are car parking facilities means there is a constant pressure on residential access, agricultural access. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-152-3	1369434		12.2	The respondent did not provide a specific answer, but under reason for answer stated 'Car parks are not wanted here, better publictransport is the only sustainable alternative.' It is not clear is this represents a preference for a more restrictive policy. However, as it more closely points to this, it is recorded as a preference for Option 2 - a more restrictive policy, rather than 'no reply'. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-151-26	1369433		12.2	The respondent did not specifically reply to the question. Under reason for answer, they said: - better public transport is needed. Where there is roadside parking it should be heavily charged. Cars parked illegally should be dealt with. No more car parks please. Grindleford is overflowing with cars at weekends, holidays and sunny days. This never helps the village. How can lots of cars coming into the Park, parking in our village help our village? Whilst the respondent didn't reply to the question, the answer above suggests that they prefer Option 2 - a more restrictive policy. The response will be recorded as such. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-150-40	1369431		12.2	The respondent prefers Option 2 - a more restrictive policy, but without any car park expansion. Under reasons for answer, the respondent cites issues in the Hope Valley suggesting: - However there needs to be more Resident only parking, so that residents can access businesses in places like Hathersage, Castleton, and Grindleford where the last local shop closed due to all parking being constantly full. More restrictions would create more problems. Villages like Grindleford will need off-road parking, with charging for the main road residents, and that parking must not just become a visitor car park. Upper, and Nether Padley need the Station Park and ride of the 60s reinstating, and controls on tourist parking for the Padley Gorge and Maynard Arms (there is going to be a tragedy here). The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach would be more restrictive than at present. This would require an agreed approach to dealing with overspill / displaced parking adjacent to busy car parks.

S-147-6	1369428	The Campaign for the Peak Line	12.2	The respondent prefers Option 2 - a more restrictive policy Under reasons for answer the respondent makes the case for rail reinstatement as a means of managing the need for visitor parking spaces; with particular reference to the reopening of the former Matlock to Buxton railway. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent advocates a more restrictive policy compared to the current approach.
S-145-3	1369422		12.2	The respondent did not offer a specific reply to the question. Instead in a manual submission, they stated the following: - On new builds all major restoration works the Park can insist that there be no impermeable driveways for people's cars or other purposes. All such driveways must allow the water to drain through and away. Cooperation with Severn Trent on this is an obvious way to go as they of course have a vested interest in slowing down the flow of water into our waterways at times of heavy rain fall. The respondent raises a very important point that will be considered for taking forward in any revision of the Peak District Parking Standards document.

S-142-1	1369419		12.2	The respondent prefers Option 2 - a more restrictive policy. Under reasons for answer, they add: - Allowing existing car parks to be expanded would still be a major point of concern as far as disincentivising private car travel into the park goes, so the stipulation of ;demonstrable need; really needs to be tightened up and better-defined. Perhaps defined limitations on the increase in size, a need to provide new options for sustainable travel alongside, using only brownfield land. Even a requirement that car parks must charge users, if an authority could stipulate such a thing (imagine a quid from each car then having to go into a funding pot for the National Park, similar to Manchester;s ;tourist tax;.) And why not Option 4: stop building for cars! The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent prefers a more restrictive approach to the current policy.

S-141-4	1369412	Hope and Derwent Woodlands Parish Council	12.2	The respondent did not provide a specific reply to the question. They did say that they: - We do not support new or enlarged car parks in our parish at any location. The respondent listed the car parks named in the appendix and stated that they didn't support any of the proposed options. The respondent pointed out that Current policy is based on the 'Demonstrable need for new parking; without demonstrable need being explained.' The proposed approach would be aligned towards that for recreation hubs and attractions ie work to facilitate the delivery of comprehensive travel and transport solutions and with partners to encourage public transport and active travel. We would support this approach in the Upper Derwent Valley coupled with no increase in car parking. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The response is recorded as does not support any of the options.

S-138-2	1369372		12.2	The respondent prefers Option 2 - a more restrictive policy. Under reason for answer they state: - I would go for a considerably more restrictive policy and say that new car parks and expansion of car parks will not be permitted where a seven days bus or rail service exists within a quarter of a mile, except in special circumstances. The respondent advocates a more restrictive policy. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-137-8	1369370	Derbyshire ALC	12.2	The respondent favours Option 3 - a less restrictive policy. Under reasons they say: - Option 3 would give some more flexibility for more appropriate parking arrangements. It should be set in a restrictive framework and could consider different options ; enlargement of an existing car park may be more intrusive than a new car park, depending on the individual situation. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach, as explained would allow more flexibility, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-136-35	1369368		12.2	The respondent prefers Option 3 - a less restrictive policy. Reason I would support potential expansion or the creation of new car parks, if there could be better enforcement and a reduction on informal parking, such as is seen in the Lake District. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-135-1	1369369		12.2	The respondent prefers Option 2 - a more restrictive policy Reasons The Peak District is being overrun by cars. Parking impedes buses and waste collection vehicles, Queues of traffic are outside Bakewell and Baslow every time the sun shines. The Park should have a clearly state policy of no more car parks The Park should actively discourage visitors from arriving by car. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach is to take a more restrictive approach to parking provision.

S-128-47	1369275	Rural Action Derbyshire	12.2	The respondent prefers Option 3 - a less restrictive policy. Reasons Lines of cars looking for somewhere to park creates far more pollution than traffic routed to car parks at key sites. Surely there is scope for creating parking hubs and hydrogen buses to move people unable to participate in active travel around the key destinations of the peak. Well designed efficient systems will take the pressure off residential parking, enable travel around the peak and reduce traffic emissions. To do this you need a less restrictive policy. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.
S-127-8	1369287		12.2	The respondent prefers a more restrictive approach to visitor car parks, whilst favouring a complimentary strategy that makes public transport more attractive. A more restrictive approach to visitor parking would require a change to our current policy. There are also links to how development of Recreation Hubs might be taken forward, along with wider consideration around user management. The benefits and impacts of a more restrictive approach will be assessed as the Plan is developed.

S-120-37	1368991	Marsh Farm Development Co Ltd	12.2	The respondent prefers Option 3 - a less restrictive policy. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.
S-115-3	1369156		12.2	The respondent did not provide a specific reply to the question. Reason All over our area of the Peak District we see ridiculous parking by visitors wanting to walk. Destruction of the land, narrowing accesses, sometimes so an ambulance couldn't get through to a house is rife. In recent months we have seen more ticketing as people park in contravention to the highway code. We need more of this. The fines generated could support full time employment for additional police to be assigned to this. People would rather destroy than pay to go in a car park in many instances. However car parks fill up once the "Free" spots go I am all in favour of finding areas living carparks can be made or extended. It is unclear which option is being supported from the above text, whether it is Option 1 or Option 3 - however, it appears most supportive of Option 3 - and will be recorded as such. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-113-39	1369153	Edale Parish Council	12.2	The respondent favours Option 1 - Retain current policy Reason We would agree to new car parks bringing local benefit, meeting demonstrable need and provided that the new car parks are well-screened and do not detract from landscape and biodiversity. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.
S-108-12	1369131	Youlgrave Parish Council	12.2	The respondent prefers Option 3 - a less restrictive policy. Reason Traffic and visitor parking is a major problem for Youlgrave and the current policy discouraging new car parking provision is unhelpful and flies in the face of increased car use. We need policy to allow us to use our local knowledge and evidence to identify new car parking locations and so take pressure off village streets. This will also allow us to direct visitor parking to more sustainable locations in and around the village and reduce landscape impact. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-104-33	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	12.2	The respondent prefers Option 3 - a less restrictive policy. Reasons Requirements are: - there is the provision of yellow lines to remove a similar number of on-street places there is effective enforcement of these restrictions, and the new or extended car park does not conflict with National Park purposes. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.
S-98-5	1368689	Greater Manchester and High Peak Area of the Ramblers	12.2	The respondent prefers Option 1 - retain current policy Reason It is acknowledged within the text that the previous assumption that restricting car parks will discourage car use has failed. Visitor Parking must be managed as part of a comprehensive visitor and traffic management strategy to reduce pedestrian- vehicle conflict, including park, ride and walk solutions linked to the wider public transport networks, to encourage modal switch towards more sustainable modes of travel. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-86-15	1368682	The National Trust	12.2	The respondent prefers Option 3 - a less restrictive policy In relation to visitor parking issues. We note the continued proposed requirement to demonstrate need for new parking and agree that further clarity is required here to support any change in policy approach. This is with consideration given to the emerging options around recreation attractions and hubs. Given the challenges identified, at this stage, it would seem sensible for the PDNPA to continue to develop further rationale, clarity and evidence around a less restrictive visitor parking policy option. This would help retain the potential for new or enlarged parking facilities but supported by a positive, sustainable framework seeking to achieve local benefit or ;wider environmental benefit;. Also, allowing for better visitor management, maintaining the safe and efficient operation of highways and help with local community relations. As noted above, this should be linked to wider recreation policy areas and help open a wider, mutually supportive, discussion around sustainable travel and access. The National Trust would welcome being a part of future discussions around these policy areas and will comment further based on the evolution of options. We also consider that the Mam Nick Car Park may warrant inclusion as a ;site attracting large numbers of visitors;. This is reflective of its popularity to access Mam Tor, Great Ridge and wider areas for recreation. Local property counts for 2024 (to date) indicate some 800,000 visitors have walked from the car park onto the nearby summit of Mam Tor. Therefore, making Mam Nick Car Park a significantly visited National Trust site. Furthermore, it is helpful to see wider acknowledgement of car parking facilities in Appendix 3. Those parking areas that are more informal will require pro-active consideration within this emerging policy area. This is partly addressed in the discussion around visitor parking. Recognising, for example, that demand for car parking can outstrip the supply of spaces. This can create pressures on informal parking and as noted by the PDNPA, illegal parking. The National Trust also recognise and support the aspiration to encourage travel by sustainable means. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-84-3	1368677	Langsett Parish Council	12.2	The respondent prefers Option 2 - a more restrictive policy Reason Langsett Parish Council would support car parks allowed to be expanded but no new car parks. The issues raised with regard to Sustainable Travel can also be listed as Visitor Parking issues. Public transport would possibly alleviate some of the problems Langsett Parish experiences regarding parking during busy periods. Car parks in Langsett can very quickly become full as there is no public transport service serving Langsett, and therefore vehicles are often parked on local roads, causing access issues for residents and for services. Additionally vehicles also park on the A616, the major route to the Woodhead Pass, which can cause major issues. Langsett car parks do not have any electric charging points currently. The consideration that Yorkshire Water is planning to introduce charges for the car parks may additionally increase parking on local roads. Langsett Parish Council would hope that if charging is introduced the Peak Park may support an attractive low charging tariff so as not to deter parking within the car parks. The respondent favours a return to the previous policy approach from the 2001 Local Plan.

S-73-19	1368375	Bradwell Community Land Trust	12.2	The respondent prefers a less restrictive policy. Reason It is inevitable that many visitors to the Park will come by car (or van or motorhome) and they will need somewhere to park. At the same time, a significant proportion of the houses in some villages don't have any off-street parking and many of the roads are narrow. This can lead to problems. For example, in Bradwell, the tight bus route along Brookside can be obstructed by vehicle parking and there are concerns this could lead to the route being suspended. It is unlikely that the volume of visitor trips by car could be significantly reduced by the use of public transport or by restricting officially sanctioned parking. So, allowing more car parks is a way of actively managing the problem. Bradwell does not have a visitor car park and planning policy should be flexible enough to allow one to be created, should the opportunity come up on a suitable site. It is also worth noting that some settlements (including Bradwell) have a shortage of on and off-street parking to meet the needs of residents. The new plan should be flexible enough to allow the provision of car parking to meet these needs. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-71-32	1368373	Tideswell Parish Council	12.2	The respondent prefers Option 3 - a less restrictive policy. Reason Resident-only parking schemes need to be introduced coupled with permitting the creation of new visitor car parks. These visitor car parks can provide a community benefit via an income source along with provision of EV charging infrastructure in the car parks. This would support the carbon reduction strategy too. Parking is the number one issue for residents of Tideswell. Resident permit parking schemes lie outside of the remit of the Plan. They are introduced via the appropriate highway authority and at a cost to the householder, which increases with the number of cars. They do not guarantee a parking space. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-69-2	1368325	Derbyshire Dales District Council	12.2	The respondent was unsure Reason Difficult to assess a blanket policy. In some places, new parking on the edge of a village could allow for resident only parking within the village rather than removing it entirely. Parking restriction needs to go hand in hand with improved public transport. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.
S-68-10	1368264	Bakewell Resident	12.2	The respondent prefers Option 2 - a more restrictive policy. Reason Where a sustainable transport network is provided this will reduce the pressure on parking. To encourage modal shift the car parking policy should be more restrictive. It is unclear from the reasons provided whether the respondent favours the policy adapting to the provision of improved public transport. Current policy seeks to address issues where demand outstrips supply to the extent that it causes harm to the Park's special qualities. The respondent's preferred approach would be reliant on other measures to manage demand.

S-67-16	1367857	Over Haddon Parish Council	12.2	The respondent did not provide a specific reply to the question Reason Over Haddon Parish Council says that in relation to Visitor Parking (Issue 41) we support the retention and possible expansion of existing car parks. The description under 'Reason' most closely aligns with Option 2 - a more restrictive policy, as the current policy allows for new as well as enlarged car parks. The response is recorded as being supportive of Option 2. The respondent also provided detailed comment on the state and operation of Over Haddon car park. Over Haddon car park and it's facilities are not operated by the National Park Authority. Whilst any application to make changes to the size of the car park would be covered under this policy, the other concerns expressed fall outside of the scope of the Plan or the National Park Authority's control.

S-66-12	1368276		12.2	The respondent prefers Option 2 - a more restrictive policy. Reason More parking = more cars. We can manage car use through 'traffic evaporation' by axing parking spaces and introducing a National Park access charge (residents exempt, like in Warsaw) and providing more public transport. We should better plan public transport via transport hubs. We should help people get to the Park in ways other than their cars, and then make them pay for it if they do choose that option The respondent's comments will be considered as the plan is developed. However, it should be noted that Option 2 - a more restrictive policy is not focussed on reducing existing parking capacity. It is focussed on only enhancing capacity in existing car parks and not permitting new ones. Charges for cars to enter the National Park are outside the scope of this Plan and do not fall under the remit of the National Park Authority.

S-65-1	1368271	Individual	12.2	The respondent prefers Option 2 - a more restrictive policy. Reason Climate change requires the Authority to urgently decrease the number of people accessing the park by car. this will only be achieved by vastly improving public transport options (including rail and bus) whilst at the same time reducing available parking, significantly increasing the cost of residual parking and enforcing breaches with heavy and repeated fines. The respondent favours a more restrictive policy, including reducing parking availability over time. It should be noted that Option 2 does not advocate reducing the amount of parking. Instead it focusses any additional parking capacity within existing car parks, including through possible expansion.
S-62-32	1368170		12.2	The respondent prefers Option 3 - a less restrictive policy Reason Welcome both recognition of delivering local benefit while also stressing environmental benefit. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-57-23	1368149	Great Longstone Parish Council	12.2	The respondent did not provide a specific answer to the question Reason Visitor Parking ; it was agreed that more parking should be provided and needed further investigation. Current parking provision in the Longstone Area is inadequate and leads to problems. The response suggests support for Option 3 - a less restrictive policy, and the response is recorded as such.
S-51-10	1368085		12.2	The respondent prefers Option 1 - retain current policy Reason There's a balancing act to play, I feel the current policy is mostly achieving that. Some new car parks are ok in some locations, and should be landscaped appropriately. Besides removing on-street parking, turning on-street parking to residents only schemes should also be explored. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission. Residents only parking schemes are outside of the remit of both the Plan and the National Park Authority. Responsibility rests with the highway authority. Resident only permits incur a cost to residents and can only be delivered where most residents are accepting of that cost.

S-50-5	1367561	Peak Park Parishes Forum	12.2	The respondent prefers Option 3 - a less restrictive policy Reason We support Option 3 only if (i) there is simultaneous introduction of yellow lines on the highway to remove the same number of street-parking spaces, (ii) there is enforcement of those yellow lines and (iii) the new carpark(s) are in places which do not significantly detract from national park Purposes. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.
S-49-12	1367873		12.2	The respondent prefers Option 2 - a more restrictive policy The respondents preferred approach would see a tightening of current policy, restricting any increase in car parking capacity to the expansion of existing car parks.
S-48-1	1368055	High Peak Business Club	12.2	The respondent did not provide a specific reply to the question. Reason Parking is a nightmare now - restricting it would make things a lot worse. You could encourage local farmers on the edge of visitor attractions and towns to provide temporary parking in nearby fields. Plus additional comments about rail reinstatement. The response indicates a lack of support for Option 2, but it is unclear whether or not Option 1 or Option 3 is preferred. The response is recorded as 'No specific reply'.

S-46-1	1367784		12.2	The respondent prefers Option 2 - a more restrictive policy. Reason Any new car parking provision will inevitably lead to additional cars being brought into the PDNP. This will exacerbate the current congestion issues. Parking policy within the Local Plan has long sought an approach that recognises both the benefits and impacts of visitor parking. A more restrictive policy may bring wider traffic management issues at particularly popular visitor locations. Many of these are not currently served by regular public transport or off-road multi-user routes.
S-45-10	1367903	Froggatt Parish Meeting	12.2	The respondent didn't provide a specific answer to the question Reason There is a need for more car parks to alleviate ;on road; parking which should only be very short stay in commercial areas. Visitors should be discouraged from parking outside the nominated car parks with better use of public transport and park and ride schemes from more appropriate areas e.g. disused industrial sites or similar It is assumed from the comments provide that the respondent prefers Option 3 - a less restrictive policy. Th response is recorded as such. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-44-44	1367865	Eyam Parish Council	12.2	The respondent prefers Option 3 - a less restrictive policy Reason There needs to be more car parks utilising best practice as done in other National Parks The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.
S-42-48	1367805		12.2	The respondent prefers Option 3 - a less restrictive policy Reason Settlements were built in different era's when the density of cars was different. We must have more residential parking, and we must have more parking in the vicinity of tourist hubs. Pop-Up car parks are effective, but when they are not in use the visitors clog roads with their parking as the attractions are still open. The weekly list from the police on parking tickets issues for white line parking - Curbar Gap/Padley Gorge etc. highlights the total inadequacy of local bus services/links to rail stations and car park hubs The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-40-41	1367788		12.2	The respondent prefers Option 1 - retain current policy. Reason When it first opened the M25 Motorway was congested with four lanes. In many parts it now has twelve, but it is still congested. The time must come when Policy stops encouraging new car trips into the National Park and instead looks at ;park and ride; type initiatives as are being explored at other of the UK;s national parks. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.
S-32-25	1367524	Bamford with Thornhill Parish Council	12.2	The respondent prefers Option 1 - retain current policy Reason There are arguments for and against car parks, but the current policy offers the best balance. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-31-11	1367452		12.2	The respondent didn't provide a specific answer to the question Reason You should develop more Park and ride facilities using public transport. There is no room in many villages for visitors to park. The respondent didn't express any preference for any of the options, the response is recorded as 'No specific reply'.
S-30-34	1367447	Country Landowners Association	12.2	The respondent prefers Option 3 - a less restrictive policy. Reason Planning must support the creation of new car parking and make it easier for proposals to be accepted. Because: . The National Park has a statutory duty to promote opportunities for the understanding and enjoyment of the park's special qualities.2. More people are visiting the Park and they need parking. Visitors will not decide not to come because of Policy T7 and DMT7.3. Visitors will still come to the Park and specific sites and will simply park where they can find a space. This includes parking on road verges, on areas of grass, park or block others. This negatively impacts visitor experience, upsets locals, can be dangerous and can lead to environmental damage. The local authority must look more favourably upon car park creation. Including for overnight campers. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-29-12	1367323		12.2	The respondent didn't provide a specific answer Reason The Peak park is already overwhelmed with visitors. More Car Parks means more people. May be extensions of existing facilities in Honey Pot areas such as Bakewell and Castleton but putting new parking facilities in quiet villages is not welcome. Easily accessible Bus services out from these central areas to villages/places of interest would be the better way to go Based on the above it is assumed that the respondent prefers Option 2 - a more restrictive policy - the response is recorded as such.
S-20-8	1367235	Oldham Council	12.2	The respondent didn't provide a specific response to the question Reason The respondent offered support for the support for 'At recreation attractions and hubs, to work with highway authorities etc' objective. The response is recorded as 'No specific reply'.
S-15-7	1364436		12.2	The respondent prefers Option 3 - less restrictive policy. Reason We have to be realistic that people will travel by car. More car parks will help manage where people park. Ideally public transport (electric minibuses?) would stop at or near significant car parks. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

S-13-13	1364893		12.2	The respondent prefers Option 1 - retain current policy. Reason Existing policy allows for new car parks where they are needed. The NP should work with Highways to ensure parking enhances the landscape. EG the New Forest national park has many well screened car parks and lots of signage forbidding verge parking. Verge parking is destroying much of the biodiversity. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.
S-9-11	1364715		12.2	The respondent prefers Option 1 - retain current policy. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.

S-8-8	1364695	-	12.2	The respondent prefers Option 1 - retain current policy Reason A hugely tricky issue I feel the current policy had the balance right. I would favour very close working with parish councils and other local groups to address these issues in our communities. The current policy approach seeks to balance the provision of off-street parking and the management of roadside parking. The Authority has taken a consistent approach around recognising that on some busy days there will not be sufficient parking space to meet demand. Pop-up car parks can mitigate these particularly busy days; and do not generally require planning permission.
S-7-4	1364251		12.2	The respondent prefers Option 3 - a less restrictive policy. Reason Any expansion in car parking should be in an appropriate setting, with high charges, accompanied by greater restrictions and enforcement on parking in the vicinity. The respondent's preferred approach would allow more car parks, but would still need to achieve a balance between our statutory purposes and the impact of any new or expanded car parks on the special qualities of the National Park.

12.3 Regarding safeguarding and protecting multi user trails on former railway routes, is your preferred option to continue to safeguard for future rail use or from development that conflicts with their current purpose?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-20	1369634	Sheffield City Council	12.3	The respondent is unsure They support the continued protection of the Monsal and Longdendale Trails for existing recreational use, but would want the safeguarding to allow for future sustainable transport use including rail. Although the answer is given as unsure, the respondent appears to support the current policy approach.
S-223-42	1369632	Hartington Town Quarter Parish Council	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason mixing trails with other mechanised transport is unacceptable rail use with the costs of infrastructure is highly unlikely. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-222-1	1369631	TPT & Sustrans	12.3	The respondent prefers new policy that will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The respondent stated, as the coordinating organisation for the TPT, the Longdendale is part of our route and should be protected. As the coordinating organisation for Sustrans, both these routes are both part of our network and should be protected. The respondent highlighted the following: - The visitor spend fro both routes These trails are vital to the physical and mental well-being of local residents, visitors, and outdoor enthusiasts from near and far. They provide accessible spaces for walking, cycling, wheeling, horse riding and other and outdoor recreation The preservation of these trails as dedicated paths for non-motorised transport ensures that the public can continue to enjoy the tranquillity and natural beauty of the Peak District in a sustainable way. The Local Plan must place greater emphasis on supporting active travel infrastructure, including additional cycle parking and storage facilities at key locations along the trails. Promoting cycling as a healthy and environmentally-friendly mode of transport is critical in reducing carbon emissions and alleviating congestion in our towns and villages. By providing better facilities for cyclists, the Peak District can help foster a greener, more sustainable future while continuing to prioritize the health and well-being of its residents and visitors. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-221-39	1369595		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason Railways, like motorways and airports do not enhance the natural beauty and wild life of the Park. Apply the Sandford principle; conservation of the natural environment should take priory. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-220-18	1369594		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason I would prefer that the Monsal and Longdendale Trails be protected from development in the same way as the other trails as this not only benefits the local economy more but is also more in line with the climate change and sustainable transport policies and aspirations of the National Park. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-219-1	1369555		12.3	The respondent supports the development of policy to protect the Trails from development in conflict with their current use. This option would add clarity to the current blance between safeguarding for rail, whilst seeking security for the Trails.
S-217-1	1369553		12.3	The respondent prefers the development of new policy to protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-216-1	1369552		12.3	Respondent prefers a new policy to protect the Trails from development that conflicts with current use. They are regular users of at least one of the trails and cite their popularity with visitors, including non-local visitors and holiday makers from abroad. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-215-1	1369551		12.3	The respondent prefers new policy safeguarding the Trails from development in conflict with their current use. The respondent does not object to a railway in principle, but not at the expense of the Monsal Trail. The respondent does not believe that the developers of a railway could retain or replace the Trail to its current standard. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-214-41	1369550	Hope with Aston Parish Council	12.3	Respondent prefers new policy protecting the Trails as recreational routes, stating that their heavy recreational use supports this approach. Creating new policy would not prevent future rail use, the safeguarding would encompass any structures necessary for rail use. However, it would support ambitions to expand both Trails.
S-212-1	1369548		12.3	The respondent prefers Option 2 This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-210-36	1369546		12.3	The respondent prefers Option 2; New policy that will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The respondent states that this must be in conjunction with with further restricting car borne travel and car parking...this relates to their preference to Option 2 in response to Question 41 on Visitor Car parks. The preferred option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-209-1	1369545		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reasons I have heard rumours that the pro railway group were talking after the open meeting and were heard to say something along the lines of this (ie the restoration of the railway) to be a done deal. Can you comment on this please. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails. There has been demand to reopen both Matlock to Buxton railway since it's closure. However, there has been a concerted campaign under the coordination of MEMRAP over the last 10 years. The current planning policy is clear and requires for any reopening to be in the National Interest and for an equal or better Monsal Trail to be delivered in advance of any reopening works. To date, there has been no demonstration that the reopening would be a Nationally important project that outweighs the importance of the National Park as set out in paragraph 190 of the National Planning Policy Framework (2024); or that an equal or better Monsal Trail can be delivered.
S-208-1	1369544		12.3	The respondent prefers New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The respondent lives locally and has used the Monsal Trail for more than 30 years; and twice weekly since reopening in 2011. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-207-32	1369542	Youlgrave Community Land Trust.	12.3	The respondent prefers Option 2 because it gives clarity to the aims of the trails and secures their future. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-201-1	1369532		12.3	The respondent is supportive of new policy that will protect the current recreational use of the Trails. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-200-37	1369531	Stanton in Peak Parish Council	12.3	There was no specific response to the question. The accompanying text suggested mixed opinions amongst the Councillors. Accompanying text suggested: - The possibility of future reopening of either one or both of these routes should not be limited by ensuring the trails are for visitor enjoyment. If more cross peak traffic could be removed from the road network then both the environment and communities health and wellbeing would benefit but, like the example of the route from Matlock to Rowsley, if it is possible to accommodate both alongside this should be fully explored. The 6 tunnels and in particular the 4 longer tunnels make the possibility of rail and trail sharing the route unfeasible at present. As the respondent stated division amongst member of the Council represented, this response will be recorded as unsure.

S-195-21	1369526	Derbyshire County Council	12.3	The respondent supports safeguarding from development that conflicts with current use. The respondent highlights: - The value of the current use and the White Peak Loop. The deficit in benefits from reopening the railway The inability for the Trail and rail to coexist on the same route The impact of reintroduction of rail on the Wye Valley including its SAC and SSSI. The response favours a change in policy, this option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-194-42	1369525	Derbyshire Dales District Council	12.3	The respondent did not specifically reply to the question. However, the accompanying text would suggest support for Option 1, continuing safeguarding for future rail use.
S-188-23	1369508	Staffordshire Moorlands District Council	12.3	The respondent did not specifically reply to the question, but did state: - The Council supports the protection of the Manifold Trail from development that conflicts with its current purpose. The question relates to the future of the Monsal and Longdendale Trails, which are subject to a current safeguarding policy for possible future rail use. The Manifold Track is not subject to such a policy. The response will be recorded as 'No specific reply'.

S-186-14	1369505		12.3	The respondent prefers option 1, but stipulates the following, rail restoration must: - show significant removal of vehicle movements within the NP be accompanied by demand management of road traffic both within and outside the NP to stop road capacity being refilled with private vehicles provide high quality replacement routes for recreation that equal those that would be lost Current policy DMT4: Railway construction, sets clear requirements that cover the first and third bullet point. In order to be equitable, the middle bullet point would need to focus on those journeys that could be replaced by the reopening of the railway. There would also need to be consideration given to the capacity of that railway - for example, the Hope Valley Railway that serves 5 stations in the National Park does not have the capacity to replace all the journeys made along its route including those into and from the National Park.
S-185-38	1369502	Devonshire Group	12.3	The respondent prefers Option 2 The respondent believes that rail reopening is unrealistic and undeliverable. However, they believe that the continued (or extended) trails offer significant economic benefit; and that protecting the routes could lead to complementary investment in related facilities with increased economic benefit. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-179-9	1369495	Charlesworth Parish Council	12.3	The respondent prefers Option 2, new policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The respondent makes particular reference to the Longdendale Trail. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-169-1	1369471		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-168-8	1369470	Railfuture	12.3	The respondent prefers Option 1 - the continuation of safeguarding of the Monsal & Longdendale Trails for future rail use. The reasons given are: - The Monsal route, reopened for rail throughout between Matlock and both Buxton and Chinley, would create a high-capacity option for tourists visiting the Peak District from London, the Midlands, Manchester and elsewhere, as well as giving access to the cities for residents of Bakewell and other places along the corridor. This would help to stabilise these communities in terms of young and working-age people currently being forced to leave in search of employment and other opportunities. It also offers capacity for modal shift of freight from road to rail, especially for quarry traffic. It would also provide relief for the Hope Valley Line by means of diverting existing quarry freight to a more direct route to the south, enabling passenger services on the Hope Valley Line to be enhanced. The Longdendale route similarly offers potential, particularly for east west freight transits, relieving the parallel roads and railways. In both cases, we support the re-provisioning of the recreational trails. This could allow greater segregation between boot, hoof and wheel, as it has been put. It could also give more direct and easy access from the trail routes into the villages and amenities they pass through or near, providing greater passing trade and thereby economic benefit. Combining this with direct rail access from the surrounding cities, especially Manchester, the overall package offered to visitors could be greatly enhanced while reducing the car-borne traffic congestion and the economic and environmental detriment this brings. The respondent supports the current policy approach, which safeguards the former railways for future rail use. Both options seek to prevent development that would prejudice the line and structures of the former railways.

