



**Peak District National Park
Authority
Local Plan 2026-2045
(Regulation 19)**

**Report of Regulation 18
Preferred Approach
Consultation**

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Introduction

This Draft Regulation 18 statement consists of a statement setting out, with regard to the *Preferred Approach* consultation:

- (i) Which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii) How those bodies and persons were invited to make representations under regulation 18,
- (iii) A summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) How any representations made pursuant to regulation 18 have been taken into account.

It should be read alongside the Regulation 18 *Issues and Options* Consultation Statement. The two reports will be included in the submission Consultation Statement together with relevant information from the Regulation 19 consultation.

1. Preferred Approach Consultation

The Peak District National Park Authority carried out a Regulation 18 consultation on the 'Local Plan Preferred Approach' between 3rd November and 21st December 2025 in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was an opportunity for stakeholders, communities, and the public to comment on Draft Policies or Draft Policy Directions for the Local Plan. It followed from the Regulation 18 *Issues and Options* consultation which was undertaken in 2024.¹ The Preferred Approach was developed as a result of changes in national legislation and guidance, evidence gathered and comments received in the *Issues and Options* consultation.

1.3 A Sustainability Appraisal supported the Preferred Approach and formed part of the Preferred Approach consultation. Representations were welcomed on the contents of this as part of the consultation.

1.4 The purpose of this Consultation Statement is to outline how the Authority conducted the consultation and to present the key findings that emerged. The statement summarises the approach taken to engage with stakeholders, businesses and the public, including how they were invited to make representations, the comments received, and how these have been considered and responded to as part of the Local Plan Review process.

1.5 The Peak District National Park Authority received 133 individual responses during the Preferred Approach Regulation 18 consultation, resulting in a total of 1,230 representation points made against the Draft Policies or Draft Policy Directions. This statement provides a summary of the main issues raised and sets out the Authority's response.

1.6 The Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012. These regulations require the production of a Consultation Statement to demonstrate:

- Which bodies and individuals were invited to make representations under Regulation 18
- How those bodies and individuals were invited to make representations under Regulation 18
- A summary of the main issues raised through the representations

¹ The Regulation 18 Issues and Options Consultation Statement is published separately.

- How any representations have been used to inform the Local Plan Review.

1.7 The Consultation Statement will assist the Inspector at the Examination in assessing whether the Peak District National Park Authority's Local Plan Review met the requirements for public participation and government guidance. This report confirms that the consultation carried out by the Authority complies with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). It also demonstrates that public engagement was conducted in line with the approach outlined in the Authority's Statement of Community Involvement (SCI).

1.8 All consultation and engagement activities have been undertaken in accordance with paragraph 16(c) of the National Planning Policy Framework (NPPF) (December 2024), which states that plans should:

“Be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.”

2. Meeting legal requirements

2.1 Local Planning Authorities have significant flexibility in how they approach the early stages of plan preparation, as long as they meet the specific consultation requirements set out in Acts and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and adhere to the commitments outlined in their Statement of Community Involvement (SCI). The Statement of Community Involvement (SCI) provides information about how the Authority will engage with the public and relevant consultees in the preparation of Local Plan documents and in the assessment of planning applications. The Regulation 18 consultation was undertaken in accordance with the provisions set out in the Authority's [Statement of Community Involvement](#) (SCI).

2.2 The Authority is required to ensure that statutory consultees and relevant organisations are engaged during the preparation of the draft Local Plan. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, specific groups must be included in the consultation process when developing statutory planning documents. This statement is evidence that: specific consultation bodies; appropriate general consultation bodies; residents and other persons carrying on business in the area; and any relevant party where the duty to co-operate requirements apply (applied) have been consulted.²

All statutory consultees, parish councils, local authorities, stakeholder organisations and other interested parties and individuals were informed of the consultation by direct email.

The consultation was published on the Authority's website during the consultation period.

Hard copies were available to view at deposit locations (as set out in the SCI) and also sent to parish councils and Authority members.

3.1 Consultation on the Local Plan Review Issues and Options (Regulation 18) document took place between 3rd November 2025 and 21st December 2025. As well as direct email the consultation was promoted through a variety of publicity and engagement methods:

² Appendix 1 lists statutory and other consultees consulted during the Regulation 18 Preferred Approach consultation.

- via the Authority's official social media channels
- information published on the Authority's website
- 'duty to cooperate' meetings held online
- in- person events held at PDNPA Offices and in Bakewell Town Hall
- posters advertising Preferred Approach consultation
- flyer advertisements displayed at the National Park Headquarters (Aldern House, Bakewell).
- coverage via local social media outlets and parish bulletins.

3.2 The list of events was:

- 11 November – Aldern House, Bakewell
- 26 November – Aldern House, Bakewell
- 1 December – Bakewell Town Hall, Bakewell

Consultation Document and Questions

4.1 Information was set out in a *Preferred Approach Consultation* document under the policy themes set out below. The document set out for each policy theme the Draft Policies or Draft Policy Directions in relation to all policy areas for the draft Local Plan.

- Spatial Objectives and Strategic Housing Provision
- Core Policies and Development Strategy
- Biodiversity, Nature Recovery and geodiversity
- Cultural Heritage
- Recreation and Tourism
- Climate Change, flood Risk and Sustainable Drainage
- Housing
- Rural Economy
- Shops, Services and Community Facilities
- Minerals and Waste
- Travel and Transport
- Utilities

4.2 The Sustainability Appraisal was publicised alongside and in the same manner as the Preferred Approach document. The online versions were accessible via in PDF format and in accessible HTML via the online consultation platform.

Other supporting evidence was available to view online in PDF format.

Comments could be entered in response to each Draft Policy, Policy Direction or in relation to the topic as a whole.

Making comments

6.1 Comments could be provided in several ways:

- Online by using our consultation platform
- By email to a dedicated Local Plan inbox: localplan@peakdistrict.gov.uk
- By letter to the PDNPA offices

6.2 Guidance was available on the PDPA website by direct contact with officers by telephone, email or at the drop-in sessions.

Comments from Individuals and Organisations

7.1 All comments, regardless of how they were received (online, post or email) were uploaded to the consultation platform. They were then summarised and responded to by the officer(s) responsible for that topic. These comments were used to inform the Draft Plan. Appendix 2 sets out for each comment a summary of the comment and PDNPA response

7.2 Duplicate responses from the same responder were identified and removed in order to avoid double counting.

3. Summary of Consultation Responses to the Preferred Approach

Spatial Objectives and Core Principles

Introduction and Planning in a National Park

The Preferred Approach consultation document set out key legislation relevant to planning in a national park, a description of the Peak District's landscape character and Special Qualities and a list of key facts.

There were 10 consultation responses comprising mostly minor points that are addressed through inclusion within supporting text of the draft plan.

Spatial Objectives and Strategic Housing Provision

Outcome 1: A sustainable level of development where the Peak District's Special Qualities and resilience as a living landscape have been significantly enhanced.

Most consultation responses were supportive. Concerns were raised that the objective did not sufficiently recognise the contribution of the minerals industry, did not recognise the Peak District as a living landscape, did not adequately reflect the climate emergency and did not address the needs of the local population.

The issues raised are addressed through the other spatial objectives.

Outcome 2: The Peak District National Park is a resilient landscape in which nature, beauty, and cultural heritage are significantly enhanced

Most consultation responses were supportive. Concerns were raised that the objective did not adequately deal with rivers and water courses, did not mention farming and that the language around conserving and enhancing was not sufficient to deal with the biodiversity crisis.

The issues raised are addressed through minor changes to wording and through the other spatial objectives.

Outcome 3: The Peak District is a place where nature recovers and biodiversity flourishes

Most consultation responses were supportive. Concerns were raised that the contribution of minerals development is not sufficiently recognised and that visitor management is important for nature recovery.

Outcome 4: Cultural heritage and the built environments of the National Park are conserved and enhanced as part of an ever-changing landscape

Most consultation responses were supportive. Concerns were raised that the Outcome is overly onerous and does not align with national guidance on heritage assets, and that it did not address heritage and climate change.

The issues raised are addressed in the appropriate policy.

Outcome 5: The Peak District is a welcoming place where all are inspired to enjoy, care for and connect to its special qualities.

The detailed spatial objectives under this objective were not well supported. Specifically, there was objection to Recreation Hubs and concerns about traffic-borne tourism and recreation.

The issues raised are addressed through a change to the objective and to corresponding recreation and transport policies.

Outcome 6: Peak District National Park communities are thriving and sustainable places where all generations can live healthy and fulfilled lives. (To enable the delivery of 1580 new homes.)

There was a mixed response to the stated housing need and housing provision. Constituent authorities expressed the view that this was too low and parish councils thought it did not respond adequately to local needs. There was also concern about the approach and the lack of information. The approach was supported by the CPRE. Others felt that the stated housing provision was too high.

The issues raised are fully addressed in the draft plan and supported by robust up-to-date evidence.

DDDC state the National Park's population is shrinking fastest among younger working families, largely because they cannot access affordable housing. They state the need in the DDDC part of the Park is far higher than the 20 homes per year currently planned, with 216

households already identified as in genuine need, and therefore calls for policy changes to increase housing supply where eligible demand exists.

Outcome 7: The Peak District has a flourishing economy in accord with nature recovery and climate change mitigation

Most of the comments related to detailed wording. These were considered and amendments made if appropriate to either the spatial Objective or the relevant policy or supporting text.

Outcome 8: The Peak District National Park is more resilient and net-zero by 2040 through its exemplary response to climate change

Responses were mixed. Concerns were raised that the Outcome does not adequately address the climate emergency, in particular by limiting development to that which is in accordance with Special Qualities, is small-scale and protects open skylines and long views.

Outcome 9: residents, visitors and businesses can travel within and across the National Park in ways that conserve or enhance Special Qualities

Responses were mixed. Concerns were raised that there should be clearer objectives regarding public transport, visitor management, heavy goods vehicles and carbon emissions. The need for flexibility to support cross-park traffic for the mineral extraction was suggested.

Objectives have been amended to align with the policy approach to recreation facilities.

Outcome 10: the adverse impact of minerals and waste operations is reduced and sites make a significant strategic contribution to the nature recovery network

Responses were generally supportive except for the requirement for a 'major' contribution to nature recovery. The Minerals industry pointed out that the outcome as worded appeared contrary to revised position in regards mineral extraction.

Objectives have been amended to refer to the historic environment and the use of stone for the conservation of heritage assets.

Core Policies and Development Strategy

Policy 1 Securing National Park Purposes

The policy approach was generally supported. Minor changes were made to address concerns about repeating national policy. Other issues raised are dealt with elsewhere in the plan.

Policy 2 Sustainable development in the context of National Park purposes and duty

The policy approach was generally supported. Minor changes were made to address concerns about travel by private car and climate change, to add policy cross-referencing and to correct drafting errors. Other issues were discussed and where relevant, addressed elsewhere in the plan.

Policy 3 Enhancing the National Park

The policy approach was generally supported. Minor changes were made to address concerns about policy drafting.

Policy 4 Landscape character and Special Qualities

The policy approach was supported. Minor amendments (and consequential amendments throughout the plan) were made to indicate those Special Qualities that are directly related to the first purpose of national parks and where their conservation and enhancement is required.

Draft Policy Direction 1 Biodiversity and Nature Recovery

The policy approach was supported except in relation to the requirement for 20% Biodiversity Net Gain. This has been amended to align with national policy.

Policy 5 Cultural heritage assets of archaeological, architectural, artistic or historic significance

The policy was supported. Concerns raised regarding the test of significance and non-designated heritage assets are addressed in other policies.

Draft Policy Direction 2 Development Strategy

There was a mixed response to this policy, both in regard to the principle and the detail. Most organisations understood the rationale but many did not agree that the strategy addressed the issues raised. There was concern that there was insufficient evidence presented regarding the capacity for development in 'top-tier' villages and that some of the underlying data was inaccurate.

There was also concern about policy drafting and the omission of Whole Estate Plans.

The policy has been significantly revised following updated evidence with regard to settlement connectivity and landscape capacity for development.

Policy 6 Conservation and enhancement of nationally significant landscapes

There was a mixed response to this policy. Many responders felt that Clause B was overly restrictive and already covered in other policies. Other comments related to policy drafting/clarity.

After discussion it was decided to retain clause B. Other aspects of the policy were amended to address issues around clarity and relationship to other policies. Some amendments to wording were suggested in order to strength and ensure landscape assessments are robust.

Draft Policy Direction 3 Settlement capacity and limits

There was a mixed response to this policy. Most responders supported the principle but did not agree that the *Settlement Capacity and Landscape Assessment* should form the basis of decision-making as it had not been consulted on.

Other concerns were: clause C is unduly restrictive; Clause E is onerous and unclear; the policy should specifically reference entry points and edge characteristics, infrastructure and neighbourhood plans.

The policy has been significantly re-drafted to take account of the concerns raised. The *Settlement Capacity and Landscape Assessment* is re-named the *Settlement Character Assessment and Settlement Edge Landscape Sensitivity Assessment*, is available on the Authority's website, is subject to an informal consultation with parish councils and will be subject to formal consultation under Regulation 19.

Draft Policy Direction 4 Development management principles

There were concerns raised about this policy both in terms of content and drafting, most significantly by statutory consultees. The policy has been significantly amended, or as appropriate amendments were made to other policies, to address the following issues: the national Green Infrastructure Framework is referenced in Policy C11 Design, siting, layout and landscaping (as required by Natural England); policy is amended to require risks posed by contaminated and unstable land to be addressed (Coal Authority); policy regarding water efficiency, floodwater storage and sustainable draining is clarified and expanded in other

policies; the requirement for 20% BNG is removed; the reference to the Active Travel Network and Plan is clarified and an additional clause regarding infrastructure is included.

Draft Policy Direction 5 Siting, design, layout and landscaping

The draft policy direction was a statement of intent rather than detailed policy. Most comments related to specific elements that should be included in the final policy (Policy C11 Design, siting, layout and landscaping). Comments have been addressed as follows: regard for the national Green Infrastructure Framework and particular attention to key approaches and settlement edge is included in Policy C11 and reference to locally sourced materials, sustainable drainage and the historic environment is contained in *Design Guides* and the *Design Vision and Principles* Appendix linked to Policy C11.

Biodiversity, nature recovery and geodiversity

General comments

General comments were made in relation to the HRA which have been resolved. Detailed comments where relevant have been addressed in policy drafting.

A new Policy B4 Delivering nature recovery is included in the draft plan.

Policy 7 Protecting and managing the Natural Zone

The draft policy was supported. Concerns were raised by Natural England about the need for development to support nature recovery. This has been addressed in policy and by additional supporting text. No changes are made to policy in response to the comments about the need to permit renewable energy infrastructure.

Policy 8 Protecting sites, species and networks

This policy was supported. Minor amendments were made to address the issues raised regarding clarity and the status of protected sites.

Policy 9 Protecting irreplaceable habitat, trees, hedgerows and walls

This policy was supported. Minor amendments were made for clarity and further information is included in supporting text to address the concern raised about irreplaceable habitat.

Cultural Heritage

Policy 10 Assessing the impact of development on designated and non-designated heritage assets and their settings

The policy is generally supported except in relation to energy efficiency measures where it was felt that the policy was too inflexible. It was suggested that more guidance should be given on weighing balance. Numerous points were raised with regard to the detailed wording. These are:

- Overly subjective language should be removed. The examples 'proportionate' and 'appropriate' were cited.
- Formal reference to process (currently in Appendix) for identifying non-designated heritage assets should be included.
- Clause C on assets with archaeological interest is too weak.
- Clause E should be deleted as it is a duplicate of clause B.
- Clause B should include that evidence is proportionate and sufficient to understand the potential for impact.
- Recognition should be considered that non-designated heritage assets contribute to wider setting / cultural landscape due to their cumulative effect of conserving a cultural landscape.
- Clause F should be re-worded.

The policy has been amended to address the above concerns as follows:

- Clause B is amended so that it refers to evidence that is sufficient to assess potential impacts.
- Clause C is expanded with regard to assets with archaeological interest
- Clause F is re-worded to set out separately the approach for designated and non-designated heritage assets.

The supporting text has been amended: to give guidance on how significance will be determined; to give more information on heritage assets within the cultural landscape and to set out the process of identification of non-designated heritage assets.

Policy 11 Listed Buildings

The policy approach was generally supported except that some respondents felt policy should differentiate between Grade I and Grade II and II* Listed Buildings with more flexibility given to Grade II with regard to energy efficiency.

Other detailed points were raised regarding: unnecessary duplication (with other policies) in Clause A; unnecessary list of criteria in clause D; criteria in Clause D overly prescriptive; affordability and viability should be clearly recognised; prevention of sub-division is too prescriptive; Clause C is not in accordance with NPPF and 'preserve' in Clause A should be changed to 'conserve'.

The policy has been re-written to address these concerns.

Policy 12 Conservation Areas

The policy approach was generally supported. It was felt that the requirement in Clause D could be unreasonable if assessment by a heritage professional is required. Detailed points were raised regarding use of the word 'preserved' in clause A and relationship to NPPF in clause C.

The policy and supporting text have been re-written.

Policy 13 Registered parks and gardens

The policy approach was generally supported and carried forward as registered parks and gardens are also heritage assets.

Policy 14 Conversion of a cultural heritage asset

The policy approach was generally supported. General comments were made regarding:

- the need for flexibility
- the need for a spatial dimension to the policy such that development in settlements, near settlements, and in open countryside has a different policy approach, with more flexibility accorded to development that is in or near to settlements
- the need for clarity regarding the purpose of conversion, since any restriction is likely to mean conversions are not viable
- the need for wording that encourages appropriate conversion that conserves the significance of heritage assets.

The policy has been re-written to address the concerns. Other policies give clarity regarding the purpose of conversion and the spatial requirements.

Recreation and Tourism

General Comments

Responses show that while several respondents raised concerns about the justification for Recreation Hubs, the omission of Castleton, and the absence of a wider visitor-management strategy, the Authority clarified that existing Policy 15 already covers recreation development in settlements, and Draft Policy Direction 7 is intended to fill a policy gap for countryside locations. Other comments questioned mapping hubs, applying the policy to settlements, and adding criteria—points the Authority will consider as the Plan evolves, including developing a new campervan parking policy. Respondents also expressed support for improved visitor facilities, sustainable transport, and recreation policies, while raising concerns about visitor numbers, parking pressures, and the need for clearer introductory context. These issues have been acknowledged, with topic-specific comments redirected to the relevant draft policies for detailed consideration.

Policy 15 Recreation, environmental education and interpretation (strategic policy)

The responses showed broad concern about how Policy 15 and Recreation Hubs should operate, with many respondents calling for tighter criteria—such as restricting new facilities in the open countryside, linking development more strongly to sustainable transport, and applying a presumption against tourism-related development except in exceptional cases. Others raised issues around interpretation boards, sustainable travel definitions, potential inappropriate development, and the need to manage car access. Several respondents also proposed additional measures, including a new campervan parking policy, clearer signposting, and stronger protection of PROW. The Authority acknowledges these concerns, noting that suggested amendments will be considered as the Plan develops, that strict criteria and the Sandford Principle already apply, and that related comments have been redirected to the appropriate draft policies for detailed review.

Draft Policy Direction 7 Recreation Hubs (Strategic Policy)

Public feedback on Policy Direction 7 (Recreation Hubs) reveals a mix of support and concern, with many respondents worried that identifying and mapping hubs—such as Fairholmes, Millers Dale, and Edale—could worsen existing visitor pressures, over-

development, and traffic issues in areas already exceeding carrying capacity. Others raised specific concerns regarding nature protections, infrastructure, and the inclusion of specific sites, while offering suggestions to incorporate criteria for climate change, horse-riders, and sustainable transport. In response, the Authority clarified that the policy addresses an existing gap by establishing strict development management criteria outside of settlements (guided by the Sandford Principle and environmental capacity) rather than trying to manage visitor numbers directly. They emphasized that naming existing hubs aims to restrict development in unsuitable areas while enabling appropriate, low-impact facility improvements that do not inherently increase footfall, and they welcomed constructive feedback to refine the final policy criteria and improve clarity. It is noted that this may allow for better integration with active travel infrastructure and promote sustainable travel options.

Draft Policy Direction 8 Hotels, bed and breakfast and self-catering accommodation (strategic policy)

The feedback shows general support for the draft policy, though respondents raised several key concerns regarding clarity, traffic impacts, and the local housing market. Specifically, many were worried that a proliferation of self-catering holiday lets and new hotels might negatively impact the availability of permanent housing for local residents and increase vehicular traffic in rural areas. In response, the planning authority welcomed the support and agreed to consider various suggestions—such as adding specific criteria for managing traffic, defining terms like "minor development," and ensuring nutrient neutrality—while clarifying that the policy works alongside housing directives to balance visitor accommodation with local residential needs.

Draft Policy Direction 9 Holiday occupancy of self-catering accommodation (DM Policy)

The feedback primarily addresses concerns regarding restrictions on holiday lets and the challenges of local needs housing. Respondents highlight that local connection requirements deter buyers due to mortgage limitations, suggesting a shift toward permanent residence clauses instead. Additionally, multiple respondents object to the proposed 28-day occupancy limit, arguing it is overly restrictive, harms commercial viability, and fails to accommodate

temporary workers. In response, the council notes that the policy aims to prevent holiday lets from becoming semi-permanent residences or negatively impacting local amenity, while confirming they will clarify legal agreements and review these occupancy, worker, and housing policy directions during the Draft Plan phase.

Draft Policy Direction 10 Caravans and camping (strategic policy)

The feedback on the draft policy direction largely revolves around requests for greater clarity, concerns over restrictiveness, and the evolving nature of the tourist market. Several respondents highlighted a lack of definition for terms like "small," "simple," and specific pod sizes, as well as the need to address changing vehicle scales (such as motorhomes) and the economic viability of sites regarding water/drainage restrictions. In response, the planning authority generally welcomed the feedback, acknowledging valid concerns regarding nutrient neutrality, wildfire impacts, and winter restrictions. They committed to amending the final version of the Plan to provide more specific detail and clarity, while maintaining a necessary balance between farm diversification, economic benefits, and the protection of the National Park landscape.

Draft Policy Direction 11 Temporary campsites

The consultation feedback shows broad support for the proposed draft policy direction, with many respondents welcoming the potential introduction of an Article 4 Direction to manage temporary campsites. However, several respondents raised concerns regarding its impact, specifically highlighting worries about affordable informal camping, the displacement of motorhomes onto highways, impacts on local events, and the burden of requiring planning permission for landowners. In response, the National Park Authority emphasized that the policy aims to ensure campsites are appropriate in size, location, and facilities rather than banning them entirely. They noted that the policy might simply mark a return to the pre-pandemic 28-day permitted development limit (down from the current 60 days), which they believe is currently harming the park's special qualities. Ultimately, the Authority committed to conducting further research, gathering evidence on wider impacts—including nutrient

neutrality—and carrying out additional consultations before implementing any formal restrictions.

Policy 16 Holiday occupancy of camping and caravan sites (DM Policy)

The feedback highlights respondent concerns regarding the scope, flexibility, and restrictions of the draft holiday accommodation policies, particularly pushing for the inclusion of alternative structures like campervans, shepherd's huts, and camping pods. Respondents also challenged the proposed operational limits—such as the 9-month campsite limit and the 28-day stay restriction—arguing they fail to reflect a year-round visitor economy, while also criticizing certain criteria as overly stringent. In response, the Authority noted these concerns for future policy development, clarifying that individual applications can be made to amend restrictions, but emphasized the ongoing need to balance the visitor economy with residents' amenities and statutory conservation duties under the Sandford Principle.

Policy 17 Facilities for keeping and riding horses

The feedback reflects general support for the proposed policy, alongside specific recommendations regarding landscape preservation, infrastructure, and transport integration. While respondents welcome the policy, they express concerns about its ecological and visual impacts—particularly regarding horse-riding bridleway adequacy and the visual disruption of temporary fencing. In response, the Authority noted that while temporary fencing often falls under permitted development, restrictions can be applied during planning consent if necessary, and commercial stables are already required to have good bridleway access. Additionally, respondents suggested better integration with active travel networks and the inclusion of Recreation Hubs within wider transport links. The Authority clarified that while public transport provision is outside its direct control, existing strategies like the Walking, Wheeling, Cycling, and Horse-riding Infrastructure Plan aim to link these networks, and future developments generating significant journeys will require dedicated Travel Plans to promote modal shift.

Climate Change

General comments

General comments were made about: the clarity of policies; the disproportionate nature of the requirements and the relationship between local and national policy.

Policies have been significantly re-drafted and issues raised have been addressed.

Draft Policy Direction 12 Energy efficiency and generation in buildings

Respondents generally support the approach policy but there were concerns about clarity and flexibility. Main concerns are:

- clearer guidance on standards, including defining “large schemes” and avoiding reliance on outdated frameworks.
- stronger emphasis on on-site renewable energy generation alongside energy efficiency.
- greater flexibility for heritage buildings, allowing measures such as insulation, improved glazing, heat pumps and solar panels where visual impact is acceptable.
- reducing barriers to domestic renewable installations and streamlining approvals.
- expanding the policy to better address climate adaptation and resilience.
- Explicitly referencing risks to strengthen the policy

The policy is substantially re-drafted to address these concerns with clearer definitions, proportionality, and deliverability.

Policy 18 Low carbon and renewable energy development

The approach is supported but specific concerns were raised about potential conflict with national policy. It was suggested that there could be specific policy for specific types of development (wind, solar etc), mapping of suitable areas and that policy should better address travel emissions, grid capacity, energy storage and low-carbon transport.

The policy is substantially re-drafted to address these concerns. The *Climate Change and Sustainable Building Design Guide* SPD is carried forward and will remain until replaced; this refers to specific types of renewable energy development. The detailed *Settlement Character Assessment and Local Landscape Sensitivity Assessment* can be used to inform applications for small-scale renewable energy developments in or on the edge of settlements. Other issues are addressed in other policies.

Policy 19 Flood Risk

The approach is broadly supported. Some comments relate to very specific local issues and these are noted. Utilities companies recommended strengthening policy with regard to sewer and reservoir flood risk. There is concern regarding unnecessary duplication of national policy.

The policy is substantially re-drafted to address these concerns.

Draft Policy Direction 13 Sustainable drainage

The approach is broadly supported. Utilities companies recommended strengthening policy with regard to retention of surface water. There is concern regarding unnecessary duplication of national policy. The policy should respond to specific landscape characteristics.

The policy is substantially re-drafted to address these concerns.

Housing

General Comments

General comments were made about the clarity of how housing policies tie in with other policies. Some responses wanted to see a reduction in the restrictions for open market housing, but this would not be appropriate

Draft Policy Direction 14 New housing

Some responses queried the restrictions on building unrestricted market housing, the Authority maintains that the National Park is not a location for this and continues to prioritise local affordable housing. It will not allocate housing sites and will rely instead on brownfield development, conversions and rural exception sites—expected to deliver 100% affordable housing unless limited market housing is needed for viability.

Policies have been streamlined, with added flexibility for self-builders, housing size and heritage assets, while S106 agreements will continue to secure affordability and key worker occupancy. Concerns about population change, school viability, second homes and holiday lets are acknowledged, but the Authority emphasises that thriving communities depend on a wider set of planning and non-planning mechanisms, not solely housing numbers. The approach aligns with the National Park Vision and Circular 2010, focusing development on local need, landscape sensitivity and the purposes of National Park designation.

Policy 20 Gypsy, traveller and travelling show people

Policy amended to require a housing need to be demonstrated and justification for a particular location.

Draft Policy Direction 15 Primary residence

The Authority notes broad support for the policy and for applying a primary residence condition, but explains that it cannot change the Use Class Order or control existing properties used as second or holiday homes. While requests were made to allow holiday accommodation to convert to permanent residences instead of local-needs housing, this is outside the Authority's powers. The Local Plan instead focuses on influencing the use of new dwellings through conditions or S106 agreements, ensuring enforceable primary residence requirements. Policy RT2 will be amended to align with primary occupancy and affordable housing expectations, key worker accommodation has been removed in favour of widened local connection criteria, and concerns about conflicts or enforceability have been addressed within the draft plan.

Draft Policy Direction 16 Making effective use of land

The Authority notes support for making effective use of land and explains that the proposed 25 dwellings per hectare density reflects past approvals that balanced character, design quality and environmental requirements. This density is not considered high, though local character may justify variation. High-rise development is inappropriate in the National Park, and garden sizes should reflect local character. SuDS and BNG can be delivered within the same land area, and healthcare contributions are unlikely to be triggered given the small scale of development. The principle of effective land use applies to all schemes regardless of size.

Policy 21 First occupation local needs homes

The Authority confirms that local affordable housing is for anyone in housing need and has widened the local connection criteria to include people with a business need to live near their workplace, such as NHS staff. While several respondents requested reducing the 10-year residency requirement to five years, consultation feedback did not show majority support, so the 10-year rule remains for first occupation, dropping to five years for later re-lets, with exceptions considered where justified. Policy continues to support young people, downsizers, armed forces personnel and those working locally, and the Authority emphasises that new housing must respond to proven affordable housing need. Differences

between National Parks are acknowledged, but the Peak District's accessibility means its approach remains appropriate.

Policy 22 Second and subsequent occupation

The Authority notes requests for clearer terminology and for locally employed people to qualify for second and subsequent occupation, and confirms that the **5-year local connection** already applies at that stage. Housing need must be assessed using consistent baselines, with allocations managed by Housing Authorities or registered providers rather than Parish Councils. Although some councils favour reducing the first-occupation requirement from 10 to 5 years or broadening eligibility to those who grew up in the Park, previous consultation showed no majority support, so the 10-year rule remains, with exceptions considered where justified. The **local connection criteria** have been widened to include people with a business need to live near their workplace, and support is noted for reducing cascade timescales. The Authority also recognises concerns about rental pressures and highlights that build-to-rent is provided for in policy, helping maintain a distinction between short- and long-term rental options.

Policy 23 Essential Worker Dwellings

The Authority explains that farm worker accommodation policy is already flexible enough to allow the conversion of farm buildings for part-time worker housing, while noting that some modern agricultural buildings were only permitted to support farming operations and must be removed when no longer needed. It clarifies that the existence of a building in a protected landscape does not automatically grant permitted development rights, and that non-farming businesses are expected to locate in more sustainable settlements with services and transport. Support for the policy is noted, transport-related comments are directed to the relevant chapter, and the Authority maintains that the policy is workable and enforceable.

Policy 24 Assisted housing

The policy is a continuation of existing policy. Flexibility is provided to ensure care homes remain viable. Assisted living accommodation will be able to respond to a local and wider National Park strategic need.

Draft Policy Direction 17 Tied accommodation

The Authority notes support for enabling Estates and key sectors to attract and retain workers, as well as support for tied accommodation, but has removed the proposed

employment-based policy direction due to concerns about subjectivity and administrative burden. Instead, the local connection criteria have been widened so that people with a business need to live near their workplace can qualify for housing. Support from partners is acknowledged, concerns about tied accommodation are noted, and the indicative housing figure remains unaffected by these changes. One response requested a widening of the policy to essential workers but maintaining a set list of essential workers to not make the policy too wide.

Draft Policy Direction 18 Planning conditions, developer contributions and legal agreements (core strategic policy)

The Authority notes support for the policy and confirms that Draft Policy Direction 18 applies to S106 agreements, with annexes included where conditions cannot control them. Terminology has been refined, enforcement capacity will be supported through the Delivery Plan, and further clarification on affordable and social housing will be provided. Acknowledgement that S06 agreements may be necessary to make development acceptable.

Policy 25 Sub-division of dwellings to create multiple units

Approach was widely supported by responses.

Policy 26 Ancillary dwellings

Supported, acknowledgement that primary residency can be conditioned. Points B iv and B v have been removed as a result of a response noting the repetition of heritage and landscape.

Policy 27 Housing development on brownfield land

Support for the approach is noted, and the Draft Local Plan now makes clear that greenfield sites are expected to deliver 100% affordable housing. Several comments sought clarification, which has been provided in the updated draft. Viability requirements, including local build costs, have been independently assessed, and applicants may submit their own viability evidence where justified. The market value areas referenced previously remain defined, and overall policy requirements are now clearly set out.

Policy 28 Housing development through conversion

Support for the policy is noted, and the Draft Local Plan now sets out requirements more clearly. Evidence on economic viability underpins the affordable housing thresholds, including the 40% expectation, and all new housing will carry a primary occupancy condition. Permitted development rights are removed for affordable homes to prevent overdevelopment, and on-site provision remains the priority to ensure delivery. The Authority disagrees with objections, emphasising that conversions must still contribute to local affordable housing to benefit the community.

Policy 29 Housing mix

Support for a mixed-tenure approach is noted, and the Draft Plan now clarifies that housing mix is based on evidence from population projections, housing needs assessments, viability, and input from Housing Authorities and Registered Providers. The policy confirms that residents can move to larger or smaller affordable homes as circumstances change, and amendments now clearly set out how local housing needs guide the mix, which is treated as a target secured through S106 obligations. The policy has also been updated to include a 5/6-person affordable home size, with flexibility for applicants who can justify a larger dwelling to meet their own needs.

Policy 30 Housing Size

The Draft Local Plan keeps affordable housing size standards in place—now with added flexibility for people building to meet their own needs—while market housing must align with NDSS. Size limits help ensure homes remain affordable, meet evidenced local needs, and make effective use of land. Flexibility is allowed where heritage constraints apply, and a 5/6-person affordable home size has been added. Requests for larger affordable homes, backdating changes, or removing size limits were noted but not accepted, as size controls are essential for affordability and community need.

Policy 31 Extensions and alterations

The Authority agrees that the former 30% size limit was too prescriptive. The revised policy now focuses on character, scale and massing rather than fixed percentages, while still aiming to prevent overdevelopment and maintain a mix of house sizes. Support and comments are noted, and related design matters are addressed through the Draft Plan's development management principles.

Policy 32 New outbuildings and alterations and extensions to existing outbuildings in the curtilage of dwelling houses

Support is noted. The policy is largely carried forward from the existing Local Plan, with amendments to delete part B and clarify part C. Clarification has been added to address concerns about overdevelopment, particularly where ancillary garden buildings could become habitable rooms. Further refinements have been included in the Draft Local Plan.

Policy 33 Replacement dwellings

The policy is intentionally prescriptive to protect smaller homes that are important to the overall housing mix. It takes a holistic approach to replacement dwellings—focusing not just on visual enhancement but also on carbon impacts, housing choice, and preventing the loss of bungalows and other small properties that serve local needs. The Draft Local Plan now clarifies proportional environmental gain, the preference for retaining existing dwellings, how site suitability should be assessed, and how embodied and operational carbon are considered. Clause (a) has been removed, supporting text has been strengthened, and flexibility is acknowledged where justified (e.g., heritage constraints). Overall, the policy aims to safeguard smaller homes, reduce unnecessary carbon production, and ensure a balanced range of housing across the National Park.