S-164-1	1369464		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-162-22	1369460	High Peak Borough Council	12.3	The respondent prefers Option 1 - to continue to safeguard the Monsal Trail for future rail use whilst retaining active travel along the route. This option would continue the current policy approach.
S-161-17	1369459	CPRE Peak District and South Yorkshire	12.3	The respondent has a split response to this question, favouring Option 2 - to protect the Monsal Trail, but Option 1 for the Longdendale Trail - further stating that rail restoration on that route should be accompanied by evidence that this would be likely to remove private cars from the national parks road network through new demand management. This approach would lead to 2 specific policies, one for the Monsal Trail and one for the Longdendale Trail. The different responses are recorded as such.
S-160-1	1369455		12.3	The respondent supports Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-158-1	1369452	Trans Pennine Trail and Sustrans Joint Response	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The respondent gives the following reasons: - As the coordinating organisation for the TPT, the Longdendale is part of our route and should be protected. As the coordinating organisation for Sustrans, both these routes are both part of our network and should be protected. The visitor spend both these routes bring into the local economy should not be underestimated. It is imperative that the plan includes strong safeguards for both the Longdendale Trail and the Monsal Trail, ensuring these routes remain closed to re-opening as railways. These trails are vital to the physical and mental well-being of local residents, visitors, and outdoor enthusiasts from near and far. They provide accessible spaces for walking, cycling, wheeling, horse riding and other and outdoor recreation, contributing significantly to healthy lifestyles, stress reduction, and overall quality of life as well as the local visitor economy. The preservation of these trails as dedicated paths for non-motorised transport ensures that the public can continue to enjoy the tranquillity and natural beauty of the Peak District in a sustainable way. Reopening these corridors to railway traffic would not only disrupt this peaceful experience but could also lead to the loss of a much-needed resource for physical and mental health in the region. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-157-31	1369450	Holme Valley Parish Council	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use. The reason given is that: - The possibility of re-opening the rail lines, in some form, should be protected, as the future is hard to predict. The engineering work required to make a railway line is so much greater than that required to restore or replace a walking/riding/wheeling route. The respondent's preferred approach would continue with the current policy. This would also require an equivalent policy seeking replacement of either Trail in equal or better form prior to the commencement of reinstatement works.
S-156-16	1367563		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The reason for their answer is: - They are wonderful recreational routes that should be preserved thus. The Monsal Trail brings the community together for the Parkrun events as well as being a pleasant corridor through the countryside for countless visitors each year. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-155-1	1369444		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-154-25	1369442		12.3	The respondent's preferred option is Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. The reasons given were: - Special character of the NP, Special character of the specific locations. Is there really a case for development/reinstatement? This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-153-38	1369437		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use The reasons given are: - The possibility of future reopening of either one or both of these routes should not be limited by ensuring the trails are for visitor enjoyment. If more cross peak traffic could be removed from the road network then both the environment and communities health and wellbeing would benefit. The respondent prefers the current policy approach. It should be noted that the Trails serve residents as well as visitors to the National Park, as well as contributing significantly to the local economy.

S-151-27	1369433		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Under reason for answer the respondent made the following points: - keep as trails. The local rail company cannot even run the railway line that is has. No drivers, no guards, brakes won't release, points failure.. an endless list of excuses. We need better bus routes, more of them. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-150-41	1369431		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use. The reason for the response is: - They would be very valuable if re-opened to passenger trams for example, to the local residents and economy. They create tourist traffic to reach them, and have little value as sustainable transport routes. The respondent prefers the current policy approach, citing the availability of back lanes for cycling. However, many people do not feel safe cycling on roads with other traffic. Elsewhere the respondent refers to dangerous incidents that they have experienced whilst cycling / horse riding on the road. The existing Trails do deliver significant benefits to the local economy, supporting directly or indirectly a number of businesses.

S-148-1	1369429		12.3	The responde prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Under reason for answer, they say: - My husband and I live near the Monsal Trail and use it on a daily basis. We walk our dog, and take our children for walks and bike rides along the trail. It is a convenient and safe space to undertake those leisure activities. We have used the trail regularly since we bought our house on Castle Drive in 2009. Prior to that, I have used the trail since a child, having been born and brought up in Bakewell since the early 1980's. We would like to see the trail protected for recreational use, not least because it is an easilyaccessible, reasonably flat trail that is suitable for all, with access closely located to parking. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-147-7	1369428	The Campaign for the Peak Line	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Under reason for answer they provide the following: - There is no doubt of the recreational value of both trails. However, it should be apparent from the tone and content of this response that the Park will otherwise fail to attain the desired goals of traffic reduction and decarbonisation, with the aim of reaching net zero. The spectre of significant development is always put forward as a reason to avoid reinstating the railway. However, much of the carbon involved and some of the short term impact was expended in Victorian times with the initial construction and the relief of pressures on A re-opened rail link between Matlock, Buxton and Chinley, produces a whole range of economic, social and environmental benefits. Not least of these is to realise the aim of making the Park available for everyone, including those without access to cars or having some disability. Residents of Manchester, Stockport, Sheffield, Nottingham, Derby and even Leicester, will for the first time have access, without the use of a car, to Bakewell, Chatsworth and many other of the most popular attractions in the Park. The informal survey work carried out by CPL and MEMRAP suggests that visitors are eager to leave traffic congestion behind when enjoying precious leisure time. The A6 and Derwent Valley will become a series of re-connected communities. This campaign receives regular complaint about the 2 hours or more needed to travel from Bakewell to Manchester by means of public transport. Residents during campaigning refer to the twin sensations of being left behind and locked in. Residents in and around Bakewell and Great Longstone want to shop at a supermarket other than Lidl without having a long drive and to fight through road congestion. Regardless of the option chosen, the track-bed and structures of the two Trails will continue to be safeguarded against development prejudicial to their use as a transport corridor.

S-142-2	1369419		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Under reasons, they state: - In the case of Monsal Trail in particular ; the core section between Blackwell Mill and Bakewell ; I feel its essential to put the idea of reopening as a railway to bed once and for all. Making Bakewell a railhead inside the park by extending the line from Matlock could be a sensible idea, though, and could perhaps be noted as an exception. Longdendale Trail is a very different case. It was madness to ever close that line, a modern electric mainline across the Peak, as late as the early 1980s. The trail and a re-opened mainline could probably coexist quite happily given the wider, more open nature of the valley. Its not necessarily useful to have combined these two trails in one option as they have very different backgroundsand future potential. Monsal Trail has huge potential for genuine active travel if linked properly into Buxton andMatlock. Longdendale is a beautiful leisure route but also alongside a key artery road. It would certainly be better tosee rail reinstated here than see the Woodhead Pass road expanded! The notes actually say ;it is highly unlikely that we would support future rail use on either of these routes because itis major development and contrary to national park purposes;. So, Option 2 ; to protect them both ;from development that conflicts with their current purpose as recreational routes; makes the National Parks stance clear. Option 1 would be confused. These routes have proven themselves in allowing sustainable access to large areas of the countryside. No train ticket is required, turn up and go. Views are 360-degrees at all times. Having some certainty over the future of Monsal Trail in particular may even help with the aim of connecting itproperly to Buxton and Matlock at either end, reducing access by car and making it a genuine active travel

				route. Derbyshire County Council are currently working on the plans and will need this certainty to access funding. I imagine it would be welcome for the many businesses which actually rely on the trail, too. Option 2. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-138-11	1369372		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. In reason for answer they state that they 'would like to see this policy go further and encourage development that extends any and all of the existing multi-use trails to provide better connections to public transport and other rights of way.' This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails. The National Parking is currently preparing a National Park Cycling, Wheeling and Walking Infrastructure Plan.
S-137-34	1369370	Derbyshire ALC	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use. Under reasons they state: - These former railway routes are well suited for railway use and would likely be the cheapest and most (or only) feasible option for any new railway routes. To achieve more sustainable and active travel, rail routes are an important part of the overall picture. It will be easier and cheaper to re-route the recreational use. The respondent prefers the current policy approach.

S-136-49	1369368		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason Option 2 does allow for the development of light rail or tram networks to increase public transport, if it doesn't stop the use as multi-user trails. Option 1 does not require the retention of the multi-user trails. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails. For clarity, it is unlikely that any light rail or tram networks would be allowed on the Trail network because of the safety issues within the tunnels; and the segregation requirements for existing horse riders.
S-135-4	1369369		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use. Reason Transport emissions will not reduce in the Peak District unless we have better ways to travel. The respondent prefers our current policy approach.

S-133-1	1369350		12.3	The respondent is unsure Reasons Matlock Buxton Railway have mixed feelings about this line. Certainly, I think the route should be protected against blockages that might prevent reopening. One wonders if a better use of scarce funding could be to facilitate heritage bus service in the Peak Park. There are a lot of old buses which are in good condition but cannot be used on ordinary stage carrier services with County Council support. Sometimes there are Vintage Bus Running Days but fares cannot be charged. The trick is to sell a programme and sell charitable donations. It is easier to run a bus service than a heritage railway. All three lines in Derbyshire are struggling financially and there are too many in England as a whole. The need is to change the regulations to allow older vehicles to continue to operate. They used to be called Construction and Use regulations. A big stumbling block is disabled access, doors steps and so on. A private act of parliament may be needed or perhaps a statutory instrument would suffice. There is a National Association of Road Transport museums but I don't now how well organised they are. This would apply to tourist services in National Parks. Woodhead: At one time this route was modernised and called the Manchester Sheffield Wath electrification. After a lot of controversy, the through route closed in 1981. A useful book was published in 1986 'Railroaded' by Simon Bain ISBN 0-571-13090-4. I am sure there are a lot of copies still around. Safeguarding the route from Hadfield to Woodhead does not present any real problems. There was talk of a pumped storage scheme for electricity but only a service road would have blocked Woodhead and railway. I hear vague ramblings from time to time about a new road over Woodhead the A628. This is open to landscape objections. There was talk of using the third Woodhead rail tunnel of 1954 for road traffic. I think this is now blocked by National Grid electricity cables. Two projects occur to me. One would be a fourth tunnel to Channel Tunnel Loading Gauge as part of a Liverpool-Hull Scheme. This loading gauge allows big lorry to be carried on an

				ordinary railway wagon. My other idea would be a road just below the surface on a cut and cover basis. This avoids ventilation and safety problems associated with a deep tunnel. Something similar has been proposed at Stone Henge on the A 303. Perhaps this scheme has recently been abandoned by the New Labour Government. It was never clear from Radio whether this came out of the Trunk Roads or English Heritage Budget. Option 2 would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails. Option 1 maintains the current approach. The response is recorded as 'Unsure'.

S-132-2	1369081		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reasons It is important to recognise the future potential of this strategic route, particularly as the climate crisis deepens. The Park is in a terrible bind - on the one hand upholding its duty to protect and enhance the beauty of the landscape, on the other seemingly unable to resist the destructive impact of increasing car-borne traffic. There are other mitigating factors - if there is a case made for a national infrastructure investment in a connecting route, it would have to be alongside an enhancement of the multi-user trail network to compensate for any loss of the Monsal Trail multi-user route. But bikes, horses and walking cannot by themselves deliver the transport needs of either local communities or visitors in the heart of the Park. It is shortsighted to close down the option of something more, along a valuable route-line that cannot be replicated in any other sustainable way. The respondent prefers to retain the current policy approach.

S-130-1	1369286		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reasons There is no material purpose for amendment of current policy Core Strategy T5, only an ideological presumption to appear unsupportive of future rail use, which I believe would be very unwise indeed. In Item 42 it is stated that the current safeguarding policy for the Monsal and Longdendale Trails implies support for future rail use. And, opines further: ;It is highly unlikely that we would support future rail use on either of these routes because it is major development and contrary to national park purposes;. I believe such statements (penned in the first person on behalf of the PDNPA) to be merely subjective and manifestly non-factual. Notwithstanding present trends and opinions within the Park Authority, the current review is for a new Local Plan to 2045, yet attitudes towards even the most controversial of issues can change within the time span of a generation. I cite as a pertinent example the shift in popular consensus towards nuclear power, the proliferation of which was as recently as the 1990s deemed too risky, unsafe and environmentally intolerable, whilst nowadays it is considered not only as an acceptable alternative to fossil fuels, but even by some the most preferable. An unthinkable prospect not so long ago.. Arguably, the greatest challenge to the PDNP, in terms of both spatial objectives and sustainability, is the increasing volume of road traffic, with associated congestion, pollution and visitor parking issues. From the PDNPAs own figures, traffic flows within the Peak District have increased by 16% from 2012 to 2023 - perhaps not surprising, given current estimates of several millions of visits per year, 85% of which are thought to be made by car. In terms of cross-park traffic alone, a single passenger train could potentially remove hundreds of cars from traversing the Peak District roads. One freight train could similarly replace scores of HGVs, not only typical quarry traffic from Derbyshire's B roads but from the national highway network in general. Trains of the future will not be fueled by diesel or coal fired steam. That road

				transport within the Peak District is the 3rd highest emitter of CO₂ (after the Hope cement works and agriculture), a present day electrified train would offer a much cleaner contribution toward the stated Management Plan Objectives, objective 1: ;To lower greenhouse gas emissions significantly, focussing on the largest emitters within our influence;. Rail removes cars from roads. A further observation, in terms of Challenges & Spatial Objectives, is that; While leisure cycling has increased, for the most popular destinations such as the trails network, the majority of visitors arrive initially by car. The re-provisioning of the Monsal Trail as a multi-use leisure trail has been particularly successful, while fulfilling its safeguarding role of the track bed and infrastructure for a future railway reinstatement. There should be no question of permanent displacement and total loss of such a joyous recreational facility from the Park. On the contrary, insomuch as a similar leisure amenity might be planned to coexist in conjunction with a future service railway, through innovative realignment (as per current policy, Core Strategy T6), both benefitting from each other - accessibility to the same being improved via reopened railway stations, not least in the western section of the Trail through Wye Dale. Stopping trains servicing these locations should have the inclusion of storage car(s) for cycles stipulated to the licensed operator. The original Midland Railways line was constructed through what is now the Peak District at great expense and innovation in the 1860s to link Manchester and the northwest of England with the East Midlands, via Derby to the Southeast and London St Pancras. These days, as a native and resident of the High Peak, it is as good as impossible to access the rest of the county of Derbyshire by public transport. Of course, nothing is really impossible, but a rail journey from Chapel-en-le-frith to Matlock today would take 3hr 15min, and require 3 changes, via Stockport, Stoke on Trent and Derby, or 4hrs and 2 changes via Stockport/Sheffield and Nottingham, at a cost of £50. Needless to say, I take the car. And, as the disused railway follows the line of the A6 corridor, it means every such car journey is an addition to cross-park traffic, completely contrary to the PDNPAs Proposed Spatial Objectives for

				travel & transport. Far from a future railway line being, ;..contrary tonational park purposes; (stated as if fact in Item 42), I believe it may prove to be the ultimate long term solution to the seemingly insurmountable present conundrum of increasing volumes of road traffic, self-proliferating & exacerbated by current policies that encourage more and more visitors to often remote recreational facilities within the Park, who arrive in their cars for which there is purposefully reduced provision. A newly operational railway along the A6 corridor could remove a huge proportion of cross-park traffic at a stroke, and contribute substantially to current policy (Core Strategy reference T7) to support Park & Ride (as well as integrated onward transport initiatives) to access destinations within the Park, plus a demonstrable enhancement to visitor parking management. To summarise; there is no material purpose and nothing to be gained by amending the wording of new policy to pledge only to protect the Monsal & Longendale Trails from development that conflicts with their current usage as recreational routes, on the basis of sentiment and perceived aesthetics. As such, I strongly recommend that the new policy adoptsOption 1: to continue to safeguard the Monsal & Longendale Trails for future rail use not least in the face of dynamically evolving attitudes in a rapidly changing world. The respondent prefers the current policy approach.

S-129-9	1369199	Rowsley Parish Council	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-128-29	1369275	Rural Action Derbyshire	12.3	The respondent is unsure Reason On the one hand reopening a railway line from Matlock to Buxton could be extremely beneficial in terms of reducing traffic and freight on Peak District roads There are restrictions in the viability of such a scheme without major investment in high voltage cables to facilitate electric trains as opposed to diesel. Therefore we would suggest that in practice there is little need for any change to the existing policies as there is unlikely to be any development on the Monsal or Longdendale trails anyway.

S-121-1	1369279	MEMRAP	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reasons Safeguarding the route for potential rail reinstatement is a long-standing policy. There have been no changes in the National Planning Policy Framework that would drive this change. There is no justification for the removal of safeguarding other than the long-standing references to the PDNPA objection to rail reinstatement which in itself does not justify the change. These statements are in the Core Policy - Policy T5 B - irrespective of the safeguarding of land for schemes, none are accepted in principle. In the Development Management Policies - Railway Construction 9.38 (page 125) confirms the recognition of the benefits rail travel brings to the Park in terms of safeguarding, these benefits still remain. National Planning Policy Framework 9. Promoting sustainable transport: 110c. Planning policies should: identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. It is known by the PDNPA that such evidence is currently being collated as part of the reinstatement proposals for the Matlock to Buxton railway. Rail is demonstrably more environmentally friendly than road transport, therefore the removal of the safeguarding conflicts with the policies regarding carbon reduction. A removal of the safeguarding based upon a reliance of electric vehicles, fails to address the Environment Act 2021 requirements for reduction in brake and tyre particulate emissions. Our review of other English National Parks, all of which work under the same legal and national planning framework highlights the PDNPAs individual and opposing position to a sustainable transport solution, examples include: a) Lake District National Park Policy 21 safeguarding routes; b) Exmoor

				National Park - RT-D13 safeguarding routes; c) New Forest Core Strategy safeguarding routes; d) Yorkshire Dales Local Plan where reinstatement is stated as an opportunity The removal of safeguarding removes protection for an option that supports achieving the PDNPA targets for sustainable travel to, from and within the National Park to achieve net zero carbon emissions by 2040. Our understanding is that PDNPA (Peak Park Planning Board at that time) acquired this section of the trackbed of the former Matlock Buxton railway line with a covenant that the route would be safeguarded for possible future reinstatement of the railway. Covenants are solemn legally binding promises. The original sale agreement refers to rights of access for railway inspections and specific maintenance requirements to protect the asset for the return of the railway. Multi-user trails are arguably creating a negative sustainability impact. Most people arrive by private vehicle to use the trail, they also visit other locations in their private vehicles, and they create known and documented issues with parking. With an acknowledged position of around 83% of visitors (13m-26m per annum) arriving by car, there is no basis for removing safeguarding for a sustainable transport alternative, particular given that even with the PDNPA position on the reinstatement, any proposals would be subject to existing planning approval processes. To clarify, our responses relate to Issue 42 and our response is Option 1 new policy will continue to safeguard the Monsal and Longdendale Trails for future rail use. The respondent favours the continuation of the current policy approach.

S-120-40	1368991	Marsh Farm Development Co Ltd	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use The respondent favours the current policy approach.
S-119-1	1369270		12.3	The respondent supports Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-116-1	1369157		12.3	The respondent supports Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-113-40	1369153	Edale Parish Council	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason These trails are truly multi-user trails which offer access for walking, cycling and wheeling in the National Park to people who may not otherwise be able to access the area for these purposes. Any reestablishment of railways along them would be hugely disruptive not only to the amenity value but also to biodiversity. It is hard to see how access could be maintained, or BNG achieved, if they are developed for rail use. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-109-1	1369132		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-106-8	1369124	Stanton in Peak PC	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason I think it would be costly and impractical to revert these back to their early 20th century use, and they are well used and loved in their current format. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-105-1	1369066		12.3	

S-104-19	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason The trails are an important asset for both visitors and residents. They are hugely popular and provide significant support for the local economy. Any change in use must support this and provide a viable alternative of at least the same quality and preferably a significant enhancement. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-99-1	1368893	Railway	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use The respondent cites the need to encourage sustainable transport and allow access for all socio-economic groups.

S-98-15	1368689	Greater Manchester and High Peak Area of the Ramblers	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason Given the undoubted success of the existing trails for walking, wheeling and cycling we would support maintaining the existing policy but to clearly state that any reinstatement plan would have to pass two key tests: a strategic national need outweighing the impact on the local environment; and provision of an alternative trail of similar quality and environmental sensitivity. The respondent prefers maintaining the current policy approach.

S-96-1	1368755		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason I understand that the Peak Park's acquisition of the track beds of the Woodhead and Buxton to Matlock Railways included safeguarding covenants for future rail re-instatement. I am concerned that option 2 would be contrary to those covenants, so option 1 please. There are so many reasons why these two routes need to be safeguarded for rail re-instatement. Frankly I believe that they both should of reopened along time ago. Although I don't live in the Peak District I am a regular visitor. It's so obvious to anyone that the traffic on the A6, A57 and A628 is absolutely terrible. The only way to address this is to reopen both the Woodhead and Matlock - Buxton / Chinley lines to heavy rail. The access to jobs, education and leisure opportunities for local people in the Peak District is also very poor. Young people in particular are very disadvantaged. Reopening both of these routes would put so many locals in a much stronger position. For example, people living in Matlock and Bakewell would have much better access to jobs, education and leisure opportunities in the Manchester area. So many more people would be able to cut down on their car usage if these two lines were open. For example I have a couple of friends who live in Litton. Whenever they travel to the South by train they drive to Chesterfield in order to be able to pick up a service from there. If they could catch a train from Millers Dale and change at Derby, it would be so much easier for them. It would also be a big environmental benefit too. The respondent prefers the continuation of the current policy approach.

S-95-1	1368746	Individual	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason Reinstatement of the railway. Would have environmental, economic and social advantages for the Peak District and beyond, reducing road traffic and allowing easier travel between the East Midlands and North West The respondent prefers the continuation of the current policy approach
S-93-1	1368691		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-92-1	1368690		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-91-1	1368688		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-90-1	1368687		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason I am very keen to protect the Monsal Trail from ever becoming a railway line again in the future. I wish to see the Monsal Trail and the Longdendale Trail remain as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-89-1	1368686		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-87-1	1368683		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason I want the Monsal Trail to have full protection from becoming a railway line This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-83-1	1368675		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason The Monsal trail should remain just as it is This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-82-1	1368674		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason These trails must be protected for recreational use. We do not want or need a railway. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-81-5	1368658		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason These trails provide popular opportunities for leisure activity for both locals and tourists. There isnt much point in having aNational Park if opportunities like this are lost. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-77-1	1368524		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason A railway would ease traffic congestion in the peak district and would link up towns with Manchester, London, and Derby and would be a greener alternative to road traffic. The respondent wishes to see the current policy approach retained.
S-75-1	1368383		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-74-2	1368379		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-72-1	1368374		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-70-4	1368372		12.3	The respondent is unsure Reason Summary of what I would like to see:1. Retain Policy T5 (Option 1) and its preamble.2. Retain Policy T6 (Option 2) and its preamble with an amendment to paragraph B to explicitly include the Monsal and Longdendale Trails by adding these to the existing list of the Manifold, Tissington and High Peak Trails. (Please see also my response to Issue / Question 40 to reposition Policy T6 and its preamble as an ;RT; policy under Recreation and Tourism.)3. A recognition of the Bakewell Neighbourhood Plans policy aim to re-open the Matlock to Buxton railway should be included. The respondent states that they are unsure, but appears to be supportive of retaining current policy, there response will be recorded as supporting Option 1.
S-69-29	1368325	Derbyshire Dales District Council	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-68-38	1368264	Bakewell Resident	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason We need options for sustainable transport networks although redevelopment as a major rail route may not be supported by the Park redevelopment as another form of mass transit with less negative impacts on conserving and enhancing natural beauty, wildlife and cultural heritage but supporting opportunities for visitors to understand and enjoy the park may open up in the near future. I firmly believe that protecting these trails for leisure use only would be a mistake before a sustainable transport network has been investigated. The respondent favours the continuation of the current policy approach.

S-67-6	1367857	Over Haddon Parish Council	12.3	The respondent did not give a specific reply to the question, but the context suggests Option 1. Reason Over Haddon Parish Council said that in relation to Safeguarding and Protecting multi-user trails on former Railway Routes (Issue 41) we support Option 1 (continue to safeguard Monsal Dale and Longdendale Trails for future Rail use). Over Haddon Parish Council has a particular interest in the Monsal Trail because it forms part of the disused section of railway between Matlock and Buxton. Reinstatement of this route, with a station at Bakewell, would provide local residents with much easier access to the national rail network (which they enjoyed for 100 years until 1968) and would also enable visitors to the National Park, from both the Derby/Nottingham and the Greater Manchester directions, to arrive without their cars. The cycle route which uses the Monsal Trail is a popular facility and could either continue to share the route or use alternative sections of route. Under 'Reasons' the respondent indicates a preference for Option 1, the current policy approach, the response will be recorded as such. It is suggested in the response that if the railway was reopened, that the Trail could continue alongside the railway - this would not be possible. Under current policy, an alternative and equal or better route would be required. So far, a suitable alternative route has not been identified.

S-65-8	1368271	Individual	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason Within the life of the new Local Plan to 2045, rail re-instatement may offer a solution to the challenges facing the Peak Park in meeting its sustainability objectives. For this reason, the safeguarding of the rail infrastructure including the track beds of the Monsal and Longdendale Trails should be retained. The respondent favours the continuation of the current policy approach.
S-62-6	1368170		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason Recreational use established and of high demand. Future rail use highly unlikely. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-61-2	1368184		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason The Monsal Trail must be safeguarded as an important walking and cycling facility for residents and tourists. Any possible future restored rail route would seriously affect this leisure facility. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-60-8	1368155		12.3	The respondent identified Option 1 as their preferred option Reason I strongly oppose reopening the trails for rail use, so please choose whichever option offers the greatest protection from this. The trails are a fabulous asset for local people and visitors alike and are very popular/desirable for active leisure, health and fitness. The comments under reason suggest support for Option 2 and the response is recorded as such. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-58-1	1368150		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-57-24	1368149	Great Longstone Parish Council	12.3	The respondent is unsure Reason There are strong and conflicting opinions on this issue, and it is recommended that the Council does not take a formal position, at this time.
S-56-1	1368147		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason The Monsal Trail is very popular with walkers, runners, cyclists and horse riders and attracts a lot of visitors the the area. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-55-1	1368146		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-54-1	1368145		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason I would like to support Option 1 and see the potential restoration of the railway between Buxton and Matlock. The respondent's preferred approach would continue with the current policy. This would also require an equivalent policy seeking replacement of either Trail in equal or better form prior to the commencement of reinstatement works.

S-51-5	1368085		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes Reason I'm not familiar with the Longdendale Trail, my comments pertain only to the Monsal Trail. I'm supportive of increased rail generally, but am firmly against it on the Monsal Trail. There's no realistic possibility of realignment of the Monsal Trail that preserves the features that make it so popular, particularly with young families. It's segregated from the road, it's essentially flat and both the bridge and tunnels provide it with something unique. This encouraging place to cycle is important to letting young people getting a taste of the outdoors, and the ability to cycle. The only exception I can possibly imagine, is an extension of the railway to terminate at Bakewell rather than Matlock. This stretch of the Monsal trail is less used, it only affects a fraction of the Peak District and a railway could make a big difference to Bakewell as a town. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-50-48	1367561	Peak Park Parishes Forum	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason To protect the rights of the existing users of these Trails. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-49-13	1367873		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason So that the continued use as a multi-user trail is preserved. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-48-3	1368055	High Peak Business Club	12.3	The respondent did not give a specific reply to the question, but the text suggests support for Option 1. Reason We really need to re-open the Buxton - Derby rail link whether along the current Monsal Trail route or by some other means. At present virtually all tourists arrive in the National Park in a vehicle, and travel from one town to another the same. A modern electric rail service would offer several valuable improvements to help numerous objectives in this Local Plan Review: it would cut emissions, it would cut congestion, it would solve the parking problem. It could be an additional attraction itself. Yes that would mean in future changing some walking and biking routes but that would also be a huge advantage, as new ones would connect far more villages. Together these changes would enable sympathetic economic growth. Based on the above, it is assumed that the respondent favours Option 1 - New policy will continue to safeguard the Monsal and Longdendale Trails for future rail use. The response is recorded as preferring Option 1.

S-46-2	1367784		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason The need for non-road based public transport between Matlock - Bakewell - Buxton is abundantly clear. Bus services more often run late than to time these days due to road traffic congestion caused by lorries and private cars. If any development in Bakewell is to be sustainable and young people encouraged to remain in the Peak District then the railway must inevitably be reopened at some stage. This would probably half journey times by public transport between Bakewell and Derby (probably down to 45mins), support rail access to the PDNP from the East Midlands (without a trip via South Yorkshire!) and hopefully open up Matlock and Bakewell to Manchester for day trips - a journey currently nigh impossible by public transport. The respondent supports the continuation of current policy
S-44-41	1367865	Eyam Parish Council	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason Currently available to a wide range of people and should be protected This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-43-19	1367843	Natural England	12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason We consider that multi-user trails offer opportunities to create new habitats and/ or connect habitats. They also offer inclusive recreational opportunities for local people and visitors including walkers, cyclists and horse riders, and people with disabilities which benefits both physical and mental health. The non-motorised access network (walking, cycling, horse riding) should complement wider green infrastructure objectives by linking together green spaces and assets into existing and new routes, corridors, and networks. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-42-37	1367805		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason The Monsal Trail provides an extremely rare opportunity to access beautiful scenery for people of all ability groups through a good footpath and shallow gradients. You often see people of different physical abilities enjoying the varied scenery and gentle access. Removing this treasure would be a travesty. The current rail proposal is poorly thought through and would come a massive financial cost and significant impact to the recreational use, wildlife and ecology of the wildlife corridors that have developed since the rail discontinued. The area would be better served through enhanced bus network linking local communities (that would never benefit from the proposed rail access) to existing rail hubs at Grindleford, Hathersage, Bamford. The costs would be massively less, and in my opinion, the benefits significantly more! This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-41-1	1367791		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason The one area which causes me greatest concern is your opposition to reopening the Monsal Trail for passenger trains. As I live in a Peak District village, the amount of traffic we have to endure causes so many problems which you may not be able to comprehend. There is no doubt that a new railway would bring more prosperity to the Peak District so I would be pleased if you would share the results of your research with me. Clearly the government's agenda is to reduce carbon levels and re-opening the trail to passenger trains would be a significant move towards this goal whereas continuing with your proposal would only serve to increase carbon emissions. Please let me know if this is your objective. No doubt you have been lobbied hard by the users of the trail but, without much difficulty, the trail and a single track railway could work, as it already does south of Rowsley where the heritage railway and a footpath share the track bed. I would be interested to see your research on how a railway alongside the Monsal Trail would impact the use of the trail by walkers and cyclists. The respondent is supportive of the current policy approach. It is recognised by the the bodies campaigning for reinstating the railway along the Monsal Trail that the two uses are incompatible on the same route. The operation of a heritage railway and a mainline railway are very different in terms of speed and safety requirements.

S-40-42	1367788		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason New development will in any location degrade the experience that these trailsdeliver. The respondent wishes to continue the current policy approach.