Policy 34 Residential gardens

Support is noted. Parish Councils will continue to be consulted on planning applications in their area. The Draft Plan removes design-specific wording from this policy, as these matters are addressed elsewhere, and future guidance such as the Design Code will encourage planting and porous surfaces. Clarifications have been added to ensure the policy focuses on its core purpose, with parking and design matters handled in other relevant policies.

Rural Economy

General Comments

General comments included a need to support farm diversification, the hospitality sector, businesses, and home working. Concern the policy on new agricultural buildings is too prescriptive. Concern about business development on greenfield sites. Support for limiting business extensions, including taking into account previous extensions. The chapter should acknowledge the important role the mineral industry plays in the rural economy. Policies should support improved telecommunications and internet access. Policy should support community shops. Policy should support for training of local skills, e.g. dry-stone walling and animal welfare. Policy should support rural green energy solutions. Continued support for anaerobic digesters, but concern about their management.

Concern that the chapter does not consider sufficiently how to cope with future changes such as climate change and other legislation. We support the idea of a local community advisory service.

Draft Policy Direction 19 Business development

Summary

Do not support business development on greenfield sites. Need to support homeworking and provide improved internet access and speed. Internet connectivity is vital for the rural economy, so there is a need to improve telecommunications and mast sharing. The chapter misses out support for Community Shops and support for training of local skills, e.g. dry stone walling and animal welfare. There are many buildings, mainly agricultural, that may not be fully used and which the National Park Authority cannot deal with under Policy 6 for legal or practical reasons. They are a resource that could be put to other uses, especially commercial, but also housing. Outside the National Park they will have permitted development rights for such uses. The conversion of heritage assets is also recognised as a potential route to business development, many such buildings being on or close to farmsteads and need to be reconciled with Policy 39, which would limit such opportunities. We don't see that the economic needs assessment is correct in saying that greenfield sites are unlikely to be viable. There is such a business space shortage that there is an effective local market for that kind of property. Supporting local enterprise and sustainability of businesses within the Parish We encourage the Plan to contain positive policy signals for small local businesses, hospitality, social enterprises and other community-focused uses so that parishes can flourish economically and socially. This includes supporting adaptive reuse of derelict or underused buildings where proposals conserve character, enable employment and bring community benefit.

Response

Request Business Development Omit permission on greenfield sites in principle on the edge of settlements Policy 69 address improved infrastructure connectivity but there is scope to do more and we can look into this. Policy 41 supports the provision and retention of community facilities and services. Note policy Unsure what a local community advisory service is and perhaps this is a service that should be provided by the Local Administrative Authority. Policy 39 provides opportunities to convert heritage assets and support farm diversification. Some buildings are isolated and not worthy of conversion or are not located in a suitably sustainable location for business or residential use. In response, it is a matter of opinion and ours is based on evidence by our consultants on the matter. Disagree that there is a large business space

shortage, the Icen report on employment land does not identify that. Support for local enterprise and business noted, including supporting adaptive reuse of derelict or underused buildings where proposals conserve character, enable employment and bring community benefit. Noted and we will address internet connectivity in the utilities chapter and the developer contributions policy.

Policy 35 Safeguarded employment sites

Summary

In policy or supporting text we need to be very clear what we mean by Employment use Business use / other suis generis uses. The designation of Station Rd, Bamford is OK on the west side of the road, but the east side of the road is arguably very suitable for housing, so an "employment sites" designation of the east side is unhelpful and unsuitable. How many local people work at these businesses on safeguarded sites, and is this a factor in determining which business sites to safeguard? For the purpose of this policy should local (people) be defined as Hope Valley? District Council support Calver Garden Centre could be considered as a new safeguarded employment site. Concern over rural employment, the lack of which is surely a driver for the aging population etc. District Council support the safeguarding of Upper Hulme Mill. Note concern that a lot of work had been put into the Leekfrith NP and that this would change the approach that the community had supported. Support to identify safeguarded employment sites and in particular Riverside Business Park. Request for flexibility within the policy to encourage the sustainable growth and expansion of all types of employment generating businesses and enable the businesses to respond to the changing economy. These uses play a positive role both in providing a complementary service role to the wider business park but also through improving the vitality and viability of the business park as they provide greater variety of offer. There are a range of uses which would be complementary to the established primary employment use including Class E (d) indoor sport, recreation and fitness, Class E (e) medical or health services and Class E (f) day nursery. Such uses are all employment generating and would support the existing provision on the site.

Response

The Policy wording has been tightened up to explain sites are safeguarded for B2, B8 and E(g) uses. The reference to Station Road, Bamford is to the current Local Plan safeguarded site. The east side of the road is not suitable for housing, this is a highly sensitive area of landscape that should be left open. Sites are safeguarded because they are the considered to be the best sites for employment uses B2, B8 and E(g) uses in the National Park, it is not

to do with the number of people employed or where they live. The District Council requested that the Authority consider safeguarding the former Calver garden centre. In response, the Authority has decided not to safeguard the site as the site would be suitable for a mix of uses (housing/employment) and there is already a safeguarded employment site in Calver. The National Park is within good commuting distance of major towns/cities therefore there is and will continue to be a large percentage of people who commute out for work. Creating more employment space above what is required over the Plan period will not change the demographic of the population. Whilst there was support by the District Council for Upper Hulme Mill to be safeguarded, the Authority has decided not to safeguard the site. The owners of the site (multiple ownership) have requested that the Authority support the existing policy that refers to the site in the adopted Leekfirth Neighbourhood Plan. The Authority is mindful of the amount of community work that has gone in to the preparation of the Neighbourhood Plan and based on this do not propose to override the intentions of the Neighbourhood Plan, which supports business use on the site. Note support for safeguarding employment sites. Note the request for flexibility within the policy to encourage the sustainable growth and expansion of all types of employment generating businesses and enable the businesses to respond to the changing economy. In response, it is important the Authority maintains a good supply of employment land for different uses. B2, B8 and E(g) uses are traditional employment generating uses, compatible uses, and require specific sites that have good access for large vehicles and be generally located away from residential areas. Other uses in the E Use Class can locate on non-safeguarded employment sites and in centres, as such they have more choice on where they can locate.

Policy 36 Change of use of non-safeguarded, unoccupied or under-occupied employment sites

Summary

Add to last point: and to thriving communities. Should questions about sustainability and energy efficiency be asked? County Council concern that significant enhancement to Special Qualities within the site seems a high bar to set that may prevent reasonable development. Note the request to reduce the marketing period to 6 months from 12

Response

Noted the comment to add thriving communities to the text. Sustainability and energy efficiency are addressed in policy CC1 and Core policies on development management principles, and design and layout. It is not good practice to repeat policies in the Local Plan,

it should be read as a whole. Enhancement would be proportionate but expected in a National Park in accordance with the requirement to further purposes. Note the request to reduce the marketing period to 6 months from 12. An applicant can already put forward reasoned justification to the LPA to market a property for a reduced period.

Policy 37 Expansion of existing industrial and business development not involving farm diversification

Summary

Consistency with allowing other types of development on the edge of settlements. What does subservient mean? Need to emphasis on small scale accommodated without harm. Businesses in the open countryside can be important to the local economy, provide local services and employ local people. The main issue is not the size of the premises nor history of extensions but how it sits in the landscape and its impact on, e.g., environment, traffic, nature etc. This policy requires a balanced approach that takes account of these but also considers issues such as the extent to which its staff live locally, the impact on the local economy, alternative travel, the availability of realistic alternatives for the business in the locality and so on. Strong support for previous extensions, alterations and increased activity that have required planning permission to be taken into consideration. Should account be taken of the impact on surrounding residents and building users? For example, the impact of emissions, noise, light etc.

Response

Policy has been amended to allow greenfield development in exceptional circumstances. The policy now better aligns with other policies regarding development on the edge of a settlement. The policy wording has been amended to include small scale and subservient without harm. If a business requires to expand beyond the capacity of the landscape in which it sits it will need to relocate. It is not for the landscape to adapt to the business but rather the business adapt and if required move to a more appropriate location that meets its needs. Note strong support in the consideration of previous extensions and alterations and that this be extended to all planning applications. Note the request for policies to take into account the impact on surrounding residents and building users. Other Local Plan policies address these issues and conditions can be attached to

Policy 38 Agricultural or forestry operational development

Summary

The policy text just refers to agricultural and forestry development. Is B needed? Problematic balancing these requirements with the need to support upland farmers (as in Edale) for mixed and thriving communities. Should questions be asked about the disposal of waste and by-products, sustainability and energy efficiency?

Response

Point recommends reducing the first part of A and B and this has been completed. The justification required for new development is considered correct. Policy intent in the current Local Plan on this matter is taken forward. Note the request that policy should consider the disposal of waste and by-products, sustainability and energy efficiency. This is addressed in other Local Plan policies.

Policy 39 Farm diversification

Summary

Concern that the policy requires a link between the business and the farm and that this is not necessary. Ownership/control is irrelevant since what matters is that the business(es) are sustainable (economically, environmentally) and operate within acceptable parameters (traffic, noise, landscape, building design etc). A policy framework that seeks to restrict new business opportunities in-so-far as they must be linked to an existing agricultural operation risk stifling innovation and ultimately be detrimental to the economic fabric of the NP, with negative consequences on social and environmental issues. Farm diversification is surely greenfield development, certainly if ground-mounted solar panels and tourist sites are the diversifications that are allowed. Diversification should not detract from the Park's Special Qualities. The section on slurry treatment could and should be important because of its effect on greenhouse gases. We support constraints on anaerobic digesters. This section overall does not consider sufficiently how to cope with future changes such as climate change and other legislation. It also does not mention the possibility of green energy farms.

Response

The purpose of the policy is to support farm diversification. General business development is addressed in Policy E1. Note concern that farm diversification is greenfield development and that diversification should not harm Special Qualities. Agree Note support to control slurry treatment and the constraints on anaerobic digester. Note the request to consider better climate change and the possibility of green energy farms. This is addressed in policies CC1 and CC2.

Policy 40 On-farm anaerobic digestion of agricultural manure and slurry

Summary

Natural England would like the impact of ammonia emissions from anaerobic digesters on natural habitats are fully considered. The impact of ammonia should also be considered within the HRA.

Response

Note support. High level policies refer to National Park purposes and for development not to harm these. The Authority will respond to any policy recommendations in the HRA.

Shops Services and Community Facilities

General comments

Summary

Support for the continued support of shops services and community facilities policies. The majority of PDNPA villages have lost their schools and shops and even their public transport. Many houses are holiday homes. A regular bus service that would be beneficial to both residents and visitors. A rail reinstatement would support shops, services and community facilities to thrive. Encourage retention and development of village shops and pubs. Parish Councils should be involved in all decisions regarding community facilities as Parish Councils are often best placed to understand and consult on their communities' needs.

Response

Policy S4 has strengthened the policy approach regarding the protection and retention of shops and community services and facilities and requires applicants to consult with Parish Councils as part of their applicant process. Please refer to the transport chapter on rail reinstatement. Note support for a regular bus service, the Authority supports active travel, but it is not in charge of the public transport network.

Policy 41 Provision and retention of community services and facilities (strategic policy)

Summary

B ii - do we want to lose every pub until there is one left? The Policy is written in conflict to securing community assets or facilities that support characteristic settlements with strong

communities and traditions which is one of the Special Qualities of the Peak District National Park. The NHS seek modifications to policy regarding surplus health care facilities formally confirmed as surplus to requirements. The Parish Council wishes to see the Local Plan actively support parishes seeking to improve community facilities. In particular, we ask that the Plan makes it easier for parish councils and local organisations to bring forward improvements such as community car parking, sports and recreation facilities, and essential infrastructure. Practical, proportionate policy guidance and clear, timely advice from the Authority would help parishes deliver beneficial local projects. The Local Plan should explicitly recognise and support community assets and recreational provision as important contributors to public health and social wellbeing. Policies that help secure improvements to open spaces, recreation facilities and community venues will deliver long-term benefits for residents and visitors alike. Do not think development should be allowed on sports facilities, especially as any replacement is likely to encroach on the countryside. Encourage retention and development of village shops and pubs. Development for business, retail and community facilities should be permitted, provided they adhere to sequential tests and policies that favour a town centre location and help maintain a thriving local economy. All development proposals should utilise land efficiently, with a preference for reusing existing buildings whenever possible. Regarding new housing development, the Council requests that careful consideration be given to the potential impact of increased traffic movements on existing homes from any new home development. Whilst Sport England supports the principle of including a policy that protects sports facilities, as drafted, the wording of the policy is not consistent with national policy, set out within para 104 of the Framework. In particular, the wording in Part D of the policy including 'satisfactory replacement' and 'no longer required' raises cause for concern regarding interpretation as this phrasing is looser than the wording in national policy. Furthermore, the wording of the policy does not address para 104c) of the Framework. Also, the wording of the policy would seem to relate solely to the loss of use of existing sports facilities and does not address proposals in the vicinity of a sports facility that may prejudice its use. We would recommend that part D of the policy is removed, and that the policy justification is amended to clarify that policy 41 relates solely to other community services and facilities that are not sports facilities, explaining that sports facilities are covered by policy 42.

Draft Policy Direction 20 Change of use of buildings or sites which provide community services and facilities (development management policy)

Summary

We suggest that the last point should apply to all decisions regarding community facilities. This needs to be consistently followed since Parish Councils are often best placed to understand and consult on their communities' needs. We think community facilities must be retained if possible

Response

Note the request that all parish councils are consulted on community facilities in their parishes. We could look into requiring pre-app community consultation prior to planning applications? Support noted.

Policy 42 Retention of community recreation sites or sports facilities (development management policy)

Summary

Do not support development of sports facilities. This policy could be stronger e.g. no alternative uses that do not serve community need (including housing). Whilst Sport England supports the principle of including a policy that protects sports facilities, as drafted, the wording of the policy is not consistent with national policy, set out within para 104 of the Framework. In particular, the wording in Part D of the policy including 'satisfactory replacement' and 'no longer required' raises cause for concern regarding interpretation as this phrasing is looser than the wording in national policy. Furthermore, the wording of the policy does not address para 104c) of the Framework. Also, the wording of the policy would seem to relate solely to the loss of use of existing sports facilities and does not address proposals in the vicinity of a sports facility that may prejudice its use. We would recommend that part D of the policy is removed, and that the policy justification is amended to clarify that policy 41 relates solely to other community services and facilities that are not sports facilities, explaining that sports facilities are covered by policy 42.

Response

Note the request to strengthen the policy to resist development on sports facilities and that there should be no alternative uses that do not serve the community need. Note the objection by Sport England. Review the policy and amend as requested to align with the NPPF.

Policy 43 Local Green Spaces

Summary

The list should include more green spaces. More clarity is required regarding what weighting is given to LGS. There were some concerns raised over the specific borders of some of the proposed LGS.

Response

This is an evolving list, there is scope for the number of local green spaces to increase, this can address concerns that the list is too small. Suggested sites were assessed against the NPPF criteria. Appropriate sites have been added to the list. Any issues with the borders have site have been addressed and amended.

Draft Policy Direction 21 Shops, professional services and related activities (strategic policy)

Summary

What is small scale in the countryside? How are farm shops controlled? Farm shops - how do we control this? Were the PDNPA to enable a rail reinstatement with the accompanying active travel routes and local bus services we would see visitors stay longer and use more facilities. Thus ensuring vibrant centres not just during the car park times but later and even overnight. In small communities, the presence of existing facilities and services should be considered before new ones are permitted.

Response

Small scale is a matter of fact and degree, but the Draft Local Plan chapter text and policy set out how the Authority will assess applications. Draft Local Plan policies S1 and S2 set out the parameters for what would be considered acceptable, including farm shops. Refer transport comments to the transport chapter. Draft Local Plan Policy S1 sets out which uses require a sequential test.

Minerals and Waste

General Comments

Concerns about future aggregate supply beyond 2042 raised, noting the Peak District's key role in crushed-rock provision and the need to assess both National Park and Derbyshire quarries. Notes that carbon capture requirements may demand extra development at cement sites, calls for stronger encouragement of stone recycling and rubble-wall construction, supports draft policies 44 and 48 while urging tougher action on fly-tipping, though fly-tipping

action is outside the Waste Planning Authority's jurisdiction. Seeks clarity on how post-operation site uses are considered in cumulative-impact assessments. Derbyshire CC recognised the importance of PDNPA mineral policy and how the two Authority's plans are connected. Staffordshire CC note the need to address the 2042 end dates in the Local Plan Review to ensure continuity of supply of aggregates and sufficient production capacity.

Policy 44 Minerals Development (Strategic Policy)

Summary

The responses raised concerns that the policy's use of 'meaningful' reserves could restrict building-stone sites and hinder secondary aggregate production. Responses recommends adding protection of heritage assets and support for renewable energy in restoration. Support for improved access in restoration schemes, calls for clearer evidence on productive capacity and HGV impacts, and seeks alignment of policy wording with the NPPF. A response also urged inclusion of 'habitat' in restoration outcomes, expresses concern about operators going into liquidation before restoration, and suggests rewording policies more positively while recognising the national importance of industrial limestone and cement. Support mineral activity as part of the National Park's heritage, emphasise the need for defined end-dates. Broadly support policy 44. Derbyshire CC supports the approach in this policy and policy 49 and recognised the importance of the two authorities' finding a mutual position, as they previously proposed in their policy SP8.

Response

Building stone sites that produce aggregates as a secondary product could seek extensions of time under Policy M3. If secondary aggregate extraction has previously been consented in principle support would already be inherent, particularly if it is necessary to extract the building stone.

Heritage assets are afforded protected through emerging policy MW4. Renewable energy generation proposals to be judged on their own merits, as it is not an approved after use under the TCPA, with amenity being favoured by the National Park to further the purposes.

Improved access to restored sites supported through emerging policies M1 and M3.

'Habitat' is inherent to nature conservation after uses.

Policies are worded in the negative given the protections afforded to the National Park through the NPPF and the 1949 National Parks and Access to Countryside Act (1995 Environment Act).

National importance of industrial limestone and cement is recognised in Minerals Topic Paper and the Draft Plan.

End dates are imposed on all minerals/waste consents.

Both PDNPA and DCC will deliver a 10 year landbank as required by the NPPF.

Sites with remaining aggregate reserves in 2042 or at other specified end dates will be given in principle support for extensions of time to ensure continuity of supply and production capacity are maintained.

Policy 45 Fluorspar (Strategic Policy)

Summary

Response supported the policy.

Response

Noted. Policy to be carried forward.

Policy 46 Building and roofing stone proposals (Strategic Policy)

Several respondents challenge the requirement for legal agreements, arguing it is unnecessary and could hinder small building-stone sites, while others stress the need to secure restoration given risks of operators entering liquidation. There is strong support for ensuring a local supply of building stone for heritage repair, with some calling for policy wording that is more positive and explicitly supportive of small-scale quarries and time extensions. Views differ on flexibility: industry respondents favour it, while a Parish Council response stated that open-ended permissions undermine certainty of restoration and nature recovery. Overall, the responses welcome recognition of local stone demand but seek clearer, more balanced policy wording.

Response

Legal agreements are proposed in the event that restoration outcomes that further National Park purposes cannot be achieved within the statutory 5 year aftercare period. Although

impact from building stone sites is limited compared to large scale aggregate extraction, impacts still occur and sites can be open, in a business sense and in from a landscape perspective for many years. To off-set this harm to the NP, long term nature conservation after use with public access where safe is desired in order to enhance the National Park in the long term. Legal agreements may be required to achieve this. Time extension can be permitted under emerging Policy M3. All consents will have an end date, but TCPA allows for proposals to extend them, not possible to ensure absolute end dates through the planning system. Clause B to be removed as covered adequately by clause A.

Clause E redrafted to include 'Where necessary'.

Policy 47 Mineral Safeguarding (Strategic Policy)

Summary

The responses broadly argue that mineral safeguarding should apply to *all* non-mineral development, not only major schemes, because any development could sterilise important resources. Three respondents explicitly state this, while another simply supports the draft policy as written. All mineral resources should be included in the policy and subject to safeguarding.

Response

Emerging Policy M5 amended to include 'all development' with the exception of householder proposals given that mineral assessments would be an unnecessary burden on applicants.

Policy 48 Waste management (Strategic Policy)

Summary

One respondent opposes oversized waste facilities that exceed the needs of the local community, while the other two respondents support the policy without raising concerns.

The approach was supported by DCC, whom stated that it was compatible with the emerging policy approach in the DDWLP Review which seeks to identify new sites for larger scale waste disposal facilities in the County for both domestic and commercial and industrial waste streams, to meet identified need arising both in the County and National Park.

Response

Noted.

Policy 49 The justification for minerals and waste development (DM policy)

Response

Several respondents argue that Policy 49 should read more positively, with the word ‘only’ removed, and that Section B should be deleted because it duplicates Policy 44 and national policy. One respondent supports the draft policy as written. Others, including Tarmac, support the principle of requiring justification for minerals and waste development but note that the exceptions test in Policy 44 makes parts of Policy 49 unnecessary. Additional comments highlight that point v is unrealistic, as applicants cannot predict future supply contracts, and that repeating national policy tests is not required.

Response

Policy negatively phrased due to protections afford to National Park and Park purposes. National policy tests included to give context to other criteria. Point v is required in order to ensure any reserves that may be consented are fit for the purposes for which they are proposed i.e. is there a market for the building/roofing stone and will the resource meet the required specification. Without this criteria the mineral would be unusable or used for general purposes which can be met through other means outside of the National Park.

Policy 50 Restoration and Aftercare (DM policy)

Summary

Several respondents argue that requiring more than 10% BNG or applying BNG to developments outside the Environment Act is unsound, noting that the Defra metric is unsuitable for minerals and that “highest possible BNG” is unrealistic. Others support adding access within restoration and suggest including adjacent habitats in proposals. Multiple responses request removing the word ‘only’ and deleting Section D, arguing that legal agreements should not be prescribed in policy. Concerns are also raised about operators going into liquidation before restoration is completed. While some respondents support the draft policy or specific elements of it, others emphasise that BNG should remain at the mandatory 10% and that biodiversity enhancements should follow local nature recovery strategies rather than open-ended targets.

Response

It has been demonstrated in Appendix A to the Minerals Topic Paper (June 2026) that greater than 10% BNG can be achieved. Maximising BNG will further National Park

purposes so will be included in emerging policy M4. Legal agreement may be necessary to ensure acceptable restoration outcomes if they cannot be achieved in the 5 year statutory period. Emerging policy M4 seeks to link restoration schemes to relevant LNRSs and the PDNRP.

Policy 51 Ancillary Minerals Development (DM Policy)

Summary

The responses raise concerns about policy clarity, with several objecting to the term “close link” and to requiring all unused plant and machinery to be removed, arguing this is impractical for large quarry operations and should be assessed case-by-case. One respondent supports the draft policy as written. Others suggest removing the final sentence of point ii and emphasise that a simple “link” is sufficient. A further response strongly opposes the implied allowance for importing stone for processing, arguing it would increase traffic, overdevelop sites, and constitute major development that should not be permitted in the National Park.

Response

Term ‘close’ link to be retained in emerging policy MW6 as it’s important that ancillary development is closely linked to on-site operations given National Park status. There may be options to utilise other sites outside of the Nation Park if the link is more tenuous.

Proposals for importation of building stone for processing will be judged on their own merits through the planning application process.

Policy 52 Processing of building and roofing stone (DM Policy)

Summary

One respondent seeks clarity on the term ‘active building stone sites’, while another raises concerns that ending transport from New Pilhough Quarry could simply shift HGV movements through Birchover unless a full haul road is required. A further respondent supports the draft policy. Others strongly oppose importing stone for processing, arguing it would harm the National Park through increased traffic, emissions and unjustified industrial activity that conflicts with National Park purposes.

Responses

Policy redrafted to improve clarity. Alongside National Park purposes, the Government also places a corresponding social and economic duty upon National Park Authorities themselves – to be considered when delivering the two purposes. This reciprocal arrangement is designed to ensure a high degree of mutual cooperation, avoiding the risk either that the needs of National Park residents and businesses will be ignored, or that others will ignore its designation when undertaking activities. CO₂ emissions and other potential impacts from importation would be assessed during planning application stage. If they were deemed to be unacceptable the application would be refused. There is no longer an overarching policy basis for a reduction in quarrying in the National Park.

Policy 53 Safeguarding gritstone resource (DM Policy)

Policy has been removed and combined with policy 47, as suggested by a response.

Policy 54 The impact of minerals and waste development on amenity (DM Policy)

Summary

The responses fall into three clear positions: one respondent supports the draft policy without changes; another argues the policy should be more positively worded by removing ‘only’; and a further response requests adding a caveat to allow otherwise unacceptable noisy operations when necessary for mineral extraction, to ensure alignment with the NPPF.

Response

Policy has been adapted to align with the NPPF. Paragraph 190 of the NPPF states : “When considering applications for development within National Parks, the Broads and National Landscapes, permission **should be refused** for major development **other than** in exceptional circumstances” (our emphasis). It is a restrictive policy, it is deemed appropriate to include ‘only’.

Policy 55 The impact of minerals and waste development on the environment (DM Policy)

Summary

The responses collectively call for clearer, more NPPF-aligned wording in the policy: ‘impacts’ should be replaced with ‘harm’ for heritage assets, the word ‘only’ should be removed to make the policy more positive, and requirements such as point v) should focus on minimising impacts rather than assessing any potential effect, which is seen as

unrealistic. One respondent questions the purpose of point xi), while another emphasises that planning controls should aim for minimisation rather than full elimination of environmental effects. Two respondents support the draft policy as written.

Response

Policy amended to include caveat to allow for short term noisy activities required to facilitate mineral extraction that would otherwise be considered unacceptable. Opening sentence of the policy requires reduction of impacts to an acceptable level, so it is not a impossible test. Need to consider 'any potential effects' as they could be related to water quality, pollution, flow rates. Water quality is a significant issue in the NP, no intention to weaken policy in this regard.

Policy 56 Cumulative effect of Mineral Development (DM Policy)

Summary

The responses show broad support for the policy, with one respondent simply agreeing with the draft. Another asks for the policy to be phrased more positively by removing 'only', while a further comment supports the requirement to consider cumulative impact in decision-making.

Responses

Retain 'only' as consistent with existing policy approach.

Policy 57 Waste Management Facilities (DM Policy)

Summary

One respondent supports the draft policy, while another opposes waste management on greenfield or settlement-centre sites, arguing such locations are inappropriate.

Response

Noted.

Travel and Transport

General Comments

The responses collectively show a pattern of constructive engagement, with many respondents offering supportive comments while also raising targeted suggestions for strengthening the Local Plan. Key themes include calls for clearer policies on EV infrastructure, campervan management, and sustainable transport, alongside detailed input from National Highways on evidence requirements, Duty to Cooperate responsibilities, and the Strategic Road Network's relationship with the National Park. Several respondents objected to the proposed shift in emphasis toward safeguarding the Monsal and Longdendale Trails as multi-user routes rather than potential rail corridors, though the Authority clarifies that safeguarding remains in place, with only the emphasis changing. Other comments highlight operational matters—such as car park management or bus service provision—that fall outside the Local Plan's remit but are acknowledged as important. Overall, the feedback reflects a strong interest in balancing environmental protection, visitor management, and sustainable mobility, with the Authority committing to refine policies where appropriate while recognising the limits of the Plan's scope.

Draft Policy Direction 22 Reducing the general need to travel and encouraging sustainable transport (Strategic Policy)

Summary of Comments

Respondents broadly support reducing private car use and strengthening sustainable travel measures, calling for more ambitious, clearer policy direction. Common themes include expanding active travel infrastructure (better PROW links, barrier removal, bridleways, e-bikes, wheeling and accessibility), improving and integrating public transport (rail reinstatement, gateway station links, electrified services, transport hubs), and adopting planning approaches that prioritise modal shift, sustainable travel hierarchies, and development accessible without car dependency. Several advocate demand-management tools such as environmental levies, pay-per-mile charging, and access-only road closures, while others highlight demographic and transport-availability constraints. Some respondents raise concerns about EV sustainability or oppose changes to safeguarding the Monsal and Longdendale Trails. A number of submissions duplicate comments made elsewhere but consistently emphasise the need for a cohesive, ambitious strategy that links transport, development planning, and climate goals. Policy will require clearer link to transitioning trips to rail and local bus service to reduce traffic and parking pressure.

Response

Overall, the responses indicate widespread support for the draft transport policies, with the Peak District National Park Authority noting that it will consider several suggested amendments to address gaps and explicitly include active travel. While the Authority emphasizes its commitment to a sustainable travel hierarchy that prioritizes active travel (walking, wheeling, cycling, and horse-riding) over private vehicles, it clarifies that it is not a formal transport authority and lacks the power to mandate public transport strategies or road-user charging. Instead, the Authority focuses on using its planning powers to safeguard multi-user routes—such as shifting the emphasis of the Monsal and Longdendale Trails without reducing their protection—while actively working to influence constituent transport authorities and trialing partner-led local area traffic management schemes.

Draft Policy Direction 23 Reducing and directing traffic (strategic policy)

Summary of Comments

The respondents express broad support for the policy direction but emphasize the need for a more cohesive, deliverable plan to tackle congestion, improve road safety, and reduce private car use. Key recommendations include restricting cross-Park traffic while acknowledging unavoidable mineral transport, implementing "Quiet Lane" schemes, and mandating Transport Assessments for new developments. Respondents strongly advocate for denser development located near existing transport links, alongside robust infrastructure for sustainable and active travel—such as enhanced public transport access for visitors, segregated bridleways, protected road verges, and active travel links integrated into road schemes. While there is opposition to changing rail reinstatement safeguards, there is a call to adopt progressive models like the Yorkshire Dales National Park Authority's ten-year Active Travel Plan, potentially incorporating measures like pay-per-mile charges and partial road closures.

Response

The provided responses indicate overall appreciation and welcoming of stakeholders' support and constructive feedback, which will be considered as the Local Plan and its specific policy directions continue to develop. The Peak District National Park Authority emphasizes that while certain ambitious aspirations—such as road user charging, cross-

boundary routing, or leading a car-free coalition—fall outside the legal remit of this specific planning document, the Plan actively utilizes its powers to influence regional partners, reduce and direct traffic, and promote higher housing densities near sustainable transport. Furthermore, the Authority highlights its ongoing alignment with the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan, confirming its commitment to improving connections to existing rights of way, balancing mineral freight traffic management, and updating the safeguarding emphasis for multi-user trails like the Monsal and Longdendale Trails without reducing their protection.

Policy 58 Cross-Park Roads (strategic policy)

The feedback for Policy 58 (Cross-Park Roads) shows general support for its focus on restricting increased road capacity and managing traffic, with authorities noting and welcoming this agreement. In response to specific suggestions, officials are considering amending wording to ensure consistency with other strategic policies, exploring proposed tests for traffic reduction, and clarifying the explicit links between road policies and active travel or rights of way. While some respondents advocated for rail reinstatement, the authority noted that formal rail safeguarding will be removed, though the protection of trail networks will naturally prevent development that could block future rail projects. Finally, regarding concerns over authority influence, officials clarified that their power is backed by major development tests, planning permission requirements, and legislative duties that require public bodies to further National Park purposes.

Policy 59 Local road improvements (DM Policy)

The provided feedback shows strong overall support for the policy, which officers noted and welcomed. Key constructive suggestions focused on enhancing sustainable transport and network resilience. While individual requests to reinstate the Monsal Trail railway were redirected to a more relevant policy, other respondents emphasized integrating sustainable travel, protecting verges, and adding bridleways or segregated active travel routes alongside new road developments. In response, officers clarified that existing policies already secure facilities for walkers, cyclists, and horse riders during development, though verge use must balance ecological protections. Additionally, while one respondent raised concerns about climate-related network resilience, officers maintained that the current policy provides

sufficient scope to handle remedial safety and resilience schemes. Policy should address that highways require resilience to maintain functionality during adverse conditions.

Policy 60 – Managing the demand for freight transport (strategic policy)

The feedback demonstrates widespread support for the freight policy, particularly regarding its focus on minimizing road-borne freight and transitioning to rail. Key stakeholder recommendations include improving HGV routing and driver facilities, implementing weight restrictions on sensitive routes, and mitigating impacts on the Hope Valley Railway and external quarry freight. In response, the National Park Authority welcomed the general support and agreed to consider actionable policy adjustments where feasible. However, they clarified regulatory boundaries, noting that they cannot control freight originating outside the Park and that powers for weight restrictions ultimately lie with highway authorities. Furthermore, while the Authority continues to support shifting road freight to existing rail corridors, they clarified that the policy does not advocate for reopening former rail lines (such as the Matlock to Buxton route) and reaffirmed that changing the emphasis of trail safeguarding does not compromise potential future rail reinstatement.

Policy 61 – Railway construction (strategic policy)

While general support for the policy was welcomed, public consultation responses primarily centered on concerns regarding a proposed change in emphasis that safeguards the Monsal and Longdendale Trails as multi-user trails rather than explicitly for rail reinstatement. The National Park Authority clarified that this shift ensures consistency across its routes and reflects current popularity, noting that protecting the trail also inherently prevents development that would prejudice future rail reinstatement. Other responses requested policy wording adjustments—such as factoring in the transport of bulk goods, clarifying Park & Ride functions, and modifying criteria for rail development—which the Authority committed to reviewing and clarifying as the plan is further developed.

Policy 62 Routes for walking, cycling and horse riding, and waterways (strategic policy)

Public consultation feedback reveals general support for the National Park's active travel policy, though a prominent point of contention is the proposed shift in emphasis to safeguard the Monsal and Longdendale Trails primarily as multi-user trails rather than for future rail reinstatement. Several respondents argue that a rail corridor would offer superior sustainable travel benefits, but the Authority clarified that this policy change simply standardizes their management approach without diminishing actual protections; protecting the current multi-user trails naturally prevents any development that would block future railway or tram reinstatement. Other feedback includes requests to explicitly incorporate "wheeling" into the policy—which the Authority accepted—alongside suggestions for better public transport integration, specific infrastructure design guidance, and clearer indicators for active travel usage, all of which the Authority noted for consideration as the final plan develops.

Policy 63 Development affecting a public right of way (DM Policy)

The consultation feedback shows broad support for the policy, particularly regarding its general direction and the safeguarding of specific trails like the Monsal and Trans Pennine Trails. In response to constructive suggestions, the Authority agreed to amend the policy to explicitly include "wheeling" and general accessibility.

Some comments raised technical queries regarding the impact of visitor facilities, infrastructure design benefits, and access to blue and green spaces. The Authority clarified that while some broader ambitions—such as expanding the Public Rights of Way (PRoW) network—fall under the jurisdiction of highway authorities rather than this Plan, they will consider expanding clearer design guidance and take suggestions regarding public transport integration and access improvements into account as the Plan develops.