S-39-1	1367786		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason Your anti-rail policy is simply wrong and illogical. The biggest transport issue we face going forward is traffic congestion. This is because most people drive everywhere because there is no train. No amount of EVs or buses will solve this, quite the reverse in fact, as these will simply add to the existing problem of congestion. The ONLY solution that will relieve the traffic congestion in the long term is to restore, urgently, the 2 track railway between Matlock and Buxton. The Monsal Trail is a red herring. If the railway had never been closed, no one would be campaigning to close it and turn it into a cycle trail. It can be, and should be, rerouted, and the railway restored as close as possible to the previous route. A restored railway, together with an integrated bus network linking stations for last-mile connectivity, will transform the situation, especially since cycles can be carried on trains. If you are serious about future proofing PDNP then I urge you, as a matter of extreme urgency, to finally understand the benefits to PDNP of restoring the railway. Among these are (i) a huge reduction in traffic congestion and use of vehicles generally, (ii) a consequent reduction in emissions of all kinds, as well as a reduction in wear and tear on the roads in PDNP and (iii) a reduction in lorry and freight traffic, since the railway can also carry freight. It is time for you to finally embrace the 21st century, and not attempt to keep PDNP as not much more than a picturesque but moribund museum. Young people especially here need reasons to remain here rather than move to the cities in search of work. Many of them do not drive anyway nowadays, so what type of cars are available makes no difference at all to them. Furthermore, they do not want to catch a bus that then simply gets caught up in the constant congestion on the A6. Bakewell is frequently gridlocked, as are Disley and other places too.

				Only the restored railway will give young people the reliable and reasonably rapid transport that they will want to use. Have a look at Edinburgh. 20 years ago they decided to restore a railway, and the local economy there boomed following the opening of the rail route. Around the same time a decision was taken here not to do the same. This missed opportunity has cost everyone dear, as the figures show that, by contrast to Edinburgh, the local economy here has remained more or less flat, with no growth to speak of over the last 20 years. My own personal dream is that one day I will be able to walk down the hill to Rowsley and catch a train to...Derby, Manchester Airport, London, Paris, Peckham...well OK maybe not Peckham LOL. My other dream is that I won't have to drive everywhere, I am fed up with it. Please, I implore you, finally get your heads out of the sand and join the majority of people in this area, as well as the majority of the new local MPs and an increasing number of DDDC and DCC councillors, and BACK THE RAILWAY. The respondent favours a continuation of the current policy. It is important to note that the current policy has not prevented the reinstatement of the railway and has continued to safeguard the line of the former railway along the current Monsal Trail.

S-37-1	1367737		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason Future rail use would be consistent with national park priorities if it reduces quarry lorry traffic - and reduces visitor travel by car - and enable more use by community thus reducing car travel. Much of the current route could be adapted in a safe route and made available for walkers and cyclists apart from the tunnels The respondent prefers a continuation of the current policy approach.
S-34-1	1367650		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason The increase in road traffic in the area is unsustainable and is causing major issues. This will only get worse. Reinstatement of the railway on existing infrastructure that was designed for this purpose would alleviate this problem and is the most economical solution. There is a need for better public transport to serve the local communities and also offer a better communication link between major towns. Reinstatement of this railway link to provide these solutions is just common sense. The respondent prefers a continuation of the current policy approach.

S-33-1	1367622		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason I have used the Monsal Trail on many occasions. Indeed it is a very good walking and cycling route and a great asset for the Peak District, opening the tunnels has also made it more unique, something that other trails in the area do not have. Although I appreciate the trail, every time I cycle or walk along it I feel a great sense of sadness that it isnt still been used as a mass transport corridor to get people from the Peak District to our big local cities such as Nottingham, Derby and Manchester. Such a valuable mass transport corridor should be fully utilised to cut congestion within the Peak District and to help work towards net zero. The railway would also take limestone off the roads and thus help cut congestion for local residents and also help reduce the number of lorries that travel south along the A515 through the centre of Ashbourne. It would also link the Peak District directly with London and offer an alternative route to Manchester which should make it a route of national importance. I understand the concerns that business and people who live close to the route would have if it was to be reopened but lets not forget it was originally built as a railway and not a trail. I also agree that it should only be reopened once the Monsal Trail has been rerouted, and provisions put in place to ensure neighbours are not adversely affected by a potential reopening. It is the only transport corridor within the Peak District that can help reduce carbon emissions, cut congestion and move masses of people and limestone quickly, relatively quietly and without having a detrimental impact on the landscape. How else can the PDNP achieve this without building more roads? Even with a higher frequency of buses they will do what every car does, which is to sit in traffic and not move!

				It is a fact that the East Midlands region is also one of the most underfunded regions in the UK per head for public transport, indeed we have even lost funding for a HS2 link to Derby and Nottingham and number of other rail reopening proposals within the region cancelled. The Peak District National Park should be working in conjunction for the East Midlands Mayor and Derbyshire County Council to fight tooth and nail for transport improvements in this region as for too long we have been ignored and forgotten. Indeed Scott Wilson Railways (who conducted a feasibility study in the early 2000s) concluded there was no ;engineering showstoppers; to reopening and it should be safeguarded until the late 2020s when it would become financially viable. That time is now and so I would urge the PDNP to start supporting proposals that come along, as we have for too long been the forgotten and underfunded region. The respondent prefers the continuation of current policy.

S-32-15	1367524	Bamford with Thornhill Parish Council	12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason The Peak Park is woefully short of public transport. We will never solve the "too many cars" problem if we don't take steps to restore better public transport. The respondent wishes to see a continuation of the current policy approach.
S-29-13	1367323		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason Protect the trails on the Old railways lines. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-24-2	1367240		12.3	The respondent didn't provide a specific response to the question. Reason The first issue regards the Monsal Trail and the question of whether it should be protected, of course Bakewell residents will vote to maintain the Trail. They have nowhere else to go, as long as it's not a Saturday, Sunday or school holiday. If you ask them if they would prefer a flat multiuser trail to Ashford in the Water and safer cycling routes from Bakewell to Youlgrave, Monyash, Rowsley and Carver for school, work, shopping, visiting friends or pure leisure they would probably give a different answer. If you also asked if they would prefer that the 10's of thousands of people who drive to the Monsal Trail every month, through Bakewell, to be redirected to the proposed Derwent Valley Trail you might also get a positive answer. Asking residents this question while the Mayor of the combined authorities is preparing a comprehensive transport plan for our region suggests a deliberate spoiling tactic of some sort. We should all be looking at how we can reduce the carbon footprint of our region and transport is a major factor that must be addressed and there will need to be compromise by all parties. The dream of a white peak loop could be replaced by a fantastic level Derwent Valley Trail with links via Bakewell to the High Peak and Tissington Trails making leisure routes that can easily be used for a rural form of active travel and this trail can be accessed from a number of places making it much more beneficial to the Peak Park than the Monsal Trail. We urgently need to offer visitors and residents an alternative to their car, they won't use it immediately, but culture change will come as the climate worsens and we must be prepared and not limiting our options. The response above suggests support for Option 1, and is recorded as such.

S-21-1	1367236		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason A fantastic resource for all members of the community regardless of mobility. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-15-9	1364436		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason The existing multi-user trails have been well developed and are well used. We don't want to lose them. Construction and use of (a) railway(s) would disturb and disrupt the current natural environment and wildlife. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.

S-14-1	1364545		12.3	The respondent prefers Option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason A reinstated railway would: increase opportunities for access to social, education and employment opportunities within and outside the communities served by the line; tackle the acknowledged ;unsustainable; use of private vehicles to, from, through and within the Peak District National Park; support the decarbonisation of surface transport; improve quality of life in local towns and villages by reducing road traffic (especially trucking), noise, air pollution and parking problems; improve passenger and freight connectivity between the North-West and East Midlands and beyond; provide additional railway capacity lost as a result of the High Speed 2 Manchester Leg cancellation; catalyse growth and tourism across the communities the line will serve; benefit the environment by reducing a range of emissions as well as investing in the natural environment of the National Park and surrounding areas; drive 'modal shift to rail' for passengers and freight; reconnect the communities isolated without the railway by delivering a sustainable, high capacity transport solution, fully integrated at stations with other modes of transport; improve access to / from the National Park and regional centres for those that do not have, or choose not to have a car; improve and speed up longer distance travel compared with road alternatives. The respondent prefers a continuation of the current policy approach.

S-13-12	1364893		12.3	The respondent prefers option 1 - Continue to safeguard the Monsal and Longdendale Trails for future rail use Reason Light railways might be helpful to manage visitor movement in the NP so whilst the potential is there the trail should be protected. The respondent prefers the continuation of the current policy approach.
S-11-2	1364858	Tintwistle Parish Council	12.3	The respondent is unsure Reason The Parish Council expresses no view on this question. However, the Council was confused by the use in the consultation document of the term "Woodhead railway", which they interpreted as meaning creation of a new railway which would terminate at Woodhead. I explained to them that "Woodhead railway" is a recognised term for the former Penistone-Hadfield line and is not a location-specific reference to Woodhead itself. Nevertheless they wished it to be recorded that, in their view, the phrase "Woodhead railway" is unclear in its meaning, and should be more clearly explained. The comments will be taken into account as the Plan is developed.

S-10-3	1364790		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason These trails are important assets for active and leisure travel as well as for health and well being. The campaign to reopen the railways is flawed and there is no business case. Please safeguard the trails for walking, wheeling, cycling and horse riding and provide more and better connected routes close to where people live which will give more choices for sustainable and active travel. This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-9-21	1364715		12.3	The respondent prefers Option 2 - New policy will protect the Monsal and Longdendale Trails from development that conflicts with their current purpose as recreational routes. Reason Reopening the former Midland line would be detrimental to the peace and quiet of these dales which are now enjoyed recreational This option would add clarity to the current balance between safeguarding for rail, whilst seeking security for the Trails.
S-7-24	1364251		12.3	The respondent is unsure

12.4 Do you think that new policy should support new road building schemes where the primary purpose is local capacity enhancement?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-43	1369632	Hartington Town Quarter Parish Council	12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason The existing road network should be sufficient. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.
S-222-22	1369631	TPT & Sustrans	12.4	The respondent did not provide a reply to the question, they did state Where new roads are provided these should also provide a compliantLTN 1/20 sustainable transport route as part of the scheme and not as a separate project. This is an important point and should possible be taken through into policy. The response will be recorded as 'No specific rely to the question'
S-221-40	1369595		12.4	

S-214-42	1369550	Hope with Aston Parish Council	12.4	The respondent supports a policy approach allowing local road building schemes. However, in clarifying this, the focus is on relocating / redirecting traffic to more appropriate routes (bypasses?) rather than creating additional capacity. Wording suggested is "support road building when it is needed for new business or housing development, road safety and road maintenance; or where it delivers major enhancement to the local environment." The approach suggested is contrary to both existing policy and National Policy re: road-building in National Parks. The current policy allows for new roads to link to development and for remedial schemes (road safety or structural integrity).
S-210-37	1369546		12.4	The respondent does not think that new policy should support road-building schemes where the primary purpose is local capacity enhancement? The respondent further stated the policy should continue to resist new road schemes and resist new road building schemes even for local capacity enhancement. Any other approach undermines the above policies. The approach advocated follows current national and local policy.

S-207-33	1369542	Youlgrave Community Land Trust.	12.4	The respondent does not think that new policy should support road building schemes where the primary purpose is local capacity enhancement. The respondent favours a move to a better public transport system that would be used by local residents. To increase road capacity will only increase the number of cars in use. How will satnavs know the difference between local and cross-park travellers? The respondent supports the current policy approach, but also favours a switch from car dependency towards public transport. Whilst the delivery latter falls outside of the scope of the Plan, it does accord with our spatial objective for transport and the aims of the National Park Management Plan.
S-200-38	1369531	Stanton in Peak Parish Council	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. The response refers to the benefits of the Taddington by-pass and refers to Bakewell as a location where traffic is often at a standstill. This approach would need to take account of National Legislation which opposes major development and road building in National Parks.
S-195-22	1369526	Derbyshire County Council	12.4	The respondent didn't directly reply to the question. They did however state that new road schemes "must fully incorporate safe, convenient, and accessible Active Travel options to ensure they support and encourage sustainable and healthy travel choices." Additional feedback suggested that they were supportive of 'roads' prioritising active and sustainable travel.

S-194-43	1369525	Derbyshire Dales District Council	12.4	The respondent did not give a specific reply to the question, but did state that "new road building should only be brought forward where it supports the overall objective of delivering thriving and sustainable communities". It is unclear whether this response constitutes a preference or not for road building to increase capacity - it will be recorded as 'no specific reply to the question'.
S-189-13	1369519		12.4	The respondent does not think that new policy should support road building schemes to add capacity.
S-186-15	1369505		12.4	The respondent does not think that new policy should support road building schemes where the primary purpose is local capacity enhancement. The respondent believes that local capacity enhancements contravene the first spatial objective for travel and transport, encourage car dependency and undermine public transport use. The respondent believes that the only exceptional circumstances would be for new development to allow public and shared transport to penetrate the site without relying on the diversion of other services. The response is supportive of the current policy approach.
S-184-25	1369500	Hope Valley Climate Action	12.4	The respondent stated that they were unsure, suggesting that; "the only exceptional circumstance would be to allow public and shared transport to penetrate the site without relying on diversion of other services." The suggested approach of supporting road building schemes where the primary purpose is local capacity enhancement, would be a relaxation of current policy and would constitute major development within a National Park.

S-179-10	1369495	Charlesworth Parish Council	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. Te respondent supports the current policy on cross-Park roads, but also has some concerns about bottle-necks / other issues on local roads such as the A57 Snake Pass and the A623 (Stoney Middleton & Baslow). The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.

S-165-40	1369466	Taddington and Priestcliffe Parish Council	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement The reason given is that capacity should be a sound reason for supporting new road schemes. Examples given are: - to facilitate public transport, off road cycling for safety or to improve capacity for motortraffic) improve capacity at transport/recreation hubs. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.
S-161-18	1369459	CPRE Peak District and South Yorkshire	12.4	The respondent gave no specific reply to the question, but in reply to 'What are the exceptional circumstances' stated: - The policy could usefully clarify that exceptional circumstances might include the provision of active travel and public transport to new development in sustainable locations. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. The response is recorded as 'No specific reply'.

S-158-21	1369452	Trans Pennine Trail and Sustrans Joint Response	12.4	The respondent did not provide a specific answer to the question. Under reasons for answer, they did state: - Where new roads are provided these should also provide a compliant LTN 1/20 sustainable transport route as part of the scheme and not as a separate project. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. The response is recorded as 'No specific reply'.
S-157-32	1369450	Holme Valley Parish Council	12.4	The respondent does not think that new policy should support road building schemes where the primary purpose is local capacity enhancement. The reason given for this response was: - The primary aim is to reduce road traffic. Traffic congestion provides some benefits, eg slowing down traffic flows and eventually, reducing usage of a particular route, as drivers find faster alternatives. This, of course, just pushes traffic outside the national park. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-156-17	1367563		12.4	The respondent does not think that new policy should support road building schemes where the primary purpose is local capacity enhancement? The reasons given are that conservation and enhancement purpose could be undermined. The respondent also said that there were 'no exceptional circumstances'. The respondent is supportive of current policy, which allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.
S-154-26	1369442		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement? They state that they are 'not aware of a legitimate case/exceptional circumstances.' The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-153-39	1369437		12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. The reasons given are: - The A6 Taddington bypass rerouted all major traffic away from the village, it provides a section of road where cars etc can pass slower moving vehicles and blends into the surrounding topology. At times approaches to large settlements such as Bakewell are at a complete standstill, if there was some way to re route through traffic away from such bottlenecks then they should be reconsidered. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest. For context, it should also be noted that the A6 Taddington bypass was not a local road scheme, but a National one, dating back to when the A6 was a Trunk Road and a part of the Strategic Road Network.

S-151-28	1369433		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Under reasons given they say that 'The little roads for little villages in a designated National Park should be left as they are.' The respondent also raises concern about the impact of HGV traffic and the need for better public transport. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-150-42	1369431		12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. The reasons for their answer is: - This is as long as the impact assessment and scheme design precludes increases in tourist traffic volumes, these must be reduced. We need to solve the traffic issues in Bakewell, and the new problem area of Calver cross roads where there are now regular lengthy tailbacks at weekday peak times, but especially weekends. Castleton also needs help. There is a general consensus that increasing capacity on roads drives traffic growth. Any Impact Assessment would not be able to address the make-up of that traffic. Any measures to address any such increase are outside of the scope of this plan and lie with the respective highway authority. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.

S-142-9	1369419		12.4	The respondent did not give a specific reply to the question. However, the following under 'reason for answer' suggests the respondent believes that the policy should not support new capacity based schemes. Generally, Im inclined to think the Authority should not support any road capacity increase. Build or expand roads, get more cars. Enhancing capacity only causes a strain on capacity elsewhere. The response is recorded as 'No'.
S-138-9	1369372		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. They believe that the existing policies have failed with traffic increasing. Under exceptional circumstances they say: - I am in favour of road building only where it will improve safety for pedestrians and cyclists The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-137-41	1369370	Derbyshire ALC	12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason New roads attract more traffic Exceptional circumstances Major developments, which might very well be restricted for other reasons. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.
S-136-53	1369368		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason As there is so little development in the Peak District, this seems unnecessary. Increased local capacity in the circumstances in PDNP is an indicator of failed transport and visitor management policies. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-135-5	1369369		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason Adding capacity to roads never reduces total demand. We need fewer car miles. Exceptions For safety The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.
S-128-37	1369275	Rural Action Derbyshire	12.4	The respondent is unsure - no reasons provided. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-127-10	1369287		12.4	The respondent does not support local road building schemes whose primary purpose is capacity enhancement. Instead, the respondent advocates for investment in public transport. The respondent states that exceptionally, roads to connect to small scale new housing development would be acceptable. The response to this question is supportive of the current policy approach of Core Strategy Policy T2C and Development Management Policy DMT2B. These policies do not permit / oppose local road schemes solely aimed at increasing capacity. They do however allow for new roads providing access to new development. There is a longstanding National approach to avoiding road building within National Parks for the purposes of increasing capacity. Where exceptions to this approach are made, they are judged to be in the National Interest. Any change in the current National Park policy approach would be in conflict with National Policy.
S-120-25	1368991	Marsh Farm Development Co Ltd	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.

S-113-41	1369153	Edale Parish Council	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason within strict limits. On rare occasions new roads may be essential to provide access to housing or other development. Exceptional circumstances As in DMT1. Additionally, new roads should not be permitted unless other alternatives have been explored, for example development close to existing roads or development designed to reduce the need for roads, such as denser housing development (which also takes up less land). The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-104-24	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	12.4	The respondent does think that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason Local schemes should only be allowed where they are intended to support thriving and sustainable communities. Exceptional circumstances Additional road capacity might be needed to support additional house building in villages to provide better access, particularly when present routes become unrepairable. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.
S-98-39	1368689	Greater Manchester and High Peak Area of the Ramblers	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason We would support this policy in general but want to see enhancements to walking and cycling included in the local benefit requirement. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.

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S-71-33	1368373	Tideswell Parish Council	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest
S-69-35	1368325	Derbyshire Dales District Council	12.4	

S-68-33	1368264	Bakewell Resident	12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason We need to action modal shift away from private vehicle use. A congested queue of electric cars stopping and starting might be more polluting in air quality terms than the current queue of petrol and diesel vehicles. Therefore we must deliver a sustainable transport network with low carbon alternative transport provision. Through a network of active travel, bus and mass transit provision we can reduce the serious issues with local capacity in places like Bakewell and Rowsley and deliver local health benefits. Where a sustainable transport network cannot be delivered due to the constraints of the given location it may be appropriate to address local congestion hot spots to reduce the impact on local receptors both environmental and human. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-66-8	1368276		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason Increased capacity just leads to more cars and requires yet more capacity. Induced demand is real and we need to take it seriously. Exceptions It's only OK to build new roads if they are bus-only as we should aim to reduce journey times for public transport. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-65-12	1368271	Individual	12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason No new roads should be built - they are not compatible with addressing vital climate change needs and only encourage new traffic. The policy should instead concentrate on traffic reduction by provision of excellent public transport (rail and bus) together with active travel routes (not just leisure ones). Exceptions None The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. Many of the points mentioned within 'Reasons' fall outside of the scope of the plan, whilst the provision of public transport falls outside of the remit of the National Park Authority.

S-62-31	1368170		12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason Local matters! The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.
S-51-7	1368085		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason Build new roads, get more cars. Increasing road capacity will be a temporary relief, until eventually more driving uses up the capacity. Instead policy should be to increase active and public transport options to alleviate capacity issues. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-50-32	1367561	Peak Park Parishes Forum	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason Subject to the caveat that the number of such schemes must be limited, and that they must provide some benefit to local residents. Exceptional circumstances They will differ, project by project. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.
S-49-1	1367873		12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.

S-44-19	1367865	Eyam Parish Council	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason Where they provide benefit to the local community Exceptional circumstances HGV traffic on roads unsuited to such traffic New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.
S-42-29	1367805		12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason reduce regular and significant areas of congestion Exceptional circumstances Three by-pass schemes Bakewell through road 2) Ashbourne By-Pass 3) Buxton A6 link avoiding the town centre A53 roundabout New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest. Only one of the bypasses named lies within the National Park; however all would be likely to induce additional traffic flow through the National Park.

S-40-43	1367788		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason Capacity is always taken up and typically more quickly than was envisaged. Exceptional circumstances None The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.
S-32-22	1367524	Bamford with Thornhill Parish Council	12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. Reason The only new-road schemes we support are very minor ones, a few yards long, to give access to new homes Exceptions None The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-30-35	1367447	Country Landowners Association	12.4	The respondent thinks that new policy should support road building schemes where the primary purpose is local capacity enhancement Reason The road network in places needs to be improved to make transport more efficient and improve capacity. To reflect the needs of communities and society. While we understand to minimise the impact, the Parks network needs improvement. Improved transport capacity would help make the park more sustainable by fostering economic and social growth. The depopulation and poor economic performance and inefficient transport justifies the need for the park to take a more creative approach. New roads of this nature would constitute major development within the National Park and as such would need to meet the major development test as set out in paragraph 190 of the National Planning Policy Framework (2024); including being in the National Interest.
S-9-17	1364715		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement. The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

S-7-11	1364251		12.4	The respondent doesn't think that new policy should support road building schemes where the primary purpose is local capacity enhancement The current policy allows for new roads into developments, but not to enhance capacity (bypasses etc). The policy also allows for minor remedial works, where subsidy etc. affects safety or the operational viability of a road.

12.5 Overnight parking for camper vans				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-44	1369632	Hartington Town Quarter Parish Council	12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason There are plenty of commercial camping sites in close vicinity that offer paid for parking for these vehicles. The cost of putting in facilities for their vehicles in car parks is better spent elsewhere Every space available is required for the number of cars visiting on a daily basis. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-221-41	1369595		12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason I don't think this policy will have much impact

S-220-19	1369594		12.5 Overnight parking for campervans	The respondent is unsure Reason It may be desirable for some use of car parks for overnight stays to be allowed but without restrictions being imposed, there is the danger that they might become de facto campsites. This in turn would then prevent their primary use for car parking with all the negative impacts on the surrounding area if cars then park on roadside verges etc. Perhaps a prohibition on staying for more than say 24 hours in any 28 day period on any particular site could help alleviate this risk. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. The response is recorded as 'Unsure'
S-214-43	1369550	Hope with Aston Parish Council	12.5 Overnight parking for campervans	The respondent does not support the suggested new policy approach. It is believed that this would encourage more camper vans, without solving existing problems. Careful consideration on the effects of the potential policy would need to be given before taking this approach.

S-210-38	1369546		12.5 Overnight parking for campervans	The respondent does not think that we should create new policy. The reason given is that it will result in a further attraction and result in outcomes that are not sustainable e.g. management of waste. The delivery of this policy would require a careful balance to manage impact of amenity and the National Park's special qualities. Locations would need to have adequate facilities, and not take trade from existing camping and caravan sites.
S-207-34	1369542	Youlgrave Community Land Trust.	12.5 Overnight parking for campervans	The respondent did not specifically answer the question. Instead they referred to the facilities on offer in Europe and the benefit to rural communities. However, they stated that a desire not to encourage these, generally large, vehicles on the narrow roads. They did suggest that sites might be appropriate at transport hubs on the edge of the Park. Because of the the above, the response is recorded as 'Unsure'.

S-200-39	1369531	Stanton in Peak Parish Council	12.5 Overnight parking for campervans	The respondent does not think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. The respondent raises issues of length of stay, with some car parks becoming camping grounds. They also believe that there are current issues with overnight parking of campervans in Birchover affecting residents ; car park users. Also issues with human waste. Some sites are already being promoted by users online with free parking. Parking should be in dedicated space with appropriate facilities. The respondent raises valid concerns, there is also the issue of competition with existing touring camping and caravan sites and avoiding disturbance to residents and wildlife.
S-194-44	1369525	Derbyshire Dales District Council	12.5 Overnight parking for campervans	The respondent did not give a specific response to the question. However, the accompanying text indicates that the respondent favours not creating new policy. The response will be recorded as such.

S-189-14	1369519		12.5 Overnight parking for campervans	The respondent does not think that we should create new policy to support the use of car parks for overnight stays by camper vans. The respondent believes that 'Campervans should always use official sites with proper facilities and disposal.' The respondent stated that uncontrolled overnight stays on roads, in lay-bys or car parks result in litter, human waste and visual impact. The respondent's views and those of others will be considered as the Plan is taken forward. Implications for equity, amenity and existing camping and caravan sites will be considered.
S-185-39	1369502	Devonshire Group	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. They believe that whilst camp sites are the most suitable option, some visitors are not willing to use them. This offers an appropriate way of making space, whilst avoiding the harm of not doing so. Should this approach be taken forward there would need to be consideration of effects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-180-9	1369496	Castleton Parish Council	12.5 Overnight parking for campervans	The respondent doesn't think we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes The respondent does not believe that this would meet demand. They are concerned about the ongoing issues of roadside overnight parking of campervans. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-171-5	1369485	Forward Land	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. The respondent believes that this would provide for a market that has grown significantly and for which there is an undersupply of provision. This would cater for an contributor to the local economy and help to manage the current situation. The respondent also provided some stats in support of the case that they were making. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-165-41	1369466	Taddington and Priestcliffe Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. This is clarified as 'with charging and subject to landscape conditions' pointing out that they are likely to be parked in the daytime too. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-157-33	1369450	Holme Valley Parish Council	12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes The respondent's reason was that: - Car parks are not camp sites. This policy change would encourage irresponsible behaviour by camper-van owners. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-153-40	1369437		12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. The reasons given are: - you would need to manage how long they remain there, effectively some car parks could become camping grounds, that is not the purpose of car parks. There are examples of issues with overnight parking by camper vans in Birchover, which is causing issues for residents, car park users and the problem of human waste, some car parks are now appearing on websites where they routinely say its a good spot to stay for nothing. The respondent raise valid concerns, should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-152-5	1369434		12.5 Overnight parking for campervans	The respondent did not give a specific reply, instead under reason for answer made the following points: - However occasional usage works elsewhere with good disposal facilities built into existing public toiletblocks. This also generates extra parking revenue. Some pubs have already started to allow this without any detriment to the surrounding settlements. The issues about disposal of human waste affecting waterways seems ironic as animal waste is frequently washed into rivers throughout the Peak Park during heavy rainfall so that water quality is polluted. Although no specific reply was given, the above suggests agreement with new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes - the response is recorded as such. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-151-29	1369433		12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Under reason for answer they state: - Minimal charge schemes work in Scotland. It does need management with clean water and chemical emptying points but could raise money for the Park Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-150-43	1369431		12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. The reasons given are: - It will bring more traffic. There may be an increase in antisocial behaviour if overnight use is allowed. Who polices any antisocial behaviour. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-141-5	1369412	Hope and Derwent Woodlands Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. The reason given is based on current levels of roadside and layby parking and the negative effects of this. They state that 'The car parks proposed for camper vans should be located away from sensitive areas, well publicised and appear on a map, and provide facilities for appropriate waste matter.' Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-140-8	1369412	Hope and Derwent Woodlands Parish Council	12.5 Overnight parking for campervans	The respondent does not think we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason No! This is wholly inconsistent with ques 25 ; 26 how would you force campervans to use those car parks? Campervans are causing a huge nuisance in some villages and along narrower roads where they are trashing the road sides and dumping their rubbish including toilet waste. There should be more height barriers at car park entrances road sides should be protected with stones and posts to prevent more damage and allow recovery. Campervans should have to pre-book touring sites and if they are full, encouraged to visit other areas. This situation is out of hand, is adversely affecting residents and the environment and is therefore at odds with PDNPA purposes. This response directly contradicts another response on behalf of Hope and Derwent Woodlands PC. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-137-38	1369370	Derbyshire ALC	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason It is better to control and require some minimum requirements at some car parks (possibly with time restrictions) than to have little or no control. This should be used to channel motorhomes/campervans to places with some facilities and prohibit overnight stays elsewhere. This will help to control/limit the adverse effects. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-136-28	1369368		12.5 Overnight parking for campervans	The respondent does think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason This policy would support the ability of people to stay in the National Park, increasing tourism spend without impacting on housing. Sites would need to be properly set up for this use with appropriate facilities and limits on the length of time that people can stay there (5 days at a time?) Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-135-3	1369369		12.5 Overnight parking for campervans	
S-128-34	1369275	Rural Action Derbyshire	12.5 Overnight parking for campervans	

S-127-2	1369287		12.5 Overnight parking for campervans	The respondent opposes the creation of a new policy to support the use of certain car parks for overnight stays in campervans and mobile homes. The reasons given for the response are: - The cost of implementing and managing, The ease of communication and levels of understanding if only some car parks can be used, and The need for close consultation with local residents. This is a possible new area of policy, which has been proposed in response to the current numbers of campervans and mobile homes parking in laybys and on roads within the National Park. There has been a significant increase in the number of camper vans and mobile homes nationally in the aftermath of the Covid-19 pandemic. There has been some negative reaction from residents to overnight parking in some areas, including within the National Park. The formalisation of parking areas might address some of these concerns. There is however, a possible conflict with the operation of existing camping and caravanning sites. The points raised are valid and would need to be considered if the decision is made to pursue this area of policy.

S-120-13	1368991	Marsh Farm Development Co Ltd	12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason This would not be respected by users, they are either parking for free and would not want to pay or they are wanting to camp in wilder areas and not in a car park. If this policy was created it would need to be backed with enforcement for not parking in lay-bys and the roadside. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-113-42	1369153	Edale Parish Council	12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason Most car parks do not have 24 hour toilet or other facilities, it is unlikely to be possible to enforce any time restrictions to ensure stays were for a short period. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-108-13	1369131	Youlgrave Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason New and dedicated car parking should be identified and promoted for the overnight parking of camper vans But it must be in sustainable locations with adequate services, eg where rubbish or chemical toilets can be safely disposed of. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-104-22	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason There is an issue with camper vans parking in unsuitable places, The clear provision of suitable car parks will allow proper provision to be made and reduce the disruption caused by inconsiderate parking. The places do not need to be car parks. The use of the old road up towards Mam Tor at Castleton seems to serve this purpose quite well. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.

S-98-20	1368689	Greater Manchester and High Peak Area of the Ramblers	12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason We note that many Peak District car parks in the open countryside were specifically created to give people access to that countryside and there is the potential for excessive Camper vans to restrict or prevent use for this purpose. Overnight presence may be disturbing to local wildlife where the car parks are in remote or sensitive locations. However, we also note that planning policy alone will have very limited impact on this issue. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-71-34	1368373	Tideswell Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason This would be a positive move as it may reduce the number of campervans/motor homes (badly) parked in central village locations / pub car parks overnight. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites.
S-69-10	1368325	Derbyshire Dales District Council	12.5 Overnight parking for campervans	The respondent does think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason A proper policy could provide for eg charging a fee, and restricting use to 1 or 2 nights per location, to regulate the use of car parks and derive income. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-68-25	1368264	Bakewell Resident	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason At the moment they park wherever they like don't use local facilities, empty their toilets on park land can be a general nuisance. Providing specific parking provision with pre-bookable spaces on an app is a must. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-67-29	1367857	Over Haddon Parish Council	12.5 Overnight parking for campervans	The respondent did not give a specific reply to the question. Reason Over Haddon Parish Council said that In respect to Issue 44 (Overnight parking for camper vans) the public car park at Over Haddon could probably accommodate a few spaces in the more secluded, lower level, provided that strict rules applied in relation to environmental disturbance and nuisance. The response indicates support for new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes and will be recorded as such. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. The respondent expressed concern that there were no policies related to bus services. This is because the provision of bus services falls outside of both the scope of the Plan and the responsibilities of the National Park Authority. Whilst the National Park Authority is the Planning Authority for the National Park , it is not a Transport Authority. However, the National Park Management Plan, (a partnership document) does have a Sustainable Travel Framework ambition.

S-66-9	1368276		12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason in some places it should be OK, so for climbers at Stanage, for example. But it ought to be by exception Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.
S-62-24	1368170		12.5 Overnight parking for campervans	

S-57-25	1368149	Great Longstone Parish Council	12.5 Overnight parking for campervans	The respondent didn't provide a specific reply to the question Reason In principle there were no issues with this, other than it taking business from farmers and others with small sites whilst not doing anything about the growing issue of campervans and mobile homes parking on the roadside. This is a pertinent issue in Longstone as 10+ vehicles are parked most night in a highly visible position on ;Longstone Edge. Vehicles now appear to use the unofficial, but widely publicized overnight parking on almost every night of the year. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered. The response is recorded as 'no specific reply'

S-50-3	1367561	Peak Park Parishes Forum	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes Reason Wholly conditional on appropriate sanitation facilities being provided at the new sites. the proposal will helpfully ease the problems caused by on-street campervan parking. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-49-7	1367873		12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason to reduce the 'random' parking in sensitive areas, to provide revenue support the use of local facilities by the users e.g. pubs Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.
S-45-8	1367903	Froggatt Parish Meeting	12.5 Overnight parking for campervans	The respondent is unsure Reason Problem with existing facilities could be built sensitively and always pay for use Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-44-12	1367865	Eyam Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. Reason Alleviate current parking challenges Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.
S-42-38	1367805		12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. Reason Too many unauthorised stopping areas that contribute to litter and sewage. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-40-44	1367788		12.5 Overnight parking for campervans	The respondent doesn't think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Reason Such facilities are generally detrimental to the natural environment can create insanitary hostile environments. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-32-2	1367524	Bamford with Thornhill Parish Council	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. Reason Campervans parked on highways can be both an obstruction and a sanitation hazard (to put it politely). We support the proposed new policy, but ONLY if there are commensurate restrictions placed on highways to prevent campervan parking there. Otherwise the new parking facilities created for them may remain unused. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-30-36	1367447	Country Landowners Association	12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes. Reason Sensitively designed car parks should be supported. The more overnight stays the more spend there is in the national park and ability for visitors to enjoy the park. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.
S-13-2	1364893		12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason But in supporting this use of existing carparks, recognition is needed that more car parking is needed and the NP needs to work with Highways to prevent 'free' verge-side and other roadside parking. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

S-9-47	1364715		12.5 Overnight parking for campervans	The respondent does think that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes. Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.
S-7-13	1364251		12.5 Overnight parking for campervans	The respondent thinks that we should create new policy to support the use of certain car parks for overnight stays in campervans and/or mobile homes Reason Provided the policy was accompanied by rigorous enforcement of a prohibition on overnight parking elsewhere Should this approach be taken forward there would need to be consideration of affects on amenity, loss of traditional parking space; and the possible impact on existing camp sites. It is unlikely that any sites would be in the open countryside, only sites with appropriate facilities would be considered.

Q 12.6 What is your preferred option for air take-off and landing sites?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-45	1369632	Hartington Town Quarter Parish Council	12.6	The respondent prefers Option 1 - the current approach, also referring to leisure helicopters as being a nuisance. Current policy specifically refers to the impact of leisure helicopter flights and states that an Article 4 direction may be brought in to manage that impact where there is a regular use. However this approach only applies to take-off and landing sites within the National Park boundary.
S-222-23	1369631	TPT & Sustrans	12.6	The respondent did not provide a specific answer to the question. They did however provide the following text - Not relevant to TPT/Sustrans but would the ceasing of commercial drones then not allow United Utilities to use them for their purposes as they currently do? This is a valid point, any attempt to map 'no-fly zones would have to take account of possible maintenance works etc; allowing for possible exceptions. The response is logged as 'No specific reply to the question'.

S-221-42	1369595		12.6	The respondent is unsure but suggests a preference for 1a, current policy plus allowance for emergency helicopters. Mapping 'no-fly zones' Yes Reason The noise and lights are not compatible with the aims of tranquillity and natural skies. The response is recorded as 1a - current approach but including emergency helicopters. This would be dependent on operational need for a stand-by site within the National Park.

S-220-20	1369594		12.6	The respondent did not provide a specific reply to the question. Reasons I think the current policy should be retained and, in order to prevent disturbance to wildlife and to the tranquillity and wilderness qualities of the National Park The response will be recorded as preferring Option 1 - current approach. The respondent thinks that we should map 'no-fly zones'. Reasons "no-fly' zones should be mapped including, but not necessarily restricted to, the Natural Zone. It is essential that the ability to experience the "quiet enjoyment" of the National Park is preserved into the future. The respondent supports the current policy approach. Quiet enjoyment is most likely to be achieved within the natural zone. However, thought should be given to how closely aligned the Natural Zone and areas of tranquillity are.

S-214-44	1369550	Hope with Aston Parish Council	12.6	The respondent is supportive of the current approach, but with provision to be made for emergency helicopters. The respondent is also supportive of mapping 'no-fly zones' as they believe that "The use of commercial drones is incompatible with the Natural Zone and arguably with the Park as a whole, and their use should be resisted." The respondent makes a good point re: emergency helicopters. Any amendment to policy would require consultation with emergency services to assess the need for stand-by sites and the best location for them.
S-210-39	1369546		12.6	The respondent prefers the current policy, but states that they would love to see a mapped 'no-fly' zone to protect environmentally sensitive areas, but has concerns as to how this would be policed as resources dwindle. The respondent raises valid concerns re: enforcing a no-fly zone for commercial drones. However, the mapping of such zones might lead to wider backing or legislation covering environmentally sensitive areas.
S-207-35	1369542	Youlgrave Community Land Trust.	12.6	The respondent prefers option 2, believing that it offers better clarity. The possible identification of stand-by sites for emergency helicopters will be dependent on need and location.

S-204-3	1369537	Ministry of Defence	12.6	The respondent did not provide a specific answer to the question. They did however state: - The airspace above the national park forms part of the UK military low flying system that is used to manage the provision of military low flying training. The Peak District National Park, is covered by Low Flying Area 8. Within this military fixed wing aircraft may engage in low flying training activities at heights of 250 feet (76.2 metres) above terrain features in non-built up areas. The response is informative, but does not relate directly to the question being asked. Generally military aircraft do not take off or land within the National Park. Military helicopter or other short-take-off-landing aircraft operating from within the National Park on exercise would fall outside of the scope of this policy; as would military drones The response will be recorded as non-specific reply.
S-200-40	1369531	Stanton in Peak Parish Council	12.6	The respondent prefers Option 1 (out current approach) Helicopter pleasure flights are generally short and disturb wildlife and the peace and tranquility of the Park for users; often numerous times in single walk. The respondent thinks that the NPA should map no-fly zones for commercial drones. This should be done to protect sensitive areas. The response favours current policy, but with the mapping of no-fly zones for commercial drones.

S-194-45	1369525	Derbyshire Dales District Council	12.6	The respondent prefers Option 2. The respondent believes that no-fly zones are covered under other legislation not related to planning. The option minimises impact on National Park purposes, whilst allowing search and rescue facilities. The provision of stand-by- sites for emergency helicopters would be subject to consultation with emergency services and dependent on need and location. It is unlikely that existing legislation would protect ground nesting birds from being overflowed by commercial drones.
S-189-15	1369519		12.6	The respondent prefers Option 1 (current policy). The respondent believes that the whole of the National Park should be a no-fly zone for drones. From a planning perspective, take-off and landing sites where there is no new infrastructure to support the use fall under Permitted Development. Where such use impacts on the Park's special qualities, the Authority can control take-off and landing through an Article 4 Direction.
S-185-40	1369502	Devonshire Group	12.6	The respondent prefers Option 2, believing that it offers a more pragmatic approach. The respondent did not express a preference on mapping 'no fly' zones. The respondent's preferred approach is more relaxed than the current policy approach, but would probably need to be backed with options to seek an Article 4 direction in case of harm.

S-165-42	1369466	Taddington and Priestcliffe Parish Council	12.6	The respondent did not give a specific answer to the question; however, their reason for answer response was: - Neither Sites for emergency helicopters only. This indicates support for Option 1 but with an option for emergency helicopters. This would be dependent on viable sites being available to fit with emergency helicopter operational requirements. The response has been recorded as Option 1a - the current policy approach, but with an option for take off and landing sites for stand-by emergency helicopters.

S-161-16	1369459	CPRE Peak District and South Yorkshire	12.6	The respondent stated that they were unsure. They did however agree with the mapping of no-fly zones. The reasons given were: - The PDNPA should further investigate the issue of the future of drones in respect of the potential benefits and impacts on the purposes of the national park and the social and economic welfare of the Peaks communities. In respect of the Local Plan, the Governments UK Future of Flight Action Plan should be part of the Sustainability Appraisals plans, policies and programmes section and addressed in the baseline. The PDNPA should engage with Government and other national parks on the future implications for the parks management and also planning policy. The issue could potentially be a matter that triggers an early partial review of the plan. The CPRE PDSY can see the potential environmental, social and economic benefits from drone technology but also the potential for harm to natural beauty and tranquillity. The Local Plan should as a minimum show that it has considered the issues even if it is deemed too early to establish a mapped planning policy stance on what areas justify protection from the noise and visual disturbance from drones including passenger, medical and delivery drones. It would seem justified to identify areas which would be sensitive to drones and that factors in aspects of drone flying such as their size, heights, likely frequency of flying, routing and purposes. A study would be needed that takes account of the parks special qualities and valued characteristics in relation to the contribution from skylines and tranquillity alongside the consideration of ecological impact, one which was well informed in respect

				of the future of drone flight. The PDNPA is encouraged to contact and liaise with the team working on the future of drone flight at the Department for Transport, as the opportunity for work towards best practice appears to exist. Option 2 is preferred in respect of droneflight only subject to protected areas having been established. If protected areas are not established then Option 1 should be defaulted to albeit the charity can see the case for Option 1 being split to remove the blanket presumption against for emergency/rescue service related landing/take off areas. This would allow for future collaboration between the PDNPA and the relevant emergency/rescue services and potentially the identification of an appropriate broad area or site allocation. The respondent makes some useful and valid points that can be taken forward during the development of the Plan.

S-157-34	1369450	Holme Valley Parish Council	12.6	The respondent prefers Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters. The respondent thinks that the National Park Authority should map 'no-fly zones', stating - S topping commercial drones in the Natural Zone will improve public enjoyment of the area and protect wild life, including ground-nesting birds. This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of stand-by sites by emergency helicopters would be based on need and an appropriate location(s).

S-154-27	1369442		12.6	The respondent prefers Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters The respondent also believes that the Authority should map 'no-fly zones', stating: - No-fly zones are important in terms of the tranquility of the area. Emergency/research are exceptions. My caveat is about what commercial means in this context. The NP does not need drones flying over it in terms of noise and risk- one step too far as far as technological solutions goes. This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of standby sites by emergency helicopters would be based on need and an appropriate location(s).

S-153-41	1369437		12.6	The respondent prefers Option 1 - Aircraft take off and landing sites will not normally be permitted. The reasons given are: - The use of helicopters for leisure flights now extends to weekdays, they fly low and disturb not just wildlife but walkers as well, due to the short duration of the flights walkers can get disturbed numerous times when out on a walk. there are also instances of drone use for pleasure, again they fly at low levels on occasion and are disruptive, their use is also intrusive when used over residential properties which sometimes occurs when visitors bring them on holiday and think its great fun to hover over peoples property. No fly zones should be mapped for commercial drones to protect sensitive areas. This approach would continue current policy but with the addition of mapped 'no-fly zones' for commercial drones. The intrusive use of private drones is harder to control unless there are regular take-off and landing sites. However, this could be considered as the Plan develops.
S-152-6	1369434		12.6	The respondent did not give a specific reply to the question, but did state under reason for answer: - Drones are another negative in terms of the environment. They upset birdlife especially birds of prey. I cannot see that there is a justifiable need. This indicates support for our current policy approach - Option 1. The response is recorded as such.

S-151-30	1369433		12.6	The respondent said that they were Unsure. Under resaon fro answer they said: - we don't need or want commercial or other drones flying in the national park. They upset birds, especially birds of prey and rare migrants that nest in the crags if only they were left alone. Also, the regular almost daily, assault on our ears as fighter jets fly through the Hope Valley at a lower altitude than our house is intrusive, irritating, unwanted and should be questioned. Also, the Chinooks are unwelcome (and have left many victims of war zones experiencing flashbacks and triggering Post Traumatic stress disorder.) Although the respondent says that they are unsure, the above suggests that they support Option 1 - our current policy approach. However, the response will be recorded as 'unsure'

S-150-44	1369431		12.6	The respondent prefers Option 1 - the current policy. The reasons for the response are: - I believe that the CAA should be the arbiter and authority in the area of Air Transport the Peak Park will not have the capacity or knowledge to do a good job. I suggest the Peak Park talk to the CAA, but also the RAF as they have low flying training zones in the Natural Zone areas, and fast jets at low level, and large transports, and helicopters have done very little damage in many years of use. I see civil or private drones as a threat to the Park, and the lifestyles of residents and wildlife. However once again the Park authority needs to talk to the CAA. As for positioning of an emergency helicopter for peak time coverage, then this would not normally need any permanent facility, and would be below 28 days a year, so is it an issue? Sure there are many farms and businesses that would welcome them. The respondent supports the current policy approach.

S-140-13	1369412	Hope and Derwent Woodlands Parish Council	12.6	The respondent prefers Option 2 Reasons Emergency helicopters and drones acceptable. If commercial drones, especially for general customer deliveries are allowed in the Peak Park, you would not be able to see the skies and there would be a permanent noise. You would also not be able to control the use of private drones. Completely unacceptable in a national park. However, farmers for example are starting to use drones which are more efficient, cheaper to run and are more environmentally friendly than motorised vehicles and spraying for example can be targeted. Perhaps permissions could be issued along side CAA licenses? This response is unclear in that it appears to only want certain types of commercial drones. The response is recorded as preferring Option 2 This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of stand-by sites by emergency helicopters would be based on need and an appropriate location(s).

S-137-43	1369370	Derbyshire ALC	12.6	The respondent prefers Option 1 - Aircraft take off and landing sites will not normally be permitted Reasons Emergency helicopter sites would be beneficial. No-fly zones would certainly help. Future developments of drone technology may mean that drones become less disruptive and/or more accepted. Emergency helicopters should be allowed to fly within no-fly zones in any event. No-fly Zones Yes Reasons Same as above. The respondent favours the current policy, but does also seem to support stand-by areas for emergency helicopters. The response is recorded as Option 1a - current approach but including emergency helicopters
S-136-4	1369368		12.6	

S-128-39	1369275	Rural Action Derbyshire	12.6	The respondent prefers Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters. Reason Sensible Mapping 'no-fly zones' Yes Reason These are intrusive and may affect wildlife and enjoyment of the natural zone. It wouldn't stop non commercial operators though. In theory, the operation of non-commercial drones is covered under existing policy. An Article 9 Direction has been used to address the impact of model aircraft in the past and could be used if a site were regularly being used for drone flying. The respondent's preferred approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of stand-by sites by emergency helicopters would be based on need and an appropriate location(s). This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of stand-by sites by emergency helicopters would be based on need and an appropriate location(s).

S-127-3	1369287		12.6	The respondent favours the current policy approach. However, they would also support take off and landing sites for emergency helicopters. The respondent is in favour of mapping no-fly zones for commercial drones. The amending of the current approach to allow for take-off and landing sites for on-call emergency helicopters would require consultation with emergency services to assess need and to identify appropriate and suitable sites. Likewise, the mapping of no-fly zones for commercial drones would require widespread consultation.
S-120-36	1368991	Marsh Farm Development Co Ltd	12.6	The respondent prefers Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters. Mapping 'no-fly zones' Yes This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of stand-by sites by emergency helicopters would be based on need and an appropriate location(s).

S-113-43	1369153	Edale Parish Council	12.6	The respondent supports Option 1 - the current approach Mapping 'no-fly zones' Yes Reason We would prefer a combination of Option 1 and 2. We do not think it appropriate to have commercial drones operating in the Park. These can interfere with people climbing, hang-gliding etc as well as with nature. The noise of drones disrupts local areas peace. Pleasure flights must be banned effectively as being contrary to Park objectives. However, emergency helicopters should be able to stand by within the Park. The respondent favours stand-by areas for emergency helicopters, so the response is recorded as 1a - current policy but with allowance for stand-by areas for emergency helicopters. If this approach was taken forward it would require an assessment of the operational need for such provision.

S-110-18	1369133	Middleton and Smerrill Parish Council	12.6	The respondent prefers Option 2 Mapping 'no fly zones' Yes Reason The Natural Zone is such an important area, it should be fully protected. This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of stand-by sites by emergency helicopters would be based on need and an appropriate location(s).

S-104-9	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	12.6	The respondent is unsure Reason The parish already includes a gliding club airfield and has significant hang gliding activity off Hucklow Edge. These operate with minimal interference and add greatly to the attraction of the area. The Parish Council would not wish to see any policy that restricts these activities. We consider it unlikely that there would be any use of powered aircraft on the airfield and would consider our response depending on the circumstances at the time. Mapping a 'no-fly zone' Yes Reason We have significant gliding and hang gliding activity above the village which is incompatible with the use of drones. We therefore consider that the National Park should be a no-fly area for drones with exemptions where appropriate (there are already air traffic restrictions around the gliding club up to 10.000 feet). The Camphill gliding club and existing hang-gliding around the Mam Tor and Rushup Edge area operate under the current policy. The question arises around commercial drone operation and stand-by sites for emergency helicopters.

S-101-10	1369010	Business Peak District	12.6	Map 'no-fly zones' Yes Reason As far as air transport is concerned, there are a variety of drone-based innovations in the pipeline that are intended to bring benefits to local communities. However, recognising the environmental sensitivities of certain areas of the Peak District, it would be logical for the PDNPA to identify and map a series of fly and/or no-fly zones.
S-98-1	1368689	Greater Manchester and High Peak Area of the Ramblers	12.6	The respondent is unsure Reason any policy stance should seek to promote quiet enjoyment Mapping 'no-fly zones' Yes Reason any policy stance should seek to promote quiet enjoyment The current policy approach seeks to ,manage take-off and landing sites where they become a nuisance and was developed specifically to respond to the impact of pleasure flights by helicopters on busy weekends and bank holidays. The National Park Authority cannot control the airspace over the National Park, but is able to control sites used for take-off and landing. Mapping 'no-fly zones' for commercial drones would represent a means of protecting tranquillity and the impact on protected ground nesting birds.

S-69-39	1368325	Derbyshire Dales District Council	12.6	The respondent prefers Option 1 - the current approach. Reason This question inappropriately lumps emergency helicopters and commercial drones together. Emergency helicopter sites should obviously be allowed. Use of commercial drones in and over the Park should be restricted as far as possible. By aircraft presumably we mean powered aircraft, not hang gliders etc? Map 'no-fly zones' Yes Reason Protection of birds and wildlife. The respondent indicates support for Option 1a, the current policy, but with the option for allowing stand-by sites for emergency helicopters - the response will be recorded as support for 1a). The provision of stand-by sites for emergency helicopters would still be determined by operational need. Current policy does allow for the control of unpowered flight such as hang-gliders , if they were having a negative impact on ground-nesting birds or other users enjoyment, through an Article 4 direction. This approach has been used in the past to manage the impact of a model glider club.

S-68-28	1368264	Bakewell Resident	12.6	The respondent prefers Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters Mapping 'no-fly zones' Yes Reason This is a clear and present danger and might be seen as a solution to the traffic congestion to move deliveries from light vans to drones. This needs to be carefully managed to avoid environmental impacts. This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of standby sites by emergency helicopters would be based on need and an appropriate location(s).

S-65-7	1368271	Individual	12.6	The respondent preferred Option 1 - Aircraft take off and landing sites will not normally be permitted Reason Whilst exception should be made for medical emergency needs, drones are a nuisance and must be heavily restricted to preserve the peace and tranquility of the park. They should only be allowed infrequently and on payment of an expensive short lived licence Mapping 'No-fly zones' Yes The respondent appears to favour option 1, but with provision of stand-by facilities for emergency helicopters. This is recorded as support for 1a. The provision of stand-by sites for emergency helicopters would be dependent on an operational need.
S-62-45	1368170		12.6	The respondent is unsure Mapping 'no-fly zones' Unsure The current policy approach seeks to manage take-off and landing sites where they become a nuisance and was developed specifically to respond to the impact of pleasure flights by helicopters on busy weekends and bank holidays. The National Park Authority cannot control the airspace over the National Park, but is able to control sites used for take-off and landing. Mapping 'no-fly zones' for commercial drones would represent a means of protecting tranquillity and the impact on protected ground nesting birds.

S-50-25	1367561	Peak Park Parishes Forum	12.6	The respondent is unsure Reason We would be happy to support Option 2 if the "commercial drones" element of that Option were to be removed (though we would be happy to allow drones for tasks such as surveying). Mapping 'no-fly-zones' No Reason Because we don't believe commercial drones should be allowed in the Park. The respondent appears supportive of a policy that allowed for the uses of stand-by sites by emergency helicopters (1a). This would be reliant on operational need and suitable sites being available. Response recorded as 1a
S-49-8	1367873		12.6	The respondent prefers option 1 - Aircraft take off and landing sites will not normally be permitted This approach follows current policy.

S-45-5	1367903	Froggatt Parish Meeting	12.6	The respondent prefers Option 1 - the current approach Reason No fly zones should be introduces for all air transport. Pleasure flights in helicopters should be restricted one day and not repeated within one month. Mapping 'no-fly zones' Yes The respondent prefers our current policy approach. It should be noted that the National Park Authority does not have control over airspace and cannot restrict helicopter flights. Current policy allows the Authority to control take-off and landing sites within the National Park. We do not have any control on take-off and landing sites outside of the National Park; or of any flights from them.
S-44-38	1367865	Eyam Parish Council	12.6	The respondent is unsure Map 'no-fly zones' The respondent is unsure
S-40-45	1367788		12.6	The respondent prefers Option 1 - Aircraft take off and landing sites will not normally be permitted Reason The use of drones is contrary to securing the natural enjoyment of the NationalPark. The respondent prefers the continuation of the current policy approach.

S-32-23	1367524	Bamford with Thornhill Parish Council	12.6	The respondent is unsure Reason We support neither option (as 1 is too restrictive, and 2 is too lax). We would support option 2 if commercial drones were removed from it. Mapping 'no-fly zones' Yes Reason It is important to protect sensitive parts of the National Park from this nuisance. The response suggests support for Option 1a - allowing for emergency helicopter stand-by sites, and is recorded as such. The identification of emergency helicopter stand-by sites would need to be based on impact and operational need.
S-22-2	1367238		12.6	The respondent didn't provide a specific answer to the question Reason Drones: Really concerned about the impact of this potential development in its delivery options. If it has to come (hope it doesnt) then restricted to one delivery for village one a day to a public site &ndash; the rec maybe and delivered to people by a designated delivery officer for the village. The response suggest support for Option 1 and is recorded as such

S-15-1	1364436		12.6	The respondent supports Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters Reason I would support standby sites for emergency helicopters. Mapping 'No-fly zones' Yes Reason We don't want drones flying over our open countryside. The response indicates support for standby sites for emergency helicopters rather than commercial drones - the response is therefore recorded as 1a. The provision of stand-by sites for emergency helicopters would be dependent on operation need and suitability of location.
S-13-47	1364893		12.6	The respondent prefers Option 1 - Aircraft take off and landing sites will not normally be permitted Mapping 'No-fly zones' Yes Reason Drones are intrusive to the landscape. Have been used to scope places to be targets for thefts The respondent favours a continuation of the current policy approach.

S-9-13	1364715		12.6	The respondent prefers Option 2 - Aircraft take off and landing sites will not normally be permitted, except for commercial drones and standby sites for emergency helicopters Mapping 'no-fly-zones' Yes Reason Drones are intrusive This approach would represent a relaxation of policy, but might offer a degree of control of how commercial drones would operate within the National Park. The use of standby sites by emergency helicopters would be based on need and an appropriate location(s).
S-7-41	1364251		12.6	The respondent prefers Option 1 - Aircraft take off and landing sites will not normally be permitted Mapping 'No-fly zones' Yes The respondent favours a continuation of our current policy approach.

13.1 Do you agree with the proposed local plan spatial objectives for utilities?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-46	1369632	Hartington Town Quarter Parish Council	13.1	The respondent agrees with the proposed objective.
S-222-24	1369631	TPT & Sustrans	13.1	The respondent agrees with the proposed spatial objectives, stating that it is 'important that the draw of the Peak District is not put at risk. The proposed spatial objectives would set the tone for the utility development within the National Park.
S-221-43	1369595		13.1	The respondent agrees with the spatial objective
S-214-45	1369550	Hope with Aston Parish Council	13.1	The respondent agrees with the proposed spatial objective. The respondent believes that the policy should highlight visual impact; and that the environmental impact of pipelines should also be included. The respondent makes it clear that they don't believe that any increase in wind turbines or pylons is unacceptable; but that the location of such infrastructure should be carefully managed to mitigate visual impact.
S-210-40	1369546		13.1	The respondent agrees with proposed spatial objective.

S-200-41	1369531	Stanton in Peak Parish Council	13.1	The respondent supports the proposed spatial objective, further stating, 'Upgrades are required but need to be managed in such a way as to blend into the environment and should not impact it.'
S-199-17	1369530	Environment Agency	13.1	The respondent supports the proposed sapatial objective. They reccomend inclusion of an objective relating nutrient neutrality. They advocate connection to main sewerage as opposed to domestic sewage treatment plants. They alos reccomend the use of SuDS ad Swales. The respondent reccomends housing allocation in existing sewered areas and the non-proliferation of priavate sewage treatment systems in locations such as High & Low Bradfield. The respondent makes good points which will be taken on-board in the development of the Plan.
S-194-46	1369525	Derbyshire Dales District Council	13.1	The respondent agrees with the spatial objective. However, they suggest an exception clause to allow for infrastructure that has some beneficial importance that might outweigh any statutory purposes. Whilst recognising the suggestion, it is likely that any nationally significant infrastructure would be considered against the NPPF major development test for National Parks. In other cases, the planning authority (Peak District NPA) would weigh harm and benefits in assessing any scheme.

S-189-16	1369519		13.1	The respondent agrees with the proposed spatial objective. In addition they stated that Utilities should be subject to the full planning process.
S-188-24	1369508	Staffordshire Moorlands District Council	13.1	The respondent does not agree with the proposed local plan spatial objective for utilities. The respondent states that 'The Council does not support a blanket ban on larger scale renewables in the Peak Park.' The respondent goes on to express concern that the lack of local grid capacity will be used as a reason to stifle development. Development of the scale suggested within the response would constitute major development within the National Park and as such would be subject to the major development test as set out in paragraph 190 of the NPPF 2024. However, the suggested approach would offer a starting point against which such schemes might be considered, taking into account the National importance of the National Park.

S-185-41	1369502	Devonshire Group	13.1	The respondent agrees with the spatial objective, but with caveats; these are: - Any decision on the acceptability, or otherwise, of any specific utility proposal must also consider the need for that infrastructure to support sustainable development. The need for infrastructure is not static, new or improved infrastructure may be required. Without it, the ability to achieve many of the other objectives of the Local Plan may be prejudiced. Decision making must be balanced. The respondent highlights the difference in emphasis in text between the 'challenges for utilities' and the proposed spatial objective. In taking this forward, we need to ensure that our approach is consistent and balanced.

S-183-9	1369499	United Utilities	13.1	The respondent did not specifically reply to the question; however, under 'reason for answer', they do say that they "are pleased to see the inclusion of the proposed local plan spatial objective for utilities" which suggests agreement? The respondents makes a number of additional points: - We wish to highlight that UUW owns assets within the borough, which may require upgrades and expansions in the future. UUW request that the Local Plan considers this during the site selection process, and any required upgrades and expansions to UUW assets can be made to meet theinfrastructure requirements of any proposed future development in the borough and future environmental drivers. We recommend that any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. It may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure. Once more details are known as the Local Plan progresses, we will be able to better understand the potential impacts of development on infrastructure. UUW requests that the Local Plan supports water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers. This is essential given our large capital investment programme, which we have explained further in the appendix to this letter. We recommend that UUW is consulted during the preparation of any future Strategic Flood Risk Assessment

				(SFRA) or Infrastructure Delivery Plans. The SFRA is a critical document to ensure that all sources of flood risk are considered and avoided where possible in accordance with the sequential approach. A detailed appendix is provided: Consideration will be given to the asks of the Appendix as utilities policies are developed. However, for clarity, the National Park is not a borough, and UU sites occur in a number of National Park locations. The National Park does not have any green belt. The response will be recorded as 'Yes' ...supports the spatial objective.
S-165-43	1369466	Taddington and Priestcliffe Parish Council	13.1	The respondent agrees with the proposed spatial objective.

S-163-28	1368617		13.1	The respondent agrees with the spatial objective, but requests that: - Can we include wording in policy to the effect that redundant equipment does not have to be removed if it has heritage merit? Whilst there might be a balance in practice between value and harm of any redundant equipment with heritage merit, we will ensure that this is covered in the new policy.
S-162-23	1369460	High Peak Borough Council	13.1	The respondent did not give a specific reply to the questions, instead, stating under reason for answer: - The Council does not support a blanket ban on larger scale renewables in the Peak Park. The Council is concerned that the lack of local grid capacity will be used as a reason to stifle development. Whilst the respondent did not provide a specific reply to the question, the above text indicates a lack of support for the spatial objective. The answer is recorded as 'No'.