Draft Policy Direction 24 Minimising the adverse impact of motor vehicles and managing the demand for car and coach parks (strategic policy)

Respondents widely advocated for stronger measures to manage and reduce traffic demand, promote a shift toward public transport, expand Park & Ride schemes, and introduce flexible overspill or environmentally sustainable parking materials. In response, the National Park Authority emphasized that while broader traffic reduction and public transport

provision often fall outside the specific scope of this development-focused policy or its direct responsibilities, they are actively addressing these concerns through other policy directions. Furthermore, the Authority highlighted its commitment to a multi-agency, partnership-led "Area Management" approach—currently being piloted in the Mam Nick and Castleton areas—which will be a key component of the upcoming National Park Management Plan to address visitor parking and transit issues collaboratively.

Policy 64 Business parking (DM Policy)

The consultation feedback shows general support for the parking policies alongside specific requests for clarity and enhancements. Key suggestions include adopting permeable surfacing for parking areas and providing dedicated space for equestrian vehicles (like horseboxes) near multi-user routes, which the council noted for future design and policy consideration. Additionally, clarification was provided regarding large estates like Chatsworth, explaining that staff parking falls under Business Parking (Policy 64) while public car park expansions fall under Visitor Parking (Policy 66).

Policy 65 Residential off-street parking (DM Policy)

The feedback shows general support for the parking policy, though respondents raised questions about its enforcement and suggested several improvements. Specifically, it was recommended that parking lots use permeable surfaces and that maximum space limits be more clearly defined based on development size and proximity to public transport. In response, officials welcomed the support and noted the suggestions for inclusion in the Design Guide, but they cautioned that public transport links in the National Park have actually been declining. They concluded that the current Peak District Parking Standards already offer flexible maximum and minimum limits for local context, which will be formally re-evaluated during the upcoming Local Plan Review.

Policy 66 Visitor parking (DM Policy)

The public consultation on the Draft Visitor Parking Policy reveals a mix of general support and targeted suggestions for improvement, balanced by the National Park Authority's focus on sustainable management. While some respondents welcomed the criteria-led approach, many raised concerns regarding the enforcement of on-street parking restrictions, traffic displacement, and the specific criteria for establishing "demonstrable need." Multiple submissions advocated for stronger alignment with public transport and active travel

infrastructure—including suggestions for Park & Ride facilities to remain outside park boundaries and the introduction of electric vehicle (EV) charging policies.

In response, the Authority clarified that while general on-street parking enforcement and broader public transport management fall outside its direct planning powers, the policy will strictly require a reciprocal removal of on-street parking before new off-street spaces are permitted. Furthermore, the Authority committed to clarifying the definition of "demonstrable need," considering suggestions regarding EV infrastructure, overnight campervan parking, and Article 4 directions for pop-up car parks, while emphasizing that complex visitor pressures will be tackled through collaborative, area-based management partnerships rather than the Local Plan alone.

Policy 67 Air transport (strategic policy)

Across the feedback, respondents expressed broad support for the policy, which the feedback team consistently noted and welcomed. While some participants agreed with the proposal outright, others provided constructive recommendations, such as clarifying vague policy language and conducting further research into the impacts and benefits of drones. Additionally, there was specific support for allowing helicopters and drones to operate when performing essential tasks related to health, safety, emergency services, and environmental restoration, all of which the team appreciated and agreed to address through policy amendments and future implementation strategies.

Utilities

General Comments

Responses highlight proposed changes to the draft NPPF (2025) and suggest introducing a new policy on water infrastructure, emphasising that new or upgraded water company infrastructure should protect the National Park's special qualities and be sensitively located, designed and landscaped to minimise environmental impact. This will be considered as the plan is developed.

Draft Policy direction 25 Development that requires new or upgraded service infrastructure

Support for the draft policy direction but calls for a stronger focus on SuDS, separation of foul and surface water, and water-efficient housing design. They request that the policy reflect NPPF paragraph 182 and incorporate wider sustainable drainage recommendations from their supporting documents. They also consider Part B overly restrictive for limiting new housing to locations with mains sewer connections.

Draft Policy Direction 26 Restoration of utility and telecommunications infrastructure sites (DM Policy)

One respondent expresses concern that the draft policy direction duplicates requirements already set out in Policy 6, and this will be reviewed as the Plan progresses. Another respondent also supports the policy overall and request the addition of a timescale clause, which will be considered as the policy is further developed.

Policy 68 New or expanded reservoirs (strategic policy)

One respondent sought the Authority's view on the proposed Carsington–Tittesworth pipeline, and the Authority explained that any scheme would be assessed against Policy 69 and National Park protections, focusing on need, alternatives, and potential harm. Across the wider comments, respondents generally supported the policy but proposed amendments, including allowing watersports on new or expanded reservoirs, clarifying the meaning of "expanded reservoirs", aligning BNG requirements with national guidance, and recognising the national importance of secure water supply. Additional suggestions included referencing water-related ecosystem services, ensuring cultural heritage impacts are addressed, and adding flexibility around site constraints. These points were acknowledged, with many to be considered as the policy is further developed.

Policy 69 New and upgraded utilities services (strategic policy)

Respondents are broadly supportive of the policy but raises several concerns about how it may affect strategic distribution networks, the Peak Cluster, and future water-supply

infrastructure. They request amendments to ensure flexibility for nationally significant or public-interest schemes, including clearer wording on the role of National Grid, the feasibility of undergrounding utilities, and the need for a dedicated water infrastructure policy. The Authority acknowledges these points, noting that alternative routes should be assessed where infrastructure offers no benefit to the National Park, and confirms that all suggested changes will be considered as the policy is further developed.

Policy 70 Development close to utility installations (DM Policy)

Responses received supported the policy.

Policy 71 Telecommunications infrastructure (DM Policy)

Respondents supports the policy overall but raises several concerns about ensuring a resilient and effective mobile network, including improved coverage, maintaining power to masts during outages, and enabling continued fibre-broadband rollout. They also highlight the visual impact of masts and satellite dishes and request wording changes to better protect heritage assets. The Authority notes these points, and firm that the concerns will be considered as the Plan develops. Clause C will be amended as suggested.

Appendix 1

PDNPA statutory and other consultees consulted during the Regulation 18 Preferred Approach consultation

British Telecommunications plc
National Gas Transmission
United Utilities
Yorkshire Water
Severn Trent
Severn Trent
Mobile Operators Association
HSE
Fisher German re Oil pipeline
National Grid
The Planning Inspectorate
Department for Transport
Network Rail
Historic England
Historic England
Environment Agency
National Highways
Natural England
Homes England
Homes England North West
Homes & Communities Agency (Midlands area)
DEFRA, Landscapes, People and Access Team
The Coal Authority
Ministry of Defence
Civil Aviation Authority
Sport England East Midlands Office
Active Travel England
Forestry England
Forestry England
Cheshire PCC
Staffordshire Police
Staffordshire PCC
Derbyshire PCC
West Yorkshire PCC
Derbyshire Fire and Rescue Service
Cheshire Fire and Rescue Service
West Yorkshire Fire and Rescue
Greater Manchester Fire and Rescue
NHS Derby & Derbyshire
NHS Staffs & Stoke
NHS North Staffordshire
NHS S Yorks

NHS Sheffield
NHS Greater Manchester
NHS Barnsley
NHS Tameside and Glossop
NHS Cheshire & Merseyside
NHS West Yorkshire
NHS Huddersfield
NHS property
NHS property

Local Authority

Barnsley Metropolitan Borough Council (planning)
Barnsley Metropolitan Borough Council (transport)
Cheshire East (Planning)
Cheshire East (Transport)
Derbyshire County Council (Planning)
Derbyshire County Council (Transport)
Derbyshire County Council (Planning)
Derbyshire County Council (Adult Social Care)
Derbyshire County Council (Transport)
Lead Local Flood Authority
Derbyshire Dales District Council (planning)
Derbyshire Dales District Council (economy)
Derbyshire Dales District Council (housing)
High Peak Borough Council (planning)
High Peak Borough Council (regeneration)
High Peak Borough Council (economy)
High Peak Borough Council (planning)
Kirklees Council (Planning)
Kirklees Council (Planning)
North East Derbyshire District Council
Oldham Metropolitan Borough Council (Planning)
Oldham Metropolitan Borough Council (Transport)
Sheffield City Council (planning)
Sheffield City Council (Transport)
Staffordshire County Council (Planning)
Staffordshire County Council (Transport)
Staffordshire Moorlands District Council
Stockport Metropolitan Borough Council (Planning)
Stockport Metropolitan Borough Council (transport)

Tameside MBC (planning)
Tameside MBC (transport)
West Yorkshire City Region CA
Sheffield City region combined authority
Leeds City Region combined authority
Greater Manchester Combined Authority
East Midlands Combined Authority
Peak Park Parishes Forum
Transport for Greater Manchester
Transport for Greater Manchester
Transport for the North

**MPs for the following
constituencies**

Derbyshire Dales
High Peak
Sheffield Hallam
Staffordshire Moorlands
Macclesfield
Oldham East and
Saddleworth
Huddersfield
Barnsley South
Barnsley North
North East Derbyshire
Penistone & Stocksbridge
Colne Valley

Bakewell and District Historical Society
Bradwell Community Land Trust
British Mountaineering Council
British Mountaineering Council
Business Peak District Coordinator
Campaign for National Parks
CAMRA
Canal and River Trust
Chatsworth Estate
Cheshire Association of Local Councils
Cheshire Community Action
Cheshire Wildlife Trust
Council for British Archaeology
Country Land & Business Association
CPRE
Dane Valley Climate Action Group

Derbyshire and Nottinghamshire Chamber of Commerce
Derbyshire Association of Local Councils
Derbyshire Dales CVS
Derbyshire Dales District Council Director of Housing
Derbyshire Gypsy Liaison Group

Derbyshire Historic Buildings Trust
Derbyshire Swift Conservation Project
Derbyshire Wildlife Trust
Devonshire Group
Devonshire Group (Group Property Development Director)
Dore Neighbourhood Forum
East Midlands Ambulance Service NHS Trust
Eastern Moors
Friends of Loxley Valley
Friends of the Peak District
Greater Manchester and High Peak Ramblers

Haddon Hall

Health and Safety Executive

High Peak CVS
Home Builders Federation
Hope Valley Climate Action Group
Litton Properties Ltd
National Farmers Union
National Farmers Union
National Farmers Union
National Parks England
National Trust
NHS Property Services Ltd
on behalf of Chatsworth
Peak Business Hub
Peak Park Parishes Forum
Peakland Environmental Farmers
RSPB
Rural Action Derbyshire
Sheffield and Rotherham Wildlife Trust
Staffordshire Association of Local Councils
Staffordshire Historic Building Trust
Staffordshire Moorlands CVS ('Support Staffordshire')
Staffordshire Wildlife Trust
The Woodland Trust
Tissington Estate
Youlgrave Community Land Trust

East Midlands Housing Association
Equity Housing
Nottingham Community Housing Association
PDRHA c/o Midlands Rural Housing Housing
Sanctuary Group
Platform Housing Group
Nottingham Community Housing Association
Rural Action Derbyshire
PDRHA c/o Midlands Rural Housing Housing

Active Derbyshire
Bakewell & Eyam Community Transport

Bright Five
British Horse Society
Derby and Derbyshire Local Access Forum

Derbyshire & Peak District Campaign for Better Transport
Derwent Valley Community Rail Partnership
Freight Transport Association

Friends of Buxton Station
High Peak and Hope Valley Community Rail Partnership

JMP (on behalf of Highways England)
Midlands Connect Partnership

National Trails

Peak Horse Power
Peak Rail

Ramblers (South Yorkshire & North East Derbyshire Area)
Ramblers Association (Derbyshire Dales Area)

Ramblers Association (Greater Manchester & High Peak)

Ramblers Association (New Mills)

Sheffield Access Liaison Group

Sheffield First

South Yorkshire Passenger Transport Executive

South Yorkshire PTE

Stagecoach East Midlands
Sustainable Bakewell cic

SUSTRANS

TM Travel Ltd

Trans Pennine Trail

Transport for Greater Manchester

Transport for the East Midlands

Transport for the North

Trent Barton

West Yorkshire Combined Authority

Yorkshire Metro

Cemex UK

Breedon Group (Hope Cement
Works)

Breedon Group (Hope Cement
Works)

Breedon Group (Hope Cement
Works)

Mineral Products Association

Hope Cement Works

Tarmac Ltd

Marshalls

Natural Stone Sales

Longcliffe

Grants (Blackstone)

Marchington Stone

HSE Quarries Team

Hazardous Substances consent

Hazardous Substances consent
at nuclear sites

Silkstone Environmental

Earls Stone

Aggregate Industries

Aggregate Industries

Stoke Stoneworks

Stoke Stoneworks

Birchover Stone Ltd

Chastsworth House Trust

Appendix 2: summary of comment and PDNPA response

Introduction and spatial objectives					
Point #	Point Name	Comment #	Name	Summary of Comment	PDNPA response
3	1 Introduction	PA--33-13		No comments	Noted.
3	1 Introduction	PA--43-1		Bakewell Town Council welcomes the general direction outlined in the Preferred Approach document.	Noted.
3	1 Introduction	PA--48-4		We welcome the emphasis on ensuring that the Peak District is a welcoming place where all are inspired to care and communities thrive.	Noted.
3	1 Introduction	PA--84-5		Difficulty in using consultation.	Platform is modelled for smartphone. Many other ways of viewing and making comments also available.
3	1 Introduction	PA--85-9	Peaks and Dales Line	Principally we object to the removal of safeguarding of railway routes - we also believe the Local Plan consultation has failed against all four National Planning Policy Framework (NPPF) Tests of Soundness (see our submitted document). We believe the Local Plan fails to be consistent with the NPPF. We believe there are necessary modifications, risks and missed opportunities.	Noted. Detailed comments considered in policy drafting.
3	1 Introduction	PA--99-1	Hope & Derwent PC	Supporting data would be improved by comparison with other parks and regions e.g. the population declines, noted in the above review, both in totals and working age. How does this compare with national trends?	This is set out separate reports: Population Projections and Housing Needs Assessment and Local Economy both available on the website.
3	1 Introduction	PA--115-3	CPRE	The PDNPA are encouraged to ensure that their next stage of plan making if Regulation 19, is consistent with the national development management policies likely to be finalised early next year and subject to consultation now. This should avoid challenges to a new plan on grounds of being out of date.	Noted. All issues of conformity with emerging Policy and Guidance addressed in policy drafting.

3	1 Introduction	PA--124-3	HPBC	The map does not currently label High Peak Borough Council whilst the other constituent authorities are named.	Noted and addressed.
3	2 Planning in a National Park	PA--135-1	DCC	The stated housing provision is insufficient. The NPA should work with parish councils to understand housing need. The approach to sustainable transport is supported.	The comments are noted. The Housing Requirement will be reassessed in light of any new evidence on need and, land availability and settlement landscape capacity.
4	2 Planning in a National Park	PA--1-1	Buxton Field Club	The Plan needs a much stronger emphasis on addressing the biodiversity crisis and therefore the need to have at its core how the Authority is protecting and enhancing the natural environment, habitats and species. It is meaningless to talk about protecting landscapes and geology if those areas are devoid of wildlife.	Proposed policies are significantly expanded and strengthened so that we focus equally on the enhance aspect of National Park purposes and not just on the conserve aspect. This includes 20% BNG and the requirement that all development proposals contribute proportionately towards nature recovery.
4	2 Planning in a National Park	PA--31-41	Edale PC	hope the Local Plan will support the purposes of the National Park while ensuring the needs of communities such as Edale, as well as visitors, are taken into account.	Noted.
4	2 Planning in a National Park	PA--33-1	Peak Park Parishes Forum	No comments	Noted.
4	2 Planning in a National Park	PA--35-2	Oldham PC	The vision is supported however the date stated is to 2043 whereas the rest of the plan refers to the plan period being until 2045.	Noted and corrected.
4	2 Planning in a National Park	PA--45-8	Eyam PC	The number of young and working age people within the Park is down by 17.9% and 12% respectively since 2011. We believe this is largely due to the lack of housing and restrictions on business development. To maintain vibrant, healthy and productive living and working communities it is crucial that housing policies take into consideration housing need.	Noted. Spatial objectives and housing policies are informed by an analysis of housing need.

4	2 Planning in a National Park	PA--57-4	BHS	Planning and development should include consideration of making the PDNP an attractive place for equestrians to be due to contribution to economy of £6k a year. Vulnerable road users should not be disadvantaged further by development. NPPF requires policies and decisions to protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks	Noted. Planning policies will continue to protect and enhance the rights of way network and support the provision of facilities for keeping and riding horses.
4	2 Planning in a National Park	PA--65-9	Minerals Products Ass	Amend Key Facts to 'The Peak District is rich in commercially valuable minerals used mainly in construction and industry. Their extraction has taken place for thousands of years and contributes to the distinctive built heritage. Today, mineral extraction continues to make an important contribution to national minerals supply and contributes to the local economy'. Other forms of development also contentious, not just minerals. Plan should recognise the important contribution to national minerals supply the area makes and the jobs and investment it provides.	Noted and considered in redrafting. It is considered that minerals development is uniquely contentious due to its scale, permanency and the nature of the activity.
4	2 Planning in a National Park	PA--85-3	Peaks and Dales Line	Our emailed document makes comments on alignment with the NPPF.	Noted. Detailed comments considered in policy drafting.
4	2 Planning in a National Park	PA--116-2	Local Access Forum	LAF is disappointed to see no mention of the distance and percentage makeup of the RoW network in Key Facts point 5, pg17. The RoW network in the National Park is a key attraction for visitors and the LAF feels the importance of the network should not be downplayed.	Noted and considered in redrafting.
4	2 Planning in a National Park	PA--125-1	Historic England	We value the recognition of the role of heritage within the creation and preservation of the National Park. This section would benefit from additional facts relating to heritage assets including archaeology and non designated heritage assets.	Noted. This section re-written for the Draft Plan.
5	3 Spatial Objectives	PA--8-1	individual	These plans will fail without addressing access to the Peak District without a car. The only mass transport solution for this is to reinstate the railway in the Wye valley.	Agree that car traffic is a serious issue but the NPA is not a highway authority responsible for mass transport solutions.

5	3 Spatial Objectives	PA--19-1	Natural England	Green Infrastructure should feature more prominently within the spatial objectives and throughout the Plan. 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. Natural England's Green Infrastructure Framework (GIF) aims to support better planning for good quality GI and help target the creation or improvement of GI where it is needed most, to deliver environmental, economic, health and wellbeing benefits, for nature, climate, local and wider communities.	Noted. Green Infrastructure will be incorporated into Outcome 1.
5	3 Spatial Objectives	PA--31-37	Edale PC	Agree.	Noted.

5	3 Spatial Objectives	PA--33-7	Peak Park Parishes Forum	<p>(i) There is a point that, as the population declines and gets older, the spatial objectives and strategic housing provision in the Park are potentially at odds with the outcome of thriving and sustainable communities in 2025. (ii) The number of younger people is declining as families leave for more suitable houses outside the Park and schools are increasingly under threat, so there appears to be some internal conflict between thriving and sustainable, the residency clause, the size of houses permitted and the reluctance to consider market housing in order to fund affordable and social development. These points are revisited in lower relevant sections. (iii) We understand the reasoning behind concentrating development in settlements most likely to be able to support new dwellings, for example because they have good transport links. However, the disadvantage is that there will not be many opportunities for development in the smaller settlements surrounding them, which may be to their disadvantage, eg if they need more young families to support a school. (iv) Query whether the policy for parishes which straddle the National Park boundary is appropriate. It appears to push development away to those parts of the parish that are outside the park boundary and within the boundary, only allows development which meets the needs of those living within the park. Is this realistic? (v) Further comments re dwelling size and 10yr clause</p>	<p>(i) Strategic housing provision is set at a level where negative population effects may be ameliorated somewhat taking into account the obvious and significant constraints.</p> <p>It should be noted that the indicative housing figures presented are neither a target nor a restriction but an evidenced assessment of the type and scale of housing development that can take place to meet need and contribute to thriving and sustainable communities, without harming Special Qualities and the very reason for designation as a protected landscape. (ii) Noted. Comments on residency clause and size of homes dealt with separately. (iii) Noted. Housing development is also permitted in smaller settlements and hamlets. (iv) Noted. Policy allows for wider housing needs to be taken into account in exceptional circumstances.</p>
5	3 Spatial Objectives	PA--34-1	Oldham PC	Vision is supported however the date stated is to 2043 whereas the rest of the plan refers to the plan period being until 2045.	Noted and error corrected.

5	3 Spatial Objectives	PA--46-1	Sport England	Sport England would recommend including more explicit references to the role of the National Park in providing opportunities for outdoor sport and physical activity, including : Expanding the vision to make reference to the Park being a healthy and active place Including a reference to physical activity within outcome Within Outcome 6 to expand the 3rd bullet to read To support the provision, retention and enhancement of community services and facilities including outdoor sport and recreation buildings and land	Noted and positively considered in re-drafting.
5	3 Spatial Objectives	PA--82-1	individual	The vision should be exemplary now. We cant wait another 20 years. The emerging revision of the Dec 2025 NPPF is looking for a vision-led approach, which means the plan should be audacious and looking with imagination towards a low carbon future.	The Vision is the National Park Vision as set out in the National Park Management Plan.
5	3 Spatial Objectives	PA--98-1	Breedon	Breedon welcome the vision and the length of the local plan, which is in accordance with the guidelines set out in Paragraph 22 of the National Planning Policy Framework (NPPF) (2024).	Noted.
5	3 Spatial Objectives	PA--116-1	Local Access Forum	We welcome the scope and vision of the overall Plan and the outcomes, detailed in Section 3.	Noted.
5	3 Spatial Objectives	PA--117-1	Hope Valley Climate Action	We repeat our observation of last year that the Vision is not sufficiently ambitious. It is of course welcome that the response to climate change is in the first sentence, but why is the Vision only to be exemplary by 2043 17 years hence? Surely, the Vision should be to exemplary now!	Vision is the Authority Vision as set out in the National Park Management Plan. It will remain aligned to this and may be changed.
5	3 Spatial Objectives	PA--118-1	United Utilities	Support Vision and Objectives, especially in relation to climate resilience.	Noted.
6	Outcome 1	PA--31-80	Edale PC	Agree.	Noted.
6	Outcome 1	PA--53-2	Ramblers	We welcome the clear statement that the network of trails, public footpaths, bridleways, and quiet lanes and open access land are part of the special qualities of the Peak District National Park.	Noted.

6	Outcome 1	PA--69-1	Tarmac	At present the focus is on the environmental and social aspects of sustainable development but neglects reference to the important economic contributions that can be delivered through development. As per the NPPF (Paragraph 8), sustainable development should comprise of three components: an economic objective, a social objective and an environmental objective. These three components should all be recognised within the objectives for Outcome 1. Minerals development, contributes to the local and rural economies within the Peak District through local employment, business rates, employee spending etc. The objectives should also recognize that sustainable development looks to meet the needs of the present without compromising the ability of future generations to meet their own needs (NPPF, paragraph 7). Minerals can only be extracted where they are found and mineral development within the Park contributes to national and local aggregate demands. This is essential to supply a steady and adequate supply of essential mineral to meet demand.	Noted. Outcome 1 is focussed on Special Qualities and landscape in recognition that sustainable development is to be delivered in the context of National Park Purposes which are given priority. Outcome 7 focusses on the economy Outcome 10 on minerals where spatial objectives seek to deliver a sustainable supply.
6	Outcome 1	PA--70-1	Emery Planning	The outcome fails to recognise that the National Park is a living landscape, and that meeting the needs of the local population and the local economy should be a key spatial objective.	Outcomes 6 and 7 address social and economic needs.
6	Outcome 1	PA--82-23	individual	Support.	Noted.
6	Outcome 1	PA--117-2	Hope Valley Climate Action	Spatial objectives do not reflect adequately the seriousness of the climate emergency. There should be a specific objective that there should be a rapid reduction, with a view to near complete elimination, of fossil fuel use within the Park, a significant increase in renewable energy generation, and that carbon sequestration be increased whenever and wherever possible.	Objectives for climate change are set out separately under Outcome 8. As set out on page 19 of the consultation document, local plan objectives are spatial objectives which set out how planning polices will achieve the Outcome. It is not appropriate for the local plan to set general objectives for carbon reduction or sequestration.
6	Outcome 1	PA--121-1	Castleton PC	Largely agree with Objectives and note issues regarding conflicting demands.	Noted.

6	Outcome 1	PA--124-4	PDNPA (Strategy & Performance)	References to conserving and enhancing obviously link to our statutory duties and the management plan, but in order to facilitate alignment with the next NPMP we must begin to codify how we will steward the transformation of the landscape and features of the National Park as resisting change is simply not going to be tenable. Adding in language such as adaptation and directing adaptive change will help with this messaging.	Noted and will be positively considered in redrafting.
7	Outcome 2	PA--20-1	individual	Rivers & Water Courses. Spatial Objectives for Landscape should include the requirement to Significantly improve the water quality and biodiversity and protect the marginal areas around all water courses and rivers to facilitate natural re growth. The Farmland section might include Rivers and watercourses incorporating marginal zones to enable natural re growth Comment: even in upland areas this is important as sheep grazing has reduced the natural habitat alongside rivers and streams. Boundary areas could be created to overcome this problem with only marginal changes to farming. The problem is of course a problem downstream too.	Comments noted and will be positively considered.
7	Outcome 2	PA--31-86	Edale PC	We generally agree but feel that sometimes too much emphasis is laid on preserving the character of historic buildings as they are now, without considering that buildings have always developed over time and that alterations may need to be made in order to use historic buildings as homes or other uses, to support thriving communities.	Noted. Alternative uses, alterations and extensions are permitted. The scale and extend of such are determined in accordance with the significance of the heritage asset.
7	Outcome 2	PA--54-8	Kinder & High Peak Advisory Cttee	We welcome the description of Park Special Qualities and particularly section 6 that recognises the importance of the Park being 'An inspiring space for escape, adventure, exploring and quiet reflection'. We are supportive of Outcome 2 and particularly Spatial Objectives for landscape 1, 3 5 (especially mention of the importance of moorland landscapes in offering a sense of 'wildness'. We note that Kinder Scout, Bleaklow and the Upper Derwent Valley are particularly important contributors in this regard).	Noted.
7	Outcome 2	PA--72-1	National Trust	Mention of carbon storage welcomed. Concern about BNG hindering recent restoration projects. Woodland creation is significant part of High Peak LRS. Consultation document must align with LRSs within the local plan area.	Noted. The Local Plan Outcome 3 is aligned to the NPA landscape strategy which sets out 'more woodland, trees and scrub'.

7	Outcome 2	PA--100-2	Hope & Derwent PC	Should read supporting the farming economy whilst conserving and/or enhancing.....	Economy is considered in Objective 7.
7	Outcome 2	PA--103-1	Darwent Architecture	Outcome 2: Preservation and promotion of local business is missing from the outcomes.	This is covered by Outcome 7.
7	Outcome 2	PA--121-2	Castleton PC	Agree with spatial Objectives but note conflicting demands on the landscape.	Noted.
7	Outcome 2	PA--124-5	PDNPA (Strategy & Performance)	References to conserving and enhancing obviously link to our statutory duties and the management plan, but in order to facilitate alignment with the next NPMP we must begin to codify how we will steward the transformation of the landscape and features of the National Park as resisting change is simply not going to be tenable. Adding in language such as adaptation and directing adaptive change will help with this messaging.	Noted and positively considered in redrafting.
7	Outcome 2	PA--97-1	Environment Agency	Point 5 Promoting a more biodiverse landscape, where nature recovery is enhanced. The language is not quite right, habitats are enhanced or created to enable nature recovery, for nature recovery to be enhanced it would need to already be implemented. Suggest replacing the word enhanced with enabled.	Noted and considered in redrafting.
7	Outcome 2	PA--125-2	Historic England	We support the references to cultural heritage. Consider including term heritage assets to reflect National Planning Policy Framework (NPPF) terminology.	Noted and positively considered in redrafting.
8	Outcome 3	PA--19-2	Natural England	Natural England supports this outcome and welcomes the reference to the Local Nature Recovery Strategies covering the Peak Park.	Noted.
8	Outcome 3	PA--21-1	Bamford PC	Outcome 3: The sentence "Sustainable farm businesses delivering nature recovery" makes it sound as if that is the principal purpose of farms - but it isn't. Farms are there to produce food. If they can help to deliver nature recovery while doing so that's fine, but it's not their primary purpose:	The objective does not say that the principle purpose of farms is nature recovery. Supporting farm-based nature recovery is a legitimate objective for this Outcome.

8	Outcome 3	PA--31-31	Edale PC	Agree, although regarding the last point: nature tourism must defined and be well managed in order for it not adversely affect fragile ecosystems, as is visibly happening around Edale. If such tourism is encouraged, it must be accompanied by funding for rangers and by education in order to mitigate adverse impacts on nature. It is generally hard to see how such tourism can benefit local communities or contribute to the rest of outcome 3	Noted and considered in re-drafting.
8	Outcome 3	PA--48-6	Middleton & Smerrill PC	Opportunities for nature tourism will help the local economy and will help visitors to appreciate the purposes of the national park.	Noted and considered in redrafting.
8	Outcome 3	PA--57-6	BHS	Maintaining natural surfaces on PRow and Active Travel routes particularly in more rural areas avoids sanitising the network. Increasing access through linking existing routes and recording/upgrading routes where user or historic evidence infers higher rights could contribute to reducing the pressure on 'honeypot' sites and congestion on roads through more sustainable travel.	Where permission is necessary policies support natural surfacing. Policy 62 provides for the lining of existing routes.
8	Outcome 3	PA--69-2	Tarmac	Whilst the Plan seeks to restrict mineral development within the National Park it should be recognised that minerals development can facilitate and deliver nature conservation objectives and enhancements. Mineral development should be included under economic opportunities to deliver biodiversity	Wording makes clear that these Spatial Objectives are relevant to all policies.
8	Outcome 3	PA--72-2	National Trust	Support. Inherent conflicts should be noted, eg with farming/cultural heritage.	Noted.
8	Outcome 3	PA--80-3	individual	Visitor management plays a big part in nature recovery. There are areas of the Peak District that are so overwhelmed with visitors that the nature in these areas is becoming stressed rather than recovered	Noted and considered in redrafting.
8	Outcome 3	PA--82-27	individual	Support.	Noted.
8	Outcome 3	PA--100-3	Hope & Derwent PC	Plantation ancient woodlands restored - this doesn't make sense.	Wording is from landscape strategy. Will be checked.
8	Outcome 3	PA--121-3	Castleton PC	Objectives are achievable within the parish with the support of large landowners.	Noted. Comments re water pollution reallocated to relevant question point.
8	Outcome 3	PA--124-6	PDNPA (Strategy & Performance)	Where have the targets for trees, moorland etc come from? Best current reference is to the PLTOF. Can we advance the language of nature friendly farming towards climate smart farming?	The targets are from the NPA landscape strategy.

9	Outcome 4	PA--31-1	Edale PC	Enhancement of heritage assets must include bringing them into use for the benefit of local communities even if this somewhat changes them.	Noted. Adaptive re-use is supported by policy.
9	Outcome 4	PA--69-3	Tarmac	In seeking to ensure the greatest level of protection to heritage assets, the objectives need to ensure they are not overly onerous. NPPF sets a hierarchy for considering impacts on heritage assets. Paragraph 212, states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation (and the more important the asset, the greater the weight should be). The objectives should therefore ensure they reflect this hierarchy in line with national policy. The objectives also need to be more prescriptive on the landscape heritage objectives they are seeking to protect to ensure they do not conflict with achieving landscape character objectives that could be delivered through development.	Objectives are aligned to National Park Purposes. Associated policies are aligned to NPPF and considerations of significance.
9	Outcome 4	PA--72-3	National Trust	Support.	Noted.
9	Outcome 4	PA--82-15	individual	Support.	Noted.
9	Outcome 4	PA--121-4	Castleton PC	Objectives should be achievable within our parish. Express support for visitor centre and other facilities. Protection of buildings depends of effective monitoring and enforcement.	Noted.
9	Outcome 4	PA--124-7	PDNPA (Strategy & Performance)	No mention of the impact of climate change on cultural heritage and built environment include text along the lines of to support cultural heritage assets and the built environment to be adapted to mitigate to the impacts and consequences of climate change	Noted and will be positively considered in re-drafting. The objectives consulted on in Issues and Options included the following 'To conserve and enhance cultural heritage in the transition to a low carbon future'. However following consultation responses and further discussions it was felt that this statement was self-evident and not necessary.
9	Outcome 4	PA--125-3	Historic England	We welcome the inclusion of this objective in the Plan	Noted.

10	Outcome 5	PA--21-2	Bamford PC	The respondent does not support the proposal to develop Recreation Hubs. They cite existing issues for residents living near to popular visitor locations, and express a desire for dispersal. They also believe that the phrase Recreation Hub is not well understood by the PDNPA different definitions used by different people.	The proposal is not to develop Recreation Hubs these already exist, named as such or not. The proposed policy seeks to direct recreational development outside of settlements, to appropriate locations and to restrict it in unsuitable locations. This approach addresses an existing policy gap and any development would be subject to strict criteria focussed on balancing National Park purposes, impact on the special qualities and environmental capacity.
10	Outcome 5	PA--31-46	Edale PC	This outcome must not allow the Park to be managed for visitors to the detriment of local communities. For example, we do not want to see excessive development or further use of housing for second homes or holiday lets, which is becoming more of a problem in Edale. Crucially Outcome 5 should have a section on Transport. There should be a focus on sustainable transport and particularly involving provision and access for public, shared and wheeled (non-motorised) transport, both local and from population centres on the edges of the National Park.	Noted and considered in redrafting.

10	Outcome 5	PA--38-31	Peak Park Parishes Forum	Outcome 5 refers to supporting development in settlements and defined recreation hubs, both including visitor management. The Sustainability Appraisal Report which accompanies the draft local plan identifies a key sustainability issue of managing tourism sustainably and in accordance with National Park purposes, whereby it contributes to the local economy in a manner which conserves and enhances the landscape. The Local Plan does not make it clear how more development around the proposed recreation hubs are compatible with this. Popular recreation places are often overwhelmed and already at capacity. There should perhaps be a presumption against development unless certain criteria are met. Crucially, Outcome 5 should have a section on Transport. There should be a focus on sustainable transport and particularly involve provision and access for public, shared and wheeled (non-motorised) transport, both local and from population centres on the edges of the National Park.	Comments carefully considered in re-drafting.
10	Outcome 5	PA--45-31	Eyam PC	All holiday lets should be registered and numbers thereof controlled within settlements.	With regard to existing homes being used as short-term lets, there is currently no legal route for their registration and control.