S-161-4	1369459	CPRE Peak District and South Yorkshire	13.1	The respondent did not provide a specific answer to the question. However under 'reason for answer, they offered the following: - The charity is conscious of the limitations of the Local Plan and PDNPA in respect of delivering physical and social infrastructure, and reducing pollution levels. Nevertheless, we would like to see more evidence within the Local Plan consultation of what work the PDNPA has carried out with those responsible for providing such infrastructure and for addressing pollution. In particular, the surrounding local authorities, mayoral authorities responsible for transport planning, Integrated Health Boards, County Councils, sewerage companies, the Environment Agency, and other service/facility providers. The PDNPA plays an important leadership and co-ordinating role which could be evidenced in the Local Plan, especially in relation to the settlement strategy, integrated transport and the mitigation and management of visitor impacts. The charity is particularly interested in knowing what work has and is being carried out with the Sheffield and Manchester regions and authorities on integrated transport, infrastructure, climate change and the mitigation of likely significant environmental effects. The Peak District National Park Authority is a statutory consultee for the high level plans of utilities companies and responds to such consultations. Recent responses have focussed on Waste Water Management Plans and Water Resources Management Plans for all three constituent water companies. The response is recorded as 'No specific reply'.

S-158-22	1369452	Trans Pennine Trail and Sustrans Joint Response	13.1	The respondent agrees with the proposed spatial objective stating: - It is important that the draw of the Peak District is not put at risk.
S-156-18	1367563		13.1	The respondent agrees with the spatial objective, believing it to be aligned with the PDNPA mandate.
S-153-42	1369437		13.1	The respondent agrees with the proposed spatial objective
S-151-31	1369433		13.1	The respondent gave no specific reply to the question. Under reason for answer, they complained about disruption from water companies digging up the road.

S-145-2	1369422		13.1	The respondent did not reply directly to the question, but provided the following by manual submission: - 1. One way of considering these issues is to look at them through the lens of the vexed question of electricity transmission pylons. All transmission of large amounts of electricity is costly and often unsightly to the point of being extremely controversial. Relieving the pressure on the transmission network is therefore of the utmost importance and indeed relevance to the Park itself which could be threatened by exactly this problem. Another lens through which to view these issues is the lens of the cost of living crisis, which has a bearing on the well-being of inhabitants of the Park just as it has on the well-being of everyone. Measures to tackle these issues 2. Three things spring to my mind. The first is the need to reduce consumption in particular in private dwellings but also in businesses. The second is to flatten demand, so that there are no peaks and troughs thus reducing volatility on the grid and increasing its efficiency. The third is to encourage the renewable generation of electricity right here where it is needed. Reducing consumption and flattening demand 3. This includes everything from home insulation of the entire housing stock, to the adoption of different habits of behavior for example length of showering, turning the thermostat down, more energy efficient appliances, and of course switching away from gas towards electricity. Flattening demand depends on the large-scale adoption of smart meters which will end up saving the consumer money by managing the demand within the home or business towards purchasing power when it is cheaper, which will also serve to level out demand. None of these are within

				the direct remit of the Park Authority, they mostly depend on government funding and government messaging. However where issues arise which clearly impinge on these matters then the Park must take a sympathetic view. For example it will help if there are sufficient businesses within the Park area who are capable of implementing the necessary changes for householders and businesses. The park inevitably has relationships with other agencies such as Severn Trent water, and such agencies can co-fund some of the necessary changes. The Park can indeed indirectly promote all these measures and the thinking behind them by its visible commitment to tackling climate change in the areas where it does play a leading role. Renewable local generation of electricity 4. The Park can and should play a role both in encouraging community and individual generation of renewable power and in its planning decisions. The overall aim is to achieve carbon neutrality and generating our own electricity would be an important contributor to this aim as well as bringing down costs for consumers and businesses and increasing resilience to any disruptions elsewhere. And so I urge you to adapt your planning policies to be more accommodating or indeed totally accommodating to such initiatives. The default position must be to grant permission in such cases. An example will help to make the point. I have been informed, although I do not know if this is true or not, that putting solar panels on the south facing roof of the parish church in Bamford, which would provide a substantial amount of power as it is a big roof and totally unshaded, is a non-starter in spite of the support which has been tacitly expressed from the diocese because of the likely response from the Planning Authority which is you. The Moore Memorial Hall, which is a well used community building run

				by the parish church itself, has also got a south facing roof which is adorned with a large array of solar panels. Solar panels on the roof of the parish church, far from being an eyesore, far from detracting from the conservation area which is Bamford, would enhance the area by showing that we do care about this issue. If solar panels are good enough for Kings College chapel Cambridge then surely they can be allowed on Bamford parish church! This is an important matter as the potential for generating our own power is immense. The village Bakery which has opened less than a year ago in stores and array of solar panels on the roof of its tiny building. When you go in to buy a breakfast roll or a sandwich you see in the corner a gadget which records the amount of energy being generated at that moment and cumulatively by the solar panels. Even on a grey day the panels are generating electricity for the bakery. I look at all the roofs devoid of panels and I sigh because of so much lost potential and I am sure that the Park can play a role in encouraging a major change in this area. The respondent raises some good points, some of which are beyond the scope of this Plan.

S-137-11	1369370	Derbyshire ALC	13.1	The respondent agrees with the spatial objective Reason Many potential utilities constructions / developments are likely to be major developments They might bring marginal benefit to the Park, but the main benefit would be for areas outside the Park. The status as National Park requires a restrictive approach for large scale developments This is particularly the case, at a time when climate change poses various challenges for the natural environment.
S-136-33	1369368		13.1	The respondent agrees with the spatial objective Reason New utilities infrastructure should not impact on the Special Qualities PDNPA should work proactively with utilities providers to enable appropriate development as sensitively as possible. This could enable a "Yes, if..." approach.

S-128-50	1369275	Rural Action Derbyshire	13.1	The respondent doesn't agree with the spatial objective for utilities. Reason There are two competing objectives within the management plan. To support sustainable communities and enable connection to essential services which are increasingly delivered online there needs to be more investment in communications infrastructure. Given the nature of the peak this will necessitate structures, masts etc. Similarly to lower greenhouse emissions and use more green energy will require infrastructure to harness wind and solar. Whilst it is important to protect the natural beauty of the park, demand for clean green energy is more important. The windfarms of Wales, Scotland and the Yorkshire moors show that there is room for both.
S-120-44	1368991	Marsh Farm Development Co Ltd	13.1	The respondent agrees with the proposed spatial objective

S-113-44	1369153	Edale Parish Council	13.1	The respondent agrees with the proposed spatial objective. Reason Of course, as with any development, development of utilities should not adversely affect the Special Qualities. However, we do need better mobile and internet connection across the Park and to reach the whole of our community.
S-104-29	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	13.1	The respondent agrees with the proposed spatial objective
S-102-1	1369015	National Grid	13.1	The response provides sample wording for DMC3 to ensure consistency with National Policy. This is aimed at ensuring that existing utility constraints are respected on development sites. The response also highlights the splitting of former National Grid responsibilities to two other companies and recommends that they be consulted separately (National Gas Transmission) and National Grid Ventures (NGV).

S-101-11	1369010	Business Peak District	13.1	The respondent did not provide a specific reply to the question Reason The key focus of this chapter is on reservoirs, however it would have been good to have also included a specific commentary on the need for a fit-for-purpose digital infrastructure that fully addresses the needs of local communities, businesses and visitors to the Peak District. This will be essential if we are to avoid a further widening in the digital divide between urban and rural communities. Digital infrastructure was not included within the consultation, because we believe that existing policies are working ok, and do not prevent it's delivery, much of which is permitted development. It is difficult to tell from the response whether the respondent does or does not agree with the spatial objective - the response is recorded as 'No specific reply'.
S-98-29	1368689	Greater Manchester and High Peak Area of the Ramblers	13.1	The respondent agrees with the proposed objective. Reason We recognise the need for modern communication infrastructure to support thriving local communities and meet the needs of visitors alike but any development must not adversely affect the Peak District's Special Qualities.

S-86-18	1368682	The National Trust	13.1	The respondent did not provide a specific reply to the question Reason Carbon capture and storage. Utilities and new or expanded reservoirs The National Trust will be interested to review an emerging policy position around utilities infrastructure. Noting the aim to preserve the Special Qualities of the National Park and protect against adverse impacts. This is balancing the overall need for relevant infrastructure against such Special Qualities. Also, appreciating that there is likely to be an increased call for utilities provision in and around the Peak District, as is being observed regionally and nationally. We recognise the scale and complexity of the challenges associated with infrastructure delivery. Also, the pressing impact of matters such as climate change and the need for sustainable adaptation. Notwithstanding any principle of any development, the impact of new infrastructure upon the setting and significance of the historic and natural environment also needs to be considered carefully. On the matter of carbon capture and water infrastructure, the National Trust may comment further depending on the evolution of relevant options alongside the supporting rationale and evidence supporting a final position. As the PDNPA acknowledges any Local Plan position would need to be considered against the local policy framework as a whole and recognising that relevant proposals are likely to be Nationally Significant Infrastructure Projects (NSIPS). Therefore, falling under a different decision-making process.

				It is unclear whether the respondent supports or not the proposed spatial objective - the response is recorded as ' No specific reply'.
S-71-35	1368373	Tideswell Parish Council	13.1	The respondent agrees with the proposed spatial objective.

S-68-27	1368264	Bakewell Resident	13.1	The respondent doesn't agree with the proposed objective. Reason If upgraded utilities infrastructure are contributing to the purpose of the park they may adversely affect some special qualities.
S-67-34	1367857	Over Haddon Parish Council	13.1	The respondent is unsure Reasons There are several possibilities for renewable energy generation in the parish of Over Haddon. Most roofs are suitable for the installation of solar panels, which should be encouraged. The river Lathkill supported three water mills within the parish historically and could provide as least as many sites for hydro power generation, especially if the measures to increase river flow and reliability by blocking up redundant soughs (as described above) were carried out. Wind turbines, sited at prominent local high points, could also contribute to clean energy production locally. We do not believe that these are intrinsically harmful to landscape quality and that their contribution to the reduction of greenhouse gas emissions outweighs such considerations.

S-65-2	1368271	Individual	13.1	The respondent doesn't agree with the proposed objective Reason The vital priority to combat climate change means that there will be occasions when the provision of renewable energy requires both location of generators and carrying capacity within the park. Not everything can be underground as this is vastly expensive, highly disruptive and very carbon unfriendly.
S-62-49	1368170		13.1	The respondent agrees with the proposed spatial objective
S-50-9	1367561	Peak Park Parishes Forum	13.1	The respondent agrees with the proposed spatial objective. Reason Answer is conditional on having workable mobile-phone and internet signals throughout the Park.
S-49-14	1367873		13.1	The respondent agrees with the proposed spatial objective.
S-44-35	1367865	Eyam Parish Council	13.1	The respondent agrees with the proposed objective. Reason But we need workable mobile networks
S-43-20	1367843	Natural England	13.1	The respondent agrees with the proposed spatial objective. Reason There should be no adverse effect on the Peak District's Special Qualities.
S-42-4	1367805		13.1	The respondent agrees with the proposed spatial objective.

S-40-46	1367788		13.1	The respondent agrees with the proposed spatial objective
S-32-18	1367524	Bamford with Thornhill Parish Council	13.1	The respondent agrees with the proposed spatial objective. Reason To protect the Special Qualities.
S-30-37	1367447	Country Landowners Association	13.1	The respondent agrees with the proposed spatial objective. Reason We understand the balance in considerations but society needs to be served by modern utilities.
S-13-41	1364893		13.1	The respondent agrees with the proposed spatial objective. Reason Utilities need to be developed acknowledging that the NP is a living landscape. This includes the need for digital connectivity, and access to DAB radio
S-9-6	1364715		13.1	The respondent agrees with the proposed spatial objective. Reason I have a grave concern about waste water treatment near where I live as Tideswell Brook regularly suffers release of untreated waste and due to the lack of sophistication in the treatment plant, medications are in high concentrations

S-7-3	1364251		13.1	The respondent agrees with the proposed spatial objective.

13.2 What is your preferred option with regard to new or expanded reservoirs?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-224-21	1369634	Sheffield City Council	13.2	The respondent favours the current approach, with National Policies determining whether a reservoir should be built and local policies setting out scope for the NPA's response. The response supports current policy.
S-223-47	1369632	Hartington Town Quarter Parish Council	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason Reservoirs completely alter the historic landscape of the National Park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.

S-221-44	1369595		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason Major development in a National Park is unacceptable. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.

S-220-21	1369594		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason In order to protect the unique and wild landscapes and wildlife habitats which are most likely to be impacted by any such development, especially as there are already 46 reservoirs within the National Park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-214-46	1369550	Hope with Aston Parish Council	13.2	The respondent supports the development of new policy stating that no new reservoirs will be permitted. The reasons given is that this would make it easier to defend this stance should a proposal be brought forward. This approach would be in line with the current local policy approach to other major infrastructure such as major road schemes.

S-210-41	1369546		13.2	The respondent supports the development of new policy saying that no new reservoirs will be permitted. Whilst recognising that National Policy would still determine such development a new policy would clearly set out our agreed position and would be used alongside other local plan policies that considered landscape, cultural heritage, biodiversity and recreation. The approach is supportive of new policy that mirrors existing transport policy for Nationally Significant Infrastructure. This would mark a return to the Authority's previous Policy stance (Local Plan 2001), and provide a starting point from which to respond to plans for reservoir development.
S-200-42	1369531	Stanton in Peak Parish Council	13.2	The respondent prefers Option 1 (current approach), stating that its a National policy issue. The current approach allows for the National Park to be consulted on new or expanded reservoirs. However, there is a grey area, in that the plans are brought forward by private companies; it is unclear whether they are adequately covered under the statutory duty to further National Park purposes; when undertaking work in National Parks.

S-199-18	1369530	Environment Agency	13.2	The respondent favours the current approach. The respondent believes that National Policy offers adequate protection. The respondent provides clarification of the use of reservoirs for temporary flood management and is concerned that policy does not block this. The respondent makes good points that will be considered in weighing the balance for and against new policy as the Plan is developed.

S-198-1	1369529	Canal and River Trust	13.2	The respondent prefers Option 1 (the current approach) The respondent makes it clear that they are not looking to develop or expand its reservoirs withing the PDNP but that the ability to carry out works to existing reservoirs is essential to manage the risk of flooding. The respondent is subject to the reservoirs act which requires them to carry out works when necessary to ensure public safety. Aging infrastructure may necessitate future alterations or other works to the reservoirs. The respondent belives that the major development test as set out paragraph 190 of the NPPF (formerly paragraph 183) negates the need for a sesperate policy within the Local Plan. The respondent belives that a seperate polict as suggested would be at odds with the NPPF. The erspondent belives that the possible propsed approach on reservoirs is not clear from the rest of the Consultation document. The respondent is concerned that the wording of any new policy would need to be carefully considered to ensure that reservoir safety works were not unduly constrained. The respondent raises valid points, which will be considered as the Plan is developed. It is not the intention that the policy should uduly cosntrain essential safety works to existing reservoirs. Rather, should the policy be taken forward, it would provide clarity on the Authority's approach to the development of

				new reservoirs or the expansion of existing reservoirs for the sake on increased long term water storage / supply.

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S-194-47	1369525	Derbyshire Dales District Council	13.2	The respondent did not provide a specific answer to the question. The additional comment suggests a preference for option 1, or more specifically, no preference for option 2. The response has been recorded as support for option 1.

S-186-16	1369505		13.2	Therespondents prefers writing a new policy that says no new reservoirs will be permitted. Reasons given include: - The recent STW proposal to increase water storage in the Upper Derweny Valley - the uncertainty and powerlessness created by the proposal was devastating for residents. The Environment Act 1995 imposes a statutory duty to seek to foster the social and economic well-being of communities. With a policy of opposing new reservoirs, the PDNPA would be fulfilling this duty, for all potentially affected communities. Stating the PDNPAs stance before the developer engages with national policy strengthens the PDNPAs hand in negotiations. It also informs the developer and the public to expect a strong stance which is essential if National Park purposes are to be upheld. It also increases pressure on the water companies to invest in alternatives such as reducing pipe leakage and increasing water efficiency before considering expending vast amounts of resources on new infrastructure. The proposed approach would set out the Authority's stance, which would provide clarification to developers. Whilst recognising that the NPPF 2024 major development test for National Parks should apply (paragraph 190), it is unclear whether water companies delivering new reservoirs

				would be covered under the new requirement to further National Park purposes (Section 245 - Levelling up and regeneration Act, 2023).

S-185-42	1369502	Devonshire Group	13.2	The respondent prefers Option 1, continuing with our current approach. The respondent gave the following reasons: - Option 2 would not best serve the objective to achieve sustainable development. It is important to differentiate between large reservoirs, designed to meet the needs of, say, large urban areas beyond the boundaries of the Park, and smaller reservoirs that might be needed to meet more specific, local needs, including agriculture. Smaller scale reservoirs to support agriculture would be more easily assimilated into the landscape. The respondent raises important issues including the possible balance between the farmed and 'natural' landscape. These will be considered as the Plan is developed.
S-183-10	1369499	United Utilities	13.2	The respondent prefers Option 1 - continuing with our current approach. The reason given is that UUW own own reservoirs within the Peak District National Park that may require upgrades or expansion in the future. The respondent's preference would see a continuation of the current policy approach.

S-173-13	1369488	Land & Nature Team - PDNPA	13.2	The respondent prefers Option 1 - continuing with our current approach, the reasons given are: - The reservoirs of the PD form part of the landscape character (e.g. the Reservoir Valleys with Woodland LCT). They present opportunities for habitat creation and for recreation, many are popular destinations for tourism and may alleviate pressure elsewhere. They are not necessarily in themselves damaging to the National Parks special qualities and can, in association with other landscape features, make a positive contribution to landscape character. It is the potentially significant negative impacts on landscape, cultural heritage and biodiversity (covered by other existing policies) which are of concern, rather than the principle of new reservoirs. In the event that a proposal was put forward which adequately avoided / mitigated / compensated these impacts, unlikely though that may be, we believe it would be wrong to dismiss it in principle out of hand. In view of likely reduced water supply in future due to climate change, a blanket in principle restriction on new / expanded reservoirs appears overly negative, particularly if we regard the provision of clean water as one of the public goods that the National Park delivers beyond its boundaries. Whilst large public supply reservoirs are unlikely to be acceptable, smaller scale (eg

				farm supply) reservoirs may be more acceptable in future, particularly in view of climate change. Therefore, any new policy would need to address the issue of scale, which may prove difficult. We therefore favour Option 1 and consider existing national and local policy acceptable, provided Planning consider they provide adequate safeguards. Accompanying text should make it clear that any proposals would need to demonstrate rigorous application of the Avoid-Mitigate-Compensate-Enhance hierarchy, and not rely on national need alone, and that alternatives should include options around reducing demand. The respondent raises valid points supporting the continuation of our current policy approach.

S-170-12	1369472	Historic England	13.2	The respondent did not reply to the question but added the following: - if new reservoirs were considered we would want to see the impacts for the historic environment and specific policy wording to protect the significance of heritage assets and their setting. The response has been logged as 'No specific reply'.
S-165-44	1369466	Taddington and Priestcliffe Parish Council	13.2	The respondent's preferred option is Option 2 - Write a new policy that says no new reservoirs will be permitted. This approach would provide a clear starting point for any proposals for future reservoirs; it mirrors our current approach to major road-building.
S-163-29	1368617		13.2	The respondent prefers Option 1 - continue with current approach The respondent adds that the supply of water is a national issue. I think our existing policies should be sufficient to frame our response to any new proposals. The respondent is supportive of current policy.

S-154-28	1369442		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake on increased long-term water storage / supply.
S-153-43	1369437		13.2	The respondent prefers Option 1 - continue with current approach. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should new policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake on increased long-term water storage / supply.

S-150-45	1369431		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. The reason given is - The water companies have decommissioned and destroyed a large number of reservoirs in the area such as Barbrook, and some outside Buxton. They should repair and reinstate places such as Barbrook before building new. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake on increased long-term water storage / supply.

S-141-6	1369412	Hope and Derwent Woodlands Parish Council	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Under reasons for answer, the respondent refers to the previous Severn Trent Water proposals for increased capacity in the Upper Derwent Valley and the concerns that this raised for parishioners. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake on increased long-term water storage / supply.

S-139-1	1369412	Hope and Derwent Woodlands Parish Council	13.2	The response appears to consist of evidence in support of a separate response in support of Option 2 see reasons below Recent climate change research supports this recommendation from the following technical points: .Increased losses from evaporation from high surface area to volume storage2. Accumulation of airborne pollutants particularly persistent organics as well as the common but now revealed as a bigger problem by better analysis of nanoparticulates (the newly emergent potentially hazardous perfluoro organics have been reported by the EA in theDenrvent reservoir system).3. The warmer temperatures will increase the eutrophication burden and raise the general organic content leading to poor water quality.4. The warmer temperatures and stronger winds will lift more sediment into the water column releasing global warming gases and generating poorer water quality5. The embedded carbon will be greater than the alternatives.5. Forest fires and moorland fires will have a long lasting damaging affect on water quality. More sustainable approaches to water supply are rejuvenation of wetlands and peat, small collection ponds with SUDS and aquifer and surface water recharge to complement smart metering (to allow customer control) and reduced leakage. As this response is additional information in

				support of the previous response, the response is not recorded as a new or separate response.

S-138-8	1369372		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. They believe that the Park is an unsuitable location for new reservoirs. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake on increased long-term water storage / supply.
S-137-28	1369370	Derbyshire ALC	13.2	The respondent favours Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason It makes a clear statement in the Local Plan that protects and strengthens the objectives of the Park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the

				expansion of existing reservoirs for the sake on increased long-term water storage / supply.

S-136-23	1369368		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason Being able to provide clarity, quickly on our position is important. Increasing the water provision within the Peak District is important. there are other ways of achieving it (reducing leaks, peatland restoration, reducing sedimentation in existing reservoirs etc). The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-128-48	1369275	Rural Action Derbyshire	13.2	The respondent prefers Option 1 - maintain current approach. This approach would maintain the Authority's current policy position.

S-127-9	1369287		13.2	The respondent supports producing a new policy that says no new reservoirs will be built. Reason - new expanded reservoirs would affect the Special Qualities This would be a return to our previous approach in the 2001 Local Plan.
S-120-12	1368991	Marsh Farm Development Co Ltd	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.

S-113-45	1369153	Edale Parish Council	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted Reason Option 2 clarifies the National Parks position. Flooding protected landscapes is against the Parks purposes. Reservoirs here would provide water for distant communities and does not support our communities. Alternative options need to be found. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.

S-104-48	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason Further reservoirs have no place in the National Park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-98-37	1368689	Greater Manchester and High Peak Area of the Ramblers	13.2	

S-86-19	1368682	The National Trust	13.2	The respondent did not provide a specific reply to the question Reason On the matter of carbon capture and water infrastructure, the National Trust may comment further depending on the evolution of relevant options alongside the supporting rationale and evidence supporting a final position. As the PDNPA acknowledges any Local Plan position would need to be considered against the local policy framework as a whole and recognising that relevant proposals are likely to be Nationally Significant Infrastructure Projects (NSIPS). Therefore, falling under a different decision-making process. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply. It is unclear whether the respondent prefers any one option, so the response is recorded as 'No specific reply'

S-71-36	1368373	Tideswell Parish Council	13.2	The respondent prefers Option 1 - Continue with our current approach. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body.
S-68-2	1368264	Bakewell Resident	13.2	The respondent prefers Option 1 - continuing with our current approach. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body.
S-62-40	1368170		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason Emphasis is on local determination of policy The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.

S-50-15	1367561	Peak Park Parishes Forum	13.2	The respondents prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason We do not consider it right to create new reservoirs in a national park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-45-2	1367903	Froggatt Parish Meeting	13.2	
S-44-27	1367865	Eyam Parish Council	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.

S-43-21	1367843	Natural England	13.2	The respondent is unsure Reason The local plan should set out its position regarding new or expanded reservoirs which complement other local plan policies which seek to protect the special qualities of the National Park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-42-12	1367805		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason We need to develop temporary flood plains, not more permanent water storage. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the

				expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-40-47	1367788		13.2	The respondent prefers Option 1 - Continue with our current approach. Reason Climate change and water scarcity dictates a flexible reactive approach. The respondent prefers a continuation of the current policy approach.

S-32-11	1367524	Bamford with Thornhill Parish Council	13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason We do not consider it reasonable to create new reservoirs in the National Park. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-30-38	1367447	Country Landowners Association	13.2	The respondent prefers Option 1 - continue with current approach. Reason We would welcome increased ability to build reservoirs. Well-designed reservoirs would positively add to the park. Including managing water levels (in flood and drought conditions) and can provide unique recreational and environmental areas. Reservoirs can have a natural lake appearance and could represent a positive contribution to certain landscapes if well designed. The respondent prefers the continuation of the current policy approach.

S-13-16	1364893		13.2	The respondent prefers Option 2 - Write a new policy that says no new reservoirs will be permitted. Reason Any new reservoir would disrupt the landscape and communities the NP has been designed to protect. Other water retention solutions need to be sought that don't affect the NP. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body. Should the policy be taken forward, it would provide clarity on the Authority's approach to the development of new reservoirs or the expansion of existing reservoirs for the sake of increased long-term water storage / supply.
S-9-33	1364715		13.2	The respondent prefers Option 1 - continue with our current approach. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body.

S-7-14	1364251		13.2	The respondent prefers Option 1 - Continue with our current approach. Reason Subject to the necessary mitigation measures, the provision of additional water storage capacity within the PDNP may form an important part of the country's adaptation to climate change. The development of new or expanded reservoirs would constitute major development within the National Park. These could be either nationally or locally driven. In the case of the former, the National Park Authority would be a consultee, rather than the determining body.

Q14.1 Do you agree with the proposed spatial objectives for minerals and waste?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary and PDNPA Response
S-226-6	1369530	Environment Agency	14.1	Policy position presumes against landfill provision within the National Park. Existing Policies CC3 and DMMW1 are prescriptive of requirements which must be met in regards waste disposal proposals and are considered sufficient to protect ground water. EA comments appear to be from one of their guidance documents and it would not be appropriate to repeat within the Development Plan. Policy DMMW3 criterion i) and v) provide adequate provision for the protection of groundwater that may be affected by mineral extraction proposals.
S-223-48	1369632	Hartington Town Quarter Parish Council	14.1	Agree spatial objectives for minerals and waste. Supportive of MIN3 to maintain buildings and communities in the National Park. Future of Hope Works needs thorough consultation to determine long term use.

S-221-45	1369595		14.1	The responder does not agree with the proposed local plan spatial objectives for minerals and waste. They believe that even in exceptional circumstances there should not mineral extraction in the National park. They think that "this is one of the issues that makes the designation of Britain's National Parks seem like a joke in the eyes of other countries."

S-214-47	1369550	Hope with Aston Parish Council	14.1	Agree with spatial objective for minerals and waste. Stated that the word 'allow' is ambiguous. In the interest of clarity, 'allow' can be construed as meaning to 'permit' or 'grant consent'. However, development would only be allowed if it complies with the development plan as a whole and relevant material considerations. 'Small scale' has not been defined by way of surface site area of total extraction tonnage. Rather it refers to sites that may be permitted under existing policy MIN3 for small scale building stone quarries. These sites are restricted to supply only developments within the National Park. Given the limited demand for material generated by the National Park, the sites by their very nature will be 'small scale' in the context of mineral extraction. Policy CC3 defines small scale waste management facilities as those which serve a local community. The scale is not defined specifically because the needs of different communities may differ, but given the level of urbanisation waste management facilities would be small scale to serve the need of the population when compared to those in more densely populated areas.

S-210-42	1369546		14.1	The representation agrees with the proposed local plan spatial objectives for minerals and waste as they feel it is the best approach to conserving the NPAs special qualities.
S-207-36	1369542	Youlgrave Community Land Trust.	14.1	Agree with Minerals and waste policy proposals. Believe there should be further recycling of construction and demolition waste and farmers should be paid by weight for clearing derelict structures and depositing stone for further use. The latter suggestion of payment is not a matter to be addressed through the local plan.
S-203-16	1369536	Tarmac	14.1	Do not support blanket approach to reduction of quarrying in National Park given the extensive mineral resource considered to be of national importance. Draws attention to exceptional circumstances test for major development set out by the NPPF. The NPA applies this test appropriately to mineral development and therefore the opportunity for future mineral development exists should those exceptional circumstances be demonstrated by a proposal.

S-200-43	1369531	Stanton in Peak Parish Council	14.1	The assessment of what constitutes 'exceptional circumstances' is carefully considered by the Authority. Mineral sites have end dates imposed by condition but an operator can seek to amend them under the Town and Country Planning Act 1990 at any time, a development plan cannot prevent such applications being made. A policy that outright opposes extensions of time to mineral sites would have an adverse impact on the landbank which may make the National Park more susceptible to applications for entirely new quarries. Refusing to consider extensions of time may also not be the most sustainable use of finite natural resources. Each proposal must be judged on its own merits.

S-192-16	1369523	Mineral Products Association	14.1	The exceptional circumstances test does allow for mineral development should the proposal be adequately justified. The question of extending the life of sites with remaining reserves when they reach the imposed 2042 end date is a special case and is sought to be addressed specifically in the the Local Plan Review, separate from the overarching spatial objective. It is acknowledged that a presumption against extending end dates of sites with consented reserves would have a significant impact on the landbank and the steady and adequate supply of minerals, thus the matter is sought to be addressed specifically. Also acknowledge that a flexible approach to ends dates for small scale building stone sites is required due to their intermittent and low rate of working patterns. These site provide a valuable building material to maintain the local vernacular. Given the nature recovery agenda and the first purpose of the NP to conserve and enhance its wildlife, it is not considered unreasonable to seek improvements to restoration schemes and secure the long term management of sites if further mineral development is to be permitted.

S-190-2	1369521	Marchington Stone Limited	14.1	The opportunity for mineral extraction exists should exceptional circumstances be demonstrated by an applicant. Geological information and a sustainability assessment could be used to support such a case at application stage. The concept of the presumption against mineral development is based on the the exceptional circumstances test and the wide availability of comparative resources outside of the National Park. The PDNPA recognises the historic production of building stone and seeks to allow provision for local use through current Policy MIN3. However, the historic supply to a wider market is recognised and the local plan review seeks to re-evaluate the NPAs policy approach to building stone provision. A statement of common ground between the PDNPA and DCC confirming that the latter will off-set the reduction in the supply of aggregates from the former has been signed to support the Derbyshire and Derby Local Minerals Plan that has been submitted for examination. This is proposed to be delivered through the MASS, where the PDNPAs annual apportionment will be reduced by 10% and a comparative 10% will be added to the annual apportionment figure for DCC. This approach was first agreed and ratified through the East Midlands AWP in 2014. A SoCG in regards the matter will be signed to support the PDNPA Local Plan Review at the appropriate time. 'Small scale' building stone sites are purposely not defined by geographic site area of total extraction tonnage. The term 'small-scale' relates to Policy MIN3 that allows building stone sites that serves solely the market within the National Park. Given the level of development, any site such site would be small scale in the wider context of mineral extraction sites. Notwithstanding, this policy approach is to be reviewed. The utilisation of over and inter burden generated building/roofing stone sites could be considered to support economic viability and this should be demonstrated in any application submission.