10	Outcome 5	PA--51-3	individual	<p>The Preferred Approach persists in treating the multi-user trails as if they are strategic sustainable transport corridors, even though PDNPAs own evidence, narrative descriptions and baseline information consistently show that the trails: are used predominantly for recreation; are accessed mainly by private car; do not function as a substitute for public transport; and do not produce measurable modal shift away from car-based travel. This misclassification has significant consequences including for Outcome 5. Outcome 5 appropriately emphasises the exceptional value of recreation and tourism within the National Park. It also notes the importance of PRow and multi-user trails in enabling access to landscapes and supporting health and wellbeing. However, parts of the underlying policies and supporting text imply or suggest that the trails serve dual purposes, simultaneously delivering recreation and sustainable transport outcomes. This is not grounded in PDNPAs own evidence. The effect is to blur the distinction between recreation infrastructure (Outcome 5) and transport infrastructure (Outcome9). This risks misleading readers and decision-makers into believing that enhancing recreational routes automatically contributes to transport objectives. A clearer articulation is required that reinforces the primary recreational purpose of trails and avoids implying transport functions.</p>	Noted. Positively considered in re-drafting.
10	Outcome 5	PA--54-10	Kinder & High Peak Advisory Cttee	<p>Generally support. Re 'To support work that maintains and enhances the rights of way network'. We believe it would be useful to include here that the importance of enhancing interconnectedness of the rights of way network, where possible, is to be welcomed as well as recognising the importance of protecting and enhancing provision of good opportunities to reach Open Access land (as defined under the Countryside and Rights of Way Act 2000) as part of that network is vital.</p>	Noted. Comments positively considered in redrafting.

10	Outcome 5	PA--57-7	BHS	The RoWIP and Active Travel Plan will support the aspirations of Outcome 5 in principle but maintenance, improvement and enforcement are resource intensive and should be provided for, including contributions from developers. The recreation hubs referred to include sites such as Hartington Station which has a five star horsebox parking area. The horsebox parking provision here and elsewhere is essential for safety, limiting distances travelled to find parking, and to provide for those whose chosen recreation is equestrian activity. Equestrian tourism is on an upward trend with people holidaying with their horse; accommodation which caters for horse and human is a valuable resource.	Noted. Policies continue to support the provision and maintenance of facilities and the further enhancement of the network.
10	Outcome 5	PA--69-4	Tarmac	The current spatial objectives for Outcome 5 do not recognize or look to promote nature-based tourism, conflicting with the spatial objective under Outcome 3 which looks for Nature tourism opportunities. The focus on mineral sites is often on restoration incorporating landscape and ecological enhancements. As such, they offer important opportunity for nature-based tourism and recreation with potential to provide additional support to the local economy. The objectives should include wording to this effect and support nature-based tourism and recreation outside of settlements where appropriate.	Spatial Objectives refer to facilities and accommodation that could be associated with any type of tourism or recreation activity, including nature-based tourism activities.
10	Outcome 5	PA--70-2	Emery Planning	The final objective is to support the provision of a range of visitor accommodation, with three measures identified for doing so. The final is: new hotels and aparthotels in converted traditional buildings (heritage assets) or on other previously developed land in suitable locations where significant enhancement to Special Qualities can be delivered. Notwithstanding that this appears to be a specific policy rather than an objective, there is no justification for requiring a significant enhancement to the special qualities of the National Park.	The objective aligns with policy requirements. Wording is checked in redrafting.

10	Outcome 5	PA--72-4	National Trust	Support principle of Rec Hubs. Acknowledgment that it should be 'responsible visitor activities/recreation' eg disturbance to sensitive species (birds at breeding time, sensitive moorland habitats) needs to be highlighted as an impact from tourism. The Trusts Access to the Countryside' policy refers to "any expanded rights should promote responsible access via the Countryside Code". Internal guidance on the Adaptive re-use of rural buildings seeks to find viable uses built on a sound understanding of the value or significance of these buildings to people and nature to give the best chance to protect and enhance their value which aligns with NPPF paragraph 210.	Noted and is considered in redrafting.
10	Outcome 5	PA--74-1	Trans Pennine Trail	This outcome highlights the importance of safeguarding the multi-user recreational trails, and expanding this network. The TPT/NCN is a key asset for recreation, attracting visitors, supporting local businesses, and encouraging healthy lifestyles.	Noted.
10	Outcome 5	PA--82-14	individual	Delete support for development in defined recreation locations including for visitor management. There should not be an in-principle approach to dev in recreation hubs in the countryside; consider on case by case. Management of visitors should take the approach of travel hubs in settlements with public transport and walking wheeling cycling routes connecting to the key visitor destinations. The Sustainability Appraisal 5.102 states All of the travel and transport policies could place more emphasis on encouraging the use of public transport instead of private cars to improve accessibility to the Park, and advises better guidance on designing active travel routes to maximise health, biodiversity and carbon reduction benefits.	Noted. Comments will be carefully considered in re-drafting, linking to DPD 7 (Recreation Hubs) and DPD2 (Development Strategy).
10	Outcome 5	PA--96-16	Winster PC	First priority of change of use of traditional buildings should be to turn them into housing of permanent residency NOT tourism. Many of the housing needs, and indeed those who have been forced to move away, within our village are the children of farming families who cannot find suitable accommodation. Peak Park should be encouraging conversion for permanent residency with protections against short-term rentals or second homes.	The owners of traditional buildings are free, within policy, to decide what they want the buildings to be used for. Policy encourages use as permanent homes but we accept that some buildings may not be suitable for use as a permanent home and that farm businesses may wish to

					supplement income via short-term lets.
10	Outcome 5	PA--100-4	Hope & Derwent PC	We do not support the concept of hubs nor the intended development of them.	Will be amended in light of any changes to Rec Hubs Policy DPD7.
10	Outcome 5	PA--101-1	Hope & Derwent PC	Delete support for development in defined recreation locations including for visitor management. Should not be an in principle approach to dev in recreation hubs in the countryside; consider on case by case.	Will change if any change made to associated Rec Hubs Policy DPD7
10	Outcome 5	PA--103-2	Darwent Architecture	Tourism: Sites for temporary accommodation (tents, caravans or campervans) that are well suited to the location. Needs camping pods and yurts adding to the list as there are a number of sites approved for these in suitable locations, usually tree lined. Otherwise the policy appears too exclusive of these. The word suitable protects this.	DPD10 deals with this.
10	Outcome 5	PA--106-1	Taddington PC	1. Defined recreation hubs as places for new development is not supported (See Draft Policy Direction 7 below). The main purposes of defining hubs should be to control and manage the surrounding area in the interests of amenity, landscape and nature recovery. 2. Tourism third bullet: if the location is suitable and the development is contributing to National Park purposes, why is significant enhancement required? Opportunities for worthwhile enhancement may be lost by this policy. (See also Policy 3 below)	Noted and will be addressed in redrafting.
10	Outcome 5	PA--115-14	CPRE	Strategic active travel routes have been identified and therefore should be promoted by the Local Plan policies. An objective to this effect should be added to the spatial objectives.	Noted and is positively considered in redrafting.

10	Outcome 5	PA--117-3	Hope Valley Climate Action	Additional tourism is only supported if visitor journeys are undertaken by public transport. The principle of visitor management should not be based on development at key hubs in the open countryside. It should be based on offering visitors high quality public transport that takes them out to key destinations from a settlement with a travel hub. For example from Hathersage station to Stanage Edge, from Hope or Edale Stations to the Castleton Caverns and Mam Tor, or from a key public transport interchange outside the Park.	Noted. The Authority supports these objectives and planning policy would support their delivery if permission were needed. However as set out on page 19 of the consultation document, local plan objectives are spatial objectives which set out how planning policies will achieve the Outcome. It is not appropriate for the local plan to set general objectives for tourism management and public transport.
10	Outcome 5	PA--121-5	Castleton PC	Castleton is already developed to capacity. Area management plan is needed.	Noted. Spatial Objectives and Planning Policies aim to support area management objectives. Comments re car park re-assigned to correct question point.
10	Outcome 5	PA--124-8	PDNPA (Strategy & Performance)	Add to support the development of recreation and tourism provision that adapts to the changing visitor patterns already underway and those that will result from climate change, including people seeking refuge from warmer urban areas	Noted and is considered in re-drafting.
10	Outcome 5	PA--125-4	Historic England	Add inappropriate in relation to conversion of heritage assets.	Noted and is positively considered in redrafting.
10	Outcome 5	PA--127-1	individual	Outcome 5 is at odds with the other Outcomes in that objectives for Recreation and Tourism cut across and undermine objectives concerning eg thriving communities, the built environment, a resilient landscape, biodiversity and sustainability. This is particularly so with respect to the development of recreation hubs and tourist facilities without any reference to the inevitable effects of the growth of vehicular traffic and the lack of sustainable transport policies.	Noted and is reconsidered alongside consideration of the approach to Recreation Hubs (DPD 7)

11	Outcome 6	PA--7-25	PDNPA - Planning	Are we only expecting market houses through conversion of heritage assets?	Also through enhancement. Will address in re-draft.
11	Outcome 6	PA--20-4	individual	I object to the inclusion of the term intermediate homes on the basis that these are not apriority for development within the Park.	Use of term will be re-assessed.
11	Outcome 6	PA--30-1	Bradwell CLT	<p>(i) Housing need and the housing requirement (target) should be expressed in the plan as a policy, not an outcome. The policy should set out a housing target /requirement which should be planned for and achieved, rather than one which states that the number of new houses should not exceed a number which falls well short of meeting identified need. As worded, building just a handful of new houses in the Peak District over the entire plan period would be policy compliant. The policy is not effective.</p> <p>(ii) It is unclear whether the 1,580 figure is intended to be the assessment of need (the plan says it is to address identified need) or a housing requirement constrained below the level of need (enable the delivery of1,580). In reality it is neither.</p> <p>(iii) Concern that the calculation of housing need is not clearly evidence and contrary to NPPF.</p> <p>(iv) The plan states that meeting housing need in full would lead to adverse impacts on landscape, wildlife and cultural heritage. However, the intended Settlement Capacity and Landscape Assessments have not yet been carried out and, consequently at this stage, the capacity for housing development is unknown. As things stand the level of restriction proposed by the plan is not evidence based. o guide local plan decisions about how much new housing can be absorbed by individual settlements.</p> <p>(v) Our view is that there are sites that can be developed in and around Bradwell (and very probably in other larger villages) that would maintain or enhance the character and appearance of these villages without compromising landscape quality or biodiversity.</p> <p>(vi) As things stand, the draft plan will fall well short of meeting housing needs. It will, therefore, allow the further decline of village communities. The draft plan refers to the 2010 government circular on the English National Parks. the</p>	<p>(i) National Park Authorities are not obliged to set housing targets in policy. The indicative housing provision of 79dpa is re-assessed for Draft Plan. It is an evidenced assessment of the scale of housing development that can take place to meet need and contribute to thriving and sustainable communities, without harming Special Qualities and the very reason for designation as a protected landscape.</p> <p>(ii) As set out in the Table on page 27 and the Figure 1 on page 28 of the consultation document, the Standard Method Housing Need Assessment is 270-362dpa, the locally derived methodology housing need is 95dpa and the Housing Requirement is 79dpa.</p> <p>(iii) The Spatial Strategy and Strategic Housing Topic Paper sets out all relevant evidence with regard to compliance with NPPF and other relevant law and guidance.</p>

				<p>circular was published under the Coalition government some 15 years ago. This limits the weight which can be attached to the circular. There is a significant risk that the plan will be found unsound at examination because it is not positively prepared, justified, effective or consistent with national policy</p>	<p>(iv) The capacity for development is re-assessed using detailed Landscape Assessments. (v) Policy supports development of such sites. (vi) Noted. This is an important issue for planning policy in all national parks. The NPPF paras 11b and 189 (with footnoted reference to the Circular in para 189) clearly provide for an approach that is different from other local authorities. Clarity is being sought from the planning inspectorate in advance of submission.</p>
11	Outcome 6	PA--31-81	Edale PC	<p>Agreed, given limits on development within the Park and the importance of thriving communities.</p>	<p>Noted.</p>

11	Outcome 6	PA--38-22	Peak Park Parishes Forum	There is a point that, as the population declines and gets older, the spatial objectives and strategic housing provision in the Park are potentially at odds with the outcome of thriving and sustainable communities in 2025. We will continue with our long-standing policy position that provision is not made for housing solely to meet open market demand. Policy continues to support new affordable and intermediate homes for local people, and key workers in agriculture. This aligns with national guidance which states that the scale and extent of development should be limited (NPPF 2024). And yet the number of younger people is declining as families leave for more suitable houses outside the Park and schools are increasingly under threat, so there appears to be some internal conflict between thriving and sustainable, the residency clause, the size of houses permitted and the reluctance to consider market housing in order to fund affordable and social development. These points are revisited in lower relevant sections.	Noted and is carefully considered in framing the final version housing need and requirement figures. The level of provision is re-assessed for the Draft Local Plan taking into account the settlement sensitivity assessments and the site assessments. It should be noted that the indicative housing figures presented are neither a target nor a restriction but an evidenced assessment of the type and scale of housing development that can take place to meet need and contribute to thriving and sustainable communities, without harming Special Qualities and the very reason for designation as a protected landscape.
11	Outcome 6	PA--45-30	Eyam PC	Support but housing need is under-estimated.	Noted. Housing need is calculated using the Government's prescribed formula to 2045, and using an alternative locally derived methodology, also to 2045, that takes into account the unique circumstances of the National Park.
11	Outcome 6	PA--48-5	Middleton & Smerrill PC	Council supports these objectives and would wish to stress the importance of retaining homes as primary residences. The increase in holiday lets and empty houses, particularly in small communities, does not foster thriving communities.	Noted. The new local plan will contain a new policy on permanent residence.

11	Outcome 6	PA--55-3	SMDC	<p>The Council considers that the proposed housing numbers in relation to the Moorlands part of the PDNP are low considering the sustainable settlements within the Moorlands such as Longnor, Warslow and Waterhouses and consider there is potential for more housing to be accommodated. Furthermore, with the right sort of affordable housing, this would help to address the real issues of an ageing and increasingly less economically active population - issues experienced across the Moorlands but especially so in the PDNP.</p>	<p>Noted. The level of provision is re-assessed for Draft Local Plan, taking into account the settlement sensitivity assessments and the site assessments. It should be noted that the indicative housing figures presented are neither a target nor a restriction but an evidenced assessment of the type and scale of housing development that can take place to meet need and contribute to thriving and sustainable communities, without harming Special Qualities and the very reason for designation as a protected landscape.</p>
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11	Outcome 6	PA--58-2	DDDC - Planning	<p>(i) It is considered the provision of new homes is insufficient to meet the stated aspects of the achievement of thriving and sustainable communities. Acknowledged that the character and appearance of settlements and special characteristics of the Peak District National Park should be protected, the Local Plan must deliver positive benefits for the social and economic wellbeing of communities.</p> <p>(ii) Standard method calculation noted. Support reference to and acceptance of DDDC assessment of 158 dwellings per annum in the Derbyshire Dales part of the National Park. Note locally derived method housing need of 95dpa which translates in DDDC area to 63dpa need and 52dpa provision (39dpa brownfield/conversion/enhancement and 13dpa greenfield).</p> <p>(iii) The District Council contends there remains scope to deliver further housing within the Peak District National Park to deliver the Plans vision and aspirations and meet a greater proportion of housing need above that acknowledged in the Plan as currently prepared.</p> <p>(iv) DDDC supports the intention of the PDNPA (as set out in the supporting PDNPA housing topic paper) to continue its policy position regarding development required to achieve heritage objectives and development of self-build housing. It is however considered that the approach relating to the total level of housing provision has not been sufficiently justified. In particular, with respect to potential mixed development schemes where market homes enable affordable housing provision including exception sites.</p> <p>(v) Derbyshire Dales District Council consider that the meeting of local affordable housing needs should be explored further, particularly with respect to a more flexible approach to enabling development. Sites in Eyam and Hathersage, and settlement edge and other sites elsewhere within the Derbyshire Dales area, should be reviewed further in terms of suitability to accommodate mixed affordable and market housing developments in contributing to meeting local affordable needs over the plan period.</p> <p>(vi) The PDNPA need to be clearer on the potential scale and location for future developments to deliver the Strategic Plan objectives and Policy direction as part of its overall vision to allow communities to thrive. The District Council respectfully requests that the evidence to demonstrate the delivery otherwise of sites within settlements should be re-examined. There remains a high risk that if development is restricted in settlements where capacity issues</p>	<p>(i) Noted. The level of provision is re-assessed for Draft Local Plan taking into account the settlement sensitivity assessments and site assessments. It should be noted that the indicative housing figures presented are neither a target nor a restriction but an evidenced assessment of the type and scale of housing development that can take place to meet need and contribute to thriving and sustainable communities, without harming Special Qualities and the very reason for designation as a protected landscape.</p> <p>(ii) Noted</p> <p>(iii) See point (i)</p> <p>(iv and v) The Authority acknowledges that viability is an issue and will work proactively with Housing Authorities to deliver schemes.</p> <p>(vi) Scale and location of development is indicated. The Authority's strong preference is to maintain an exceptions approach to housing delivery. This is supplemented (in the larger, more sustainably located villages) by the detailed landscape sensitivity assessment which will allow a long-term judgement about capacity in</p>
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				<p>have been identified development will be unable to meet the need for local housing, with associated implications for the ability of the Plan to meet the wider social and economic needs and its inherent vision and objective to create thriving and sustainable communities.</p>	
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					<p>settlements to be made. The assessments may also function as a guide for site search work and will aid decision-making (by indicating more or less sensitive settlement edge locations).</p>
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11	Outcome 6	PA--68-19	HPBC	The Council considers that the proposed housing numbers in relation to the High Peak part of the PDNP are low considering the sustainable settlements within High Peak such as Bamford, Castleton and Hope and consider there is potential for housing to be accommodated at the Hope Cement Works site once operations cease, which would still be within the plan period for this plan which runs to 2045 (closure date for cement works 2042 at the latest).	Housing numbers are re-assessed in accordance with settlement sensitivity analysis. We note the comments about the potential for housing development at Hope Cement and this will be considered.
11	Outcome 6	PA--69-5	Tarmac	The defined spatial objectives for Outcome 6 should recognise the importance that the minerals industry provides to the rural and local economies of the Peak district, through employment, business rates, indirect benefits through employee spending and others. The objectives should support the provision and continuity of minerals development and employment, for example, through supporting a prosperous rural economy and rural employment opportunities.	It is considered that in referring to support for a prosperous rural economy, the Spatial Objective as worded takes into account all Peak District industrial sectors, including minerals.
11	Outcome 6	PA--70-3	Emery Planning	(i) Outcome 6 sets out the proposed level of new housing provision. This should be expressed as a policy rather than as a spatial objective, and the housing requirement should be a target with sites allocated accordingly. (ii) Fundamentally disagree with the housing need and housing requirement, both in methodology applied and the figures reached. 79dpa housing provision is not ambitious enough and contrary to NPPF.	(i) National Park Authorities are not obliged to set a housing target. (ii) As set out on page 29 of the consultation document, the Authority must reconcile the conflicts arising from National Park purposes that restrict the scale and extent of development, with the Standard Method for housing need which promotes a high level of development. The Draft Plan establishes the Housing Requirement as the amount of homes that could be delivered over the plan period without harm to landscape or Special Qualities.
11	Outcome 6	PA--72-5	National Trust	Support of appropriate diversification of agriculture and land management businesses is being carried out by implementation of the LRS.	Noted.

11	Outcome 6	PA--80-8	individual	There needs to be a broader spectrum of housing type, whilst affordable housing is vital for local families and those working in the Peak District, there is also a need for other types of housing as well.	Spatial Objectives specifically refer to the provision of open market, affordable and intermediate homes.
11	Outcome 6	PA--96-13	Winster PC	On brownfield land allow borrowing against long-term value/life of asset rather than short-term pay back. Listed buildings must have legal protections in place against them becoming second homes or holiday lets.	Borrowing (to build on brownfield land) is not a planning matter. While policy encourages heritage assets to be converted for use as permanent homes, our first concern is that the asset is conserved and enhanced.
11	Outcome 6	PA--104-1	Spring Planning	(i) By allowing more new small scale affordable holiday accommodation, such as shepherd huts and pods, this should reduce the demand on smaller homes for this use. (ii) There should also be opportunities for new build open market housing in larger settlements, potentially as part of schemes to bring forward affordable local needs housing. These could be controlled in terms of an occupancy clause (ii) The draft policies in respect of heritage assets are overly prescriptive and stifle the opportunity for exciting, well-designed schemes to come forward to provide a viable use for these.	(i) This is not necessarily the case and cannot be controlled. (ii) Homes with an occupancy clause are not open market homes. (iii) The purpose of a national park is to conserve and enhance cultural heritage so policies are necessarily strong in this regard.
11	Outcome 6	PA--105-1	Green Group	The housing target is increased to at least align with the evidenced need of 95 dpa. The land at Bakewell promoted by our client has not yet been included in the assessment, despite it offering a logical and sustainable extension to the existing settlement of Bakewell. The site at Bakewell should be included within ongoing site assessments, including the SHLAA and Settlement Capacity and Landscape Sensitivity work; and a more comprehensive review of the sites potential is undertaken prior to the Regulation 19 stage to ensure that all reasonable options are fully considered.	Noted. The site was not put forward in the call for sites. The area of the site is included in the broad area of the landscape sensitivity assessment.
11	Outcome 6	PA--106-2	Taddington PC	The Objective is strongly supported but its achievement needs to be measured against the agreed definition of Thriving and Sustainable communities. However, the National Park Authority has failed to understand its own objectives (as does the Sustainability Appraisal) when considering the settlement strategy and related housing policies.	Noted. The SA assesses policy against an objective of thriving and sustainable communities.

11	Outcome 6	PA--115-1	CPRE	The Peak District National Park Authority (PDNPA) is urged to stand firm against major development which would destroy the special qualities and valued characteristics of the Peak District. The charity believes that development should happen in a way that is in line with the statutory purposes of national parks in England, and the proposed broad spatial strategy and Local Plan objectives appear to be consistent with such a stance. The proposed approach to demonstrating how the standard method housing need requirement is inappropriate to meet in the PDNPA is appropriate, as is the envisaged scale and spread of new housing.	Noted and support for broad spatial strategy welcomed.
11	Outcome 6	PA--118-2	United Utilities	When considering housing provision, we recommend that any strategy which you bring forward delivers growth that is proportionate to the size of each settlement.	Noted. Policy allows for a scale of development that is proportionate to the settlement.
11	Outcome 6	PA--121-6	Castleton PC	(i) National targets for development and the principles of the NP are at odds. There are few locations that would not have a visual impact on the landscape. (ii) We'd like conditions placed on purchase of existing properties so that they are available for residents only not for holiday lets/second homes	(i) Noted. The Local Plan sets out a locally derived methodology for housing need that takes national park circumstances into account. (ii) Existing properties do not require planning permission to be used as short-term lets.
11	Outcome 6	PA--124-9	PDNPA (Strategy & Performance)	add To require that new build and re-use development housing is well adapted to the future impacts of climate change including through non-fossil fuel heat sources, high thermal insulation capacity and integrated renewable energy generation, sustainable drainage and water use etc.	Noted. Is considered in redrafting. Also covered in Outcome 8.
11	Outcome 6	PA--125-5	Historic England	This needs consideration of what the potential harm is for the historic environment and the significance of heritage assets. There may be opportunities for appropriate conversion and reuse of heritage assets but this would require additional detail.	Noted. Other policies require an assessment of impact on significance (Policy 10) and list criteria that must be met before permission can be granted (Policy 14).

11	Outcome 6	PA--130-1	individual	(i) disconnect between Local Plan Management Plan ambitions and the proposed policies, especially in relation to thriving and sustainable communities. 13 new homes/yr for DDDC area is insufficient and 39 dwellings a year delivered by conversion is not realistic. (ii) Evidence is presented that housing delivery is not viable therefore plan is unsound.	(i) Noted. The level of provision is re-assessed for Draft Plan, taking into account the settlement sensitivity assessments and the site assessments. It should be noted that the indicative housing figures presented are neither a target nor a restriction but an evidenced assessment of the type and scale of housing development that can take place to meet need and contribute to thriving and sustainable communities, without harming Special Qualities and the very reason for designation as a protected landscape. (ii) Viability is a serious concern and the Authority will continue to work with housing authorities to address this, including by consideration of an appropriate policy response.
12	Outcome 7	PA--2-5	individual	Given this Local Plan runs much of the way to 2050, this net zero objective ought to be much stronger. I assume the Peak District can become a carbon sink, so perhaps we need to talk about carbon negativity through the life of this Plan.	These issues are covered in Outcome 8: The Peak District National Park is more resilient and net-zero by 2040 through its exemplary response to climate change.
12	Outcome 7	PA--31-64	Edale PC	Agree.	Noted.
12	Outcome 7	PA--45-22	Eyam PC	Support.	Noted.

12	Outcome 7	PA--57-10	BHS	Keeping horses makes a significant contribution to the economy including by supporting feed merchants, vets, farriers etc. Management of land for equestrian use and access continues to improve therefore benefits the landscape.	Policies support facilities for the keeping and riding of horses, and the improvement and extension of the trail network.
12	Outcome 7	PA--69-6	Tarmac	The overall ambition is (to the extent that can be achieved through the planning system and within a protected landscape) for a thriving economy that is balanced with available jobs, homes and workforce. To do this we will: Support business, agriculture, forestry, land management, minerals development, and rural enterprise that conserves and/or enhances the Special Qualities of the National Park and the local economy, whilst contributing (x and contributes x) to thriving and sustainable communities. The NPPF supports building a strong, competitive economy, stating at Paragraph 85 that Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development, with emphasis on a prosperous rural economy stating that policies should enable the development and diversification of agricultural and other land-based rural businesses as well as sustainable rural tourism and leisure developments which respect the character of the countryside (Paragraph 88). As active mineral operations provide employment and investment into the local area, they should therefore be a supported industry identified within the objectives as underlined in the policy above. The objectives should provide support to existing business and economic growth / productivity within the Park in order to support existing communities. The identified objective should also, therefore, include reference to conserving and enhancing the local economy in addition to communities.	Noted and is considered in re-drafting. The minerals industry is unique and considered separately in both spatial Objectives and associated Policy.
12	Outcome 7	PA--74-2	Trans Pennine Trail	The plan could reference the TPT/NCN as a potential green corridor for biodiversity, linking nature recovery sites.	Noted and is considered in policy drafting.
12	Outcome 7	PA--96-5	Winster PC	Be specific, eg clear policy for home-owners to follow on Solar Panels.	Draft Policy Direction 12 sets out that all development should incorporate sustainable design features that are appropriate to the scale and type of development.

12	Outcome 7	PA--117-4	Hope Valley Climate Action	The reference to climate change mitigation is very welcome. We think, however, that the commitment to Promote a positive contribution towards meeting net-zero carbon emissions, could and should be made significantly stronger. We suggest: Promote steps that move the economy rapidly to being net-zero in terms of carbon emissions.	Noted and is considered in redrafting.
12	Outcome 7	PA--121-7	Castleton PC	Much employment is low-paid and filled by people commuting-in who need public transport. The objective to support high-wage industries that would enable people to compete in the local housing market is not achievable due to the extremely high property prices.	Noted. The issue of low-wages, low-skilled jobs and high property prices is a result of socio-economic factors beyond the control of the planning system. However it is reasonable to aim to support high-wage industries where this is compatible with national park purposes.
12	Outcome 7	PA--97-2	Environment Agency	Promote nature recovery and mitigation of environmental concerns. Promote suggests its optional, we would prefer stronger language, suggest replace with "embed requirements for...."	Noted and is considered in redrafting.
12	Outcome 7	PA--124-10	PDNPA (Strategy & Performance)	Outcome 7: should read climate change adaptation and mitigation Require a positive contribution towards meeting net-zero for business-related developments	Noted and is considered in redrafting. Outcomes are directly adapted from NPMP.
13	Outcome 8	PA--31-66	Edale PC	Agree.	Noted.
13	Outcome 8	PA--35-3	Oldham PC	The supporting objectives refer to supporting work to protect and enhance peat. The objectives may wish to expand on this to clarify whether this is all peat or peat that is capable of restoration to support notable habitats.	Noted and is addressed in redrafting.
13	Outcome 8	PA--55-13	SMDC	The PDNPAs consultation statement recognises the benefits of a clear definition of small-scale renewable energy and this would be supported by the Council. There appears to be no such definition in this consultation version of the plan.	The Authority agrees that this is an area of policy that needs clarification. Currently this is dealt with in the Climate Change SPD.

13	Outcome 8	PA--68-8	HPBC	The PDNPAs consultation statement recognises the benefits of a clear definition of small-scale renewable energy and this would be supported by the Council. There appears to be no such definition in this consultation version of the plan.	The Authority agrees that this is an area of policy that needs clarification. Currently this is dealt with in the Climate Change SPD.
13	Outcome 8	PA--69-7	Tarmac	To achieve an ambitious approach to achieving net zero, it is considered that all development proposals for low carbon and renewable energy should be considered and supported within the spatial objectives, providing they can accord with the wider objectives of the National Park and its Special Qualities. The objectives should not just limit support of renewable energy infrastructure to those that are just sensitively sited and small scale. The scale and extent of development should only require limitations if there is a reason that it does not meet the wider Park objectives or has an unacceptably significant impact on the National Park. The wording of these objectives and subsequent policies should, therefore, be caveated to that effect. There may be, for example, circumstances where development can facilitate the enhancement/achievement of the National Park objectives, particularly over a larger scale.	Spatial Objectives (and planning policies) for climate change must operate in the context of National Park purposes; conservation and enhancement of natural beauty is paramount. Large-scale and/or insensitively sited renewable energy infrastructure is wholly inappropriate. It is important to establish this principle at the highest level (ie within the Spatial Objectives) as this sets the scope for the associated policies.
13	Outcome 8	PA--72-6	National Trust	There is also a need to help residents change behaviours to reduce emissions. The recognition of holistic landscape scale adaptation and change is welcomed. The maintenance and enhancement of peat habitats across Peak District moorlands is a key delivery mechanism.	Noted.
13	Outcome 8	PA--80-4	individual	There are areas of the Park that are so overwhelmed with traffic, this has a negative effect on carbon emissions. Traffic management is of vital importance in these 'hot spots'.	Spatial Objectives for travel and transport address this by supporting comprehensive travel and transport solutions at Recreation Hubs.
13	Outcome 8	PA--82-18	individual	To either Outcome 8 or 9, add new bullet To reduce travel-related carbon emissions and pollution. To Outcome 9, add new bullet: Promote high quality integrated sustainable public transport and active travel facilities.	Noted and is considered in re-drafting.
13	Outcome 8	PA--96-3	Winster PC	Where is a policy on new builds and conversions incorporating wildlife features such as swift boxes, bee bricks etc?	This is included in Draft Policy Directions 4 and 5.

13	Outcome 8	PA--115-2	CPRE	The draft spatial objectives whilst referring to nature recovery and climate change mitigation and adaptation do not address the charities previous comments during the Issues and Options consultation in relation to plan wide specific, measurable and achievable targets for reducing emissions. However, changes to the NPPF may predicate against the use of specific, measurable targets for carbon emissions and it is hoped that the PDNPA will at least use the Sustainability Appraisal process to consider alternative approaches to plan strategy and policies and the likely consequences for carbon emissions despite having reached a preferred option stage.	As set out on page 19 of the consultation document, local plan objectives are spatial objectives which set out how planning polices will achieve the Outcome. It is not appropriate for the local plan to set general objectives for carbon reduction or sequestration. The SA will test policies against the SA Framework which includes SA Objective 1 'to reduce greenhouse gas emissions to mitigate the rate of climate change and to adapt to the effects of climate change.'
13	Outcome 8	PA--117-5	Hope Valley Climate Action	We welcome the inclusion of this Objective! However we would like to see two amendments. We think the objective To protect open skylines and long views. should be removed. The necessary increase in renewable energy generating capacity will certainly require more onshore wind generation capacity. We must therefore be open to the possibility of skylines being disrupted by wind turbines, (and possibly other infrastructure). We also think the words sensitively-sited, small-scale should be removed from the final bullet point.	Noted and is considered in re-drafting. To note however that this is a long-term approach held by the authority as it is felt that it is necessary to ensure that development aligns with national park purposes.
13	Outcome 8	PA--121-8	Castleton PC	(i) Need to define small-scale renewable energy infrastructure. (ii) Larger scale renewable energy developments could be sited sensitively in old workings including quarries. (iii) There needs to be support for installation of e-charging points.	(i) This is currently set out in Supplementary Guidance which will be updated. (ii) Quarry restoration is set out in law. Applications for renewable energy generation can come forward. (iii) EV charging will be considered in policy drafting.

13	Outcome 8	PA--124-11	PDNPA (Strategy & Performance)	Acknowledgement of landscape change and adaptation is most welcome, can this also made explicit in the title to reflect the National Park management plan The Peak District National Park is more resilient, well adapted, and net-zero by 2040 through its exemplary response to climate change.	Noted and is addressed in re-drafting.
14	Outcome 9	PA--6-5	Staffs CC	This outcome could consider including something around reducing visitor traffic by private motor vehicle. EV charging could be mentioned here and in relation to infrastructure provision complimenting new developments (perhaps in another section).	Is considered in re-draft as it may then be a better link to policy wording.
14	Outcome 9	PA--20-7	Bradwell CLT	Include: To work in partnership with and encourage neighbouring authorities and voluntary organisations to maintain and improve Rights of Way beyond the Park boundaries where they provide connecting routes into and out of the National Park network	This objective is beyond the scope of a Local Plan but is appropriate for the National Park Management Plan
14	Outcome 9	PA--31-52	Edale PC	Agree and support bus transport as this is the only way recreation hubs will have benefits for SQs or for residents.	Noted.