				However, its use in the restoration process would reduce the lasting landscape impact of the quarry once restored. Protecting the landscape is the primary purpose of the National Park, so this is a key factor when considered development proposals. The NPPF states that landbanks for non-energy minerals should be provided for outside of National Parks where reasonably practical. The current policy approach is not at odds with this statement as the MASS allows for the provision of an appropriate quantity of aggregates to be made from outside of the National Park. The exceptional circumstances test can be applied to other minerals types (and indeed aggregates), which potentially allows for their extraction and therefore does not result in a sterilisation of the mineral deposits.

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S-185-43	1369502	Devonshire Group	14.1	Supportive of long term provision of building/roofing stone to maintain and repair heritage and traditional buildings. Also support landscape enhancement and nature recovery.

S-177-1	1369493	Coke Turner & Co	14.1	Agree future mineral extraction only in exceptional circumstances. Development of Critical Minerals should be acknowledged as an exceptional circumstance. PDNPA agrees extraction of a 'critical mineral' could meet the exceptional circumstances test depending on other material consideration. Exceptional Circumstances should not be assumed/interpreted to be an outright ban, and the previous/existing tests should be applied. PDNPA agrees and will continue to apply the test as such. Long term landscape enhancement can be achieved through mineral extraction. PDNPA accepts this may be the case in some specific instances, but in general mineral extraction, certainly on greenfield sites, is inherently harmful to the natural landscape and that harm can be perpetuated for a significant period of time before a site is fully restored and the benefits are seen. The period of time the harm occurs would be balanced against the landscape gain, which is unlikely to be significant enough to weigh in favour of the development. Agree with small-scale building stone policy but development must be of a scale that makes it economically viable. Disagree that Hope Cement Works should ceased operation in 2042 at the latest. Significant skilled employer beyond usual agriculture and tourism. Significant capital investment required to run the cement works, if consented reserves remain beyond 2042 the Works should be allowed to continue to operate. PDNPA acknowledges the economic contribution of the Works, but it should be noted that consented reserves are due to be exhausted in or before 2042. PDNPA acknowledges the importance of Fluorspar and supports its extraction through Policy MIN2, but points out that it is not currently included on the latest UK Critical Minerals list (2024), although it is possible that it will be added at the next revision. The PDNPA should include a new Mineral Policy for the prospecting for and development of Critical Minerals. The PDNPA will consider this possibility further through the LPR process.

				The new policy should apply to surface and below ground working given new technologies are not as intrusive as traditional opencast extraction. PDNPA considers that such proposals for critical mineral extraction could be considered under existing policy MIN1. Consideration will be given to whether a specific critical minerals policy is required. Critical minerals should be safeguarded through Policy MIN4. PDNPA will assess whether this is necessary.

S-173-14	1369488	Land & Nature Team - PDNPA	14.1	Suggest small-scale building/roofing stone sites and waste facilities should only be allowed 'where compatible with special qualities of the National Park'. Existing policies with the development plan make provision for this assurance. Suggest building stone should only be used within or in immediate proximity to the National Park. It would not be possible to control the destination of stone once it has left the Park, so this is not a feasible option. Potential for after-use of Hope Cement Works to be major recreational attraction, which should be avoided in favour of enhancement of natural beauty, wildlife and cultural heritage. Agreed - any redevelopment will be landscape, wildlife and heritage led. Suggest adding a reference to public access, along the lines of to require site restoration that links into active travel / PRoW networks and provides opportunities for education recreation alongside nature recovery where possible. PDNPA will consider adding this reference to public access, although provision is already made through MIN1.

S-170-13	1369472	Historic England	14.1	Need for policies to protect the historic environment. Existing policy DMMW3 (proposed to be retained) provides suitable protection for heritage assets from mineral related development.
S-168-9	1369470	Railfuture	14.1	Support the general principle of not allowing new large-scale mineral extraction of all kinds within the National Park once the existing sources have been exhausted or permissions have expired. Any further permissions or extension of existing permissions for extraction should be accompanied where possible by conditions attaching to use of rail for distribution of extracted materials. This is made easier by the main quarry sites already having rail access. The PDNPA agrees. Will consider whether reference to rail transit of minerals should be included in policy wording.

S-166-9	1369468	Breedon	14.1	Breedon supports the principle that exceptional circumstances for mineral extraction in the National Park should continue as this accords with the NPPF. Breedon also supports the requirement for quarry restoration to deliver landscape enhancement, which in most cases would be better than the current position. However, the objective that proposals at Hope should be considered exclusively against an end date of 2042, is not consistent with the NPPF as it excludes the exceptional circumstances test. The Sustainability Appraisal does not assess the spatial objectives. PDNPA response: the NPs strategic position to Hope Cement Works and its quarries had historically been to consider proposals in the context of the extant mineral reserves when there was no agreed end date. The objective seeks to give further context to any proposals which might arise before 2042 whilst making clear mineral extraction and cement production will cease at the agreed end date in 2042. Notwithstanding, the exceptional circumstances test would still apply. Noted that the Sustainability Appraisal does not address the spatial objectives. This will be rectified.

S-165-45	1369466	Taddington and Priestcliffe Parish Council	14.1	Comment makes reference to objective 4 of the Management Plan, which cannot be altered through this consultation process. Notwithstanding, should proposals come forward for housing or employment development within a former quarry out of its aftercare period they will be considered on their own merits against the adopted development plan policies and other material considerations.
S-163-30	1368617		14.1	Important to support small-scale sources of building and roofing stone for conservation purposes. This could be restricted to use in the National Park only.
S-161-21	1369459	CPRE Peak District and South Yorkshire	14.1	The CPRE are unsure as to whether they agree with the proposed local plan spatial objectives for minerals and waste. They state that they support the overarching policy of retreat of the quarrying and cement industries provided this would not prejudice national security but will reserve the majority of their comments pending the commission of expert advice on this specialist area of planning.

S-153-44	1369437		14.1	The assessment of what constitutes 'exceptional circumstances' is carefully considered by the Authority. Mineral sites have end dates imposed by condition but an operator can seek to amend them under the Town and Country Planning Act 1990 at any time, a development plan cannot prevent such applications being made. A policy that outright opposes extensions of time to mineral sites would have an adverse impact on the landbank which may make the National Park more susceptible to applications for entirely new quarries. Refusing to consider extensions of time may also not be the most sustainable use of finite natural resources. Each proposal must be judged on its own merits.
S-150-46	1369431		14.1	Fully supports the local plan and feels noting could be more against the purposes of the National Park than waste landfill or open cast mineral extraction.

S-149-3	1369430		14.1	States no robust policy in regards landfill or waste transfer stations. Policies CC3 and DMMW4 set out clearly the criteria for waste management facilities within the National Park. Presumption against large scale landfill and waste facilities, provision for small scale facilities that serve a local need. Policy position is clear and considered robust.
S-147-8	1369428	The Campaign for the Peak Line	14.1	Supportive of minerals spatial objectives, but suggest contingency given quality of resource in the National Park in the event of national emergency. This contingency is provided by policy MIN1 and the exceptional circumstances test. Mineral products should be transported by rail rather than road. Railheads below a certain throughput volume are not economically viable so suggest minerals from non rail linked sites be conditioned to transport to railheads. 3 of the 4 remaining large scale producing site sin the National Park already rail linked. The other is remote of the nearest suitable railhead. Notwithstanding, it is not possible to impose a policy directive for rail transport only as operators may not wish to share their railheads/have capacity or agree mutually satisfactory remuneration.

S-139-3	1369412	Hope and Derwent Woodlands Parish Council	14.1	Comment states that cement and lime production is highest emitter of CO2 in the NP. Carbon Capture proposals are not suitable in the NP due to length of pipeline, pressure and chemical required for the process. Continued extraction of limestone should be dependant on use of rail for production and fuel. Response: No industrial lime is produced in the. The comment makes reference to a specific carbon capture project that is in its infancy and is not proposed through the development plan. All but one of the remaining limestone/cement producing sites are rail linked.
S-138-4	1369372		14.1	The representation feels that there is a missed opportunity in the proposed spatial objectives to think about enhancing recreational use through provision of new multi-user trails as sites are decommissioned and restored.

S-137-7	1369370	Derbyshire ALC	14.1	Small-scale building stone quarries needed to repair and maintain/extend heritage buildings. Low environmental impact (e.g. CO2) of locally sourced material. Disused quarries have great potential for nature recovery and biodiversity enhancements. Small scale waste facilities can also reduce environmental impact by reducing need for transport of waste over longer distances. All points agreed and covered by existing policies and proposed revisions.
S-136-44	1369368		14.1	The responder agrees with the local plan spatial objectives for minerals and waste. They believe they sensible objectives.
S-128-6	1369275	Rural Action Derbyshire	14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste.
S-127-6	1369287		14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste and notes their alignment with the special qualities.
S-120-3	1368991	Marsh Farm Development Co Ltd	14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste.

S-113-46	1369153	Edale Parish Council	14.1	Mineral extraction does not support the Special Qualities and should not be extended. HGVs endanger local communities and cause traffic problems. Opportunities for restoration to support communities e.g. renewable energy generation at Hope works. Anaerobic digestion plants could provide energy, and compost for community use. All points acknowledged. Impact of HGVs assessed at planning application stage. Opportunities to redevelopment quarries/industrial sites and AD plants will be considered against relevant policies if applications are put forward.
S-104-4	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.1	Generally supportive of spatial strategy as outlined but want to ensure sufficient control is imposed upon companies who may walk away from restoration responsibilities after extraction has ceased. PDNPA acknowledges this point. Existing policy provides control and can be implemented at planning application stage. Imposition of restoration bonds on companies with a history of non-compliance is also an option. Policy could be tightened to require restoration bonds, but the provision already exists through the NPPF.

S-103-3	1368574	Marshall's plc	14.1	The use of the term "small scale" in relation to building and roofing stone quarries is unhelpful and unclear. Such quarries tend to be smaller in scale than say aggregate quarries but the term could be construed as meaning that only smaller scale building stone quarries could be acceptable as opposed to "larger" building stone quarries. Suggest the deletion of the term "small scale" as has recently happened with regard to the PPG. PDNPA Response: The term Small-scale in the context of the existing development plan relates to sites granted under the existing MIN3 Policy that serve the need of the National Park only. The limited impact of all building stone sites when compared to large scale aggregate sites is recognised as is the removal of the term 'small-scale' from the NPPF. Consideration of a potential revised policy is proposed as part of the LPR.
S-98-17	1368689	Greater Manchester and High Peak Area of the Ramblers	14.1	Agree that large scale mineral extraction is incompatible with NP purposes. Restoration schemes should work with local character, protect PRoW and help link people of nature. The PDNPA acknowledges this point and will consider further in LPR process.

S-80-1	1368656	Hard Rock Mining Ltd.	14.1	Mineral extraction has shaped the landscape of the National Park, that is enjoyed by many visitors. To be recognised that minerals can only be extraction where they occur, a blanket ban on all minerals does not consider potential needs for future 'critical minerals' that may not occur elsewhere. Suggest selective surface extraction of fluorspar to allow rehabilitation of brownfield sites. Other minerals have been previously mined within the park; Baryte, Calcite and SilicaSand. Of these Baryte is on the critical minerals list. Each mineral application should be judged on its own merits, not subject to an outright ban. PDNPA Response: Consideration will be given to potential for a 'critical minerals' policy. However, provision exists for extraction in 'exceptional circumstances' under policy MIN1, so it would be for any application to extract 'critical minerals' to demonstrate such circumstances. As such, there is no 'outright ban', nor is one proposed by the LPR.

S-78-1	1368614	The Thornhill Settlement	14.1	Environmental and financial benefits to the NP from building stone extraction. Stone used for heritage sites such as Chatsworth and Haddon Hall, also heritage buildings elsewhere in the UK. Portcullis House and Bloomberg building built with stone from the NP. Both in UNESCO world heritage sites. These sites/projects create jobs for engineers, labourers, architects and stone masons. None of these projects would be possible if proposed spatial objectives are met. Commercial extraction of building stone (not necessarily very large scale) can contribute to management plan objectives of reducing CO2 emissions. Natural stone less embodied carbon than bricks, concrete or steel. Significant nature recovery has been demonstrated in former building stone sites. Suggest that continued extraction of building stone can meet all management plan objectives. Historic industry that has played a part in PD economy for centuries and should be maintained. Suggest that building stone extraction proposals could meet the exceptional circumstances tests due to quality of material and its contribution to heritage assets. PDNPA notes the comments, recognises the importance of building stone to the local economy, that it is a sustainable building material, nature recovery of sites and its contribution to the cultural heritage of the park, local vernacular and heritage assets nationwide. The LPR seeks to understand whether existing policy is sufficient to meet local and national need or if a change of strategy is required.

S-71-37	1368373	Tideswell Parish Council	14.1	The response agrees with the proposed local plan spatial objectives for minerals and waste.
S-69-27	1368325	Derbyshire Dales District Council	14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste. Stating that they find them to be sensible whilst noting that restoration should include high BNG.
S-68-41	1368264	Bakewell Resident	14.1	The responder is unsure whether they agree with the proposed local plan spatial objectives for minerals and waste.
S-67-5	1367857	Over Haddon Parish Council	14.1	To achieve the exemplary response to climate change', building and roofing stone supplies need to be limited to use on heritage assets, restoring and maintaining the cultural landscape that exists and ensuring its survival for future generations. To use these commodities on newbuilds, affordable housing or simple additions when other materials would compliment and enhance the built environment will simply protract the damage done to the landscape and its fragile ecosystems. The comments are noted. The design code will specific which materials should be used in specific areas of the NP and/or on certain types of buildings/developments.

S-62-1	1368170		14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste.
S-50-11	1367561	Peak Park Parishes Forum	14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste stating that they help support the special qualities of the NP.
S-49-3	1367873		14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste.
S-45-12	1367903	Froggatt Parish Meeting	14.1	The responder agrees with the proposed local plan spatial objectives for mineral and waste.
S-44-31	1367865	Eyam Parish Council	14.1	The responder does not agree with the proposed local plan spatial objectives for minerals and waste because quarrying, mining and industry are part of our cultural heritage.

S-43-22	1367843	Natural England	14.1	Would like to see net gain achieved at each phase of mineral extraction and restoration. The restoration of minerals sites should integrate into the Nature Recovery Network (guided by the emerging LNRS) and be sympathetic to the local landscape character and the wider setting of the site. PDNPA Response: It is too prescriptive and unnecessarily burdensome on an operator to require a net gain at every phase of extraction/restoration and there is no policy or legislative basis to require this. Mineral developments provide opportunity for significant biodiversity net gains and to be this prescriptive may compromise the delivery of overall gains if they cannot be delivered in a specific phase e.g. initial phase of soil stripping and breaking of ground. Agree that restoration of sites should link in with the Nature Recovery Network and be guided by the emerging LNRS. We will consider such an inclusion in restoration policy to guide net gain that could surpass the mandatory 10%.

S-42-7	1367805		14.1	Poor management of historic sites has resulted in environmental harm. Limestone geology makes the NP unsuitable for waste management. PDNPA Response: Management of sites is dealt with through enforcement of planning controls and by other regulatory bodies, not the development plan process. Clear policies exist on approach to waste management and protection of ground water.
S-40-48	1367788		14.1	Extractive industries have generated significant impacts within the National Park. The time has come to wind down and to restore. PDNPA recognises the impacts of mineral extraction and this is reflected in restrictive policies and restoration requirements.

S-38-1	1367737		14.1	Critical Minerals' are uniquely available in the National Park e.g. fluorspar and barytes. Surface extraction is more economically viable than underground mining and has been conducted in the past over relatively short time periods and achieved enhancements to the landscape through restoration. Much of the NPs beauty is as a result of historic mineral extraction. Blanket exclusion of aggregates extraction could jeopardise national supply needs, particularly after 2042. PDNPA response: 'Critical Minerals' could be extraction from the NP under policy MIN1 if exceptional circumstances were demonstrated. Critical Minerals may be of national importance so could meet the tests. There would always be a presumption in favour of below ground extraction (MIN2) given the reduced landscape harm compared to opencast methods. It should be noted however, that fluorspar and barytes are not on the UK Critical Minerals List 2024, but this may change in the future. It is recognised that the restoration of former mineral extraction sites has contributed heavily to the character and beauty of the National Park, the existing restoration policies will seek to ensure this continues. MIN1 allows for the extraction of aggregates in exceptional circumstances, so there is no blanket exclusion. The question of granted consent to extend end dates at sites with remaining viable reserves after 2042 is dealt with as a specific issue elsewhere in the LPR.

S-30-39	1367447	Country Landowners Association	14.1	Advocates a balanced approach. protect landscape but allow appropriate operations to contribute to economy, local building requirements and resources that are needed by society, including support for transition to NetZero. Policy should be consistent with National Policy. LPR seeks to achieve all these aspirations but may deviate from National Policy in some instances to protect the purposes and special qualities of the NP.
S-13-46	1364893		14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste and believes that further mineral developments would affect the purposes of the National Park.
S-9-24	1364715		14.1	The responder agrees with the proposed local plan spatial objectives for minerals and waste. They note that the expansion of Tunstead (Old Moor) was allowed on appeal 40-odd years ago due to supposed special circumstances.
S-7-18	1364251		14.1	The response agrees with the proposed local plan spatial objectives for minerals and waste.

14.2 Should mineral extraction at existing quarries with remaining reserves be allowed to continue beyond the agreed or imposed end dates?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-49	1369632	Hartington Town Quarter Parish Council	14.2	Extraction should be allowed to continue beyond 2042, determined on a case by case basis, particularly if the minerals in question are of national importance and cannot be obtained elsewhere. Strong case for extensions under strictly controlled agreements.
S-221-46	1369595		14.2	The responder believes that existing quarries with remaining reserves should not be allowed to continue extraction beyond the agreed or imposed end dates. They state that they do not think there is any place for quarries in a National Park and that there should be no exceptions to this.
S-220-22	1369594		14.2	Does not support extensions of time as mineral extraction is contrary to the purposes of the National Park.
S-214-48	1369550	Hope with Aston Parish Council	14.2	The response does not think there should be time extensions for quarries with remaining reserves and believes there should be no exceptions to this.
S-210-43	1369546		14.2	I would suggest that the only limestone quarries that should have permitted time extensions is the cluster around Buxton. If any extension of time has an impact on the area of the national park very restrictive extensions of time and policies that require major biodiversity gain as an offset should be required. PDNPA Response: Considering applying a site specific policy but this would exclude some sites that may wish to extend their life. There would have to be a clear rationale for this.

S-203-17	1369536	Tarmac	14.2	Yes quarries with permitted reserves should be allowed to continue beyond existing end date. Generally accepted that the government will introduce means to allow extension of 2042 end date. To preclude this opportunity would sterilise the mineral and have a significant impact on the landbank. Closure of sites in the NP in 2042 does not mean other sites outside the NP have the available reserves/production capacity to make up the shortfall in order to ensure the steady and adequate supply of minerals to meet national needs. PDNPA Response: Agree that there should be means of extending the life of sites beyond current end dates and to do not make provision for this would sterilise the reserves and adversely affect the landbank. Noted that it is likely the Government will make legislative provisions for the extension of the Environment Act 1995 imposed end dates of 2042. Approach should apply to all quarries, not specific sites only, provided they meet the exceptional circumstances tests. Extensions of time should also allow for physical extensions; lateral or depth. It should be recognised that high value industrial minerals sometimes requires extraction of construction grade material to release them. PDNPA Response: Agree provision to extend the end date of sites should apply to all sites. It would not be appropriate for this provision to automatically infer support for an physical extension of a site. Any proposals for physical extension would be judged on their own merits. Development Plan should set out what constitutes major development. The assessment should take account of the existing setting of a site and potential impact on the surroundings in the context of the existing development. PDNPA Response: Proposals that constitute 'major development' will continue to be determined on a case by case basis and take into account existing context. It is not considered appropriate to tightly define what constitutes major development as the spectrum of development types, circumstances around them and environmental factors are endless.

S-200-44	1369531	Stanton in Peak Parish Council	14.2	The responder does not think that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates. They feel that the end date is agreed and therefore should be adhered to. Whilst this is the case with some sites, other older permissions have had an end date of 2042 imposed upon them rather than an agreement being reached. PDNPA Response: It must be recognised that the extraction of minerals can be affected by numerous factors outside of the planning system, such as market demand, competition from other operators, transport constraints, economic viability and unforeseen environmental constraints or changes. All of these factors mean the rate of working at a quarry cannot always be accurately predicted. As such there is a need for a flexible approach to the extension of end dates and any such proposal should be judged on its own merits against material considerations prevalent at the time.
S-195-23	1369526	Derbyshire County Council	14.2	Paragraph 14.7. It implies that aggregate provision is apportioned from national level to local authorities. This is not the case. It needs to explain that local Mineral Planning Authorities (MPAs) determine aggregate provision in their area through the preparation of an annual Local Aggregate Assessment, taking account of guidance in the NPPF and PPG. The LAA is then submitted to the Aggregates Working Party (AWP), an advisory body made up of MPAs and mineral operators across the region, for consideration and scrutiny. The work of MPAs and AWP across the country is overseen by a National Aggregate Co-ordinating Group (NACG), the main role of which is to monitor the overall provision of aggregates in England and provide advice to AWP and the Government. PDNPA Response: Agreed, the description at 14.7 is misleading and needs to be amended in line with the responder's comment.

S-192-17	1369523	Mineral Products Association	14.2	Sites with remaining permitted reserves should be allowed to continue beyond agreed or imposed end dates. Policy position should apply to all sites as the principle of mineral extraction has already been established through the planning process. PDNPA Response: Agreed. <div id="540_381_1715092984971_237968" class=" question-sentiment " data-id="540_381_1715092984971_237968" data-type="tiny_mce"> The 2042 end date was not imposed as a drop dead end date for quarrying in National Parks or any other area. The issues and options report does not address the loss of production capacity or impact upon the wider economy were the 2042 date deemed to be an end date. <div class="questionset-question-controls response-sentiment">PDNPA Response: Recognised the comment. If the plan proposes 2042 as an ultimate end date not capable of extension then further justification in relation to impact on the landbank and the steady and adequate supply of minerals needed to support the economy.
S-185-44	1369502	Devonshire Group	14.2	End dates should be extended subject to individual circumstances. Consider imposed or agreed end dates to be, to an extent, arbitrary. Environmental and amenity impacts of the mineral development will have already been assessed and approval granted. An extension of time would not increase the void, harm caused or ultimate benefits of restoration. Early closure would sterilise a finite resource. PDNPA Response: Acknowledge the comments and will consider them in the formulation of policy.
S-178-1	1369494	Greater Manchester Combined Authority	14.2	Unsure whether end dates should be extended. Greater Manchester relies on imports of crushed rock from areas including the PDNPA to support its construction industry/economy. 2019 figures suggest between 20-30% of imports to the wider GMMWH area. It would be useful to understand how provision from PDNPA quarries would be compensated for by DCC if the sites closed in 2042. PDNPA Response: Acknowledge comments. Further explanation and justification would be provided should policy approach to close sites in 2042/existing end dates be taken forward.

S-177-2	1369493	Coke Turner & Co	14.2	Agree quarries with remaining reserves should be allowed extensions of time until reserves exhausted. However, quarries should not be allowed to 'stop and start'. This would give companies certainty to fulfil their investment. Policy would affect few quarries and would be fair. PDNPA Response: Acknowledge point, but note that NPPF states it should be recognised that working of building stone quarries can be intermittent. Policy should apply only to operational quarries with a track record of robust extraction. PDNPA Response: Recognise this point and will consider inclusion in any policy wording. Exceptional circumstances could be demonstrated by the fact consent has been previously granted after a full planning assessment of impacts was undertaken. Modern conditions will have already been applied to older consents through the RoMP process. PDNPA Response: Noted and will be considered further.

S-166-10	1369468	Breedon	14.2	It is not yet know what the government guidance will be in relation to extensions of time at sites with the Environment Act 1995 imposed 2042 end date. Should be recognised in any policy that minerals can only be extracted where they occur and where reserves and infrastructure exists, this should be an important material consideration. If 2042 to be referenced in the plan it should be made clear that the position should be reviewed in line with future government guidance. NPPF states it is essential there is a sufficient supply of minerals to provide for the country's needs. They can only be worked where they are found and best use needs to be made of them to secure their long-term conservation. Exceptional circumstances should be those identified in the NPPF and include social and financial aspects and not just environmental criteria PDNPA Response: Acknowledge points and will consider in an policy formulation. There is no dispute that Hope Cement Works provides a nationally significant proportion of the UKs cement and this will not be readily replaced by existing operations outside the National Park. The issue of alternative imported cement or clinker is addressed above in climate change terms, which will need to be considered a global issue.The consequences of allowing/not allowing continuation beyond 2042 has not been assessed in the Sustainability Appraisal. PDNPA Response: Note the importance of Hope Works to UK cement supply, but there are potential alternatives outside of the National Park, or at least for such alternatives to be developed. Sustainability appraisal is lacking and has not addressed these points. It will be updated as the local plan review progresses.
S-165-46	1369466	Taddington and Priestcliffe Parish Council	14.2	Mineral resources are finite. Unless there are good reasons to the contrary, an approvedquarrys resources should be fully utilised, before it is allowed to close. PDNPA Response: Noted and will be considered as part of policy review.

S-163-31	1368617		14.2	No, extensions should not be allowed. Existing permissions have been gained on the basis of impacts for a known period of time, on landscape, communities etc. If extensions are continually granted the delivery of restoration/enhancements is delayed and management of the workings could be slowed down for indefinite periods. It is hard to know what exceptional circumstances would be but surely these would be argued through the planning balance anyway, and do not need to be in policy? PDNPA Response: Note the comments and potential for perpetuation of adverse impacts over a longer period of time than initially assessed. However, the planning application process for an extension of time would consider the acceptability of any ongoing impacts. Agree exceptional circumstances can be argued through the planning balance.
S-159-9	1369454	Staffordshire County Council	14.2	The most recent Local Aggregate Assessment (LAA) for Derbyshire, Derby and the Peak District National Park indicates the importance of crushed rock supply from the Peak District to other regions including the West Midlands (based on data from the national Aggregates Survey 2023). Paragraph 14.10 of the consultation document anticipates that the landbank for crushed rock aggregate may be sufficient to meet the requirements to 2045 but the certainty of this landbank provision needs to be assessed in terms of the maintenance of production capacity beyond 21 February 2042 at quarries within the National Park. Furthermore, the policy to substitute provision from quarries in Derbyshire (outside the National Park) also needs to be assessed. The consequence of the 2042 limit on aggregate provision from the National Park should be considered in the context of alternatives available to maintain that provision, particularly where quarries in other areas may be similarly restricted by the 2042 end date. PDNPA Response: Acknowledge that existing reserves form part of the current landbank and any proposal to preclude extensions of time at sites with remaining reserves in 2042 and the impact this would have on the steady and adequate supply of minerals and potential for demand to be satisfied from elsewhere would have to be factored into the final decision.
S-156-19	1367563		14.2	No sites should not be granted extensions of time. End dates were imposed for a reason. Does not consider there to be any exceptional circumstances to allow mineral

				extraction in the NP. PDNPA Response: Noted.
S-153-45	1369437		14.2	No, extensions of time should not be allowed. The end date is agreed and should be adhered to. Exceptional circumstances need to be very tightly controlled. PDNPA Response: Acknowledge comments. Further comments also made in relation to a specific site and application that are not relevant to the Local Plan Review.
S-151-32	1369433		14.2	The responder does not think that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates.
S-150-47	1369431		14.2	Does not believe sites should be granted extension of time because residents are inconvenienced by restrictions and costs in order to keep the NP beautiful. Area should not be subject to mineral extraction by potential overseas company for profit. Policy should apply to all sites. Exceptional circumstances could only constitute a national crisis such as a war. PDNPA Response: Note the comments, policies in place to protect the landscape which mineral extraction proposals must satisfy to gain approval.
S-137-49	1369370	Derbyshire ALC	14.2	The representation does not think that existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates and that in the long term, only small scale quarries should be allowed to operate in the NP. They do not name any quarries that should receive leniency and state that the exceptional circumstances that justify major developments should remain narrow.
S-136-25	1369368		14.2	Responder is unsure whether extraction at quarries with remaining reserves should be permitted to continue after the end date. They see the reasons to pursue ending quarrying as soon as possible but acknowledge that continuing work at existing quarries will reduce the need for new quarries.

S-129-1	1369199	Rowsley Parish Council	14.2	Extensions of time should not be permitted. As permissions expire the production of aggregates should be moved out of the NP. National quotas for provision of aggregates should not apply to National Parks. PDNPA Response: Acknowledge comments, MIN1 seeks to prevent further mineral extraction where alternatives exist. National Parks are not currently exempt from contributing to aggregate demand and are subject to the MASS. This is not a requirement that can be altered through the LPR.
S-128-17	1369275	Rural Action Derbyshire	14.2	The responder is unsure as to whether mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates. They feel that they are not qualified to comment.
S-113-47	1369153	Edale Parish Council	14.2	Extensions of time should not be granted and Hope Works should not be an exception. No exceptional circumstances for extensions of time as large quarries outside of NP can provide mineral needed. PDNPA Response: Note comments. Any proposals would be judged on their own merits through the planning application process. Assessment would have to be conducted to ascertain whether sites outside of NP could pick up the production of sites within the NP if they closed in 2042. This would need to be conducted if policy approach is to resist extensions of time.
S-104-11	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.2	The responder does not think that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates as they believe that large scale quarrying is incompatible with the purposes of the National Park. They think that this should apply to all sites and that exceptions would have to be decisions made at government level that the PDNPA should resist as far as possible.
S-103-4	1368574	Marshalls plc	14.2	Sites should be granted extensions to end dates if reserves remain. Each case to be addressed on its own merits. Premature closure of sites where reserves and infrastructure exists would only export the need to alternative greenfield sites outside of the NP which does not appear to be a sustainable approach. PDNPA Response: Comments noted and will be considered in policy formulation.