14	Outcome 9	PA--51-1	individual	<p>The Preferred Approach persists in treating the multi-user trails as if they are strategic sustainable transport corridors, even though PDNPAs own evidence, narrative descriptions and baseline information consistently show that the trails: are used predominantly for recreation; are accessed mainly by private car; do not function as a substitute for public transport; and do not produce measurable modal shift away from car-based travel. This misclassification has significant consequences including for Outcome 9. The continued reliance on aspiration that the trails could support or contribute to sustainable travel - does not meet the soundness requirement for an evidence-led strategy. Outcome 9 could be strengthened, by refocusing on settlement-based sustainable travel and removing reliance on recreational trails for transport delivery. As drafted, it rests on a conceptual foundation that does not withstand scrutiny. Given that the majority of transport emissions and congestion pressures in the National Park arise from visitor car travel rather than resident journeys, the Plans sustainable travel strategy should give clearer emphasis to measures that enable visitors to arrive in the Park by public transport rather than by car. Misclassifying the trails as transport corridors creates a false perception that PDNPA is delivering modal shift simply by expanding or enhancing recreational routes. This allows adverse effects, including increased car travel to trailheads, to be obscured.</p>	<p>Noted. Multi-user will be clearly defined in the plan. Policies support the creation of new routes.</p> <p>Increasing access through linking existing routes could contribute to reducing the pressure on 'honeypot' sites and congestion on roads through more sustainable travel. Multi-user trail' can be misunderstood to mean walking and cycling rather than including other wheelers and horses. Clear definitions and in practice clear signage are essential. Improved connectivity could be achieved by connecting active travel, PRoW and even permissive paths to reduce the need to travel distances via road to reach places to walk, wheel and horse ride. Removing barriers such as stiles or bollards will improve access for equestrians and other users.</p>
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14	Outcome 9	PA--69-8	Tarmac	Any wording should be flexible to ensure that necessary cross-Park traffic such as that associated with mineral extraction and development is not penalised. Currently the objectives seek to prevent all proposals which may result in an increase in 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. Subsequently, the objectives should resist proposals, including for new and/or improved roads, that would lead to an increase in cross-park traffic where alternatives in sustainable or active travel modes exist and are viable.	Noted and is considered in re-drafting.
14	Outcome 9	PA--72-7	National Trust	In relation to recreation hubs we are supportive in principle of a holistic approach to sustainable transport options and exploring relevant opportunities in partnership.	Noted.
14	Outcome 9	PA--74-3	Trans Pennine Trail	The TPTNCN, as a long-distance, accessible route for walking, cycling, and horse riding, directly supports these aims by providing a safe, car-free corridor for both residents and visitors.	Noted.
14	Outcome 9	PA--80-5	individual	The term Recreation Hub, indicates that further development will be allowed in these areas, Surely the best way to manage visitor impact on the Park and Nature is to encourage visitors to visit all the less well known areas of the Peak District. Or are you resigned to having some very popular areas that are overwhelmed by visitors? Great care needs to be taken that congestion doesn't destroy the very experience that our visitors are coming to enjoy.	The Recreation Hubs policy would support improved or expanded visitor facilities, subject to strict criteria including impact on Special Qualities. Whether or not visitors continue to congregate at 'hot spots' or disperse to other areas is largely outside the control of planning. Policy aims to address current issues and (if it can be agreed with the responsible bodies including landowners, local authorities and the highway authority) would work alongside an agreed visitor management approach.

14	Outcome 9	PA--103-3	Darwent Architecture	Needs reference to enhancement of parking provision for visitors in hotspots and separation of this from private residential parking which is causing issues across the park since covid as visitor numbers have increased.	This is dealt with under Policy 66.
14	Outcome 9	PA--106-3	Taddington PC	Second bullet: new development should also be resisted that will add to the problem of heavy goods vehicles within the Park.	Noted and is considered in policy drafting.
14	Outcome 9	PA--115-9	CPRE	These should include an objective to reduce carbon emissions and also 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)	Objectives for climate change are set out separately under Outcome 8. As set out on page 19 of the consultation document, local plan objectives are spatial objectives which set out how planning policies will achieve the Outcome. It is not appropriate for the local plan to set general objectives for carbon reduction or sequestration.
14	Outcome 9	PA--117-6	Hope Valley Climate Action	Neither Outcomes 8 and 9 nor the transport policies indicate the crucial link between reducing the need to travel by private car and mitigating climate change. 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. There is also no mention of general travel to from or within the Park. We therefore suggest that either Outcome 8 or 9 should have a new bullet point added: To reduce travel-related carbon emissions and pollution. To Outcome 9, add new bullet point: Promote high quality integrated sustainable public transport and active travel facilities.	Noted and is considered in redrafting.
14	Outcome 9	PA--121-9	Castleton PC	(i) Multi-user trails must not restrict main roads for emergency vehicles or on street residential parking. (ii) Recreation Hubs is an unfortunate term and confused between Objective and Policy . If mapped this will lead to over development.	(i) Noted. This is largely a management issue rather than a planning issue. (ii) Noted and will be considered in redrafting, cross-referencing to Policy.

15	Outcome 10	PA--68-1	HPBC	It is noted that the PDNPAs consultation statement reveals that the future of Hope Cement Works will be guided by a Supplementary Plan working with the landowner, stakeholders and the local community once the closure date is clearer. This consultation version of the plan does not appear to mention this and it is considered that the Reg 19 version of the plan should. It is at this point that HPBC will be able to take part in a detailed statutory process to determine how this site is restored. The Council welcomes this opportunity.	Noted and is considered in policy drafting.
15	Outcome 10	PA--69-9	Tarmac	Tarmac supports the objective to deliver sustainable mineral extraction that contributes to the supply of minerals to meet the local, regional and national need whilst minimising any potential impacts in the context of the protected landscape and the highest level of protection afforded to it in order to accord with National Park purposes. The importance of ensuring the National Park continues to deliver sustainable mineral is critical. The Peak District National Park contains significant reserves of nationally important mineral. Objective 3 should be reworded to remove major as shown on the policy above. The objective should aim for site restoration to deliver significant long-term landscape enhancement (from current position) and make a contribution to local nature recovery priorities.	Noted and is considered in re-drafting.
15	Outcome 10	PA--103-4	Darwent Architecture	Add- Better control licensing of quarries to ensure that a wider range of traditional building material becomes available to the market to better preserve our historic building fabric. The options for stone and slate are so poor in number and those supplying are running out of quality product. Too many granted licenses sit unused every year.	Noted. Considered in re-drafting.
15	Outcome 10	PA--121-10	Castleton PC	The industry was here before the PDNP. Regeneration should provide opportunities for renewable energy which should be supported by the PDNPA.	Noted. Mineral site restoration is prescribed in law. Applications for energy generation on minerals sites can come forward.

15	Outcome 10	PA--125-6	Historic England	We would welcome a reference to appropriate restoration of mineral workings, for the historic environment. This would be in keeping with the aspirations for Nature Recovery but with consideration of what schemes may be appropriate within a historic landscape context and affecting the significance of heritage assets including setting. A reference to building stone being suitable for repairs to heritage assets would be welcome.	Noted and positively considered in redrafting.
15	Outcome 10	PA--126-1	Minerals Products Ass	Cement is vital for delivering the UKs development needs and industrial ambitions. The UK can be self-sufficient at meeting its demand for cement. Nature recovery should be appropriate to site - delete 'major'. Amend: To require site restoration that delivers significant long-term landscape enhancement (from current position) and contributes to local nature recovery priorities. Delete: 'To consider proposals at Hope cement works in the context that operations will cease in 2042 at the latest.'	Noted and considered in re-drafting. It is reasonable to expect that restoration should make a major contribution to nature recovery.

Core Policies and development strategy					
Point #	Point Name	Comment #	Name	Summary of comment	PDNPA response
16	Chapter 4	PA--16-8	Bamford PC	Yorkshire Bridge is not hamlet.	Noted. Considered in re-drafting.
16	Chapter 4	PA-135-2	DCC	Policy 6. It is recommended that the term “referencing” be replaced with “informed by”, as assessments should actively apply the requirements of the Landscape Strategy rather than merely cite it.	Noted. Considered in re-drafting.
16	Chapter 4	PA--71-1	Staffs CC	The Core Policies and Development Strategy are supported. In particular, Policy 4 Landscape Character and Special Qualities and Policy 6 Conservation and Enhancement of the Landscape provide appropriate criteria for protecting and enhancing landscape character and guiding development to avoid adverse impacts.	Noted.
17	Policy 1	PA--2-1	ind	The definition of Major Development should be more rigorously defined, and the impact of being a Major Development more clearly articulated. This is not a very helpful approach to the policy.	This part of the policy is derived from the NPPF. In re-drafting we will consider removal as it is not usually necessary to repeat national policy in local policy.
17	Policy 1	PA--7-8	PDNPA - Planning	Are D & E necessary as they are repeating NPPF?	Agree not, will address in re-draft.
17	Policy 1	PA--19-3	Natural England	Natural England generally supports this policy however we suggest in point E, which covers the approach to decisions on major development, that the mitigation hierarchy should be followed i.e. avoid, mitigate, compensate, before it is permitted.	Noted and is positively considered.

17	Policy 1	PA--31-44	Edale PC	Agree except that we do not see how the harm to the Special Qualities of a major development could be mitigated and would like to see policy to the effect that the Park would oppose such development, even though we realise it might be national infrastructure over which the Park does not have planning powers.	Noted and is considered in re-drafting.
17	Policy 1	PA--82-9	individual	Support.	Noted.
17	Policy 1	PA--89-57	Holme Valley PC	Agree.	Noted.
17	Policy 1	PA--104-5	Spring Planning	The draft policies in respect of heritage assets are overly prescriptive and stifle the opportunity for exciting, well-designed schemes to come forward to provide a viable use for these.	Such policies are in order to deliver national park purposes.
17	Policy 1	PA--121-11	Castleton PC	The PDNPA should have the power to define what is a major development within the Park. We'd like to see this term defined or at least an example given.	The NPPF sets out that what is considered to be major development is a matter for the decision-maker, ie the NPA. The term is also defined in the NPPF.
18	Policy 2	PA--2-11	individual	The Design Guide is mentioned here. It is worth pointing out that the Design Guide has a very cliched understanding of the vernacular and does not reflect the building contexts of very many local villages (my own specifically). It's too restrictive, conservative and needs updating.	The Design Guide will be replaced in due course.
18	Policy 2	PA--31-73	Edale PC	No comment.	Noted.
18	Policy 2	PA--48-3	Middleton PC	Council strongly supports the requirement that development proposals will be required to show that they will improve biodiversity by enhancing or creating habitats and increasing species numbers and range.	Noted.
18	Policy 2	PA--64-1	Youlgrave CLT	We agree with the four core policies hoping that sustainable development refers to, and includes use of: ground source heat pumps, solar panels, water conservation and grey water use.	Noted. DPD12 on energy efficiency and generation in buildings goes into more detail on this point and will be further clarified in policy drafting.

18	Policy 2	PA--69-10	Tarmac	<p>Part A does not reflect or promote a proactive approach to development proposals. Paragraph 39 of the NPPF states that state that Local planning authorities should work proactively with applicants and that planning policies should positively and proactively encourage sustainable economic growth (Paragraph 86). The wording should, therefore, be amended to 'When considering development proposals the National Park Authority will take a positive and proactive approach in favour of sustainable development that is consistent with National Park purposes.</p> <p>Part C not consistent with the NPPF (Paragraph 7) which defines sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Reference to meeting the needs of the present without compromising the ability of future generations to meet their own needs should, therefore, be reflected within the policy text with the caveat that that development must otherwise accord with other National Park policies and purposes.</p> <p>Whole Estate Plans (reference page 41). Large landholdings could benefit from forming part of a WEP. 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. As such, Tarmac support continued work on the potential for WEPs and support reference to this within policy supporting text, if not a new individual policy.</p>	Noted and is positively considered in policy drafting. It is considered that reference in policy to sustainable development includes reference to its full NPPF definition.
18	Policy 2	PA--82-22	individual	Support but add to first bullet reducing the need to travel by private car, otherwise is in contention with Outcome 5 Welcoming place.	Noted and is considered in re-drafting.

18	Policy 2	PA--106-4	Taddington PC	Development is also sustainable when it meets the agreed definition referred to above under Outcome 6. Again, the National Park Authority seems not to have understood this. Last bullet point: for proposals to be in accordance with another Plan, that Plans policies need to be explicit so that the public can be consulted on them, especially when a future successor may contain policies as yet not considered. Either itemise the relevant policies or alter the wording.	Noted and is considered in re-drafting.
18	Policy 2	PA--117-7	Hope Valley Climate Action	The fourth bullet point of part C - drafting error. Development is sustainable if it maximises the impact on climate change (or minimizes the impact on climate). We think this bullet point would be best made into two separate ones. It should also include reference to the need to reduce the need to travel by private car (see comment below on Draft Policy Direction 22, below). We suggest the following: Maximises mitigation of climate change by reducing greenhouse gas emissions and / or increasing carbon sequestration. This must include reducing the need to travel by private car. Promotes resilience and adaptation to climate change effects, including extreme weather, drought and flooding.	Noted and is considered in re-drafting.
18	Policy 2	PA--124-15	PDNPA - Strategy	Develop on minimising impact on climate change to ensures a minimal contribution towards greenhouse gas emissions and considers long-term impacts of climate change in the design, for example location in relation to flood risk, integration of energy use reduction and efficiency technologies	Noted. Is positively addressed in redrafting.
18	Policy 2	PA--125-7	Histric England	We support this policy.	Noted.
18	Policy 2	PA--127-2	individual	Add-Maximises the opportunities for the use of, and development of, sustainable transport.	Noted and is considered in re-drafting.

19	Policy 3	PA--2-6	individual	The phrase 'offer significant overall benefit to the natural beauty, wildlife, cultural heritage and Special Qualities of the area' should be removed as most developments, for example 'a single dwelling (or even a few), an extension, or really any development at all' cannot achieve this. Clause C is confusing. Clause F is repetitive.	This policy only applies to applications whose justification is that they enhance the National Park. It does not apply to applications that are justified for other reasons, for example to provide or extend homes. This is why overall benefit is required. Agree that the language in Clause C is confusing and this will be addressed, although it is considered that the intent should remain.
19	Policy 3	PA--7-34	PDNPA - Planning	Should C just say 'the replacement of a dwelling, will not on its own be considered an enhancement'? There will be arguments about what traditional or non-traditional means. Is this defined? Is F necessary?	Noted and is considered in re-drafting.
19	Policy 3	PA--31-9	Edale PC	Generally agree except: The replacement of a non-traditional dwelling with a new dwelling, including in a traditional style or with traditional materials, will not on its own be considered an enhancement. Such replacement would be an enhancement, potentially contributing to energy efficiency and visual amenity.	Noted. A replacement dwelling may not always be an enhancement. New policy will require other factors to be taken into account to prevent the loss of smaller dwellings such as bungalows.
19	Policy 3	PA--82-10	individual	Support.	Noted.
19	Policy 3	PA--89-25	Holme Valley PC	The replacement of a non-traditional dwelling with a new dwelling in traditional style and materials should be considered as an enhancement.	It may be in some (most) circumstances but not all. Change to policy in response to loss of small dwellings such as bungalows.
19	Policy 3	PA--99-2	Hope & Derwent PC	The Park should seek to expand its boundaries.	This is beyond the remit of the local plan review.

19	Policy 3	PA--101-4	Hope & Derwent PC	Support.	Noted.
19	Policy 3	PA--103-5	Darwent Architecture	Add: Any designs must be of high quality architecture demonstrating an aesthetic and holistic enhancement to the immediate surroundings.	This is covered in DPD5.
19	Policy 3	PA--97-3	Environment Agency	F. Development in settlements necessary for the . . . permitted. In such cases significant overall enhancement for landscape, suggest add habitats, wildlife, cultural heritage and residential amenity, as relevant, must be demonstrated.	Considered in redrafting.
19	Policy 3	PA--121-12	Castleton PC	Dont understand the first sentence of F!	Considered in redrafting.
20	Policy 4	PA--31-68	Edale PC	it would be useful to replace in exceptional circumstances with more detail; interpretation of exceptional could be at the whim of individuals making planning decisions.	Exceptional circumstances are set out in Policy 7.
20	Policy 4	PA--53-1	Ramblers	Given the importance of recreational walking to the Peak District the text describing Special Qualities should explicitly mention the importance of walking and rights of way.	Noted and is considered in re-drafting.
20	Policy 4	PA--54-7	Kinder & HP Advisory Cttee	We particularly welcome 'Development must conserve and/or enhance valued landscape character' and especially that (other than in exceptional circumstances) 'proposals for development in the Natural Zone will not be permitted.'	Noted.
20	Policy 4	PA--72-8	National Trust	Clarification of what exceptional circumstances means in this context is required as aspects of land management within this zone can be classified as development.	Exceptional circumstances are set out in Policy 7.
20	Policy 4	PA--82-5	individual	Support.	Noted.
20	Policy 4	PA--89-19	Holme Valley PC	Agree.	Noted.
21	Draft Policy Direction 1	PA--2-7	individual	Support for 20% BNG. Requirement for off-setting options and guidance on site-based delivery.	Support noticed. Further guidance will be developed, including through a new Design Guide.

21	Draft Policy Direction 1	PA--7-27	PDNPA - Planning	Proposals exempt from statutory BNG Proposals not exempt from statutory BNG	Addressed in redraft
21	Draft Policy Direction 1	PA--19-4	Natural England	Natural England is generally supportive of this policy and welcomes the reference to Local Nature Recovery Strategies (LNRS). We reiterate our previous advice that the policy may set out a percentage biodiversity net gain target greater than the statutory minimum of 10%, however there should be evidence to justify the target proposed and demonstrate that development is deliverable.	Support noted. The Spatial Strategy and Strategic Housing Topic Paper sets out the evidence and viability regarding 20% BNG.
21	Draft Policy Direction 1	PA--31-76	Edale PC	Agree.	Noted.
21	Draft Policy Direction 1	PA--33-14	Peak Park Parishes Forum	Welcome the requirement for 20% BNG.	Noted.
21	Draft Policy Direction 1	PA--35-4	Oldham BC	In terms of biodiversity hierarchy, the Special Area of Conservation (SAC) / Special Protection Area (SPA) should be listed before Sites of Special Scientific Interest (SSSI). It would be helpful for the justification to list the six relevant Local Nature Recovery Strategies (LNRS), of which the Greater Manchester LNRS is one, and perhaps show these on a map.	Noted and is considered in re-drafting.
21	Draft Policy Direction 1	PA--38-17	Peak Park Parishes Forum	Support policy changes.	Noted.
21	Draft Policy Direction 1	PA--48-7	Middleton PC	Council supports the approach to require 20% Biodiversity Net Gain when BNG is mandatory and nature-friendly design when it is not. This strategy meets the aim of maximising contribution to nature recovery.	Noted.

21	Draft Policy Direction 1	PA--55-18	SMDC	The Council is aware that there is a suggestion of recreational disturbance relevant to HRA and this issue may have been raised by the Peak Park Authority in relation to neighbouring authorities plans. We would appreciate clarification as to the status of this issue and how it is being addressed in relation to development within the Peak Park Local Plan, especially development affecting the South Pennine Moors SAC Peak District Dales SAC and Peak District Moors (Pennine Moors Phase1) SPA.	The Authority will work proactively with the Council to understand and address this issue.
21	Draft Policy Direction 1	PA--64-2	Youlgrave CLT	Agree and support 20% BNG.	Noted.
21	Draft Policy Direction 1	PA--65-1	Minerals Products Ass	Plan should follow national guidance - 10% BNG not 20%.	Noted and is considered in re-drafting.
21	Draft Policy Direction 1	PA--69-11	Tarmac	It is not considered appropriate or justified for the policy to seek more than the mandatory 10% BNG requirements. The policy wording should be amended to reflect requirements in line with national guidance. A blanket approach to seeking additional gains poses the risk of less nuanced and priority habitats being delivered and does not take account of individual site circumstances or 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 and local nature priorities.	Noted and is considered in re-drafting.
21	Draft Policy Direction 1	PA--72-9	National Trust	20% as blanket approach not supported. Imposition of BNG on small-scale environmental management schemes can threaten their viability.	Noted and is considered in re-drafting.
21	Draft Policy Direction 1	PA--74-4	Trans Pennine Trail	By encouraging non-motorised travel, the TPT/NCN helps reduce carbon emissions and supports the plans climate change and nature recovery objectives. The Trail also acts as a green corridor, supporting biodiversity and connecting habitats.	Noted.
21	Draft Policy Direction 1	PA--103-6	Darwent Architecture	20% BNG not supported as this will prevent development and is against national guidance.	Noted and is considered in re-drafting.

21	Draft Policy Direction 1	PA--104-6	Spring Planning	20% BNG not supported due to costs and impact on development.	Noted and is considered in re-drafting.
21	Draft Policy Direction 1	PA--111-1	Jane Newman Planning	20% BNG not supported. It is contrary to the national policy direction and will have a detrimental impact on the delivery of affordable local needs housing. The requirement for 20% delivery may also reduce the provision of other mechanisms for biodiversity. The trading rules are such that the provision of bird boxes and bat boxes don't have a value within the matrix. Equally the delivery of different habitats such as ponds were none are affected do not score highly and therefore are not incorporated into schemes. On established business and industrial sites BNG already has an unintended consequence of dissuading owners and operators from developing features such as ponds and tree planting of their own volition, because they have become concerned that this would raise baselines in future proposals. Increasing the requirement to 20% is only likely to cement that approach.	Noted and is carefully considered in redrafting. 20% BNG was viability tested for housing typologies typical of the National Park.
21	Draft Policy Direction 1	PA--115-6	CPRE	(i) A question remains over identifying the core ecological network on the policies map. The charity encourages the PDNPA to work with DCC, Derbyshire Wildlife Trust and Natural; England and reach agreement on how to use the LNRS and its habitat map, local evidence and national habitat datasets, in terms of defining the core network, protecting it and identifying it on a policies map. (ii) The plan could also include policy wording that prioritises new habitat creation that fits with the Derbyshire Local Nature Recovery Strategies habitat creation measures and potentially overcomes the limitations of the mandatory trading rules in relation to any extra 10% above statutory biodiversity net gain.	(i) This is noted and accepted. The Authority will ensure the 6 constituent LNRSs are embedded in Policy (maps), potentially via it's own spatial Nature Recovery Plan. (ii) Noted and is considered in re-drafting.

21	Draft Policy Direction 1	PA--118-3	United Utilities	<p>(i) Concern over 20%. Not viable and difficult to deliver in practice.</p> <p>(ii) Policy must include 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. (iii) 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. 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 therefore request that your policy includes the following wording: Biodiversity net gain must not be located on top of, or where it would preclude access to, or where it would adversely affect the operation of, water and wastewater assets unless agreed in writing with the relevant statutory undertaker.</p>	<p>(i) Noted. Is reconsidered in light of Government advice. (ii) Noted and is considered in re-drafting. (iii) Noted and is considered in re-drafting.</p>
21	Draft Policy Direction 1	PA--121-13	Castleton PC	Limited capacity for BNG.	Noted. This is accepted as development overall is restricted in a national park.
21	Draft Policy Direction 1	PA--97-4	Environment Agency	<p>Policy welcome particularly pleased that the PDNPA have decided to ask for 20% BNG.</p> <p>All development proposals will be required to contribute proportionately towards nature recovery in accordance with design policy and development management principles Policy.</p> <p>Do these already exist? Have/did the EA have a chance to input?</p>	<p>Noted.</p> <p>Policies quoted are set out as draft policy directions as part of part of this consultation.</p>

21	Draft Policy Direction 1	PA--123-2	Devonshire Group	BNG enhancement of 20% is unwelcome, not viable and not evidenced. Current Gvt consultation seeking to limit BNG in recognition of development sector's concerns. NPA viability evidence for BNG relies on out-of-date data.	Noted and is considered in re-drafting.
22	Policy Direction 5	PA--2-3	individual	There needs to be more clarity on this. The current system allows the Park to identify NDHA in their Officer's Reports, but this is WAY TOO LATE in the process for applicants to do anything with this information. So there needs to be a 'presumption of NDHAs' per the suggested approach, or as part of the validation process so that fewer proposals are refused on the basis of impact that could have been addressed earlier on. The NDHA seems to be a way of allowing planners to refuse a development they don't like and it's not fair. The Park should enable a 'is this a NDHA?' function as part of the pre-app/ enquiry process.	It is recognised that decision-making about whether or not a building or structure is a non-designated heritage asset should be clear and transparent. The approach as set out aims to do this.
22	Policy Direction 5	PA--69-12	Tarmac	In seeking to ensure the greatest level of protection to heritage assets, policy needs to ensure it is not overly onerous. As worded, the approach is contrary to the objectives of the NPPF which set a hierarchy to consideration of development effecting heritage assets.	Noted. Other policies will give clarity to the hierarchy.
22	Policy Direction 5	PA--70-4	Emery Planning	The policy is inconsistent with national policy, as it places a higher test on development proposals involving heritage harm, and fails to take account of public benefits. The policy should reflect paragraphs 212 221 of the Framework, or simply cross refer to national policy.	Noted. Is considered in policy drafting.
22	Policy Direction 5	PA--89-37	Holme Valley PC	Agree.	Noted.
22	Policy Direction 5	PA--106-5	Taddington PC	Later policies 10 to 12 refer to the need to balance harm to a heritage asset against other issues. Part B omits this necessary requirement.	Noted. Is considered in policy drafting.
23	Draft Policy Direction 2	PA--7-15	PDNPA-planning	B - delete new-build? What about development types not mentioned in the development strategy? C again does this apply to all applications on edge i.e. householder or agricultural	Addressed in re-draft

23	Draft Policy Direction 2	PA--20-3	individual	There should not be greenfield development on the edge of settlements. Within settlements development may be permitted. Smaller villages and hamlets should be excluded. Split settlements should be brought into the National Park	The 'edge of settlement' approach to greenfield development is a long-standing policy based on the principle that a level of housing to meet local need is appropriate, and many settlements do not have any other appropriate sites. Some sites within settlements are protected because they contribute to the historic character. Comment regarding small villages and hamlets is noted and addressed in Draft Local Plan.
23	Draft Policy Direction 2	PA--26-3	National Highways	Given the limited SRN coverage in the National Park, the proposed development strategy and settlement strategy are unlikely to have a material impact on the SRN, provided that housing and employment proposals remain proportionate and are accompanied by Travel Plans and construction traffic management measures. We recommend that the forthcoming Settlement Capacity and Landscape Assessments confirm that growth does not rely on increased cross-Park car trips via the SRN and that any cumulative effects on the A628 corridor are screened early.	The Settlement Capacity and Landscape Assessments are primarily concerned with the impact of developed on the Peak Districts Special Qualities. However the proposed Settlement Strategy does take into account road capacity. Growth is very limited to that which addresses local need; it does not rely on increased cross-Park traffic.

23	Draft Policy Direction 2	PA--30-2	Bradwell CLT	<p>(i) We support the categorisation of Bradwell as a larger village but we object to B and C and to the Settlement Strategy for Larger Villages. (ii) The policy is so caveated that it may compromise the possibility of such sites being accepted (may be acceptable in principle, where capacity exists, where a suitable site can be found). (iii) the application of a local plan policy should not be dependent on applicants or decision-makers carrying out an assessment against a Settlement Capacity and Landscape Assessment which will not form part of the plan and which will not have been subject to sustainability appraisal, consultation or scrutiny at examination. (iv) the Settlement Capacity and Landscape Assessments should be used to inform policies within the plan. This could take the form of a positively worded criteria-based policy which supports greenfield and brownfield development within and on the edge of villages subject to an acceptable effect on the character and appearance of the village and the landscape of which it is part. (v) Safeguards could also be put in place to prevent valuable greenspace within villages from being developed (vi) In addition, the plan could allocate suitable sites for development, informed by the assessment. (vii) the scope of the policy should be widened to allow market housing where it would deliver a reasonable proportion of the development as affordable housing.</p>	<p>(i) Noted. (ii) The policy is caveated in order to ensure that housing development does not compromise the first purpose of a National Park which is to conserve and enhance natural beauty, wildlife and cultural heritage. (iii) The Settlement Assessments are embedded within the Local Plan and subject to Regulation 19 consultation and Examination. (iv) The Settlement Assessments inform policy and decision-making. Greenfield and brownfield development within and on the edge of villages is supported by the Development Strategy. (v) Policy C9 Settlement capacity and limits gives protection to Local Green spaces and Open Spaces in Conservation Areas. (vi) The Authority maintains an exceptions-based approach to housing development. (vii) The Authority maintains an approach that delivers 100% local needs affordable housing on greenfield sites.</p>
23	Draft Policy Direction 2	PA--31-77	Edale PC	<p>We agree with Edale being inxxxx with 10 houses to be built, which seems reasonable for the size of the parish and potential availability of however sites.</p>	<p>Noted. Comments re house size and local connection dealt with under relevant question point.</p>

23	Draft Policy Direction 2	PA--38-23	Peak Park Parishes Forum	We do not have any specific comments on the policy of setting out the four categories of settlement based on their size, and we understand the reasoning behind concentrating development in settlements most likely to be able to support new dwellings, for example because they have good transport links. However, the disadvantage is that there will not be many opportunities for development in the smaller settlements surrounding them, which may be to their disadvantage, eg if they need more young families to support a school.	Noted and is considered in policy redrafting.
23	Draft Policy Direction 2	PA--43-2	Bakewell TC	Specifically, the following proposed approaches are generally supported by the Council. New housing developments, including schemes of more than ten units, may be acceptable in principle within Bakewell or on its edge. Acceptance is conditional on meeting identified local needs and ensuring there is no significant harm to the landscape character or the town's special qualities.	Noted. Policy supports this approach.

23	Draft Policy Direction 2	PA--50-2	Framptons	<p>Settlement Strategy: smaller villages The provision within this settlement strategy is confined to new build developments and does not embrace the opportunities that may exist (as is the case with the assets identified above) for the appropriate re-use of existing buildings. It should not be assumed that existing unoccupied buildings are necessarily agricultural buildings and hence not within the definition of Previously Developed Land. Policy 2c considers development is sustainable where it makes efficient use of land and infrastructure in particular by prioritising the use of previously developed land and buildings, encouraging mixed uses and reducing the need to travel The reference to opportunities to re-use existing buildings for appropriate purposes within the Settlement Strategy for Smaller Villages (Draft Policy Direction 2) would be consistent with the provisions of Policy 2 and Policy 6B (conservation and enhancement of the landscape). It is submitted that the following wording should be added as emboldened text after point (IV):The re-use of existing buildings for housing or for uses supporting the tourism economy will be supported within the settlement of where the building is closely related to the edge of the settlement.</p>	Noted and is considered in re-drafting. Re-use of an existing building in or on the edge of a settlement can be accepted where this is required in order to achieve conservation and enhancement. The sensitive conversion of buildings that are heritage assets is supported.
23	Draft Policy Direction 2	PA--52-4	Tideswell PC	Settlement Analysis. The scores for Tideswell are erroneous, and the arithmetic is wrong.	Settlement analysis is amended.

23	Draft Policy Direction 2	PA--58-3	DDDC - planning	The PDNPA need to be clearer on the potential scale and location for future developments to deliver the Strategic Plan objectives and Policy direction as part of its overall vision to allow communities to thrive. The District Council respectfully requests that the evidence to demonstrate the delivery of other sites within settlements should be re-examined. There remains a high risk that if development is restricted in settlements where capacity issues have been identified, development will be unable to meet the need for local housing, with associated implications for the ability of the Plan to meet the wider social and economic needs and its inherent vision and objective to create thriving and sustainable communities.	Noted. Scale and location of development is indicated. The Authority maintains an exceptions approach to housing delivery. This is supplemented (in the larger, more sustainably located villages) by a detailed landscape sensitivity assessment which allows a long-term judgement about capacity to be made. The assessments may also function as a guide during site search work and will aid decision-making (by indicating more or less sensitive settlement edge locations).
23	Draft Policy Direction 2	PA--64-7	Youlgrave CLT	We should continue to be permitted to build social and affordable housing on greenfield sites on the boundaries of settlement.	Noted. Policy supports this.
23	Draft Policy Direction 2	PA--70-5	Emery Planning	(i) The Policy direction in respect of larger villages appears to take a more restrictive approach than that indicated at Outcome 6 in that the Policy suggests that only affordable housing will be acceptable in these locations whereas Outcome 6 acknowledges that there will be a role of intermediate and market housing within the National Park. (ii) We do not consider that the Development Strategy and approach to the settlement hierarchy, can or should be set out until the capacity studies have been undertaken and their outcomes assessed as that process should inform the basis for a strategy which is seeking to meet the needs of the Parks population going forward.	(i) CP8 deals with housing on greenfield land. H1 sets out the approach to other forms of housing. Occupancy conditions only apply to homes built on greenfield land. (ii) Development Strategy is reassessed in light of when settlement landscape assessments.

23	Draft Policy Direction 2	PA--72-10		Principle for allowing improved or expanded visitor facilities in defined recreation hubs is supported.	Noted. Policy RT 2 deals with recreation attractions in the countryside.
23	Draft Policy Direction 2	PA--82-29	individual	DPD2 Delete Diii. Development in countryside should not be permitted in principle. It will undermine policy 2 particularly first and second bullets.	Noted and is addressed in RT2.
23	Draft Policy Direction 2	PA--96-12	Winsters PC	Does not recognise community's wider needs or future needs. Does not understand that sustainable communities need families regardless of where they are from. Communities need to be 'rebalanced' as currently retirees or those purchasing pre the early 2000 boom are favoured. Schools and businesses are losing out.	Government guidance recognises that Parks are not suitable locations for unrestricted housing and asks us to focus on affordable housing to meet local need.
23	Draft Policy Direction 2	PA--100-1	Hope & Derwent PC	Hope Woodlands is omitted from your village list. And we see that Wash, near Chinley, is also not on the list. Why is this?	Hamlets not listed.
23	Draft Policy Direction 2	PA--101-5	Hope & Derwent PC	Delete Diii. Dev in countryside should not be permitted in principle.	Addressed in C8.
23	Draft Policy Direction 2	PA--103-8	Hope & Derwent PC	Section B is welcomed for both residential and small scale commercial development in the right areas	Noted.
23	Draft Policy Direction 2	PA--104-7	Spring Planning	(i) For larger developments the policy should require the delivery of other benefits and contributions (ii) policy should be clearer on the type of housing that is allowed within these settlements (ii) what is approach for enhancement sites.	(i) C12 deals with developer contributions. (ii) C8 defines housing that is permitted on greenfield land. H1 deals with other forms of housing. (iii) C3 deals with enhancement.
23	Draft Policy Direction 2	PA--105-2	Green Group	Support for overall approach, promoting a higher level of development in Bakewell and promoting a specific site.	Noted. The site was not put forward in the call for sites. The area of the site is included in the broad area of the landscape sensitivity assessment.

<p>23</p>	<p>Draft Policy Direction 2</p>	<p>PA--106-6</p>	<p>Taddington PC</p>	<p>(i) It is impossible to comment on these proposals because central to them is the Settlement Capacity and Landscape Assessment, upon which neither the criteria nor the process has yet been consulted. This is a significant flaw in the consultation process. In those circumstances the proposed Larger and Smaller Villages (the LSV) strategy is strongly opposed. (ii) It is not explained what the policy is intended to achieve over and above existing policy nor how it meets the Outcome 6. (iii) The essence of the agreed definition of Thriving and Sustainable Communities is their ability to sustain what is important to each settlement: their village assets, families and community support, local employment etc. Neither the Consultation nor the Sustainability Appraisal address this issue. They are mainly directed to how to build more houses, which is of itself not a National Park purpose. (iv) Why does the settlement strategy need to refer to house numbers at all? What does it achieve, other than alarm and uncertainty about the future? (v) The Settlement Capacity and Landscape Assessment, if accepted and written into policy, could actually make the situation worse. Every piece of greenfield land not protected by some other policy will be identified as potential building land on the say so of a firm of planning consultants, with no consultation, even though it may never be built upon. (vi) Housing is defined by the policy, but this is a narrower definition than may or may not be envisioned by Policy Direction 14. There needs to be clarity. (vii) Hamlets are defined as having no services which is obviously not always the case. (viii) Priestcliffe Ditch should be in the list of hamlets, or edge of settlement should recognise more scattered areas outside the nuclear village. (ix) Defined recreation hubs not supported (See Draft Policy Direction 7 below)</p>	<p>(i) Noted. Settlement strategy is amended in light of the landscape and site assessments. The Assessment forms part of the Local Plan evidence base and as such consultation will take place under Regulation 19. Larger and smaller villages not now in Policy. (ii) The intent is to set a scale of development that is appropriate for each settlement, taking into account landscape sensitivity. It is a reasonable approach to all types of greenfield development but in particular it is useful for framing a policy approach that is capable of delivering spatial objectives for housing. (iii) The agreed definition is threaded through objectives and the policy approach. (iv) Settlement strategy now refers to need not numbers. (v) The assessment sets out those settlement edge landscapes that are relatively more or less sensitive, accepting overall that sensitivity is by definition high in a protected landscape. Methodology and each analysis scrutinised and agreed by multi-disciplinary specialists within the NPA. The assessments do not identify building land. (vi) Housing in the</p>
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						<p>settlement strategy is defined separately because it refers only to new housing on greenfield land. (vii) Hamlets are not defined or listed. (ix) RT2 deals with recreation in the countryside.</p>
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23	Draft Policy Direction 2	PA--107-1	Hartington PC	(i) The report claims that Larger Villages are those with the biggest population that also score well against other basic indicators. In fact this does not apply to Hartington as we do not have a large population and therefore undue influence must have been given to basic indicators.	Hartington is not included as a village with greater capacity following the landscape and site assessments.
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23	Draft Policy Direction 2	PA--115-5	CPRE	<p>(i) The PDNPA are encouraged to assess the capacity of the NP for not just new housing and community facility developments in and around settlements but also the NPs capacity for renewable energy generation, in particular solar panels on water or ground mounted. (ii) Alternatively, the plan could contain a policy that presumes for solar where it can be integrated into the landscape and poses no threat to nature recovery. The RTPIs Spatial Approaches to Local Energy Planning advice is useful in on this theme. The comments made by the charity to the Issues and Options consultation are still applicable in relation to encouraging the PNDPA to develop the evidence base and carry out positive planning for renewable energy. (iii) As proposed the 3 tier approach is supported on the basis proposed subject to settlement and landscape capacity limitations, as it does appear to provide scope for some smaller settlements to see some new housing development. The approach of carrying out settlement and settlement edge capacity studies as part of a continuation of the exceptions approach is supported. Ecology and nature recovery should be part of the considerations,</p>	<p>(i) The assessments consider the sensitivity of settlement edge landscapes. Draft Local Plan policies make explicit how the assessment should be used. (ii) Policy CC2 supports renewable energy generation subject to impact on Special Qualities. Standard spatial approaches for local energy planning do not work well for protected landscapes as everywhere is classed as 'highly sensitive'. (iii) Noted. Ecological constraints and opportunities are are considered somewhat in the methodology.</p>
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23	Draft Policy Direction 2	PA--117-8	Hope Valley Climate Action	<p>(i) The first sentence refers to promoting a sustainable distribution and level of growth,.. without explaining what is meant by growth. The assumption must be that it is economic growth that is being referred to here, and if that is the case it would be helpful were that to be specified. (ii) We think this would be an opportunity to highlight the need for any economic development to be consistent with the urgent imperative to reduce greenhouse gas emissions and promote carbon sequestration. Specifically, we think that the development of renewable energy generation capacity should be permitted, and developments of employment and tourism can only be permitted where there are adequate sustainable transport links in place (or their development is part of the overall project). The need to travel by private car must be eliminated.</p>	<p>(i) The growth is with regard to the forms of development as set out in the Policy. (ii) Policies respond to Law and Guidance, primary relating to National Park Purposes and Duty and the National Planning Policy Framework. Policy permits renewable energy generation and encourages sustainable transport.</p>
23	Draft Policy Direction 2	PA--118-4	United Utilities	<p>UUW requests the opportunity to engage early in this assessment. It is critical that any areas within settlements that are identified to have potential for development are also assessed for site constraints associated with our water and wastewater functions that could preclude development. We would welcome early sight of any potentially suitable areas for development so that we can advise the Park Authority of any potential constraints / concerns. These constraints and concerns could affect the developable area and the deliverability of any sites that may be identified as suitable to meet development needs.</p>	<p>The assessments form part of the evidence base for the local plan and as such are subject to the Regulation 19 consultation. The Authority maintains an exceptions approach to housing delivery. No development sites are allocated.</p>

23	Draft Policy Direction 2	PA--121-15	Castleton PC	<p>(i) Castleton cannot accommodate significant new housing without a major impact on the landscape. (ii) Conversion of existing structures to residential properties not for tourism. (iii) Castleton should be in the second settlement category rather than the first. Castleton has been placed as a town/large village (in the same group as Bakewell and Tideswell). We have some decent services including a Post Office. Our permanent population number is probably lower than stats say due to % of holiday lets. We may be more accurately placed in the Smaller village subset? (iv) From the angle of affordable housing and housing need, perhaps the Hope Valley should be seen as a whole unit, rather than viewing as a collection of villages. In practice families are often dispersed along the valley, with younger generations finding homes where property is cheaper.</p>	<p>(i) A settlement landscape sensitivity assessment has been undertaken and forms part of the evidence base for the Local Plan, as such it is subject to Reg 19 consultation. All applications must demonstrate how settlement capacity and limits have been taken into account. Capacity is the extend of development that can take place without harm to the landscape or Special Qualities. (ii) H7 states that all new housing will be subject to a primary residence clause unless it is part of farm diversification or is not capable of being a primary residence. (iii) Noted. This is considered in policy drafting and in light of new evidence on landscape sensitivity and connectivity. (iv) A 'parish cluster' approach to meeting housing need was considered but determined to be unnecessarily complex. Policy H5 on 'Second and subsequent occupation' is considered to address this issue.</p>
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23	Draft Policy Direction 2	PA--123-1	Devonshire Group	Disappointing that the apparent recognition of the role that Whole Estate Plans can play in achieving sustainable forms of development has not been more fully reflected in the details of draft policy. DG would welcome the opportunity to engage with the National Park Authority (NPA) further on this matter in advance of the publication of any next stage of Local Plan (LP) preparation.	WEPS are in Policy C8
23	Draft Policy Direction 2	PA--124-12	PDNPA - Strategy	Develop on minimising impact on climate change to ensures a minimal contribution towards greenhouse gas emissions and considers long-term impacts of climate change in the design, for example location in relation to flood risk, integration of energy use reduction and efficiency technologies	Noted and is considered in re-drafting.
23	Draft Policy Direction 2	PA--127-3	individual	Diii improved or expanded visitor facilities are permitted in principle in defined recreation hubs.	It is not clear what comment is being made.
23	Draft Policy Direction 2	PA--130-3	individual	(i) No evidence is offered that sensitively designed new housing development (of any tenure) within and/or adjacent to existing settlements would universally result in harm. (ii) The presumption that in principle all new development should be resisted is resulting in a fossilisation of communities. (iii) The Plans ambition to support thriving and sustainable communities should be demonstrated through the identification of sites for new housing.	(i) Detailed landscape sensitivity assessments are undertaken which allow a long-term judgement about capacity in settlements to be made. The assessments may also function as a guide during site search work and will aid decision-making (by indicating more or less sensitive settlement edge locations). (ii) Policy C8 sets out that development on greenfield land in and on the edge of settlements is acceptable. (iii) The Authority maintains an exceptions approach to housing delivery as set out in the NPPF para 82.

24	Draft Policy Direction 2	PA--7-5	PDNPA - Planning	Again delete new build "housing schemes including those of more than 10 units can come forward" Will be permitted?	Addressed in re-draft
24	Draft Policy Direction 2	PA--18-9	individual	Hard to see how the number of houses outlined for development sits within the landscape character of the larger settlements. What would happen after 2045? Would the next plan allow for the same number of houses again irrespective of then footprint of settlements. Much more radical steps need to be taken to address (legitimate) local housing need than just to continue building on green field sites.	Other policies in the plan protect Landscape and Special Qualities and these take priority in order to deliver national park purposes. A Townscape and Local Landscape Assessment has been undertaken that includes Bakewell and the larger settlements providing evidence about capacity. The Authority is working with constituent housing authorities to address housing need and will consider any steps that are within its legal means and resources. However, the Authority's powers are currently limited in this regard to what can be achieved as the local planning authority.

24	Draft Policy Direction 2	PA--24-1	Butterton PC	<p>Information for Butterton is out of date. We have no convenience store (2 quoted), no Post Office (1 quoted) and scored 1 for reasonable road width, whereas sections of all the roads in or through the village are no better than single track and too narrow for vehicles to safely pass. Taking all this into account Butterton should score 3 for services rather than 7 and hence this should affect the village's suitability for further development of a stated potential extra 10 units. Any development within or adjacent to the Butterton conservation zone significantly risks the unique character of the village and what is meant to be conserved. A development of up to 10 units would be wholly inappropriate. Further, by stating a specific number of housing units in the plan and not determining their locale, it enables potential developers to challenge any negative planning decision on the basis that it is in the Local Plan. The Local Plan appears to take no specific note of the special status of Conservation Areas for further development. It also takes no note of the fact that for villages close to the edge of the Peak Park, development to address local need would be better taking place wholly outside the Peak Park rather than threatening the unique properties of the National Park with unnecessary development. As a general point, by positively promoting limited development within the Peak Park, overtime this will lead to increasing urbanisation of the towns and villages within the Park and slowly erode the features and character of the National Park the PDNPA is there to protect.</p>	<p>The errors regarding community facilities are noted and corrected. The concern regarding the scale of development is noted. New homes are to be permitted on the basis of identified need. If the maximum number of units specified are not needed they would not be permitted and any challenge (by a developer refused permission for a higher level of development than is needed) would be very weak. The Conservation Area is specifically protected by other policies in the Plan. The features and characters of the National Park (its Special Qualities) are strongly protected by other policies.</p>
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24	Draft Policy Direction 2	PA--55-7	SMDC	The Council supports the settlement strategy and would like to see further details as to where development will be accommodated published at Reg 19 stage.	Scale and location of development is indicated in policy C8. The Authority maintains an exceptions approach to housing delivery. Detailed landscape sensitivity assessment forms part of the evidence base and as such is consulted on under Reg 19.
24	Draft Policy Direction 2	PA--68-7	HPBC	Support and require more detail about where development to be located.	Scale and location of development is indicated in policy C8. The Authority maintains an exceptions approach to housing delivery. Detailed landscape sensitivity assessment forms part of the evidence base and as such is consulted on under Reg 19.
24	Draft Policy Direction 2	PA--92-4	Grindleford PC	Grindleford PC supports the proposal to designate larger villages such as ours as being suitable - in principle - for sympathetic development. It is right that housing development in the Park should be concentrated in the main settlements, and that loose straggly development be avoided	Noted.
24	Draft Policy Direction 2	PA--105-3	Green Group	Support for approach. Site suggested on edge of Bakewell.	Noted. The site was not suggested in the call for sites. It is not in or on the edge of Bakewell.

25	Draft Policy Direction 2	PA--18-8	individual	<p>Small villages that may be developed with up to ten local need housing developments just seems to be a list of villages without any discernment or reference to landscape character or historical development. For example villages such as Chelmorton, Stanton, Tissington have been listed but one would suggest that is impossible to see how up to ten housing units could added in these settlements (and my list is not comprehensive) without destroying the landscape characteristics of such settlements. For example Stanton is a linear village, highly observable within the landscape by views from the north and it is impossible to see how a development of up to ten houses could fit in this settlement; one would be a struggle. And Stanton is just one of the settlements listed in this policy that is impossible to see how up to ten houses could be accommodated on a greenfield site without completely undermining the character of the landscape. The list needs to be revisited and a landscape character assessment needs to be used to reduce the number of settlements as one suggests it is giving false hope to housing need whilst potentially undermining the objectives of conserving and enhancing the national park.</p>	Scale and location of development is indicated in policy C8. The Authority maintains an exceptions approach to housing delivery in relation to identified need and capacity. A detailed townscape and landscape sensitivity assessment forms part of the evidence base informing the local plan and as such is consulted on under Reg 19.
25	Draft Policy Direction 2	PA--31-38	Edale PC	<p>We agree Edale should be classed as a "smaller village". We would want to see development as close to the main Grindsbrook and station areas possible , for access to amenities and transport links and preservation of character of the village.</p>	Noted. This classification is not taken forward.
26	Draft Policy Direction 2	PA--7-42	PDNPA - Planning	<p>"it is expected that single unit dwellings can come forward" this is vague and doesn't actually set a limit. Are we limiting it to single dwellings? If so this needs to clearly say so.</p>	Amended.
26	Draft Policy Direction 2	PA--18-10	individual	<p>Hard to see how the number of houses outlined for development sits within the landscape character of the larger settlements.</p>	Scale and location of development is indicated in policy C8. The Authority maintains an exceptions approach to housing delivery in

					relation to identified need and capacity. A detailed townscape and landscape sensitivity assessment forms part of the evidence base informing the local plan and as such is consulted on under Reg 19.
26	Draft Policy Direction 2	PA--80-1	individual	Some areas described as Hamlets are misleading, for example Yorkshire Bridge is a collection of houses all of which are part of the Parish of Bamford, residents will shop, go to school and be part of the Village of Bamford. The Yorkshire Bridge area is one of the sites where 10 units of housing could be feasible, but the description of this as a hamlet restricts this.	Noted. Considered in policy re-drafting. Hamlets are not listed.
27	Draft Policy Direction 2	PA--7-39	PDNPA - Planning	A number of these split parishes are large (Rainow, Waterhouses etc) but the policy does not allow the business or community facilities permitted in other settlements of a similar size. Only housing is permitted? Is this intended?	Policy C8 sets the approach for parishes split by boundary.
27	Draft Policy Direction 2	PA--45-19	Eyam PC	Where housing needs surveys have recently been carried out, as in Eyam, is it not appropriate to include the required housing need within the plan?	The plan is required to set the overall need for the plan area for the plan period, ie for the PDNP to 2045.
28	Policy 6	PA--7-35	PDNPA - Planning	B does not require the building to be a heritage asset. This may be stated in the other relevant policies, if so ignore this comment. C the reference to planning conditions or obligations is unnecessary.	Addressed in re-drafting
28	Policy 6	PA--31-28	Edale PC	Strongly support re-use of buildings, especially for residential use. It should be easier than at present to convert barns, for example, for primary residential use where these are within easy reach of services.	Policy continues to permit the re-use of traditional buildings for residential and business use.
28	Policy 6	PA--89-1	Holme Valley PC	Agree.	Noted.

28	Policy 6	PA--96-11	Winster PC	More flexibility should be considered here where the building could become more than one dwelling with sympathetic extensions. Limiting a buildings development to one dwelling when it could accommodate two or more with extension and reconfiguration and help to meet housing needs is short-sighted. Further, rejecting conversion where building is too small for family home, but again could be sympathetically extended is wrong. Often this leaves them being converted to a holiday let. Another big missed opportunity.	This policy applies to conversions in the open countryside where the impact of conversion on Special Qualities must be carefully judged.
28	Policy 6	PA--104-8	Spring Planning	Part B of this policy suggests that the conversion of existing buildings outside of settlements will only be allowed for business or residential uses and not for holiday accommodation purposes. This should be clarified.	Noted and clarified in redrafting.

28	Policy 6	PA--106-7	Taddington PC	Part A is accepted, but Part B needs to be firmly placed within a clear philosophy about historic barns and buildings that goes beyond the negative and spells out how the National Park Authority sees their future if conversion to residential/business is considered to be unacceptable. Part B is out of place here and is dealt with under Policy 14 below. Beyond the edge of settlements needs consideration. There are scattered villages or nuclear villages with scattered surrounds where buildings can usefully be converted to housing even if not contiguous with the main part of the village, perhaps with some enhancement. More flexibility should be applied to farmsteads. Outside the Park, conversion to housing is Permitted Development and there are successful schemes that conserve and even enhance the wider landscape (see also Policy 23). A similar approach locally could sustain local communities with minimal impact on the wider countryside. An alternative to requiring the removal of an unsightly building is to consider applications for its reuse and enhancement. This should be encouraged where there is neither the means nor the resources to secure its removal (see also Draft Direction 19 below).	Noted and is considered in re-drafting. Core Policies work alongside Cultural Heritage Policies.
28	Policy 6	PA--115-15	CPRE	The CPRE PDSY has noted an increase in the number of proposals to convert isolated traditional buildings and would support a new policy specifically to clearly set out the parameters or conversion and what uses may be acceptable.	Clause B of Policy C5 is new policy intended to address these concerns.
28	Policy 6	PA--117-9	Hope Valley Climate Action	We think that point A should have an additional subclause as follows: v the necessity to increase renewable energy generation within the Park, as part of the overall approach to protecting the landscape by mitigating climate breakdown.	Noted. This clause is unrelated to the others and not relevant in this context.

28	Policy 6	PA--124-13	PDNPA - Strategy	Reference developments with landscape-scale impact; could this include ensuring that landscape scale development supports National Park Management Plan/PLTOF/EIP aims of establishing, securing, enhancing and connecting priority habitats. species corridors , and support long term management of these assets.	Considered in re-drafting. These aspects are covered elsewhere in policy.
28	Policy 6	PA--127-4	ind	Add: Bvi is accessible to sustainable transport such as a train station, a bus route, a cycling route or a reasonable walk from a public transport stop.	Noted and is considered in re-drafting. This policy primarily concerns conservation and enhancement of the landscape and operates alongside other policies that permit the conversion of heritage assets. It may be desirable to achieve sustainable transport but unreasonable to make this a requirement in all circumstances.
29	Draft Policy Direction 3	PA--7-30	PDNPA - Planning	A - must have regard to? D - just a thought - does this mean that old neighbourhood plans will trump the new policy? Generally the newer policies in the development plan trump older ones where there are conflict. Is this the intention? Fine if so	Addressed in redraft
29	Draft Policy Direction 3	PA--18-5	individual	Supportive of this policy particularly in regard to not allowing development in existing building e.g barns that are separated or isolated from the main settlement. The individual development of barns in the open countryside is detrimental to the landscape character of the NP and introduces urbanisation in to the wider countryside. Such development has already undermined the character of some local actions in the NP and has had a detrimental affect on the countryside of the country.	This policy applies primarily to new-build development. Other policies are more relevant to existing buildings.

29	Draft Policy Direction 3	PA--30-3	Bradwell CLT	(i) The application of a local plan policy should not be dependent on applicants or decision-makers carrying out an assessment against a Settlement Capacity and Landscape Assessment which will not form part of the plan and which will not have been subject to sustainability appraisal, consultation or scrutiny at examination. (ii) The policy should be expressed more positively to say that permission will be granted for small scale developments on the edge of settlements unless there is conflict with criteria A, B or C. (iii) Criterion D should be amended to refer to up-to- date Neighbourhood Plans. Parts of the Bradwell Neighbourhood Plan are now out of date because it is over 10 years old and the built-up area defined within it no longer reflects the range of opportunities that exist for sensitive small-scale development to meet housing needs. If the Bradwell NP is used as the starting point for decision-making it could unnecessarily restrict opportunities for affordable housing.	(i) The Landscape Assessments form part of the evidence base for the Local Plan. (ii) The policy is expressed positively within the context of National Park Purposes. (iii) Noted and will be considered at redrafting.
29	Draft Policy Direction 3	PA--31-25	Edale PC	Strongly support E	Noted.
29	Draft Policy Direction 3	PA--50-3	Framptons	(i) Criterion C is unduly restrictive. Fails to acknowledge the opportunities that may be presented for the re-use of existing buildings in the countryside that may in response to their historical significance be separate from an existing settlement but closely related thereto. (ii) Reference to Development does not reasonably make a distinction between the impacts of the built development and the change of use of land say for the provision of short term tourist facilities.	Re-use of buildings that are heritage assets is permitted in principle in settlements and in the open countryside through other policy routes, for example for homes or business use.

29	Draft Policy Direction 3	PA--53-9	Ramblers	Draft Policy Direction 3 on Settlement capacity and limits requires that any development should not harm the character of the settlement and its landscape setting. The supporting text notes that users of the National Park enjoy its numerous walking routes. The development management principles should explicitly recognise the importance of walking routes when any new developments are proposed.	Noted and is considered in re-drafting.
29	Draft Policy Direction 3	PA--54-3	Kinder & HP Advisory Cttee	we note that the justification given makes important points about Park users enjoying numerous walking routes and value the appreciation of historic settlements, going on to point out that 'The entry point and edge characteristics of the settlements will require great care..' in this regard, yet this is not explicitly included in the draft Policy Direction itself. We think it should be.	Noted and is carefully considered in redrafting.
29	Draft Policy Direction 3	PA--105-4	Green Group	Our clients site lies immediately on the edge of the settlement of Bakewell and should therefore be fully considered as part of the ongoing Settlement Capacity and Landscape Assessment work.	The site did not form part of the call for sites and therefore is not assessed as part of the SHLAA, however the area of the site is included within the broad area covered by the landscape sensitivity assessment.
29	Draft Policy Direction 3	PA--106-8	Taddington PC	The comments above in relation to the Settlement Capacity Assessment apply. To be in accordance with the Settlement Capacity and Landscape Assessment, means that the Assessment takes priority over all other considerations, including public consultation and factors the assessment may not have considered. As there has been no consultation on the Assessment, the policy is fundamentally unsound. B. should include historic setting.	Noted and is addressed in redrafting.

29	Draft Policy Direction 3	PA--107-2	Hartington PC	Await the SCLA for Hartington in the next round of consultation before we can comment in detail on this Policy. Again we refer to our Neighbourhood Plan and the determined Settlement Boundary and Local Green Spaces. These have drawn extensively on the settlements historic pattern of development. We hope the Plan will be given full consideration in any future development proposals. Hopefully there are development opportunities within the Settlement boundary. Clearly this meets the requirement of delivering consultation with the local community The key to any development proposals is the scale being appropriate to the location and robust examination of the reasons for the development. Too often we hear statements that it will provide employment of attract more visitors. Frankly Hartington is awash with visitors and overrun with vehicles and the wellbeing of its permanent residents must not take second place.	The Policies Map shows an indicative settlement edge for Hartington for the operation of Policy C9.
29	Draft Policy Direction 3	PA--118-5	United Utilities	We recommend an additional criterion to this policy direction, which states: F. Applications will only be approved where infrastructure is available or can be provided in time to meet the needs of the development.T his should be reflected in the drafting of your final policy. It is relevant to all uses including tourism related uses such as hotel and camping proposals which can have significant impacts on our infrastructure.	Noted and is considered in re-drafting. May be more relevant to Policy C10 Development Management Principles.
29	Draft Policy Direction 3	PA--123-3	Devonshire Group	The requirement under criterion E for an assessment of site alternatives in consultation with the local Community will be required introduces uncertainty. No guidance is provided as to what form of engagement would be required. Readers of the LP must have clarity as to what would be required as part of any development proposal. If clarity and certainty can not be provided, this provision should be removed from the draft policy.	Noted and is considered in re-drafting.
30	Draft Policy Direction 4	PA--2-12	individual	Promote the highest standards of neighbourliness and amenity for local residents/occupiers is too wide. Needs clear definitions to remove subjective judgement.	Policy C10 sets high development maangement

					principles subject to being possible and appropriate.
30	Draft Policy Direction 4	PA--7-6	PDNPA - Planning	Must where possible?	Addressed in re-draft
30	Draft Policy Direction 4	PA--19-5	Natural England	Natural England generally welcomes this policy particularly the requirement for nature friendly design and landscaping, and Biodiversity Net Gain. We also welcome the point on green and blue infrastructure, and we suggest that reference is made to Natural Englands Green Infrastructure Framework (GIF) when the detail of this policy is developed further.	Noted and is positively considered. Reference included in Policy C11.

30	Draft Policy Direction 4	PA--27-1	Coal Authority	Within the Peak District National Park area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. We are very disappointed to note that this policy makes no mention of addressing issues of land instability and we request that an additional criteria be added to address this omission. Suggested amendment to the policy direction is set below: Add - address any risks posed by land instability.	Policy C10 addresses.
30	Draft Policy Direction 4	PA--31-67	Edale PC	Support.	Noted.
30	Draft Policy Direction 4	PA--35-5	Oldham BC	The policy should reflect the need to avoid flood risk in the first instance. Some of the criteria need more detail or more detail included in the justification to be effective. For example, development must be water efficient does this mean going beyond building regulations? And the highest standards for foul and surface water drainage. Its not clear what is meant.	Addressed in re-drafting CC3.
30	Draft Policy Direction 4	PA--45-10	Eyam PC	Support.	Noted.
30	Draft Policy Direction 4	PA--53-5	Ramblers	Draft Policy Direction 4 Development management principles require all development proposals to promote active and sustainable travel and contribute to the green and blue infrastructure network. (p 61)Policy 62 and 63 should be explicitly cross referenced in this and Draft Policy Direction 3.	Noted. To avoid complex cross-referencing (as this issues applies to most policies) the Authority's convention is to make an upfront statement to the effect that all policies must be read in conjunction.

30	Draft Policy Direction 4	PA--54-13	Kinder & HP Advisory Cttee	we welcome inclusion of 'contribute to the green and blue infrastructure network, for example by linking to walking, cycling, horse-riding and wheeling routes, or by naturalising water courses.'	Noted.
30	Draft Policy Direction 4	PA--65-3	Minerals Products Ass	Plan should follow national guidance - 10% BNG not 20%.	Noted and is considered in re-drafting.
30	Draft Policy Direction 4	PA--69-13	Tarmac	It is not considered justified to seek more than the mandatory 10% BNG requirements. This risks less nuanced and priority habitats being delivered and does not take account of individual site circumstances or the habitats removed to facilitate development. Similarly, contributions to the green and blue infrastructure network and sustainable travel can be supported but caveated to only be required where appropriate, viable and feasible.	Noted and is considered in re-drafting.
30	Draft Policy Direction 4	PA--82-11	individual	support 20% BNG	Noted.
30	Draft Policy Direction 4	PA--96-2	Winster PC	New policy needed on new builds and conversions incorporating wildlife features such as swift boxes, bee bricks.	Policy requires nature-friendly design and landscaping. Detailed elements such as swift-boxes may be included in the new design guide.
30	Draft Policy Direction 4	PA--101-6	Hope & Derwent PC	Support BNG 20%	Noted.
30	Draft Policy Direction 4	PA--104-9	Spring Planning	The requirement for BNG over 10% should be subject to viability. Support should be given to contemporary architecture within this policy.	Viability report includes BNG. Design is covered in Policy C11
30	Draft Policy Direction 4	PA--106-9	Taddington PC	The broad aim is agreed, but the words where possible are queried. Most of these will be possible, but it may not always be desirable, feasible or even relevant to the application. The efficient use of land may be appropriate on some sites but not others, where local characteristics may be of greater priority.	Noted and is addressed in redrafting.

30	Draft Policy Direction 4	PA--111-4	Jane Newman Planning	There needs to be clarity about what is meant by naturalising watercourses in the context of green and blue infrastructure networks (rather than in relation to flood management).	Reference removed.
30	Draft Policy Direction 4	PA--117-10	Hope Valley Climate Action	We would like to see an additional requirement added, as follows: promote the use of sustainable forms of transport for journeys to and from the site.	Policy includes 'promote active and sustainable travel'
30	Draft Policy Direction 4	PA--118-6	United Utilities	bullet 3 - To avoid policy ambiguity, the requirements for water efficient development require clarity. We recommend that you include our recommend water efficiency policy which is included in our enclosed document titled Supporting Information and Recommended Policies for Local Plan Preparation, hereafter referred to as Supporting Policies. bullet 5- it is not sufficient to only minimise flood risk or promote SuDS. For consistency with national policy it is necessary to ensure that the policy direction has regard to flood risk from all sources, ensuring that flood risk it is not increased by development and securing sustainable drainage in the delivery of new development.	Core Policy C10 indicates broad principles. CC3 is the detailed Flood risk policy that addresses issues raised.
30	Draft Policy Direction 4	PA--121-18	Castleton PC	An additional consideration that should be included is sustainable drainage to include on all developments to remove non-porous surfaces and replace with water permeable surfaces for Natural Flood Management.	Addressed in Policy CC3
30	Draft Policy Direction 4	PA--97-5	Environment Agency	Whole policy is welcomed.	Noted.
30	Draft Policy Direction 4	PA--123-4	Devonshire Group	Presentation is so open to interpretation and riddled with uncertainty as to make its effective implementation extremely challenging for both the reader and the NPA.	Noted. Page 8 of the consultation report sets out that Policy Directions indicate aspiration and content of future policy only. They were not drafted as a policy. Any ambiguous elements are addressed.

29	Draft Policy Direction 3	PA--118-5	United Utilities	We recommend an additional criterion to this policy direction, which states: F. Applications will only be approved where infrastructure is available or can be provided in time to meet the needs of the development. This should be reflected in the drafting of your final policy. It is relevant to all uses including tourism related uses such as hotel and camping proposals which can have significant impacts on our infrastructure.	Noted and is considered in re-drafting. May be more relevant to C10 Development Management Principles.
29	Draft Policy Direction 3	PA--53-9	Ramblers	Draft Policy Direction 3 on Settlement capacity and limits requires that any development should not harm the character of the settlement and its landscape setting. The supporting text notes that users of the National Park enjoy its numerous walking routes. The development management principles should explicitly recognise the importance of walking routes when any new developments are proposed.	Noted and is considered in re-drafting.
31	Draft Policy Direction 5	PA--19-6	Natural England	Natural England recommends that reference should be made within a Design policy to the Natural England Green Infrastructure Planning and Design Guide 2023. This Guide provides details of what good GI design looks like linked to the ten characteristics of well-designed places as set out in the National Model Design Code and the National design guide. It provides evidence based practical guidance on how to plan and design good green infrastructure and can be used to help planners and designers develop local design guides and codes with multifunctional green infrastructure at the heart. This will help to inspire the creation of healthier, nature-rich, climate resilient and thriving places to live, learn, work and play.	Noted and is included in Policy C11.
31	Draft Policy Direction 5	PA--20-2	individual	The Plan fails to comment strongly enough on the importance of good design and aesthetic quality. A number of suggested changes are suggested that would incorporate design into other policies.	The new Local Plan has one design policy C11 that applies to all development.
31	Draft Policy Direction 5	PA--31-61	Edale PC	Seems reasonable. will this apply to conversions? change of use?	Noted. Policy is lawful and reasonable.

31	Draft Policy Direction 5	PA--45-3	Eyam PC	Support. Query application of policy.	Noted. It is not appropriate to comment here on application of policy.
31	Draft Policy Direction 5	PA--53-3	Ramblers	The plan should recognise the importance of rights of way and walking routes to place making and we would like to see those being clearly referenced in the proposed design guide.	Noted.
31	Draft Policy Direction 5	PA--65-5	Minerals Products Ass	This policy should include reference to materials. Locally produced building and roofing stone has a number of important sustainability benefits: -inherently lower energy/carbon intensity in production than their conventional equivalents; -lower transport-related carbon emissions than imported materials; - higher potential for subsequent re-use; and -high levels of durability and relatively low through-life maintenance. The Plan (Outcome 10) seeks to be supportive of building and roofing stone quarries and this needs to be reflected in the relevant design policies of the Plan as well. By doing so the Plan can help to deliver design excellence, contribute to local distinctiveness and reduce carbon emissions as well as supporting a long-established industry which provides traditional, skilled work. The type of materials used, the prudent use of existing and new resources and the use of low embodied carbon building materials are all important contributors to reducing carbon emissions during the construction process. This policy should: -recognise the use of locally produced building and roofing stone to help maintain and enhance local character and distinctiveness in our built environment; -support the use of locally produced building and roofing stone as a low-embodied carbon building material; and - support the use of local building and roofing stone as a material which will deliver high levels of durability, low through life maintenance and high potential for subsequent re-use in the construction process.	Noted and is positively considered in drafting Policy C11.

31	Draft Policy Direction 5	PA--72-11	National Trust	The aim of this policy is supported, however, consideration of whether this should include paths and multi user trails is necessary. Furthermore, landscaping is important where it protects overall landscape character and specific routes.	Policy C11 applies to all development.
31	Draft Policy Direction 5	PA--118-7	United Utilities	In this policy we request that you ensure that the core design policy ensures that sustainable drainage systems are considered at the start of the design process and thereafter integrated with the wider design of the site, especially any on-site landscaping and new public realm. In doing so, we recommend that you refer to our recommended policy for sustainable drainage set out in our enclosed Supporting Policies.	Policy C10 on development management principles and CC3 on flood Risk address this issue.
31	Draft Policy Direction 5	PA--125-10	Histpic England	We would recommend incorporating information for the historic environment in relation to design and what will be appropriate in this context. For example, dealing with shopfronts and advertisements in the context of listed buildings and conservation areas, locally distinctive design and appropriate materials, heigh, scale and massing that are appropriate within a historic context and respect the significance of heritage assets, including their setting.	Policy C11 brings together all relevant guidance.
31	Draft Policy Direction 5	PA--127-5	ind	Add to the bullet points after access design criteria; Caravan parks, car parks, campervans sites and campsites.	Policy C11 applies to all development.
32	Draft Policy Direction 6	PA--7-1	PDNPA - Planning	legal agreements need to be consistently called planning obligations throughout	Addressed in re-draft
32	Draft Policy Direction 6	PA--31-6	Edale PC	Reasonable but depends on capacity and funding to be effective.	Noted.
32	Draft Policy Direction 6	PA--65-10	Minerals Products Ass	There is already guidance and tests on the use of conditions and legal agreements. There is no need for a policy on this and it should be deleted.	Noted. Policy C12 does not repeat guidance an tests.
32	Draft Policy Direction 6	PA--69-14	Tarmac	As worded this policy appears to apply to all development which is onerous. Development should only be required to provide developer contributions where justified and that they can not be controlled by condition.	Policy C12 sets out where the Authority may seek contributions.