S-98-36	1368689	Greater Manchester and High Peak Area of the Ramblers	14.2	The responder is unsure whether mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates, feeling that they have no specific expertise on this question.
S-80-2	1368656	Hard Rock Mining Ltd.	14.2	Yes, extensions of time should be allowed. Technological advances and extraction techniques mean that limestone can be extracted within minimal detrimental impact e.g. with tunnel boring machines which can run off electricity making them a highly sustainable extraction method. PDNPA Response: Acknowledge the comments, alternative extraction techniques could be proposed and considered under the current MIN1 policy.
S-71-38	1368373	Tideswell Parish Council	14.2	The response believes that extensions should be granted to existing quarries that still have remaining reserves in order to maximise productivity from existing assets.
S-69-20	1368325	Derbyshire Dales District Council	14.2	No extensions of time should not be permitted. Failure of a quarry operator to extract consent reserves within given time limit is a matter of commercial efficiency and not a planning matter. Unsure what constitutes an exceptional circumstance but it is not operational inefficiency. PDNPA Response: Note the points raised and agree operational inefficiency is not an exceptional circumstances. However there are matters outside of an operators control that can affect the rate of working. NPPF recognises that building stone sites in particular are often worked intermittently due to market demand and outside factors.
S-68-23	1368264	Bakewell Resident	14.2	
S-67-7	1367857	Over Haddon Parish Council	14.2	Sites should not be allowed extensions of time. National mineral supply quotas should not apply to National Parks. Supply of aggregates should be provided outside of the NP once existing consents expire. PDNPA response: Aggregate apportionment is determined through the Managed Aggregate Supply System (MASS) and set by the Aggregate Working Party. The NPPF requires a Mineral Planning Authority to provide a minimum 10 year landbank for crushed rock. National Parks are not excluded from this requirement.

S-66-11	1368276		14.2	The responder does not believe that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates. They acknowledge the economic arguments but believe that the need to protect landscape in a National Park is not served by extracting mineral. They believe all extraction should be stopped and sustainable development should be the focus. The only exception that they feel there should be for this is in the case of local building materials.
S-62-8	1368170		14.2	The responder thinks that existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end date.
S-50-34	1367561	Peak Park Parishes Forum	14.2	The Peak Park Parishes Forum think that quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates but they believe this should be taken on a case by case basis and are unsure of any specific named quarries that this should apply to. The cite one example of an exceptional circumstance being where a particular type of stone is available only from that one particular quarry (or area).
S-49-9	1367873		14.2	The responder does no think that mineral extraction at existing quarries with remaining reserves should be be allowed to continue beyond the agreed or imposed end dates except with the exception of fluorspar sites. They also believe there are no exceptional circumstances that would justify extensions of time for mineral extraction.
S-45-15	1367903	Froggatt Parish Meeting	14.2	No extensions of time should not be allowed because of impact on landscape and HGV movements. Quarries should be subject to HGV routeing agreements. Policy should apply to all sites. Exceptional circumstances could be demonstrated if there is not further visual impact and no increased HGV movements. PDNPA Response: Note comments and proposed exceptional circumstance. Routeing agreements have been and can be imposed through application process if necessary.
S-44-14	1367865	Eyam Parish Council	14.2	The response thinks that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates in order to provide jobs and to exploit local resources. They think that this should apply to all quarries and that sites should be given extensions of time if there is a strong business case.

S-42-47	1367805		14.2	The responder does not think that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates.
S-40-49	1367788		14.2	Allow extensions of time but on a site by site basis after full and proper consideration of environmental, social and economic impacts. Policy should apply to all quarries. Exceptional circumstances could be met if the only alternative option was to import mineral from overseas thereby created an elevated climate change impact. PDNPA Response: Acknowledge comments, all applications are subject to EIA screening and thorough assessment. Will consider proposed exceptional circumstance further in LPR.
S-31-12	1367452		14.2	Quarrying has created much of the PDNPA landscape and extracted mineral used to building roads and villages. Queries whether presumption against major development is government policy. The Park needs high skilled high paid jobs that are available locally to meet the needs of communities. 2042 end date is not fair. Employment and minerals needed in all areas of the NP so extensions of time should be available to all sites. PDNPA Response: Note the contribution to economy and local vernacular that quarries provide. Will be considered in the LPR.
S-29-11	1367323		14.2	The response welcomes the reduction in quarrying in the park and believes that time extensions to quarrying should only be granted in truly exceptional circumstances.
S-13-36	1364893		14.2	The responder believes that existing mineral sites with remaining reserves should not be allowed to continue working beyond end dates with the exception of smaller limestone quarries producing building stone. They state that an extension to HCW would destroy a large area of landscape.

				The responder does not believe that mineral extraction at existing quarries with remaining reserves should be allowed to continue beyond the agreed or imposed end dates. They feel that only quarries that are vital for national infrastructure should be permitted to work beyond end dates. They also state that "use of some of the purest limestone in the world for building roads and making cement is a criminal misuse of the resource and is anyway contrary to the objectives of a national park."
S-9-34	1364715		14.2	The only exceptional circumstances would be vital national importance.
S-7-21	1364251		14.2	The responder does not think mineral extraction should be allowed to continue at existing quarries with remaining reserves beyond the agreed or imposed end dates.

14.3 Do you agree with the principle that the future supply of industrial limestone should come from outside the national park?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-50	1369632	Hartington Town Quarter Parish Council	14.3	Future supply of industrial limestone should come from outside the NP. However, long term planning required as existing quarries provide number of jobs and are a major employer in the NP. PDNPA Response: Acknowledge comments. Impact on the economy will be assessed in SA if policy to provide for industrial limestone from outside the NP is pursued.
S-221-47	1369595		14.3	The responder agrees with the principle that the future supply of industrial limestone should come from outside the National Park, stating that quarries have no place in National Parks.

S-220-23	1369594		14.3	Future supply of industrial limestone should come from outside the NP. Against NP purposes and contradicts aims of NP on climate change. PDNPA Response: Acknowledge comments. However, climate change a global issue, relocating mineral supply to outside of the NP won't affect the demand for mineral products and the resultant CO2 emissions.
S-214-49	1369550	Hope with Aston Parish Council	14.3	Agree future supply of industrial limestone should come from outside the NP. &nbsp;It is unclear what any memorandum of understanding with neighbouring authorities would actually entail or why it might be needed. PDNPA Response: The terms of any MoU would be agreed during the LPR process, it would potentially direct future industrial limestone extraction to areas outside of the NP under the duty to co-operate in order to protect the nationally designated landscape and its special qualities.&nbsp;
S-210-44	1369546		14.3	The representation agrees with the principle that that the future supply of industrial limestone should come from outside the National Park as they feel it is an essential requirement to conserve the special qualities of NP.

S-203-18	1369536	Tarmac	14.3	Do not agree that future provision of industrial limestone should come from solely outside the NP. Purity and chemical make up of mineral can vary vastly within geological formations so reserves across different sites are not directly interchangeable. Quality of mineral can vary even within the same site. Different chemical properties are needed to supply specific markets, including cement manufacture and industrial powders. Consistent chemical composition of the supply products for industrial product manufacture is critical and is not easily/readily substituted. PDNPA Response: Acknowledge point and will considered further in policy formulation.
S-200-45	1369531	Stanton in Peak Parish Council	14.3	Agree future supply of industrial limestone should come from outside NP. This would benefit nature recovery, community amenity and take HGVs off the highway network. PDNPA Response: Acknowledge response and will consider in further policy formulation.

S-192-18	1369523	Mineral Products Association	14.3	Do not agree that industrial minerals should be provided solely outside the NP. Industrial minerals are of national importance and geology dictates where these resources occur. NPPF and Issues and Options doc recognises that minerals can only be worked where they occur. We trust the authority can support the statement, that All the reserves use the same geological resource and therefore have the same required 97% purity as in our experience industrial minerals are specification critical and can be variable within the same beds let alone within differing lithologies. Having reserves/resources outside of the NP does not necessarily mean they are economically viable .A memorandum of understanding with neighbouring authorities would not appear to take into consideration the views of operators or downstream industries. We seek clarification over what is meant by end-use controls over mineral extraction. PDNPA Response: Acknowledge points and will consider further in policy formulation. 'End-use controls' refers to the final use of a mineral e.g. for aggregate or industrial purposes.&nbsp;

S-177-3	1369493	Coke Turner & Co	14.3	Does not agree that all future supply of industrial limestone should come from outside the NP. MoU would provide the necessary long term certainty of supply. However, minerals can only be worked where they occur. Future policy should provide flexibility to ensure access to supply. PDNPA Response: Acknowledge points and will consider further in policy formulation. &nbsp;
S-166-11	1369468	Breedon	14.3	Breedon does not agree with the principle that aggregates should be solely supplied from outside the National Park. Reserves at Hope Works should not be conflated with wider crushed rock reserves. Specific chemical characteristics and used solely for cement manufacture, not squandered for aggregate uses. Nationally valuable resource. Borehole data only not sufficient to test chemical properties, each blast pile is tested to determine precise chemical composition. Do not agree that there is no requirements for further permissions at Hope limestone quarry. No justification for the '97% purity' across whole of the deposit statement. PDNPA: Acknowledge points and will consider further in policy formulation.
S-165-47	1369466	Taddington and Priestcliffe Parish Council	14.3	The response agrees with the principle that that the future supply of industrial limestone should come from outside the National Park unless there is a way to extract without long term damage to the National Park's special qualities.&nbsp;

S-153-46	1369437		14.3	Agree future industrial mineral provision should be provided outside NP. Benefit nature recovery, community amenity and take HGVs of highway network. PDNPA Response: Acknowledge response and will consider in further policy formulation.
S-151-33	1369433		14.3	The response agrees with the principle that that the future supply of industrial limestone should come from outside the National Park.
S-150-48	1369431		14.3	Agree that future industrial mineral supply should be from outside the Peak Park. Want to avoid a situation where an operator seeks to extract mineral for a specific industrial purpose, but that purpose is no longer required or sales are not made to that market e.g. mineral is used for general aggregate purposes. PDNPA: Acknowledge comments. Assessment of need for industrial minerals and their markets would eb undertaken at application stage and tight end use controls would be applied to any permissions that may be granted.
S-137-21	1369370	Derbyshire ALC	14.3	The representation agrees with the principle that the future supply of industrial limestone should come from outside the National Park as resources exist elsewhere and the objectives of the Park need protecting.

S-136-6	1369368		14.3	The responder is unsure whether they agree with the principle that that the future supply of industrial limestone should come from outside the National Park. Whilst they generally agree with this they do feel that existing quarries within the National Park could have a lower impact on many people than new quarries outside the National Park.
S-128-10	1369275	Rural Action Derbyshire	14.3	The responder is unsure as to whether they agree with the principle that that the future supply of industrial limestone should come from outside the National Park. They feel they are not qualified to comment on what the impact of this policy would be.
S-120-23	1368991	Marsh Farm Development Co Ltd	14.3	The responder agrees with the principle that that the future supply of industrial limestone should come from outside the National Park.
S-113-48	1369153	Edale Parish Council	14.3	Yes, future supply of industrial limestone should come from outside the NP, given there is sufficient supply outside the Park.
S-104-28	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.3	The responder agrees with the principle that that the future supply of industrial limestone should come from outside the National Park. They believe that this principle is aligned with the National Park Purposes.

S-98-24	1368689	Greater Manchester and High Peak Area of the Ramblers	14.3	The responder is unsure as to whether they agree with the principle that that the future supply of industrial limestone should come from outside the National Park. They state that they do not have the specific expertise to answer this question.
S-97-1	1367737		14.3	The responder does not necessarily agree with the principle that industrial limestone should come from outside the NP. They state that if it is in the national interest then end dates could be over-ridden.
S-67-27	1367857	Over Haddon Parish Council	14.3	The responder believes that supply of industrial limestone should not come from within areas awarded National Park status.
S-62-35	1368170		14.3	The responder is unsure if they agree with the principle that the future supply of industrial limestone should come from outside the National Park.
S-50-23	1367561	Peak Park Parishes Forum	14.3	The Peak Park Parishes Forum agrees with the principle that that the future supply of industrial limestone should come from outside the National Park, stating that the stance is consistent with NP purposes.
S-49-4	1367873		14.3	The responder agrees with the principle that that the future supply of industrial limestone should come from outside the National Park in order to preserve the National Park's Special Qualities.
S-45-6	1367903	Froggatt Parish Meeting	14.3	The responder agrees with the principle that the future supply of industrial limestone should come from outside the National Park.

S-44-45	1367865	Eyam Parish Council	14.3	The response does not agree with the principle that that the future supply of industrial limestone should come from outside the National Park. The responder believes that current resources should continue to be allowed to operate.
S-40-50	1367788		14.3	Agree future industrial mineral extraction should be provided for outside the NP. Provided that sustainable alternative sources have been identified and are available at not greater degree of negative climate impact. PDNPA: Acknowledge response. Opening new sites outside of the NP is likely to have a greater climate impact than allowing extension of time or physical extensions to existing industrial limestone sites within the NP.
S-32-20	1367524	Bamford with Thornhill Parish Council	14.3	The responder thinks that the future supply of industrial limestone should come from outside the National Park in order to reduce the environmental damage that is caused within the National Park.
S-31-13	1367452		14.3	Does not agree with future supply of industrial limestone from outside of the NP, if industrial grade limestone were to be imported the additional transport needs would result in higher CO2 emissions. PDNPA response: Acknowledge comments.

S-13-43	1364893		14.3	The responder agrees with the principle that that the future supply of industrial limestone should come from outside the National Park because they feel there shouldn't be further destruction of the National Park Landscape.
S-9-26	1364715		14.3	The responder agrees with the principle that that the future supply of industrial limestone should come from outside the National Park.
S-7-31	1364251		14.3	The response agrees with principle that that the future supply of industrial limestone should come from outside the National Park.

14.4 What broad policy principles should be set out in the new local plan to guide restoration and redevelopment at Hope Cement Works?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-51	1369632	Hartington Town Quarter Parish Council	14.4	The principles stated are sound but emphasis must be put on the aspirations of the local community and great vigour must be taken in ensuring a developer abides by the decisions made following public consultation. PDNPA: Noted.
S-221-48	1369595		14.4	The responder believes that the principles to guide restoration at HCW should be to make the site as wild-life friendly as possible, while still allowing some areas to regenerate naturally.
S-214-50	1369550	Hope with Aston Parish Council	14.4	Policy principles should ensure future uses are compatible with broader Park policies but reflect need for nature recovery and carbon reductions and be inline with local community priorities. In depth consultation required with Bradwell, Hope and Castleton in particular. PDNPA: Noted. Full consultation will be undertaken with the local communities when developing the Supplementary Plan for the site.
S-192-19	1369523	Mineral Products Association	14.4	Responder states that Hope Works is a heart of the Peak Cluster CCS project, which will create jobs and attract investment. PDNPA: Point noted, but no necessarily relevant to the future of the Works post cement production. Although if CC infrastructure installed at the site it may lend itself to future redevelopment opportunities.

S-189-17	1369519		14.4	Hope Works should be restored as far as possible to natural state. Need to clearly define the areas regarded as 'brownfield' and ensure future development is not an 'eyesore'. PDNPA: Noted, brownfield land will be clearly identified and future uses will be restoration led.
S-184-26	1369500	Hope Valley Climate Action	14.4	The policy principles that should guide the redevelopment of the site must include the requirement that such development maximises the opportunities for reducing overall GHG emissions through, for example, renewable energy generation on site (capitalizing on the grid connection), as well as carbon sequestration and promotion of biodiversity. No development which significantly increases road traffic or other environmental damage should be allowed. Restoration schemes should focus on nature recovery and achieving greater than the mandatory 10% BNG. PDNPA: Noted.
S-177-4	1369493	Coke Turner & Co	14.4	The restoration of limestone quarries is a highly developed process which has excellent outcomes for nature and biodiversity. Restored quarry sites represent some of the most important nature reserves and habitats, a reality borne out by the high level of involvement with Wildlife Trusts and other nature bodies. The Works represent an important employment centre in an area otherwise dependent on agriculture and tourism/hospitality. Consequently, it is important to develop policies which encourage high value employment. The eventual restoration of Hope represents a unique opportunity to blend nature conservation with imaginative brownfield, high value employment development, possibly a high technology hub. Policies should be developed to encourage such development. Such policies are not incompatible with the objectives of a National Park. PDNPA: Noted and will consider in future policy formulation.

S-173-15	1369488	Land & Nature Team - PDNPA	14.4	Hope Cement Works, there is potential for it to be considered as an opportunity for a major recreational attraction, with associated employment. Whilst we would not discount recreational use the primary consideration, in line with NP purposes, should be opportunities it presents for the enhancement of the natural beauty, wildlife and cultural heritage of the NP. Recreational opportunities could be pursued insofar as they are compatible with such enhancement. PDNPA: Noted. Any redevelopment will be nature, heritage and landscape led.

S-166-12	1369468	Breedon	14.4	Context of redevelopment policy should not be based solely on NP purposes. These and other aspects need to demonstrate soundness in NPPF context. Breedon Cement is committed to working with the PDNPA in the context of the current efficient operations at Hope and developing / setting out sound sustainable policy principles for the longer term. Whilst Breedon Cement accepts the historic role of the Works, predating National Park designation may not align with more recent aspirations for the Park to be green and leisure based, this cannot override the consented position and also its potential for sustainable redevelopment beyond cement production. The site is and will continue to be a strong social and economic component in the Park in the current and medium future. It is suggested that 14.16 should be re-drafted in a more balanced and meaningful manner to avoid confusion, setting out matters more clearly including the need for future flexibility and resilience in line with the Government's strong drive toward 'building for prosperity'. The Plan's spatial strategy is clearly not yet defined and is more orientated toward objectives like 'conserving and maintaining tranquillity' than the broader context set by the NPPF in particular the economic and social perspectives that underpin prosperity and quality of life. The sustainability appraisal is silent on the future of the Hope Works. PDNPA: Comments noted and consideration will be given to future drafting of policy in the broader context of the NPPF. Noted that Sustainability Appraisal is silent on the future of the Works post cement manufacture. This will be addressed as the LPR progresses.

S-163-32	1368617		14.4	Potential reuse of existing quarry/works buildings for high energy efficiency buildings or for renewable energy generation. Could be a tourist destination, contemporary residential development. Make use of existing rail connection. Habitat and landscape restoration must be of the highest quality. The original landscape design for the limestone quarry was innovative of its time (Jeffery Jellicoe) and is of considerable heritage significance. Site has been considered by Historic England for registration as a registered Park and Garden - will be reconsidered upon cessation of operations and final restoration. Be inclusive in consultation process e.g. don't assume everyone hates the chimney. It is a local landmark that has been in situ since before the NP was designated. Its removal will have significant landscape impact and some will consider it a loss. PDNPA: All points noted and will be considered in policy formulation.
S-162-24	1369460	High Peak Borough Council	14.4	High Peak Borough Council are uncertain as to the end date for work at the cement works. They support the principles outlined in the Issue 51 box as well as looking to build housing at the site. The current end date for quarrying and cement manufacture is 22 February 2042.
S-161-22	1369459	CPRE Peak District and South Yorkshire	14.4	The responder thinks that the redevelopment of Hope Cement Works for an appropriate mix of sustainably designed housing and business uses to meet local needs. They think that the PDNPA should develop a masterplan for the site.
S-151-34	1369433		14.4	The response believes that the broad policy principles that should guide restoration and redevelopment at Hope Cement Works are: landscape, local community and use as a brownfield site for homes.

S-150-49	1369431		14.4	a. Removal of the ugly main kiln and chimney as soon as possible after closure.b. Road access to the Hope Cement works site is poor.c. It has a rail spur, this is probably the keyd. Remediation of the landscape is going to be a massive task, thought should be put in to what business if any can thrive there.e. A major study should be undertaken, could there be power generation, carbon capture etc? PDNPA: Noted and will be considered in policy formulation.
S-147-9	1369428	The Campaign for the Peak Line	14.4	Given pressures to accommodate housebuilding within the Park is there an opportunityhere for higher density than elsewhere in the Park. This might be of greater interest todevelopers and public transport providers. In turn this housing could be far less reliant onthe private car for personal transportation. The site’s proximity to Hope station is a furtherpotential benefit. PDNPA: Recognise the potential for redevelopment and potential for sustainable transport link to mainline train service via the existing Works branch line. Will be considered further.
S-138-10	1369372		14.4	The responder believes there are a number of broad policy principles that should guide restoration and redevelopment at Hope Cement Works. These are: sustainable development of housing and business, enhancement and expansion of public rights of way, and nature recovery.
S-137-15	1369370	Derbyshire ALC	14.4	The responder feels that the Authority should take a broad policy approach that balances the different principles and objectives.
S-136-41	1369368		14.4	The responder believes that nature recovery and protection of the special qualities should guide restoration at Hope Cement Works, whilst also providing local employment, housing and an increase in natural capital.

S-128-7	1369275	Rural Action Derbyshire	14.4	The responder agrees with the same principles as outlined in the Issue 51 box within the Issues and Options document. They believe that the broad policy principles that should guide restoration at Hope Cement Works are: 1. national park purposes for landscape, wildlife and cultural heritage 2. national park purposes for the public's enjoyment and understanding 3. national park duty to foster economic and social wellbeing of local communities.
S-127-1	1369287		14.4	The responder would like to see the restoration at HCW be a scientifically guided opportunity to demonstrate a combination of nature recovery and light human visitor use.
S-113-49	1369153	Edale Parish Council	14.4	Those given cover the issues at a general level, though the balance between them needs to be decided eg heritage could mean preserving much of the works infrastructure, but this would detract from efficient use of the land for other purposes, including those that would benefit Hope Valley communities. PDNPA: Noted, there would be competing priorities that would be considered during the supplementary plan formulation process.
S-104-50	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.4	The Hope Cement Works provides significant employment for not only Hope and Bradwell, but also many of the surrounding villages. On closure this will all be lost. It is therefore essential that the site is recovered and redeveloped in such a way to provide a significant number of highly skilled and environmentally sustainable employment opportunities. There may be opportunities to develop renewable energy facilities. PDNPA: Noted. Need for employment opportunities will be fully considered.
S-98-49	1368689	Greater Manchester and High Peak Area of the Ramblers	14.4	The responder would like any proposals for the future of HCW to work with the character of their surroundings and provide new rights of way and help to link people with nature.

S-97-3	1367737		14.4	The responder does not agree with current policy and plan regarding the restoration and redevelopment at Hope Cement Works. They raise the concern that if national needs require the current 2042 closure legal document could be over-ridden and extended operation enabled subject to the usual consultation.
S-73-20	1368375	Bradwell Community Land Trust	14.4	The site has the potential to deliver on all three of these principles. However, a key issue is how the site can best to contribute to local economic and social well-being. This is a once in a lifetime opportunity in the Peak District re-develop part of a very large brownfield site to create a 21st century village, deploying innovative, sensitive and sustainable design, delivering affordable housing to meet the needs of the Hope Valley and beyond in a reclaimed landscape setting. It could be a sustainable 21st century equivalent of the model village of Edensor at Chatsworth. The development of a new village could also help support the reclamation and long-term management of the wider site. PDNPA: Comments noted and will be considered for future policy position.
S-67-24	1367857	Over Haddon Parish Council	14.4	Over Haddon Parish Council thinks this should be a question for a specialist team.
S-66-6	1368276		14.4	We should build a highly-sustainable new rural village here, using the natural features of the quarry. This should be a testbed for development in the UK in this context. The mining company should stump up the costs and the infrastructure should be carefully considered. This site could solve the housing need for the Park for a decade. PDNPA: Comments noted and will be considered in future Supplementary Plan formulation.
S-62-20	1368170		14.4	The responder is unsure what broad policy principles do you think should guide restoration and redevelopment at Hope Cement Works.

S-50-27	1367561	Peak Park Parishes Forum	14.4	The responder believes that the broad policy principles that should guide restoration and redevelopment at Hope Cement Works are those that are outlined in the issues box on page 168 of the Issues and Options document. They also suggest use of the site for renewable energy generation.
S-49-6	1367873		14.4	The responder believes that the broad policy principles do you think should guide restoration and redevelopment at Hope Cement Works are those outlined within the issue 51 box.
S-45-3	1367903	Froggatt Parish Meeting	14.4	
S-44-49	1367865	Eyam Parish Council	14.4	The responder thinks that the restoration and redevelopment at Hope Cement Works should initially be driven by the wished of the local community.
S-43-23	1367843	Natural England	14.4	The restoration of this site should integrate into the Nature Recovery Network and be sympathetic to the local landscape character. Any such proposals should look to follow the mitigation hierarchy in which the development should seek to: Avoid impacts; Minimise impacts; Remediate/restore habitats affected by impacts; and as a last resort, compensate for any residual harm through habitat creation or restoration. Do not wish to see CCS proposal used to justify extension of life of Hope Works. PDNPA: Note comments in regards nature recover, this will be considered in policy formulation. CCS comments not directly relevant to after use of the Works post cement production. However, the PDNPA as statutory consultee in the NSIP process is fully aware of strategic implications of the CCS project and these matters will be fully considered when providing a response to the scheme through the DCO process.

S-40-51	1367788		14.4	Site should be returned to its natural state and for the purposes of nature recovery. Location and setting will provide significant challenges for sustainable alternative uses. PDNPA. Comments noted and will be considered. Rail link does present some sustainable travel opportunities.
S-32-5	1367524	Bamford with Thornhill Parish Council	14.4	The responder believes that the broad policy principles that should guide restoration and redevelopment at Hope Cement Works are set out in the Issue 51 box of the Issues and Options document. Landscape, wildlife and cultural heritage. Public's enjoyment and understanding duty to foster economic and social wellbeing in local communities
S-31-14	1367452		14.4	Why close Hope Cement works when it still has reserves of materials. It has employed many people for many years which has made the surrounding villages into vibrant and healthy communities. If Peak Park intended to close it what employment do they intend to put in its place? PDNPA: If/when the Works closes it will be because the consented mineral reserves have been exhausted. No proposal for immediate closure. Future redevelopment will consider employment needs of the local community.
S-13-38	1364893		14.4	The responder believes that the broad principles that should guide the restoration of HCW are the purposes of the NP - enjoyment of the landscape, recreation and understanding of the landscape and affordable housing to ensure more inward migration for leisure and recreational employment.
S-9-22	1364715		14.4	The responder believes that the broad policy principles that should guide restoration and redevelopment at Hope Cement Works are biodiversity, rewilding and the removal of industrial infrastructure.

14.5 Which option do you prefer for building and roofing stone?				
Submission Responses				
#	Consultee Id	Consultee Organisation	Consultation Point	Summary
S-223-52	1369632	Hartington Town Quarter Parish Council	14.5	Option 4 - new building stone policy (rewrite MIN3) with allocated areas of search. Most likely to restrict use of stone to within the NP and would guard against speculative applications for larger sites. PDNPA: Option 4 proposes areas of search for building stone sites that could supply the open market. The responder appears to suggest that areas of search should be sought for sites that would solely supply the NP market. This option will be considered are the LPR progresses.
S-221-49	1369595		14.5	The representation states a preference for Option 1, stating that they "do not see how this policy could possibly make the National park more vulnerable".
S-220-24	1369594		14.5	This representation prefers Option 1 - Retain current building stone policy MIN3.
S-214-51	1369550	Hope with Aston Parish Council	14.5	Option 1 - Retain current building stone policy MIN3. Option 2 offers few advantages. Option 3 weakens case against larger sites. Option 4 would encourage development. PDNPA: Response noted.
S-210-45	1369546		14.5	The responder has a preference for Option 1 - Retain current building stone policy MIN3. They feel this is best to conserve both the natural landscape and the built environment.
S-207-37	1369542	Youlgrave Community Land Trust.	14.5	The responder agrees with Option 4 as this gives the PDNPA the greatest control over the resources.

S-200-46	1369531	Stanton in Peak Parish Council	14.5	Option 1 - Retain current building stone policy MIN3. It is important to retain a strong policy that clearly states the stone is for use within the National Park, not for export to other countries or other UK locations, the current blockstone quarries main markets are not within this National Park. They have been able to supply to any market due to long held permissions granted after WWII. Quarrying on a small scale for local needs is acceptable, such as Birchover Quarry but the requirement to meet any projects outside this National Park should cease when the current permissions end. The quarries around Stanton Moor do not employ any local workers, the last census covering Stanton-in-Peak parish recorded no one working in quarrying. So, there is little or no benefit to the communities as regards jobs and far more detrimental impact on their amenity. PDNPA: Comments and preference noted. However, Birchover Quarry is not a MIN3 site and serves the open market so is directly comparable with Stanton Moor Quarries. Assessment of employment contribution of building stone quarries will be undertaken as necessary in the LPR process.
S-199-19	1369530	Environment Agency	14.5	Usually, such quarries are small scale and above water table so are low risk to groundwater PDNPA: Comments noted, any impact on the water table would be determined through the planning application process.
S-195-24	1369526	Derbyshire County Council	14.5	Unsure of preferred policy approach. Issue 52 Option 3, paragraph 2 needs clearer explanation for the reason why reference to small scale would be removed. It needs to explain that the current NPPF no longer refers to small scale when advising policy makers on how to meet demand for building stone. It does still however, recognise the small scale nature and impact of building stone quarries. PDNPA Response: Comments noted and further explanation will be given in regards removal of 'small-scale' provision in line with NPPF if that approach is to be adopted.

S-192-20	1369523	Mineral Products Association	14.5	Option 4 - new building stone policy (rewrite MIN3) with allocated areas of search is preferred. Would provide certainty and clarity which are integral to a spatial plan. Options 1 & 2 and vehemently opposed. Question which other business sectors in the Park have market controls and suggest restrictions are anti-competitive. PDNPA: Acknowledge comments and preference. Will consider further in LPR.
S-190-3	1369521	Marchington Stone Limited	14.5	Option 3 goes some way to ensuring that the new Plan does not conflict with the NPPF. If reference to 'small-scale' is retained then the policy does not sit comfortably with the NPPF. Restriction on sales of building stone has no national policy basis and is at odds with fundamental geological principles e.g. stone from within the NP may historically have been used for buildings located just outside the boundary. Many building/roofing stone sites encounter geological horizons that are unsuitable for use as dimension stone/roofing slates. This material should be permitted to be used for aggregate purposes. PDNPA: Note comments and preference. Reference to 'small-scale' will be removed to accord with NPPF if that policy position is to be adopted. Use of unsuitable material for aggregate purposes is sustainable in one sense but would result in less restoration material that could be used to mitigate landscape harm as part of the restoration process.

S-185-45	1369502	Devonshire Group	14.5	Support option 1 or 3. Necessary to ensure the appropriate locally sourced stone is available to meet matching specifications of historic buildings and estates such as Chatsworth to ensure repairs can be made to a high standard. This in turn protects the cultural heritage of the NP. Permission had previously been granted to source stone from the original quarry that supplied Chatsworth House. This should remain an option. Recognise that some buildings beyond the NP boundary may have requirements for 'matching stone' which may only be capable of being sourced from within the NP. PDNPA: Acknowledge comments and preference. Will consider possibility of borrow pit style policy to source matching stone from old quarries, but this could be applied for under existing policy MIN1. Cost and time implications of re-opening an old quarry for such a low level extraction operation may make such options uneconomically viable however.
S-177-5	1369493	Coke Turner & Co	14.5	Option 4 is preferred. Option 3 & 4 should be adopted. It is vitally important that developers are encouraged to submit applications to develop future supplies of building stone and roofing stone to preserve and enhance the Park's special character and protect the built heritage assets. Existing policy has led to a lack of investment in the NP building stone market. The restrictions on open market sales have made building stone site unviable. This has had a negative impact on the NPs cultural heritage. Heritage assets will become further degraded over coming decades if current policy position is repeated. Option 2 would be prohibitively expensive for building stone operators given the need to address exceptional circumstances test as required for aggregates sites, which is disproportionate to the impacts building and roofing stone quarries have. Using stone from outside the NP to repair and maintain heritage assets would dilute the Park's special character. PDNPA: Response and preference noted. Further consideration during LPR.