32	Draft Policy Direction 6	PA--106-10	Taddington PC	It is not clear why this is limited to spatial outcomes nor why paying particular attention is limited to local authorities: this should include affected parish councils, for example.	Noted. Policy C12 is related to infrastructure and spatial objectives.
32	Draft Policy Direction 6	PA-135-5	DCC	<p>All housing developments comprising 10 or more dwellings (whether market or affordable) are assessed for potential requirements for new infrastructure and associated developer contributions. Where there is insufficient capacity at existing schools, the County Council will seek developer contributions. While it is acknowledged that previous Section 106 (S106) requirements within the Peak District National Park have reflected its protected status, concerns remain regarding the allowance for general S106 contributions factored into the 2025 Assessment – specifically, the figure of £2,700 per unit referenced in paragraph 4.25 and Table 4.7. Contributions per dwelling could be much higher than this.</p> <p>It is noted that affordable housing requirements are often prioritised over other obligations, which can significantly affect the level of contributions available for County infrastructure.</p>	<p>The Authority has fully considered viability issues in the development of policy and will continue to work with the County Council.</p> <p>Policy C12 sets the scope of types of infrastructure that may be provided by developer contributions.</p>
32	Draft Policy Direction 6	PA--107-3	Hartington PC	Robust legal agreements and detailed scrutiny of viability are essential.	Noted.

Biodiversity, nature recovery and geodiversity					
Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
33	Chapter 5	PA--34-6	Oldham BC	The HRA has not included at this stage appropriate assessment for the screened in sites to assess the Likely Significant Effects (LSEs) to the protected sites which may arise because of the 36 outcomes or policies that have been screened in. The consultation again states: 'All protected sites located within the Peak District National Park boundary are screened in and will be subject to an appropriate assessment at the next stage of the plan-making process including consideration of In Combination effects.' LSEs are identified and yet the HRA does not propose any mitigation and therefore the Local Plan at a Preferred Approach stage has not been able to consider and be informed by the HRA process so far. This is not considered to be appropriate. The SA and HRA should be an iterative part of the plan making process, informing the plan, and giving stakeholders the opportunity to make comment on any policy changes as a result of that assessment.	An appropriate assessment is undertaken to inform the Regulation 19 stage of plan-making. We apologise if this was not clear in our assertions.
33	Chapter 5	PA--43-7	Bakewell TC	The Council welcomes the policy directions outlined in the document, which aim to protect and secure a flourishing biodiversity and promote nature recovery within the context of a climate emergency.	Noted.
33	Chapter 5	PA--57-12	BHS	Management of land for equestrian use and access continues to improve therefore benefits the landscape. The Farming in Protected Landscapes programme has illustrated what can be achieved with examples of horse riding trails, path restoration and 'horsiculture' projects (Shropshire Hills NL and Cannock Chase NL). Collaborative projects like these could be built in to nature recovery and bio/geodiversity.	Noted. When permission is necessary, planning policies can support nature recovery. Policy E5 supports development on non-operational farms that deliver nature recovery.

33	Chapter 5	PA--94-1	Swifts Group	Existing nest sites for building-dependent species must be protected and retained where possible, as endangered red-listed bird species such as swifts, house martins, and house sparrows, return annually to traditional nest sites. Suitable mitigation measures must be installed where it's not possible to retain nest sites.	Protection and mitigation is set out in Policy C6 and B2
33	Chapter 5	PA--95-1	Swifts Group	To be in line with the LNRS, please add: "Artificial nest cups for house martins may be specified as an alternative to swift bricks, where recommended by an ecologist."	Detailed designed elements for wildlife are in Appendix 2.
33	Chapter 5	PA--114-5	Over Haddon PC	Lathkill Dale is already a well-conserved natural landscape, as testified by the designation of most of it as a National Nature Reserve, and all of it as a Site of Special Scientific Interest, with a substantial area of Ancient Woodland. However, 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.	Noted. Planning policies (if permission were necessary) would support such an initiative.
34	Policy 7	PA--7-26	PDNPA - planning	Is it necessary to cross refer to the siting, design, layout and landscaping policy? I thought the point of rationalising it was that it applies to all development?	Comment is addressed in policy re-drafting.
34	Policy 7	PA--18-7	individual	Strongly supportive of the policy that states development that will service land management needs or make access easier will not be permitted	Noted.
34	Policy 7	PA--19-7	Natural England	Welcomes the strengthening of the Natural Zone policy.	Noted.

34	Policy 7	PA--31-7	Edale Parish Council	Support.	Noted.
34	Policy 7	PA--33-16	Peak Park Parishes Forum	PPPF agrees that protections need to be strengthened where possible.	Noted.
34	Policy 7	PA--35-6	Oldham BC	The policy needs to refer to where the Natural Zone can be viewed.	Plan contains a map of the natural zone.
34	Policy 7	PA--54-4	Kinder Association	Welcome the continued commitment to protecting and managing the Natural Zone in Policy 7 and protecting sites, species and networks in Policy 8.	Noted.
34	Policy 7	PA--69-15	Tarmac	The Natural Zone covers large expanses. The NPPF is clear that minerals are a finite resource and may only be worked where they are found. Policy wording should, therefore, contain some flexibility to this effect.	It is considered that there is no need for flexibility in this policy because any application for minerals development in the natural zone would be assessed in consideration of other relevant policies, including under Policy 1 that sets out the major development tests.

34	Policy 7	PA--72-12	National Trust	<p>This policy whilst identifying that some supporting development does need to occur within the Natural Zone, the removal of management of the Natural Zone is a concern as 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. Where nature recovery schemes within this zone require planning permission as for example the peatland restoration at Kinder Scout, if this were to be assessed against this draft policy would it be considered to comply as it does make access easier? However, the purpose is nature restoration. Inclusion of nature recovery as an exceptional circumstance does go some way, however, clarification is required to ensure it would allow all essential habitat restoration activities to take place. Investigation is required into the implications of removal of permitted development actions for conservation / habitat restoration when these are considered essential for nature recovery. Whereby each condition which includes the removal of permitted development rights has a requirement to pass the six tests. Whilst we support the principles of strengthening the existing Natural Zone policies, particularly with regard to limiting inappropriate large-scale development. We would welcome further clarification of what types of development would be considered to comply to the criteria. It is considered that the overall intention of this policy should be of creating a positive framework for Natural Zone stewardship that relevant stakeholders can work to underpin partnership with the PDNPA.</p>	<p>Noted an is considered in re-drafting. The intent of policy is to support land management for nature recovery.</p>
34	Policy 7	PA--82-12	individual	Support.	Noted.

34	Policy 7	PA--101-7	Hope & Derwent PC	Support.	Noted.
34	Policy 7	PA--106-11	Taddington and Priestcliffe Parish Council	A. Imperative? What does this add?	Noted. Will reconsider.
34	Policy 7	PA--117-11	Hope Valley Climate Action	We recognise the need to protect and manage the Natural Zone, and broadly support the proposed policies in this section. However, as we noted in our comments last year, the overall protection of Natural Zones is dependent on successful mitigation of the threat of climate breakdown. We think therefore that the following should be added to Policy 7: Support permission for small scale, suitably located and designed, infrastructure close to settlements, to provide for local energy needs. Support, on an exceptions basis, new renewable energy infrastructure in the Natural Zone to help meet national need, and as a practical demonstration of the National Park's commitment to tackling the climate crisis. Recognise that, in practice, this means big wind turbines. Devise planning policy and guidance which identifies suitable/unsuitable locations for big turbines, so that the vast majority of the Natural Zone remains free of these installations.	Noted. Suggestions are not relevant for inclusion in a development management policy. Such development would be considered under Policy 1 (National Park Purposes) and Policy 4 (Landscape Character and Special Qualities.)
34	Policy 7	PA--123-5	Devonshire Group	When referencing a personal consent (criterion C(iii)), the criteria should reference appropriate person or business reflecting that some proposals will be put forward by a commercial entity.	Noted and considered in redrafting.
35	Policy 8	PA--7-28	PDNPA - planning	Is the last paragraph necessary? We will always use conditions or obligations to to secure this for any policy reason	Addressed in re-drafting
35	Policy 8	PA--19-8	Natural England	Welcomes the additional protection with this policy of important ecological networks, corridors and stepping stones and aligns with the guidance in the NPPF.	Noted.

35	Policy 8	PA--31-83	Edale Parish Council	Sites under D should have the same level of protection as sites under B so that local wildlife sites etc have the potential for increasing biodiversity and becoming formally eligible for higher protection, and contribute more forcefully to wildlife networks.	Noted and addressed in redrafting.
35	Policy 8	PA--33-17	Peak Park Parishes Forum	sites under D should have the same level of protection as sites under B so that local wildlife sites etc have the potential for increasing biodiversity and becoming formally eligible for higher protection, and contribute more forcefully to wildlife networks.	Noted and addressed in re-drafting.
35	Policy 8	PA--69-16	Tarmac	In order to avoid replication of wider policy/regulation, applications effecting the listed protected habitat sites be determined in line with national and international policy requirements and regulation. The policy states 'Agreed measures for the mitigation or compensation of adverse effects under this policy will be secured by a planning condition or Section 106 agreement. This is covered under the requirements of Policy 6 and doesnt require repetition. Biodiversity Net Gain requirements under *Biodiversity and nature recovery policy* will be additional to these measures'. This can be incorporated within the Policy for BNG to avoid unnecessary repetition.	Considered in drafting.

35	Policy 8	PA--82-24	individual	<p>Strengthen. Regard National Park as single piece of natural infrastructure not piecemeal/site by site. Essential to drive nature's recovery and to underpin sustainable development. Instead the policy addresses protected sites habitats species and ignores the relationship with the wider countryside within the NP. Development proposals should only be permitted where they have an overall positive impact on the ability of the natural environment to provide goods and services. Currently the proposals map uses Natural Zone, habitat designations (SPA, SAC, SSSI, NNR) and recreation zones. It needs some thought as to how to figuratively demonstrate the importance of the whole of the natural environment in the National Park. DPD1 may be the place to make any amendments? The following amendments are only a beginning: To title, add 'and enhancing' after protecting. Begin first sentence with 'Nature is critical national infrastructure' and Insert new Cii increasing connectivity and stepping stones to create a comprehensive and cohesive network promote the inclusion of green infrastructure within transport networks (e.g. green roofs on bus shelters, semi-natural habitats in verges)</p>	<p>Noted and positively considered in redrafting. Many of the points raised are already addressed. DPD1 links to Local Nature Recovery Strategies. Policy 8 applies to species and networks not just sites. Clause E refers specifically to buffer zones, stepping stones and land corridors. DPD4 requires all development to contribute to nature recovery.</p>
35	Policy 8	PA--89-38	Holme Valley PC	Agree.	Noted.

35	Policy 8	PA--91-1	Swifts Group	Proposed policy is welcome but should be consistent with national policy on swift bricks, especially as the Peak District is an important area for swifts and other red-listed endangered building-dependent bird species which will use swift bricks, due to the presence of older buildings for nest sites and suitable vegetated and waterside locations for foraging. Note that the mandatory national Biodiversity Net Gain calculation does not include species features such as swift bricks, so it is important that swift bricks have their own separate policy. Please include the text of NPPG Natural Environment 2025 paragraph 017, in particular the requirement for at least one swift brick per dwelling on average for new developments, plus explanation that other bird species will use swift bricks, and best-practice guidance references.	Comment positively addressed in policy re-drafting. Appendix 2 contains nature specific desing elements.
35	Policy 8	PA--101-8	Birchover Parish Council	Support. With following amendments: To title, add 'and enhancing' after protecting. Begin first sentence with 'Nature is critical national infrastructure' Insert new Cii increasing connectivity and stepping stones to create a comprehensive and cohesive network	Noted. Considered in redrafting.
35	Policy 8	PA--97-6	Environment Agency	Good.	Noted.
35	Policy 8	PA--106-12	Taddington and Priestcliffe Parish Council	Draft Direction 1 gives equal priority to protected designated sites, but this policy in parts A and B separates SSSIs etc. Part B allows for the management of sites, features etc but Part A does not, which seems wrong. Part B (ii) seems very wide and goes beyond the NPPPF because there are a wide range of Special Qualities most of which would be unsuitable in a SSSI. What is being proposed needs to be clear and unambiguous.	Policy redrafted.
36	Policy 9	PA--7-33	PDNPA - planning	C omit separately	Addressed.
36	Policy 9	PA--19-9	Natural England	Welcomes the update of this policy in line with NPPF requirements.	Policy RT1 and RT2 replace Rec Hubs approach.

36	Policy 9	PA--31-21	Edale Parish Council	Strengthened nature protections are welcome. However, it is hard to see how these protections are compatible with proposed recreation hubs. Protections must be applied as rigorously to the hubs, if they are agreed, as to other forms of development.	Noted and will be considered in redrafting.
36	Policy 9	PA--33-18	Peak Park Parishes Forum	Agree.	Noted.
36	Policy 9	PA--71-2	Staffordshire County Council	Policy 9 is welcomed. However, it refers only to trees and wooded habitats and there are other habitats that can be considered irreplaceable in the Peak District. In fact, many of these habitats contribute to the uniqueness of the area. Reference should be made to Calaminarian grassland, blanket bog and CHEGD grassland (grasslands with waxcaps and allied species.)	Addressed in policy drafting.
36	Policy 9	PA--89-46	Holme Valley PC	Agree.	Noted.
36	Policy 9	PA--106-13	Taddington and Priestcliffe Parish Council	Part E presupposes that the removal of a dry stone wall requires the National Park Authority's approval, which in most cases it will not do, unless the National Park Authority takes the urgent action that is needed to prevent the loss of further dry stone walls by extending conservation area boundaries, as the Parish Council has already asked, but has received no response. Strip field walls and old barns have been removed to provide building stone for other projects. The National Park Authority needs to respond.	Noted.
36	Policy 9	PA--97-7	Environment Agency	Good.	Noted.

36	Policy 9	PA--110-1	individual	Is it possible to treat the whole of the Peak Park as a conservation area in terms of trees so that permission is needed from the Peak Park before any felling takes place?	Tree felling is largely outside of planning control. This new policy is intended to give additional protection to ancient and veteran trees.
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Cultural heritage					
Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
37	6 Cultural Heritage	PA--13-1	individual	User is disappointed the policy hasn't been brought forward as 57% supported.	Thank you for your submission. 57% was a substantial number and this policy was discussed thoroughly. In the end, other polices were expanded to fill this gap.

37	6 Cultural Heritage	PA--33-6	PPPF	<p>The respondent raises several concerns and recommendations across heritage policies. They state that: Policy 10 uses overly subjective language and should formally reference and incorporate Appendix 3 into the Plan. Policy 11 should clearly differentiate between Grade I and Grade II listed buildings. Policy 12 requires a clear definition of conservation areas and cross-reference to relevant detail in the tree conservation policy.</p> <p>They argue that the Authority has been too inflexible on energy-efficiency measures for heritage buildings and that decisions should focus on visual impact rather than strict adherence to original materials. They support allowing measures such as high-quality double or triple glazing, insulation, heat pumps and rooftop solar panels—particularly for Grade II and II* buildings—balancing heritage considerations against the urgent need to reduce emissions and improve habitability.</p> <p>The respondent also notes that enabling such measures would support sustainable communities and improve living conditions in heritage buildings, some of which are currently cold and damp. They stress that effective monitoring and enforcement, with adequate resourcing, is essential. Finally, they recommend that Policy 14’s assessment of impacts on settings should explicitly reference Appendix 3.</p>	<p>Thank you for your detailed feedback on Policies 10, 11, 12, and 14. We note your observations regarding definitions, references to Appendix 3, and considerations around energy efficiency measures for heritage buildings. Your points about monitoring, enforcement, and balancing visual impact with sustainability have also been noted. These are carefully and positively considered in re-drafting.</p>
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37	6 Cultural Heritage	PA--43-4	Bakewell TC	<p>The Council supports the proposed policies to conserve and enhance Bakewell's cultural heritage, landscapes, and unique character, including strong heritage-led design guidance and protection of key green and recreational spaces. It agrees that development should respect the conservation area, biodiversity, and the town's special qualities as the Peak District's only town, while noting that increasing visitor pressures and limited resources will make effective conservation challenging over the Local Plan period.</p>	<p>Thank you for your comments regarding the draft policies for Bakewell. We appreciate your support for the measures aimed at conserving the town's heritage, landscapes, and green spaces, and for highlighting the challenges associated with increasing visitor pressures.</p>
37	6 Cultural Heritage	PA--71-3	Staffs CC	<p>The respondent considers the Cultural Heritage Policies comprehensive and aligned with national policy, welcomes the focus on impacts to heritage settings, and supports continued engagement with relevant authorities under the Duty to Cooperate.</p>	<p>Noted 10-14 are comprehensive. Noted r: Duty to cooperate.</p>

37	6 Cultural Heritage	PA--114-2	O Haddon PC	The respondent emphasises the importance of protecting local heritage, including the village's limited listed buildings and its historic, man-made landscape, notably Lathkill Dale and the surrounding strip fields with their extensive dry stone walls, which residents are proud to preserve.	Thank you for your comment. Comment noted in regards to heritage and protection at Lathkill Dale.
37	6 Cultural Heritage	PA--125-11	HE	Welcomes the section	Noted
38	Policy 10	PA--2-8	individual	<p>'there are occasions where the balancing exercise has not been done appropriately. There ought to be clear guidance on this for everyone's clarity. '</p> <p>The user notes concern over a lack of standardisation and approach to the 'balance' of a heritage statement and urges the need for very clear guidance.</p>	Thank you for your response. The need for clear guidance for both applicants and planners is fully considered in re-drafting.

38	Policy 10	PA--14-1	PDNPA (arch)	<p>Clause C as it stands is pretty basic and not really fit for purpose on the supporting information required.</p> <p>Policy 10</p> <p>c) Development proposals that affect sites or heritage asset of archaeological interest or those with potential archaeological interest must be accompanied by appropriate supporting information in the form of a Desk Based Assessment and where required an evaluation of the site. The supporting information needs to:</p> <ul style="list-style-type: none"> • Set out the nature of the archaeological potential and interest of the site, including the nature, level and extent of significance. • Identify the likely nature of any harm or impact resulting from the proposed development. • Set out strategies to minimise harm and impact, and where necessary a mitigation strategy. • Identify opportunities for enhancement of significance e.g. enhancing physical or intellectual access; provision of interpretation, community engagement plan to deliver community and public benefit. • Adhere to national archaeological standard and guidance as set out by the Chartered Institute for Archaeologists and Historic England. <p>Supporting information must have regard to the</p>	<p>Thank you for your detailed comments on Policy 10(c) regarding archaeological sites and supporting information. We note your observations on the current wording and your suggestions for referencing the Archaeological Research Framework, as well as your proposed expansion of the supporting information requirements. This is positively considered in-re-drafting.</p>
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				emerging Archaeological Research Framework for the Peak District.	
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38	Policy 10	PA--31-18	Edale PC	Assessing the impact of development on designated and non-designated heritage assets and their settings (development management policy). The language is subjective eg use of "proportionate" and "appropriate". There is more detail in Appendix 3, but this is not referenced. Appendix 3 should be included formally in the Plan.	Thank you for your comments on Policy 10 regarding the assessment of impacts on heritage assets. These are addressed in re-drafting.
38	Policy 10	PA--38-24	PPPF	Policy 10. Assessing the impact of development on designated and non-designated heritage assets and their settings (development management policy). The language is subjective. There is more detail in Appendix 3, but this is not referenced. Appendix 3 should be included formally in the Plan.	Thank you for your comments regarding Policy 10 and Appendix 3. We note your observations on the language used and the suggestion to formally reference Appendix 3 within the Plan. These are addressed in re-drafting.

38	Policy 10	PA--69-17	Tarmac	The respondent advises that Policy 10 should reflect the NPPF without duplicating it, including recognition of the heritage asset hierarchy and proportionality of impact. They recommend deleting paragraph E as it duplicates paragraph B, and expanding paragraph B to clarify that the level of detail required should be proportionate to the asset's significance and sufficient to assess potential impacts.	Thank you for your comments on Policy 10. We agree that the policy should reflect the NPPF, including the hierarchy of heritage assets and the significance of potential impacts. These are addressed in re-drafting.
38	Policy 10	PA--72-13	NT	Inclusion of recognition that non-designated heritage assets contribute to wider setting / cultural landscape should be considered due to their cumulative effect of conserving a cultural landscape.	Noted and are positively addressed in re-drafting.
38	Policy 10	PA--89-65	Holme Valley PC	Will consideration be given to the impact of a development adjacent to a heritage asset, for example if a large housing development blocks the sight of an archaeological site?	This is addressed in re-drafting.

38	Policy 10	PA--125-12	HE	Clause C add in about a suitably qualified professional. Clause F is it relating to development of a heritage asset or development affecting the significance of a heritage asset, including its setting. Would consider rewording the clause, in relation to all sections of F.	Noted and is positively addressed in re-drafting.
38	Policy 10	PA--127-6	Bill Hanley	The respondent argues that Policies 10 and 11 should take a balanced, practical approach to heritage assets, allowing the use of modern materials and adaptations to ensure buildings are suitable for contemporary living and working, provided that overall appearance, landscape impact, and the retention of key historic features are preserved.	We agree that the plan should take a balanced and realistic approach to heritage assets, allowing the use of modern materials and design features where appropriate. Ensuring buildings can provide acceptable levels of warmth, light, and functionality for contemporary use is important, while retaining key historic features and the overall appearance in the landscape. Policies should allow sensitive interventions, such as replacement windows or additional openings in barns, where these do not compromise the heritage significance.

39	Policy 11	PA--7-11	PDNPA (planning)	<p>A is just repeating policy 10 which would apply here.</p> <p>B also</p>	Noted and is considered in re-drafting.
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39	Policy 11	PA--31-35	Edale PC	<p>The respondent notes that the policy fails to differentiate between Grade I and Grade II listed buildings and calls for clearer definitions. They argue that the Authority has been overly inflexible on energy-efficiency measures for heritage buildings and that decisions should be based on visual impact rather than strict use of original materials. They support allowing measures such as insulation, high-quality double or triple glazing, heat pumps and rooftop solar panels for Grade II and II* buildings, balancing heritage considerations against the urgent need to reduce emissions and improve living conditions. They highlight that some heritage dwellings are currently unfit for habitation due to cold and damp, citing black mould as an example. Finally, they stress the importance of properly funded monitoring and enforcement, noting a perception that enforcement is currently lacking.</p>	<p>Thank you for your comments regarding listed buildings, energy efficiency measures, and monitoring. We note your observations on differentiating between Grade I, II, and II* listed buildings, the potential impact of measures such as double glazing, insulation, and solar panels, and the balance between heritage protection and sustainable use. Points are addressed in re-drafting.</p>
39	Policy 11	PA--38-25	PPPF	<p>Policy 11 doesn't differentiate between grade 1 and grade 2 listed buildings. There should be a clear definition.</p>	<p>NOTED: Policy 11 doesn't differentiate between grade 1 and grade 2 listed buildings. There should be a clear definition. These are addressed in re-drafting.</p>

39	Policy 11	PA--69-18	Tarmac	The primary aim should be in conserving and making beneficial use of a listed building. The specific criteria under category D could be deleted and assessment/judgement made on the level of harm that would be incurred and if any public benefit outweigh the impact from the changes.	Noted and positively addressed in re-drafting. Thank you for your comments.
39	Policy 11	PA--70-6	Emery Planning	There is unnecessary duplication and cross over between Policy 10 (heritage assets) and Policy 11, given that listed buildings are also heritage assets. Furthermore, Policy 11 introduces unnecessary prescription, setting out various forms of development which may result in a degree of harm to the heritage asset. We therefore consider that Policy 11 is unnecessary and should be deleted.	Thank you for your comments. They are positively considered in re-drafting.

39	Policy 11	PA--72-14	NT	<p>i how their significance will be preserved; and Inclusion of 'revealed or enhanced' after the word preserved at i, above should be considered as often development and good design can reveal more of the historic character or purpose of a building.</p>	<p>Thank you for your comments. They are positively considered in re-drafting.</p>
39	Policy 11	PA--89-48	Holme Valley PC	<p>The respondent cautions that protecting listed buildings should not conflict with the need to adapt them for viable contemporary use, noting that some internal subdivision may be necessary to secure their long-term survival, particularly for community-owned buildings. They call for Policy 14 to be framed more reasonably and pragmatically, with clearer recognition of affordability and viability, and suggest that if public benefit and optimum viable use are intended to allow such flexibility, this should be stated explicitly in the policy.</p>	<p>Thank you for your comments. We agree that Policy 14 should carefully balance the protection of Listed Buildings with the need to enable their sustainable, contemporary use. Provisions that restrict subdivision or other internal alterations should be applied with pragmatism, particularly for community-owned buildings where financial viability is a concern.</p> <p>We note that the policy's reference to changes being "off-set by the public benefit... including enabling optimum viable use" is intended to allow for this balance. However, we agree it would be helpful to make this explicit, highlighting that enabling viable use and adaptation is part of the public benefit that supports the preservation of the building.</p> <p>These are addressed in re-drafting.</p>

39	Policy 11	PA--100-5	Hope & Derwent Woodlands PC	not allowing the sub-division of large interior spaces. This is too rigid and will prevent conversions of otherwise unusable buildings. Whilst the buildings and original features should be preserved where at all possible some things have to be sacrificed.	Noted re: large interior space division.
39	Policy 11	PA--103-9	Darwent Architecture	Part D: This should largely be removed as it is too prescriptive. There is National Guidance from Historic England on what is acceptable and what is significant v less than significant loss. All applications need to be balanced and weighed up by the planner.	Thank you for your comments. They are positively considered in re-drafting.

39	Policy 11	PA--104-10	Spring Planning	<p>art C of this policy does not reflect the NPPF in terms of heritage assets. This element does not need to be repeated and is covered in Policy 10(F). "Development will not be permitted if it would: i) adversely affect the character, scale, proportion, design, detailing of, or materials used in the Listed Building; or ii result in the loss of or irreversible change to original features or other features of importance or interest." Part D is overly prescriptive, and the policy does not need to go into this detail. This section should be deleted.</p>	<p>Thank you for your comments. They are positively considered in re-drafting.</p>
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39	Policy 11	PA--111-5	Jane Newman Planning	<p>The respondent argues that Policy 11 is overly restrictive in opposing subdivision of large interior spaces, noting that some subdivision, such as in barn conversions, can be necessary to secure a building’s sustainable use and prevent loss. They recommend that subdivision be assessed case by case based on impacts on significance rather than being effectively prohibited. They also suggest refining references to specific features to recognise that some may be later, harmful additions, and instead focusing on protecting fabric that positively contributes to significance. Additionally, they object to the requirement for building recording in all cases, stating that it is disproportionate, costly, and unreasonable for minor works.</p>	<p>Thank you for your comments. They are positively considered in re-drafting.</p>
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39	Policy 11	PA--125-13	HE	<p>A) i amend 'preserve' with 'conserve'. Relate the sentence to significance.</p> <p>D) Consider NPPF harm and also test for substantial harm.</p> <p>Consider impacts for locally listed buildings. Do you have a local list? Implications for listed buildings for shopfront/ advertisements.</p> <p>E) Any loss should be recorded and added to the Historic Environment Record (HER)</p>	Thank you for your comments. They are positively considered in re-drafting. After careful consideration through the local plan review process the Authority has decided not to have a Local List.
40	Policy 12	PA--2-9	individual	How are "important views" defined? Are these laid out in the adopted appraisals? If so, be specific.	Important views can be, and are, defined in the Conservation Area Analyses and in the Settlement Character Assessment and Landscape Sensitivity Assessments.
40	Policy 12	PA--7-36	PDNPA planning	Notes F is not a policy.	Noted.
40	Policy 12	PA--18-3	individual	Supportive of these policies so fail to see how such a policy would allow for the development of of up to ten houses in the smaller settlements, which are all conservation areas. The policies seem at odds and therefore why it is imperative to revisit the number of settlements	Noted in regards to earlier policies.

40	Policy 12	PA--31-74	Edale PC	<p>Needs a clear definition of what a conservation area is, within the Plan. On F, relevant detail which is in the tree conservation policy needs to be referenced.</p> <p>See also comments at Policy 11. The main criterion should be visual amenity, but taking into consideration the need for more houses fit for habitation, not only the need to preserve character.</p>	Thank you for your comments which are noted and will be considered carefully in re-drafting. Conservation Areas are defined in law and their boundaries are shown on the Policies Map.
40	Policy 12	PA--38-26	PPPF	Policy 12. Needs a clear definition of what a conservation area is, within the Plan. On F, relevant detail which is in the tree conservation policy needs to be referenced.	Thank you for your comments which are carefully considered in re-drafting. Conservation Areas are defined in law and their boundaries are shown on the Policies Map.
40	Policy 12	PA--89-27	Holme Valley PC	The respondent emphasises that places must be allowed to evolve, balancing protection of heritage with openness to innovation and contemporary design. They argue that over-conservation risks stifling progress, and that the relationship between conservation and innovation should be managed positively to allow future generations to see the contribution of the present.	Thank you for your comments. We agree that while protecting heritage and cultural assets is essential, it is equally important to allow scope for innovation and contemporary design. Policies should seek a balance. These are addressed in re-drafting.

40	Policy 12	PA--104-11	Spring Planning	In particular, Part C should refer to the tests in the NPPF and Policy 10, where harm is balanced against public benefit.	Noted: In particular, Part C should refer to the tests in the NPPF and Policy 10, where harm is balanced against public benefit. These are addressed in re-drafting.
40	Policy 12	PA--106-14	Taddington PC	“conserved” not “preserved” (A) The public interest and the general enhancement of the conservation area are both reasons why these things should happen (C)	noted for edits. These are addressed in re-drafting.
40	Policy 12	PA--111-6	Jane Newman Planning	Part D of the policy 12 also requires recording and if this was to lead to a full requirement for recording be a heritage professional, again, the requirement is unreasonable.	noted Part D of the policy 12 also requires recording These are addressed in re-drafting.
41	Policy 13	PA--89-70	Holme Valley PC	Agree.	Noted.
41	Policy 13	PA--125-14	HE	What is the policy aiming to achieve? We consider the policy should be resisting harm to RPGs.	Noted question. Policy does resist harm.

42	Policy 14	PA--31-43	Edale PC	<p>Conversion of a cultural heritage asset (development management policy). The section about assessing impact on settings should reference Appendix 3.</p> <p>and see above on need to be flexible and to allow for the development of Edale</p>	<p>Thank you for your comments regarding Policy 14 on the conversion of cultural heritage assets. We note your observations on referencing Appendix 3 and the importance of supporting sustainable communities, including the provision of housing in villages such as Edale.</p> <p>These are addressed in re-drafting.</p>
42	Policy 14	PA--38-28	PPPF	<p>Policy 14. Conversion of a cultural heritage asset (development management policy). The section about assessing impact on settings should reference Appendix 3.</p>	<p>Thank you for your comments regarding Policy 14 on the conversion of cultural heritage assets. We note your observation that the section on assessing impacts on settings could reference Appendix 3.</p> <p>These are addressed in re-drafting.</p>

42	Policy 14	PA--50-4	Framptons for private individual	The respondent argues that Criterion B is overly restrictive by limiting housing reuse to designated heritage assets, overlooking the contribution of non-designated heritage assets to the Park's Special Qualities and social history. They state that the policy should allow and encourage the restoration and reuse of non-designated heritage assets, warning that failure to do so could lead to dereliction, decay, and avoidable loss of cultural and historical value.	Thank you for your comments regarding Criterion B of Policy H14 and the treatment of non-designated heritage assets (NDHAs). We note your observations on the potential contribution of NDHAs to the Special Qualities of the Park, and the points raised regarding the restoration and reuse of such assets. These are addressed in re-drafting.
42	Policy 14	PA--89-62	Holme Valley PC	Does this include consideration of the conversion of a historic asset into economic use, for example a barn being converted into offices or small workshops?	Yes. Noted.

42	Policy 14	PA--104-12	Spring Planning	<p>This policy must distinguish between designated and non-designated heritage assets. The policy should not prescribe that subdivision of an existing building is not acceptable in principle, and each proposal should be assessed on its own merits.</p> <p>Under Part B, this suggests that the conversion of an existing building to residential can only come forward if the PDNPA have concluded the building is a non-designated heritage asset. How will this process be assessed and managed?</p>	<p>Thank you for your comments. We agree that the policy should clearly distinguish between designated and non-designated heritage assets. Subdivision or conversion should not be ruled out in principle; each proposal should be assessed on its individual merits.</p> <p>Regarding Part B, clarification will be needed on how the PDNPA will determine whether a building qualifies as a non-designated heritage asset and how this process will be managed to ensure transparency and consistency in decision-making.</p> <p>NOTED. These are addressed in re-drafting.</p>
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42	Policy 14	PA--106-15	Taddington PC	<p>The respondent raises concerns that the policy overlaps with Policy 6B and should be consolidated into a single, clearer Policy 14 that distinguishes between development in settlements, near settlements, and in open countryside. They argue that some heritage-related development is more appropriate in or near settlements, and that the retention and reuse of heritage buildings, including barn conversions, is preferable to dereliction, contributes to landscape character, sustainability, and reduces pressure for new build. They state that if reuse is not supported, the Authority must set out an alternative strategy for endangered rural buildings. The respondent also calls for greater clarity and flexibility in criteria, particularly to allow imaginative and modern approaches to secure long-term conservation, and notes that some wording, such as “attention will be paid,” is unclear and needs refinement.</p>	<p>Thank you for your detailed comments. We acknowledge the overlap between this policy and Policy 6B and agree that consolidation could improve clarity. Policies should clearly distinguish which apply across the board, near settlements, or in the open countryside, as impacts and acceptability differ by context.</p> <p>We agree that reusing barns and other rural heritage buildings can be a sustainable approach, preserving key features while reducing pressure for new builds. Flexible and imaginative approaches may be necessary to secure the future of derelict or decaying assets, and policies should encourage reuse that maintains their essential character while allowing modern adaptation.</p> <p>We also note the need to clarify phrasing such as “attention will be paid” to ensure the criteria are applied consistently and proportionately.</p> <p>These are addressed in re-drafting.</p>
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42	Policy 14	PA--111-3	Jane Newman Planning	<p>The respondent seeks clarity that the reuse of buildings, including heritage assets, for business or residential purposes is supported in appropriate circumstances, and that residential conversion should not be restricted to affordable local needs or essential workers. They note that the costs and scale of many heritage conversions make them unsuitable for such restricted housing uses.</p>	<p>Thank you for your comments. We agree that the policy should support the reuse of buildings for business or residential purposes in appropriate circumstances.</p> <p>These are addressed in re-drafting.</p>
42	Policy 14	PA--125-15	HE	<p>We are supportive of this policy and seek to ensure that the wording encourages appropriate conversion that conserves the significance of heritage assets. Not all conversion will be appropriate, and it may be that certain schemes are unsupported due to the level of harm on the heritage asset. We are keen to ensure that heritage assets find a viable use to protect their future, which is why the policy is welcome.</p>	<p>Thank you for your comments. We welcome the policy and agree it should support conversions that conserve heritage significance. While not all schemes will be appropriate, enabling viable use is key to protecting the long-term future of heritage assets.</p>

Recreation and Tourism					
Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
	Outcome 5	PA--22-1	Bamford with Thornhill Parish Council	The respondent does not support the proposal to develop Recreation Hubs. They cite existing issues for residents living near to popular visitor locations, and express a desire for dispersal. They also believe that the phrase 'Recreation Hub' is not well understood by the PDNPA – different definitions used by different people.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Chapter 7	PA--16-6	Bamford with Thornhill Parish Council	Policy Direction 7 – the respondents does not support the Recreation Hubs concept and is concerned about the impact on Fairholmes. Policy Direction 9 – the respondent is concerned about the required local connection legal agreement. Policy Direction 10 – the respondent suggests that the policy should differentiate between sizes of motorhome. Policy Direction 11 – the respondent is concerned that this approach increase the number of motorhomes parked on the highway. The responses have been copied across to the relevant policy consultation points – 16-9 to 16-12.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.