S-173-16	1369488	Land & Nature Team - PDNPA	14.5	Suggest the building/roofing stone should be additionally qualified with for local use within, or in immediate proximity to, the National Park. PDNPA Response: Local use is already required under MIN3. Difficult to control destination of sales once they have left the NP via a policy and/or condition.
S-170-14	1369472	Historic England	14.5	A policy for local stone supply could be useful. PDNPA: Note the comment.
S-165-48	1369466	Taddington and Priestcliffe Parish Council	14.5	The responder prefers Option 1, to retain current building stone policy MIN3 and believes that policy should recognise the proximity of the right building stone quarries from locations immediately outside the NP.

S-163-33	1368617		14.5	Unsure of preference. Not clear how 'small-scale' is defined. Important stone is retained for use within NP and harm is not permitted to service markets outside of the NP. However, concerned that to comply with MIN3 the quarries are too small to be viable, so stone is sourced from elsewhere that is not suitable - supply of roofing stone is a particular issue. If it were possible to have legal agreement that a certain percentage of extracted stone was retained for use in the park, then this might help overcome economies of scale and viability. In this case, option 4 (revised, as above) might be suitable. If this could be tied to a compulsion to train craftspeople in traditional dressing and stoneworking skills this would be even better it would help to maintain the crafts skills that are so urgently needed to maintain and conserve the park's heritage assets. PDNPA Response :Comments acknowledged. Assessment needed to determine whether existing policy is harming provision of suitable materials and makes MIN3 site unviable. LPR process seeks to do this. May be possible to require % of stone extracted from unrestricted sites to be used/retained for use in the NP, this would be on a case by case basis and depend on quality/suitability of the resource. Could be considered in policy review. Not possible to compel an operator to train people as part of the planning process as would not be necessary to make development acceptable. However, it could be considered at application stage and may add weight to an application if submitted.

S-153-47	1369437		14.5	Option 1 - Retain current building stone policy MIN3. Important to maintain strong policy that states stone is for use within the NP only and not for export outside the Park. Existing quarries around Stanton Moor have been able to supply a wider market since permissions granted. Quarrying on a small scale to meet local need is acceptable such as at Birchover Quarry. Stanton Moor quarries do not employ any local people so no benefit to community in regards jobs, far more detrimental impact on amenity. PDNPA: Comments and preference noted. However, Birchover Quarry is not a MIN3 site and provides stone to the open market so is directly comparable with the Stanton Moor quarries. Assessment of contribution building stone quarries make to local employment will be further assessed as the LPR progresses.
S-150-50	1369431		14.5	Prefer option 3 - new building stone policy. There are some awful looking synthetic and non-local stone houses that have been built in areas like the Dar Peak especially. Monstrously ugly stone builds in Froggatt, and elsewhere. To build and restore, you need local stone, only in small amounts to detail, and make new buildings look like they belong in the landscape. I love the gritstone buildings of the dark peak. PDNPA: Comments noted. Policy position review seeks to ensure enough suitable stone is available to maintain character and cultural heritage of the NP.
S-137-12	1369370	Derbyshire ALC	14.5	The representation prefers Option 4, stating that it gives control over extraction, but retains flexibility and allows focus on most suited sites.
S-136-9	1369368		14.5	The responder prefers option 1 - Retain current building stone policy MIN3.
S-128-42	1369275	Rural Action Derbyshire	14.5	The responder prefers Option 4 - new building stone policy (rewrite MIN3) with allocated areas of search. They believe it is a sensible approach.
S-120-16	1368991	Marsh Farm Development Co Ltd	14.5	The responder prefers Option 1 - Retain current building stone policy MIN3.

S-113-50	1369153	Edale Parish Council	14.5	Prefer to retain policy MIN3 (Option 1). This seems to work. Regarding national need, this could override National Park policy in any case, so does not alter our response. PDNPA: Note preference. Assume reference to national need overriding Park policy relates to ability to extraction building stone under MIN1. This is recognised, but possibly prohibitive as building stone operators may struggle to demonstrate 'exceptional circumstances' but impacts of sites are far less than that of aggregate quarries. As such, need for further consideration in LPR.
S-104-3	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.5	The responder prefers option 1, to retain the current building stone policy MIN3 as they feel it is adequate to provide the local building material that is presently needed.
S-103-5	1368574	Marshall's plc	14.5	Option 4 - new building stone policy (rewrite MIN3) with allocated areas of search. Options 3 and 4 represent an improvement on current policy position and give a degree of certainty to all parties. Option 1 not supported as the term 'small-scale' is unhelpful and not defined. The requirement to only use stone in the NP is unrealistic and not commercially viable - in essence a de facto ban. PDNPA: Comments and preference noted.
S-98-9	1368689	Greater Manchester and High Peak Area of the Ramblers	14.5	The responder is unsure as to which option they prefer regarding building stone policy. They state that they do not have the specific expertise to answer this question.
S-69-24	1368325	Derbyshire Dales District Council	14.5	Option 1 - Retain current building stone policy MIN3. Seems appropriately cautious. Reinstatement must involve enhanced levels of BNG. PDNPA: Preference noted. Separate policy looks at possibility of further biodiversity enhancements.

S-67-31	1367857	Over Haddon Parish Council	14.5	Over Haddon Parish Council thinks that option 2 leaves too wide a gap. Removing 'small-scale' in Option 3 opens a wider door to large operations, and 4 makes it look like the PDNP is in favour of quarrying, which is at odds with its vision and purpose. PDNPA: Acknowledge the points made. Potential to adopt a new policy position on building stone hence options 3 and 4 being put forward for consideration in LPR process. Subjective if at odds with vision and purpose as the sites could provide for the maintenance of the Parks cultural heritage and support the rural economy. All matters to be considered in the LPR process.
S-62-7	1368170		14.5	The responder prefers option 3, which is a new building stone policy to replace or supplement MIN3.
S-50-1	1367561	Peak Park Parishes Forum	14.5	The responder prefers option 1, to retain current building stone policy MIN3. They state that the current policy is adequate.
S-49-2	1367873		14.5	The responder prefers option 4 to adopt a new building stone policy (rewrite MIN3) with allocated areas of search.
S-45-14	1367903	Froggatt Parish Meeting	14.5	The responder prefers option 4 - new building stone policy (rewrite MIN3) with allocated areas of search.
S-44-8	1367865	Eyam Parish Council	14.5	The responder supports option 3 to adopt a new building stone policy to replace or supplement MIN3. They state that business needs must be taken into consideration.
S-40-52	1367788		14.5	The response prefers Option 1 - Retain current building stone policy MIN3. They state that it is sustainable to have a local source for local consumption.
S-32-8	1367524	Bamford with Thornhill Parish Council	14.5	The responder would prefer Option 1 - Retain current building stone policy MIN3. They feel that the current policy is fit for purpose.

S-27-1	1367245	Birchover Stone LTD	14.5	We comment as the operators of Birchover Quarry which supplies building stone under a planning permission granted by the National Park Authority which extends until 31 March 2040 for the extraction of stone. This permission does not limit the market area for the stone and it should be appreciated that certainly from our experience if the market were to be limited to the National Park area the operation of the quarry would not be viable. Market extends beyond the Np to Derbyshire Dales, in particular Matlock. PDNPA: Comments noted. LPR seeks to understand whether current policy position is appropriate given concerns over viability. Matter will be further considered.
S-13-48	1364893		14.5	The responder prefers Option 4 because they feel that allocated areas of search for building stone will help the National Park to retain as much control as possible.
S-9-30	1364715		14.5	The response supports pursuing Option 4 - new building stone policy (rewrite MIN3) with allocated areas of search.
S-7-36	1364251		14.5	The response favours option 3 but with further research into option 4, with a view to potentially implementing option 4 in the future.

14.6 Should sites with ancillary processing in the national Park be able to import stone from other quarries in the National Park for processing?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-53	1369632	Hartington Town Quarter Parish Council	14.6	The responder is unsure as to whether sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing. They state that they possess insufficient knowledge to answer.
S-221-50	1369595		14.6	The representation does not believe that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing. They believe that all activity should be concentrated at the existing sites and that the existing policy should be retained.
S-214-52	1369550	Hope with Aston Parish Council	14.6	No to importing stone for processing from other quarries. Planning policies should strengthen controls on winning and processing minerals across the NP. Moving stone across the Park would increase traffic movements and impact on communities. There are possibly other appropriate locations for small scale stone processing. PDNPA Response: Note comments. Possible that processing stone won within the NP would reduce vehicle movements as the stone wouldn't have to come back into the NP for final use. Will consider further.

S-210-46	1369546		14.6	The responder does not think that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing as it undermines the carbon policies and possibly extends quarry site working.
S-203-19	1369536	Tarmac	14.6	Yes sites within the NP should be able to export to others for processing. Yes there should be opportunity to import stone from other quarries for processing. There are a number of sustainability and environmental advantages as well as economies of scale to utilising existing infrastructure. PDNPA: Comments noted.
S-200-47	1369531	Stanton in Peak Parish Council	14.6	No sites should not be able to import stone for processing from other sites within the NP. Previous operations of this kind were unviable and closed down. Should not allow stone to be imported from outside the NP for processing. PDNPA Response: Acknowledge comments. There is no policy proposal to allow importation of stone from outside the NP. Policy would only allow stone won within the NP to be processed at other sites in the NP, if the proposal is taken forward.

S-192-21	1369523	Mineral Products Association	14.6	Yes sites within the NP should be able to import stone from other NP sites for processing. There may be other locations suitable for processing but dependant on economic and environmental factors. The preamble states that "Some active quarries are unsuitable for processing". Ideally, quarries should be able to process site derived materials, however, the cost of specialist processing plant may well be prohibitive. However, it may also be necessary to allow material to be imported into sites in the park, say for example where prior extraction of a material would ensure the resource is not sterilised. We question any business model for any other sector in the Park which restricts imports and exports of raw materials. Such an approach, is unreasonable, unjustified and unsustainable. PDNPA Response: Comments noted and point regards potential sterilisation is valid. However, impossible to control imports from outside of the NP, which could result in significant additional HGV movements to the detriment of NP purposes. To be further considered in LPR.
S-190-4	1369521	Marchington Stone Limited	14.6	If ancillary minerals processing is not permitted at minerals sites, then building stone sites would rapidly become "waste bound", sterilising the remaining mineral and prejudicing restoration. This is a simple operational principle that is well understood by Mineral Planning Authorities and Operators. PDNPA Response: The question is whether sites within the NP should be allowed to import stone from other NP sites. Not whether they should be allowed to process mineral won within their own site, this right is established under the GPDO.

S-185-46	1369502	Devonshire Group	14.6	Yes sites should be allowed to import and process stone from other NP quarries. Could reduce transport needs and contribute to job creation/economic activity and make effective use of mineral sites. Some alternative sites may also be suitable.
S-177-6	1369493	Coke Turner & Co	14.6	Yes sites within the NP should be able to import stone from other NP sites for processing. Imports will assist in making a marginal operation financially viable. Scale of imports can be managed through planning conditions. Alternative suitable non mineral sites will also be available. Ensuring processing occurs within the park will support operators to remain financially viable. PDNPA: Acknowledge comments and will consider in policy review.
S-165-49	1369466	Taddington and Priestcliffe Parish Council	14.6	There can be no objection in principle to importing stone from outside the National Park fortreatment, especially if the process supports a National Park interest, e.g. the right sort ofbuilding stone or architectural products.However, the key issues are noise and transportation,and the impact of heavy goods vehicles on roads and communities transferring thestone/completed article. PDNPA Response: Comments noted. Potential impacts on amenity would be considered through the planning application process.

S-153-48	1369437		14.6	No sites should not be able to import stone for processing from other sites within the NP. Previous operations of this kind were unviable and closed down. Should not allow stone to be imported from outside the NP for processing. PDNPA Response: Acknowledge comments. There is no policy proposal to allow importation of stone from outside the NP. Policy would only allow stone won within the NP to be processed at other sites in the NP, if the proposal is taken forward.
S-150-51	1369431		14.6	Yes sites in the NP should be able to import and process stone from other NP sites. Provided the road network can handle the additional movements. Many small sites already in use and history of 'small' contributor sites to larger quarries. PDNPA Response: Note comments. Vehicle movements and impact on highway network would be assessed through the planning application process. Question on other alternative appropriate locations relates to sites other than active mineral sites.
S-137-2	1369370	Derbyshire ALC	14.6	Yes imports from other NP sites for processing should be allowed. Existing sites have processing facilities so utilising them rather than providing more at other sites will reduce overall impacts on amenity. Other non mineral sites may not be as well suited and would need developing first. PDNPA: Comments noted and will be considered further.

S-136-50	1369368		14.6	Yes imports for processing from other NP quarries should be allowed. This would reduce carbon emissions of associated industries and maintain economic viability. There may be other suitable locations for stone processing and they should be considered on a case by case basis.
S-128-11	1369275	Rural Action Derbyshire	14.6	The Responder is unsure whether ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing and feels they are not qualified to comment on this issue. They are also not sure of any other appropriate locations for the small scale processing of stone won and worked in the National Park.
S-120-1	1368991	Marsh Farm Development Co Ltd	14.6	The responder thinks that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing.
S-113-51	1369153	Edale Parish Council	14.6	Yes sites within the NP should be able to import stone for processing from other NP sites. Don't know if other suitable locations. Imports from outside of the NP would have greater impact on environment. PDNPA: Comments noted. No proposals to allow imports from outside the NP at this stage but will consider further.
S-104-34	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.6	The responder believes that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing as this will allow processing to take place at the most appropriate and least environmentally damaging locations and reduce the need for new or relocated sites.

S-103-10	1368574	Marshalls plc	14.6	Yes sites within NP should be able to import stone for processing from other NP sites. Ancillary processing facilities, particularly for building stone can be well established, accepted facilities providing skilled employment in the rural economy. Should consider allowing imports from outside of the NP if it contributes to jobs and wider economy. PDNPA: Comments noted.
S-98-34	1368689	Greater Manchester and High Peak Area of the Ramblers	14.6	The responder is unsure as to whether sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing. They state that they do not have the specific expertise to answer this question.
S-67-23	1367857	Over Haddon Parish Council	14.6	Over Haddon Parish Council thinks that stone mined in the NP should primarily be worked and used in the NP. Active quarries with extra processing and storage facilities should be encouraged to take minerals from neighbouring quarries in the NP who don't have such provisions with the hope of keeping the resources within the NP. PDNPA: Comments acknowledged.
S-62-21	1368170		14.6	The responder is unsure if sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing.
S-50-42	1367561	Peak Park Parishes Forum	14.6	The responder believes that mineral sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing but this support is subject to whether HGV movements would be considered acceptable. They are unsure of any appropriate sites.

S-49-5	1367873		14.6	The responder thinks that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing
S-45-26	1367903	Froggatt Parish Meeting	14.6	The responder does not think that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing due to the impacts on noise, air quality and traffic movements.
S-44-39	1367865	Eyam Parish Council	14.6	The responder believes that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing but does not know of any other appropriate sites for small scale processing.
S-40-53	1367788		14.6	The responder is unsure if sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing and states that each case much be judged individually, taking into account the factors at play.
S-13-14	1364893		14.6	The responder is unsure as to whether sites with ancillary processing in the National Park be able to import stone from other quarries in the National Park for processing.
S-9-25	1364715		14.6	The responder thinks that sites with ancillary processing in the National Park should be able to import stone from other quarries in the National Park for processing, provided the quantity is kept in check.

14.7 Should new policy on restoration and aftercare have a stronger focus on nature recovery?

Submission Responses				
#	Consultee Id	Consultee Organisation	Responded Consultation Points	Summary
S-223-54	1369632	Hartington Town Quarter Parish Council	14.7	The responder believes that new policy on restoration and aftercare should have a stronger focus on nature recovery and provides the reason that maximum restoration of the natural environment must always be foremost in a national park. They also believe that minerals sites that can achieve over 10% BNG should be required to do so, providing the same reasoning as previous. Noted and will be taken forward
S-222-25	1369631	TPT & Sustrans	14.7	The responder believes that new policy on restoration and aftercare should have a stronger focus on nature recovery. They also believe that more than 10% mandatory BNG for minerals site is important to protect and enhance the Peak District National Park's natural environment. They state that this is important now and for future generations and the positive impact on carbon reduction Noted and will be taken forward

S-221-51	1369595		14.7	The representation believes that new policy should have a stronger focus on nature recovery. There reason for this is that they do not feel that housing or business development would be appropriate due to quarry sites mostly being in open countryside. They also feel that bonds for restoration need to be higher and water tight. The responder also believes that the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes due to the irreversible damage that they feel quarrying does to the landscape.
S-220-25	1369594		14.7	The representation believes there should be stronger focus on nature recovery and biodiversity in a new policy on restoration and aftercare. This is in order to be compatible with NP purposes.
S-214-53	1369550	Hope with Aston Parish Council	14.7	
S-210-47	1369546		14.7	The representation believes that new policy on restoration and aftercare should have a stronger focus on nature recovery and the Authority should require greater than 10% BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-203-20	1369536	Tarmac	14.7	No should not require greater than 10% mandatory BNG. National policy only requires 10%
S-200-48	1369531	Stanton in Peak Parish Council	14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. Habitats can be disturbed during quarrying so additional long term BNG should be provided. PDNPA: Comments noted.

S-199-20	1369530	Environment Agency	14.7	Yes stronger focus on nature recovery. Where sites to be restored to agriculture in particular. The new policy should promote the inclusion of Catchment Sensitive Farming Techniques to deliver greater biodiversity value on restored agriculture sites e.g. buffer strips and cover cropping. This would support nature recovery targets for nutrient neutrality and climate change resilience. PDNPA: Comments noted and will be consider further.
S-192-22	1369523	Mineral Products Association	14.7	No need for greater nature recovery focus. Do not support greater than 10% mandatory BNG provision. No justification has been put forward to require more than 10% and requirement does not apply to ROMP process. PDNPA: Comments noted. Policy would not apply to ROMPs as they are exempt from BNG requirements. If policy requiring more than mandatory 10% is to be pursued further justification will be provided in the LPA process.
S-185-47	1369502	Devonshire Group	14.7	Support nature recovery. The restoration of former quarries may support this objective. Although the consultation document states that ‘There is a concern that the effect of new legislation will be to reduce the amount of biodiversity that is delivered on restored minerals sites’, it does not elaborate on the basis of those concerns. Reasonable opportunities to maximise enhancements to biodiversity, including habitat creation, should be explored, but these must be considered alongside other requirements, including commercial viability. PDNPA: Comments noted. Quarries have historically provided more than 10% BNG (before it was quantified by the metric), they may now only provide the minimum 10% as this is all they are obliged to do. Thus the need to review our policy on restoration.

S-177-7	1369493	Coke Turner & Co	14.7	Nature recovery already diverse, often best achieved through natural regeneration. Mineral sites should not be required to provide more than the mandatory 10% BNG. On site provision is always preferable to off-site. Nature will invariably succeed over time. PDNPA: Acknowledge comments. Consider whether long term management is required, or if sites should tied to a nature conservation after use in perpetuity and left to their own devices. However, sites often need some management to ensure desired habitats and species establish and are not outcompeted by less desirable species.
S-173-17	1369488	Land & Nature Team - PDNPA	14.7	Yes stronger focus on nature recovery. Concern that mineral sites have historically provided >10% BNG prior to mandatory metric. The Mandatory requirement may result in operators providing the bare minimum. Strongly support the principle of greater than 10% for mineral sites. Long development timescale should be considered, BNG metric could be applied at different working and restoration stages of a mineral development. Existing restoration schemes could be run through metric to establish an average % achieved which could be used as a baseline. Yes should strive for more the 10% mandatory BNG. PDNPA: Comments noted and will be considered for further policy formulation. Aim is to ensure BNG is maximised rather than setting an arbitrary % that must be met. Baseline establishment on basis of existing schemes is worthy of consideration.

S-170-15	1369472	Historic England	14.7	Issue 54 will need to consider its impact on the historic environment. Appropriate restoration principles will be required that protect the significance of heritage assets, including their setting PDNPA: Noted. Will consider further for policy review.
S-166-13	1369468	Breedon	14.7	Nature recovery is important but it should not be to the exclusion of social and economic benefits as required by the NPPF. Reference to need for consistency of policy with the NPPF. If there is a reduction in extraction from the NP there needs to be a clear demonstration of alternative options to support this approach. PDNPA: Acknowledge points and need for consistency with NPPF.
S-165-50	1369466	Taddington and Priestcliffe Parish Council	14.7	Yes stronger focus on nature recovery, but not restrict consideration of alternative uses such as employment or housing.
S-163-34	1368617		14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. Large sites so have greater capacity to provide for BNG, also impacts of development have been greater and over a longer period of time. Could be used as exemplar sites to showcase restoration. Need to be considered in the wider landscape and joined up/networked with other sites to enhance nature recovery. Consider revision of policy wording to require removal of quarry buildings. Some of these are historic (some listed) and can provide excellent habitat, so blanket removal is not needed. Traces of industry within a well restored site can make a positive contribution to the landscape. PDNPA: Acknowledge comments and will consider further in policy review/formulation.

S-158-23	1369452	Trans Pennine Trail and Sustrans Joint Response	14.7	The responder thinks that new policy on restoration and aftercare should have a stronger focus on nature recovery. They also think the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes. They state this this is require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes
S-153-49	1369437		14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. Long term nature of development impacts on habits and species, this must be considered. PDNPA: Comments noted.
S-151-35	1369433		14.7	The response feels that policy on restoration and aftercare should have a stronger focus on rewilding and new homes.
S-150-52	1369431		14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. Impact of mineral extraction sites is high but so is the potential for restoration opportunities and to maximise BNG. Potential to sell BNG credits at mineral sites to offset impacts of other developments. PDNPA: Comments noted and will be considered further. Potential to sell credits is a possibility but it should not be as a consequence of a reduced remit of restoration related to the active mineral site itself.
S-138-5	1369372		14.7	The representation believes that quarries are large sites with the potential to make a significant difference to nature recovery. They also think that the Authority should require more than 10% BNG, stating that "These sites could very easily and cost effectively support a very high percentage of BNG".

S-137-37	1369370	Derbyshire ALC	14.7	The representation thinks that new policy on restoration and aftercare should have a stronger focus on nature recovery to achieve and enhance opportunities but feel it may be difficult in practice. They also think that the Authority should require greater than 10% BNG at minerals proposals/sites that have potential to achieve greater outcomes but suggest that it needs a definition (reference to what time the 10% refer to and the greater potential would need to be evidenced.)
S-136-26	1369368		14.7	The responder believes that new policy on restoration and aftercare should have a stronger focus on nature recovery as former minerals sites offer good opportunities for nature's recovery, as they have shallow, mineral rich soils and limited alternative land use. They also believe the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-128-45	1369275	Rural Action Derbyshire	14.7	The responder is unsure whether a new policy on restoration and aftercare should have a stronger focus on nature recovery but supports it in principle. They also think the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes provided there is the potential to achieve this.
S-127-12	1369287		14.7	The responder believes that a new policy on restoration should have a stronger focus on nature recovery in the face of a biodiversity and climate crisis. This is also their justification to support the proposal that the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.

S-120-26	1368991	Marsh Farm Development Co Ltd	14.7	The responder thinks that new policy on restoration and aftercare should have a stronger focus on nature recovery. They also think that the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-113-52	1369153	Edale Parish Council	14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. There is no reason why large operators and landowners should have a lower BNG obligation than small developers, especially as these operations have been impacting negatively on the Park landscape and hence biodiversity (except where they have already restored parts of the area) for many years. The large areas covered by some quarries, eg Hope, provide opportunities for diverse BNG which may not be available in other places. Question: how will BNG be calculated given the length of time since the quarries began working? PDNPA Response: Note comments. The requirement of 10% BNG does not mean the contribution made by mineral operators would be lower than other developers as the 10% would be provided beyond a higher initial baseline given the land take, so the requirement is proportionate to the development at hand. Restored mineral sites have historically provided the best outcomes for biodiversity above all other development types. BNG requirement will be calculated on the basis of the proposed new development i.e. additional land take. Legislation does not allow for previous development i.e. existing quarry/restoration to be taken into account in the BNG metric calculator. However, previous restoration provision would be retained.

S-104-39	1368161	Great Hucklow, Little Hucklow and Grindlow Joint Parish Council	14.7	Yes stronger focus on nature recovery. If operator moves on restoration promises/proposal may be compromised. Should consider bond when issuing consent. Yes should strive for more the 10% mandatory BNG. should always aim for the maximum reasonably obtainable. PDNPA Response: Acknowledge comments. Provision of restoration bonds is provided in the NPPF and advice in PPG. Could consider including wording in new policy formulation.
S-103-2	1368574	Marshall's plc	14.7	No stronger focus on nature recovery. Proposals for new mineral extraction should be considered on their own merits. It is unclear if this policy is meant to relate to existing mineral operations which will have already approved schemes. If this policy is meant to impact on existing developments then it is unclear what planning vehicle will be used to effect such a policy. Should not require more than 10% mandatory BNG as it would be contrary to Government guidance. PDNPA Response: Note comments and reference to government guidance. Policy could relate to new and existing developments, seeking to achieve improvement to existing restoration schemes. Policy could look to go beyond the gov guidance/minimum as we are a National Park.

S-98-44	1368689	Greater Manchester and High Peak Area of the Ramblers	14.7	The responder thinks that new policy on restoration and aftercare should have a stronger focus on nature recovery as there is a nature crisis. They feel that restoration should work with the character of their surroundings and that new public rights of way should be provided. There can be some issues with public access, as footfall can be seen to interfere with restoration schemes. They are unsure if we should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-97-2	1367737		14.7	The responder does not think that new policy on restoration and aftercare should have a stronger focus on nature recovery, stating that the current policy is adequate. They also do not believe that we should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes. Stating that each site is different and that historically the PDNPA has generally resulted in considerable BNG without any mandatory requirements. They think that the new requirements will be more onerous on developers despite historic outcomes being positive.
S-69-1	1368325	Derbyshire Dales District Council	14.7	The responder feels that new policy on restoration should have a stronger focus on nature recovery and biodiversity. They believe that the Park is nature-depleted and that quarry operators must help to remedy this after being allowed to extract profit from such a special area. They also believe that the Authority should require more than the 10% mandatory BNG for Mineral proposals. They feel that National Parks need to do more than the 10% which they see as the bare minimum.

S-67-20	1367857	Over Haddon Parish Council	14.7	Restoration of mineral sites should be judged on a case by case basis. Nature recovery not the only outcome, but want to avoid negative landscape impact. Redevelopment should be considered equally importance. 10% minimum BNG but higher targets should be encouraged. PDNPA: Comments noted and will be considered.
S-66-2	1368276		14.7	The responder thinks that new policy on restoration and aftercare should have a stronger focus on nature recovery. They state we should aim to restore the setting where possible to before mineral extraction. They also believe that we should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-62-42	1368170		14.7	The responder thinks that new policy on restoration and aftercare should have a stronger focus on nature recovery as there are examples across the country where former mineral workings can have thriving nature recovery outcomes. They also believe that the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes as a demonstration of aspirations.
S-57-26	1368149	Great Longstone Parish Council	14.7	The response supports a new policy on restoration and aftercare having a stronger focus on nature recovery.
S-50-35	1367561	Peak Park Parishes Forum	14.7	The responder believes that new policy on restoration and aftercare should have a stronger focus on nature recovery as we need to do better at nature recovery than we are currently achieving. They also support requiring more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes in order to do better at BNG than currently achieving.

S-49-11	1367873		14.7	The responder believes a new policy on restoration and aftercare should have a stronger focus on nature recovery. They also believe the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-45-19	1367903	Froggatt Parish Meeting	14.7	The responder believes that a new policy on restoration and aftercare should have a stronger focus on nature recovery in order to maximise nature opportunities. They also believe that the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-44-4	1367865	Eyam Parish Council	14.7	The responder believes that new policies on restoration and aftercare should have a stronger focus on nature recovery in order to ensure nature recovery occurs. They also think that more than 10% BNG should be mandatory for minerals sites.

S-43-24	1367843	Natural England	14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. Natural England would welcome a new minerals policy that would focus more strongly on naturerecovery. We would like to see net gain achieved at each phase of mineral extraction andrestoration. The restoration of minerals sites should integrate into the Nature Recovery Network(guided by the emerging LNRS) and be sympathetic to the local landscape character.We acknowledge that there is considerable scope for minerals sites to achieve a much greateroutcome than the minimum of 10% provided that any higher policy requirement is achievable andevidence based. Evidence should justify the target proposed and demonstrate that development isdeliverable. PDNPA Response: Comments noted and will consider further in policy formulation. Potential to achieve 10% BNG at each phase of development may be difficult for some operators and potentially unreasonable given approach taken to other development types and the prospect of a very high BNG later in quarry development or upon final restoration. Link to LNRS potentially a means for securing a greater than 10% BNG contribution, rather than an arbitrary % figure.
S-42-32	1367805		14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG. The concentration of heavy metals in powders and slurries as a by product of the extraction process is a environmental issue waiting to happen. the highest standards must be applied to the aftercare and restoration of these facilities. PDNPA: Comments noted. Extractive and industrial wastes are managed by existing planning policy and through the EA permit process.

S-40-54	1367788		14.7	Yes stronger focus on nature recovery. Yes should strive for more the 10% mandatory BNG Request for up to date housing needs assessment. PDNPA: Comments noted. Request for housing data forwarded to Policy team.
S-32-27	1367524	Bamford with Thornhill Parish Council	14.7	The responder thinks that a new policy on restoration and aftercare should have a stronger focus on nature recovery because currently the Authority is not doing enough. They also feel that we should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-13-49	1364893		14.7	The responder believes that new policy on restoration and aftercare should have a stronger focus on nature recovery. Their reason for this is because many of the quarries predate the NP but now the pressure is on for more areas for enjoying the natural landscape and encouraging biodiversity. They also believe the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-9-14	1364715		14.7	The responder thinks that the PDNPA's new policy on restoration and aftercare should have a stronger focus on nature recovery. They also believe that the Authority should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.
S-7-15	1364251		14.7	The responder thinks that the new policy on restoration and aftercare should have a stronger focus on nature recovery. They also think that we should require more than the 10% mandatory BNG for Mineral proposals/sites that have potential to achieve greater outcomes.