	Chapter 7	PA--22-1	Hathersage Parish Council	<p>Although the comment is posted under the Chapter 7 chapter, the particular focus appears to be on the Recreation Hubs and Attractions policy (Draft Policy Direction 7). The respondent raises concerns about the sentences providing justification for the policy. The respondent is concerned that Castleton is not described as a Recreation Hub. The respondents is concerned that there isn't a visitor management policy for the whole of the National Park and lists a number of issues that they feel such a plan would be able to address.</p>	<p>The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.</p>
	Chapter 7	PA--33-2	Peak Park Parishes Forum	<p>The respondent provided a whole chapter response with reference to specific policies. The respondent provided a separate response to Draft Policy Direction 7 Recreation Hubs (33-15). However, the response to this chapter queries</p> <ul style="list-style-type: none"> • Whether hubs should be identified on a map • Should the policy apply to settlements • The respondent suggests a set of criteria that will need to be met. The respondent has included specific comment within this response on Policy 15 – Recreation, environmental education and interpretation, Draft Policy direction 8 – Hotels, B&B and self-catering accommodation and Draft Policy Direction 11. These responses have been copied across to the appropriate policy (33-23, 33-24 and 33-25 respectively). The respondent advocates for the inclusion of a policy on campervan parking. 	<p>The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.</p>

Chapter 7	PA--43-5	Bakewell Town Council	The respondent offers support for expanded or extended visitor facilities. The respondent wishes to see the ambitions in Draft Policy Direction 22 prioritised. This section of the response has been copied across to the responses to Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport (43-8). The respondent also refers to the need to consider extended hotel provision as an alternative to self-catering units. This section of the response has been copied across to the responses to Draft Policy Direction 8 – Hotels, bed & breakfast and self-catering accommodation (43-9).	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
Chapter 7	PA--45-9	Eyam Parish Council	The respondent states that they support improvement / expansion of public transport, but also wish to see additional car park provision.	The respondent has provided comment under Policy 66 – Visitor Parking. There is a balance between the harm associated with insufficient parking and the loss of land to supply car parks. We believe that the current approach within Policy 66 is balanced.
Chapter 7	PA--64-3	Youlgrave Community Land Trust.	The respondent is supportive of the Chapter 7 policies.	We welcome the support provided.
Chapter 7	PA--100-6	Hope and Derwent Woodlands Parish Council	The respondent does not believe that the chapter introduction is specific enough about the number of people within 1 hour's travel of the National Park boundary.	The respondent makes a fair point, which is addressed.

	Chapter 7	PA--114-3	Over Haddon Parish Council	The respondent expressed concern about the number of visitors and the subsequent need for more parking facilities and better public transport. The respondent believes that the National Park Authority should reduce the amount of marketing and promotion to encourage visitors in the future.	The respondent's concerns are noted.
	Draft Policy Direction 7	PA--16-9	Bamford with Thornhill Parish Council	Policy Direction 7 – the respondent does not support the Recreation Hubs concept and is concerned about the impact on Fairholmes. This has been copied over from the response to Chapter 7 – Chapter 7 (16-6)	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--18-2	individual	The respondent is concerned that some locations identified as possible Recreation Hubs are already exceeding carrying capacity.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--26-6	National Highways	The respondent is supportive of the approach, and requests early engagement on any proposals that might affect the A616/A628 Trunk Roads.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--31-91	Edale Parish Council	The respondent does not support recreation hubs and does not believe that there should be more development for tourism in Edale. The respondent does not support the development of other recreation hubs outside of settlements and is concerned about the effect on special qualities.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.

	Draft Policy Direction 7	PA--33-15	Peak Park Parishes Forum	The respondent is concerned about the balance between the policy and nature protections; and advocates rigorous application to development related to Recreation Hubs. The respondent raised separate concerns about Draft Policy Direction 7 – Recreation Hubs under their response to Chapter 7 – Chapter 7 (33-2).	Nature protectis are included in the criteria.
	Draft Policy Direction 7	PA--35-1	Oldham Council	The response is a statement that Dove Stone and Binn Green are not listed within the Draft Policy Direction.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--38-33	Peak Park Parishes Forum	The respondent expresses concerns about identifying recreation hubs on a map. They also question whether recreation hubs should include settlements. The respondent also provides some suggested criteria to be applied to the policy.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--53-8	Ramblers Areas covering West Riding, SYNED, Derbyshire Dales, Staffs, Cheshire East and GM&HP	The respondent is cautiously supportive of the policy, but is wary of over-development and negative impacts.	The criteria provided by the respondent are useful and are considered.
	Draft Policy Direction 7	PA--57-3	British Horse Society	The respondent wishes to ensure that consideration is given to horse-riders as part of any development under this policy.	The respondent raises a valid point, the criteria will be expanded to include 'impact on existing users'.

	Draft Policy Direction 7	PA--68-6	High Peak Borough Council	No comment	N/a
	Draft Policy Direction 7	PA--70-7	Emery Planning	The respondent queried how the Recreation Hubs were selected and pointed to issues affecting Millers Dale; including the need for a HRA if development was proposed. There was also a reference to the Sandford principle. The respondent recommended additional criteria relating to heritage and highways impacts, but was not specific.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--72-15	National Trust	The response appears generally supportive, but raises the following concerns: - <ul style="list-style-type: none"> • Request further clarification on 'locations that provide access to recreation management areas', including examples. • Consideration for the need of improved infrastructure and visitor dispersal between Dovedale and Ilam Park. • Ongoing parking issues at Lyme Park. • The inclusion of Mam Nick within the listed sites • Concern about linking Policy 66 – Visitor Parking to the Recreation Hubs Policy because of the strict criteria of Policy 66. 	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--80-9	individual	The respondent is concerned about the impact of development and increased visitor pressure at recreation hubs.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.

	Draft Policy Direction 7	PA--82-30	individual	The respondent wishes to see the removal of 'acceptable in principle' form the policy direction. The respondent raises specific concerns about Fairholmes and its inclusion within the policy; and with reference to sustainable travel. The respondent raises specific concerns about Fairholmes and its inclusion within the policy; and with reference to sustainable travel.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--92-6	Grindleford Parish Council	The respondent opposes the policy in its current form.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--99-3	Hope and Derwent Woodlands Parish Council	The respondent raises particular issues with Fairholmes and suggests the Marquis of Granby site as an alternative.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--101-10	Hope and Derwent Woodlands Parish Council	The respondent wishes to see the removal of 'acceptable in principle' form the policy direction. The respondent raises specific concerns about Fairholmes and its inclusion within the policy; and with reference to sustainable travel.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--106-16	Taddington and Priestcliffe Parish Council	The respondent raises a number of concerns and is opposed both to the policy as a whole and specifically to the inclusion of Millers Dale as a Recreation Hub.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.

	Draft Policy Direction 7	PA--111-2	Jane Newman Planning	The respondent believes that this approach may lead to the intensification of visitor pressure. The respondent is concerned that it is anti-competitive and focuses too much on Peak District National Park Authority sites.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--115-7	CPRE Peak District and South Yorkshire	The respondent agrees with the sites identified.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--116-7	Peak District National Park Local Access Forum	The respondent is welcoming of the policy direction, but expressed concerns about the reference to reducing / mitigating visitor pressure.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--118-20	United Utilities	The respondent wishes for an early notification of any development that might impact their holdings or services. This is a partial duplication of the response to Policy 15 – Recreation, environmental education and interpretation (118-8) to include the reference to Recreation Hubs.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--120-1	Fawfieldhead Parish Council	The respondent does not wish there to be additional visitor facilities at hamlets such as Hulme End.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.

	Draft Policy Direction 7	PA--121-19	Castleton Parish Council	The respondent recognises that the policy does not apply to settlements.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--123-6	Devonshire Group	The respondent does not oppose the principle of the Draft Policy Direction; However, they believe that the Chatsworth Whole Estate Plan is the best mechanism for Chatsworth.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.
	Draft Policy Direction 7	PA--124-14	PDNPA Strategy and Performance Team	The respondent suggests that the policy direction should be cognisant of the effects of climate change and generational preferences on visitor patterns.	The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.

Draft Policy Direction 7	PA--127-8	individual		<p>The respondent suggests a range of criteria that Recreation Hub development should meet. The respondent opposes the naming and mapping of hubs. Development that facilitates access to the National Park by sustainable means of transport, including wheeling, cycling (including electric assisted pedal bikes), horse riders and on foot. This can include, eg, signage, tracks, and shelters.</p> <p>2. There is no loss of amenity to local residents or visitors to the National Park.</p> <p>3. The scale of the development is appropriate to the location and the wider landscape.</p> <p>4. There is evidence that the demand for car/vehicle users won't increase and there can be a reduction in existing car/vehicle parking spaces.</p> <p>5. Doesn't detrimentally affect the environmental capacity of the site and the surrounding landscape.</p> <p>6. Mitigation measures such as screening and landscaping are included.</p>	<p>The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.</p>
Draft Policy Direction 7	PA--130-6	individual		<p>The respondent expresses concerns about the policy approach, citing existing visitor management issues as a reason.</p>	<p>The Local Plan does not have a recreation hubs policy. The comments are fully taken into account and addressed in Policies RT1 and RT2 which together deal with recreation, environmental education and interpretation in and on the edge of settlements and in the wider countryside.</p>
Draft Policy Direction 8	PA--7-40	Peak District NPA		<p>The respondent is concerned that the policy does not provide enough clarity on where new build hotels on previously developed land will and won't be acceptable. The respondent expresses concern that the policy is not explicit enough.</p>	<p>The respondent raises valid points. The policy direction states that: - "New hotel accommodation will be acceptable on brownfield and enhancement sites except where it would create unacceptable landscape impact in open countryside." Local Plan Policy is clarified.</p>

	Draft Policy Direction 8	PA--25-3	Froggatt Parish Meeting	The respondent raises concerns about the number of holiday cottages across the Peak District and the effect that this has on local people looking to buy or rent.	The respondent raises valid concerns. Recreation and housing policies give priority to permanent homes except in specific circumstances.
	Draft Policy Direction 8	PA--31-19	Edale Parish Council	The respondent generally supports the policy, but suggests additional criteria to manage the impact of more than 3 self-catering units.	We appreciate the general support for the Policy Direction. The suggested criteria are useful and are considered as the policy is finalised.
	Draft Policy Direction 8	PA--33-24	Peak Park Parishes Forum	The respondent believes that the policy is generally acceptable. However, they suggest 2 additional criteria aimed at preventing the incursion of additional vehicle traffic into the open countryside: - <ul style="list-style-type: none"> • Any new development or provision of more than 3 units must be in a location close to an existing or potential future public transport or bridleway link. • Any change of use away from public transport or a through road, will not normally be allowed unless the access road and parking does not adversely affect the wider landscape. This response has been copied across from the respondent's response to Chapter 7 – Recreation and Transport (33-2). 	We welcome the general support for the policy. Additional criteria are considered.
	Draft Policy Direction 8	PA--38-34	Peak Park Parishes Forum	The respondent is generally supportive of the Draft Policy Direction. They suggest additional criteria to manage the impact of more than 3 self-catering units.	We appreciate the general support for the Policy Direction. The suggested criteria are useful and will be considered as the policy is finalised.

	Draft Policy Direction 8	PA--43-9	Bakewell Town Council	The respondent recognises the value of staying visitors to the local economy, but advocates for the need to consider extended hotel provision as an alternative to self-catering units. This is because of the impact of self-catering cottages on the local housing market. This response is a duplicate of part of the response to Chapter 7 – Chapter 7 (43-5).	The respondent's concerns are noted. The policy seeks to maintain a balance between accommodation types. Recreation and housing policies give priority to permanent homes except in specific circumstances.
	Draft Policy Direction 8	PA--45-13	Eyam Parish Council	The respondent wishes to see the Plan control the change of use of domestic properties to holiday lets.	Recreation and housing policies give priority to permanent homes except in specific circumstances.
	Draft Policy Direction 8	PA--68-5	High Peak Borough Council	The respondent objects on the grounds that the policy does not refer to nutrient neutrality.	The requirement for NN is set out Policy C10
	Draft Policy Direction 8	PA--70-8	Emery Planning	The respondent requests clarification on 'minor development'. The respondent raises concerns about the impact of this approach on local businesses and the visitor economy.	The respondent's concerns are noted and considered in policy development.
	Draft Policy Direction 8	PA--71-4	Staffordshire County Council	The respondent believes that the policy is too restrictive and will restrict the delivery of hotel accommodation within Staffordshire; along with the visitor economy. The respondent believes that the policy does not adequately reflect the various tourism strategies including those of Staffordshire.	The respondent's concerns will be considered as the Policy is developed. However, it should be noted that hotel accommodation within the Park's neighbouring market towns and cities can also serve visitors; as well as boosting the economy of our neighbouring catchment.

	Draft Policy Direction 8	PA--96-7	Winster Parish Council	The respondent wishes to see priority to be given to local need permanent residency over holiday accommodation. The respondent refers to farming families and the difficulty in finding accommodation for grown-up children stating a preference to conversion for permanent residence. The respondent raises concerns about hotel accommodation on brownfield sites, stating this will reduce opportunities for housing.	Recreation and housing policies give priority to permanent homes except in specific circumstances.
	Draft Policy Direction 8	PA--104-13	Spring Planning	The respondent advocates more scope for extensions and additions to existing holiday accommodation. The respondent believes that there is a link between the availability of alternative holiday accommodation and the demand for holiday homes.	The respondent's comments are considered. However, it should be noted that hotel accommodation within the Park's neighbouring market towns and cities can also serve visitors; as well as boosting the economy of our neighbouring catchment.
	Draft Policy Direction 8	PA--121-20	Castleton Parish Council	The respondent wishes to see any change of use to firstly consider private residence in Castleton.	Recreation and housing policies give priority to permanent homes except in specific circumstances.
	Draft Policy Direction 8	PA--123-7	Devonshire Group	The respondent welcomes the flexibility of the policy.	The support for the policy direction is noted.

	Draft Policy Direction 8	PA--127-9	individual	<p>The respondent is generally supportive of the policy, but suggests additional criteria to address the associated impact of additional traffic arising from development. 1. Any new development or provision of more than 2 units (3units?) must be in a location that is close to an existing or potential future public transport or bridleway link. Visitors must have the opportunity to reach new accommodation venues by sustainable means (I.e. not private motor vehicles). This applies in particular to new hotels.</p> <p>2. Any change of use away from public transport or a through route, will not normally be allowed; unless the access road and parking does not adversely affect the wider landscape.</p>	Suggested criteria considered.
	Draft Policy Direction 9	PA--16-10	individual	<p>The respondent owns a holiday property they have sought to convert to a local needs house but have had no interest from buyers. Refer to a lack of mortgage companies offering mortgages on local connection housing and that selling market housing is much easier and it accrues value. A more radical approach is needed. Supports a permanent residence clause instead of a local connection requirement for holiday lets as written in current Local Plan policy RT2.</p>	Recreation and housing policies give priority to permanent homes except in specific circumstances.
	Draft Policy Direction 9	PA--16-10	Bamford with Thornhill Parish Council	<p>The respondent is concerned about the required local connection legal agreement. This has been copied over from the response to Chapter 7 – Chapter 7 (16-6)</p>	Policy Direction 9 – the respondent’s concern may be related to a misunderstanding of the clause described in the second bullet point. Its intent is to ensure that where a holiday occupancy agreement is removed, it is replaced with one ensuring that future occupancy is for those having the required local connection. Addressed in re-drafting.

Draft Policy Direction 9	PA--31-4	Edale Parish Council	The respondent wishes to see a 28-day occupancy restriction in settlements as well as the open countryside.	Draft Policy Direction 9 works with policies in the housing chapter (Draft Policy Direction 15: Primary residence in particular) to try and ensure that new housing development within settlements does not become self-catering holiday accommodation. The exceptions are where due to size etc, a conversion may not be suitable for permanent residence.
Draft Policy Direction 9	PA--45-21	Eyam Parish Council	The respondent wishes to see the Plan control the change of use of domestic properties to holiday lets.	The comments are noted, but do not really apply to this policy, which aims to restrict the length of time that that a self-catering holiday let can be occupied by any one person per year.
Draft Policy Direction 9	PA--50-5	individual	The respondent questions the need for the restriction to be set at 28 days; suggesting that this is unduly restrictive. They suggest that this could be amended to no more than 28 days in one block.	The policy tries to ensure that holiday accommodation serves that purpose rather than being semi-permanent residence.
Draft Policy Direction 9	PA--70-9	Emery Planning	The respondent raises concerns about the approach of restricting occupancy to 28-days; stating that this conflicts with the need for residential dwellings.	Whilst the respondent suggests a season of 245 days, in most cases, self-catering accommodation is available for 365 days of the year. We will consider the points made as the policy is further developed.
Draft Policy Direction 9	PA--71-5	Staffordshire County Council	The respondent disagrees with the 28-day limitation and recommends an alternative approach that would control permanent residential use. The respondent believes that the Policy approach impedes commercial viability.	The respondent's concerns are noted and will be considered as the policy is developed.
Draft Policy Direction 9	PA--96-8	Winster Parish Council	The respondent believes that policy has been applied too rigorously. The respondent believes that the impact of a holiday let is more harmful than a permanent residence. The respondent raises concerns about the lack of transfer of holiday lets to permanent residence.	Recreation and housing policies give priority to permanent homes except in specific circumstances.

	Draft Policy Direction 9	PA--100-7	Hope and Derwent Woodlands Parish Council	The respondent believes that '28 days' is too restrictive, and cites the needs of temporary workers to be able to stay for more than 28 days.	The policy is aimed at allowing for holiday accommodation rather than for temporary workers. If accommodation is unavailable, then it increases the demand for additional holiday accommodation.
	Draft Policy Direction 9	PA--127-10	individual	The respondent supports the draft policy direction	The support is welcomed
	Draft Policy Direction 10	PA--7-2	Peak District NPA	The respondent has concerns about the lack of clarity within the policy, with regard to: - <ul style="list-style-type: none"> • the size of pods and shepherd's huts • the provision of facilities within pods and shepherd's huts • the relationship between B and C 	The respondent raises valid points about the lack of clarity on size and facilities associated with camping pods and shepherd's huts – this is addressed in the Draft Local Plan. In the case of Part C – this allows for the consideration of other products other than camping pods or shepherd's huts, but directs the developer to the same criteria as for camping pods or shepherd's huts. Amendments to provide clarity are included.
	Draft Policy Direction 10	PA--16-11	Bamford with Thornhill Parish Council	The respondent suggests that the policy should differentiate between sizes of motorhome. This has been copied over from the response to Chapter 7 – Chapter 7 (16-6)	We are unclear on what the respondent means by this response. The policy focuses on caravan and camping sites, but does not specify the size of touring caravans, campervans or tents. This will vary according to the size of the campsite, the range of facilities and the ease of access
	Draft Policy Direction 10	PA--31-50	Edale Parish Council	The respondent believes that the policy lacks clarity, particularly with regard to "small" or "simple".	The respondent raises a valid point. The policy is amended to provide more specific detail.
	Draft Policy Direction 10	PA--39-1	individual	The respondent supports the proposed draft policy direction.	We appreciate the support for the proposed policy direction.
	Draft Policy Direction 10	PA--50-6	individual	The respondent suggests minor changes to aid clarity: - In order to provide clarity to the policy it is considered the title should read: 'Caravans, campervans and camping'. Criterion A should read: 'Small touring camping campervans and caravan sites'	We will make changes to improve the clarity of the policy.

	Draft Policy Direction 10	PA--55-8	Staffordshire Moorlands District Council	No comment	N/a
	Draft Policy Direction 10	PA--68-10	High Peak Borough Council	The respondent objects on the grounds that the policy does not refer to nutrient neutrality.	NN is covered in Policy C10
	Draft Policy Direction 10	PA--70-10	Emery Planning	The respondent believes that the policy is too proscriptive about the type of pod / shepherd's hut style accommodation and the locations where such facilities are acceptable. The respondent believes that the policy doesn't reflect the changing visitor market.	The respondent's concerns are noted and are considered.
	Draft Policy Direction 10	PA--71-6	Staffordshire County Council	The respondent believes that Part A of the policy is unclear as it does not define 'small', The respondent is also concerned that the policy may restrict economic viability of sites. The respondent is concerned that Part B of the policy is too restrictive, and should be reworded to support sustainable, high quality design, modular holiday accommodation proposals that still affords the high level of protection of the landscape all year round. They recommend the National Forest sustainable design guide. They believe that the requirement to be off-grid from foul and fresh water is overly restrictive.	The policy direction aims towards a balance of National Park purposes and the Sandford principle; plus the Section 62 Duty. The final version of the Plan will offer guidance on size of sites. The current policy allows for small simple exceptions to our restrictions on static caravans and Lodges / Chalets. Part B seeks to provide clarity as to what is and isn't acceptable within the National Park. Clarity provided in re-draft.
	Draft Policy Direction 10	PA--80-6	individual	The respondent expressed concern about the use of roadsides and laybys by camper vans.	The respondent raised concerns that are currently outside of the scope of Policy Direction 10 – Caravans and camping.

	Draft Policy Direction 10	PA--88-1	individual	The respondent believes that the policy should recognise the change in scale of vehicles , particularly motorhomes and should be modified accordingly. The respondent also suggests that the road access to campsites / caravan sites should also be considered.	The respondent raises some valid concerns. The premise of the policy is that it allows for “Small touring camping and caravan sites” or small extensions to existing sites. The intent is to minimise impact whilst allowing for farm diversification and public access to cheaper holiday accommodation. Possible amendments to the policy, (or elsewhere in the Plan), with regard to the recent and large increase in camper vans within the National Park are considered.
	Draft Policy Direction 10	PA--100-8	Hope and Derwent Woodlands Parish Council	The respondent believes that the policy is too restrictive.	Considered in policy development.
	Draft Policy Direction 10	PA--103-10	Darwent Architecture	The respondent wishes to see the removal of criteria related to the connection to water and drainage.	The comments are noted and will be considered.
	Draft Policy Direction 10	PA--104-2	Spring Planning	The respondent believes that there is a link between the availability of small-scale accommodation (pods and huts) and the demand for holiday homes. The respondent objects to the restrictions proposed, citing economic benefit arising from the use of pods and huts etc.	The respondent raises valid concerns. However, the issue also relates to the year-round permanence of the accommodation, and the requirement for the provision of additional amenities to enable such accommodation. Also of concern is the considerable increase in size and complexity of accommodation, which in some cases equals or even exceeds that of a simple dwelling.
	Draft Policy Direction 10	PA--106-17	Taddington and Priestcliffe Parish Council	The respondent makes a connection between the use of housing for holiday accommodation and the restrictions of the Policy Direction at B and C. The respondent believes that visibility in the landscape should be the primary criteria rather than the type of accommodation.	The respondent raises valid points. However, in the case of parts B and C, the issue also relates to the year-round permanence of the accommodation, and the requirement for the provision of additional amenities to enable such accommodation. Also of concern is the considerable increase in size and complexity of accommodation, which in some cases equals or even exceeds that of a simple dwelling.

	Draft Policy Direction 10	PA--118-8	United Utilities	The respondent requests consideration of wildfire and water quality impacts arising from new sites.	The respondent raise valid points that are considered.
	Draft Policy Direction 10	PA--120-3	Fawfieldhead Parish Council	The respondent welcomes restricting sites during the winter months, but expresses additional concerns, focussed on: - <ul style="list-style-type: none"> • The operation of the 28-day rule • Expansion of camp sites (numbers) • The scope for farm diversification • Consideration of existing provision when granting new permissions • Impacts of tourism on residents as a result of the growth in the number of campsites 	The support for restricting winter operation of campsites is welcomed. The additional concerns raised are considered.
	Draft Policy Direction 10	PA--121-21	Castleton Parish Council	The respondent supports the draft policy direction.	The support is noted and welcomed.
	Draft Policy Direction 10	PA--123-9	Devonshire Group	The respondent believes that the policy is too restrictive, particularly with regard to connection to fresh and foul water supply. They advocate a more flexible approach.	Current policy does not permit permanent structures apart from: "Exceptionally, the development of structures may be permitted where these are small, simple, wooden pod structures in woodland locations with minimal landscape impact, or a single shepherd's hut where this can be located close to the facilities of a farmstead without harm to the natural or historic landscape." Since the adoption of the policy, the trend has been for pods and shepherd's huts to become larger and more sophisticated. New policy seeks to provide clarity on what is meant by small, simple structures.

	Draft Policy Direction 10	PA--127-11	individual	The respondent offers support subject to an additional criterion regarding improving the appearance of existing sites. E Developments must improve the appearance of the existing site and the immediate and wider landscape by recognising their location in the National Park. An area of the highest planning protection in the UK. Improvements in appearance include significant landscaping, a lower density of provision than the norm outside National Parks, and the screening from surrounding areas including local residents, rights of way and in the wider landscape.	We welcome the general support and considered the suggested amendment.
	Draft Policy Direction 11	PA--4-1	individual	The respondent is concerned about the effect of the proposed approach on those who wish to camp informally in farmers fields and who may not be able to afford to stay at formal campsites.	The National Park Authority will gather evidence as the Plan is further developed. Anecdotal evidence and the response to the Regulation 18 Issues and Options Consultation (2024) indicates that development around temporary campsites and wider impacts, is an issue that affects a number of locations across the National Park. If this approach is taken forward, it would mean most likely result in a return to the previous approach of the past where temporary campsites have been allowed to operate for up to 28 days. This is likely to have been the regime under which the respondent enjoyed some of their camping trips to the Peak District.
	Draft Policy Direction 11	PA--16-11	Bamford with Thornhill Parish Council	The respondent is concerned that this approach increase the number of motorhomes parked on the highway. This has been copied over from the response to Chapter 7 – Chapter 7 (16-6)	The response raises valid concerns. The current use of temporary campsites by campervans, and their possible displacement will be further considered by the Authority.

	Draft Policy Direction 11	PA--18-1	individual	Supportive of the Draft Policy Direction	The proposed policy direction would not prevent temporary campsites. Instead, it would help to ensure that they are appropriate in size, location and the provision of facilities.
	Draft Policy Direction 11	PA--31-85	Edale Parish Council	The respondent supports a return to 28 days per annum operation of temporary campsites.	The support for this approach is noted.
	Draft Policy Direction 11	PA--33-25	Peak Park Parishes Forum	The respondent supports the proposed Policy Direction. This response has been copied across from the respondent's response to Chapter 7 – Recreation and Transport (33-2).	The support is noted and welcomed.
	Draft Policy Direction 11	PA--38-35	Peak Park Parishes Forum	The respondent supports the proposed draft policy direction.	We appreciate the support for the proposed policy direction.
	Draft Policy Direction 11	PA--39-2	individual	The respondent supports the proposed draft policy direction.	We appreciate the support for the proposed policy direction.
	Draft Policy Direction 11	PA--55-4	Staffordshire Moorlands District Council	The respondent expressed concern about the impact of the policy on a range of events.	We are yet to determine what approach will be taken through an article 4 direction. This may result in a return to the former controls of 28 days through permitted development. If this were to be the case, then the same controls would apply as before the Covid-19 pandemic. If the result was an Article 4 direction restricting temporary campsites to those with planning permission, it would not prevent camping associated with the type of events described. In the case of annual festivals / events, they often already require planning permission.
	Draft Policy Direction 11	PA--61-1	individual	The respondent is supportive of the policy and provides a number of reasons why they support the policy.	We welcome the support provided.
	Draft Policy Direction 11	PA--68-2	High Peak Borough Council	The respondent supports the approach, and wishes the policy to include acknowledgement of the potential impact of temporary campsites on nutrient neutrality.	The support is noted and welcomed; we will ensure that the issue of nutrient neutrality is captured in the Plan where appropriate.

	Draft Policy Direction 11	PA--70-11	Emery Planning	The respondent disagrees with the suggested Article 4 direction and believes that it is inappropriate to require landowners to apply for planning permission for temporary development of this nature.	The National Park Authority will gather evidence as the Plan is further developed. Anecdotal evidence and the response to the Regulation 18 Issues and Options Consultation (2024) indicates that the change to 60 days permitted development is having a negative impact at a number of locations across the National Park.
	Draft Policy Direction 11	PA--88-2	individual	The respondent offers strong support for this policy direction.	We welcome this support.
	Draft Policy Direction 11	PA--100-9	Hope and Derwent Woodlands Parish Council	The respondent queries the need for the policy approach, and whether it is the effect on permanent campsites.	The Authority believes that the current 60-day permitted development for temporary campsites is having an adverse impact on the special qualities of the National Park. As the Plan is developed, we will carry out research to assess this impact.
	Draft Policy Direction 11	PA--116-8	Peak District National Park Local Access Forum	The respondent wishes to see further consultation on this prior to the introduction of an Article 4 Direction. They also suggest other options as an alternative to the suggested approach.	The introduction of an Article 4 Direction would be based on further research and would require further consultation. We will consider the suggested alternatives as we develop the Plan.
	Draft Policy Direction 11	PA--118-10	United Utilities	The respondent is supportive of the draft policy direction.	The support is noted and welcome.
	Draft Policy Direction 11	PA--120-2	Fawfieldhead Parish Council	The respondent supports the proposed policy direction.	The support for the Policy Direction is noted and welcomed.
	Draft Policy Direction 11	PA--121-22	Castleton Parish Council	The respondent supports the draft policy direction.	The support is noted and welcomed.
	Draft Policy Direction 11	PA--123-9	Devonshire Group	The respondent is concerned about the draft policy approach with regard to it applying to the whole of the National Park and the availability of evidence in support of the approach.	The National Park Authority will gather evidence as the Plan is further developed. Anecdotal evidence and the response to the Regulation 18 Issues and Options Consultation (2024) indicates that this is an issue that affects a number of locations across the National Park.

	Draft Policy Direction 11	PA--127-12	individual	The respondent strongly supports the draft policy direction.	The support is welcomed.
	Policy 15	PA--20-10	individual	Prohibit interpretation boards in open countryside	The current policy generally prevents the delivery of interpretation boards in the open countryside; except in exceptional circumstances.
	Policy 15	PA--31-78	Edale Parish Council	The respondent advocates for criteria for the policy: - <ul style="list-style-type: none"> • New facilities should only be allowed where there is access to public transport and no need for additional car parking. • New facilities should not be allowed in open countryside. • There should be a presumption against development to increase tourism except in exceptional circumstances. The respondent supports facilities for environmental education, but not in the open countryside. The respondent also advocates for a policy on campervan parking; including suggested criteria. 	Criteria suggestions considered and included in Policies RT1 and RT2 where considered appropriate.
	Policy 15	PA--33-23	Peak Park Parishes Forum	The respondent raises concerns with the criteria of Policy 15 – Recreation, environmental education and interpretation. This response has been copied across from the respondent's response to Chapter 7 – Recreation and Transport (33-2).	Criteria suggestions considered and included in Policies RT1 and RT2 where considered appropriate.
	Policy 15	PA--38-32	Peak Park Parishes Forum	The respondent raises a number of concerns with the criteria within the policy. The respondent believes that there should be a presumption against development for Recreation, environmental education and interpretation unless there are exceptional circumstances.	Criteria suggestions considered and included in Policies RT1 and RT2 where considered appropriate.

	Policy 15	PA--54-5	Kinder and High Peak Advisory Committee	The respondent welcomes the policy.	We welcome the support for the policy.
	Policy 15	PA--57-8	British Horse Society	The respondent makes the case for the Plan to adhere to the NPPF para 105 which requires the protection and enhancement of PROW.	We believe that other policies within the Plan require development to ensure that it delivers connections to the PROW. Other plans and strategies that fall outside of the Local Plan process also play a role in this respect, including the various constituent authority LCWIPS ROWIPs and the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan.
	Policy 15	PA--69-19	Tarmac	The respondent doesn't believe that the policy allows for role that the restoration of mineral sites can play in recreational and nature-based tourism opportunities.	The policy is focused on provision in or on the edge of settlements. However Policy TR2 does allow for development for active recreation outside of settlements.

Policy 15	PA--81-3	Friends of the Derwent Valley Line	<p>The respondent believes that the policy should go further in linking the provision of new facilities to sustainable transport. The response then goes on in some detail to advocate for rail reinstatement along the Monsal Trail. In so doing, it makes reference to Policies 58, 60 and 61, all of which are subject to individual responses by the respondent at responses 81-5, 81-4 and 81-2 respectively. These comments will be dealt with under the specific policies. The respondent advocates for the following: -</p> <ul style="list-style-type: none"> • Explicitly recognise transport-linked income streams in Policy 15 and Policy 61. • Safeguard the Monsal Trail for future rail use, enabling integration with ticketing, access charges, and congestion management. • Ensure new recreation and education facilities are tied to sustainable transport funding models, reducing reliance on government grant alone. 	The suggestion of linking development to sustainable transport is fully considered throughout the Draft Local Plan.
Policy 15	PA--82-6	individual	<p>The respondent raises concerns about 15 A and the risk of inappropriate development and 15B and the inclusion of EVs as sustainable travel options. The respondent advocates demand management tools limiting access by private car, including the control of visitor parking.</p>	The concerns are fully addressed throughout the Draft Local Plan.
Policy 15	PA--83-14	Bakewell Safer Cycling Group	<p>The respondent believes that there are no sustainable transport options from Bakewell. The respondent makes the case for a cycling hub with routes in many directions and linked to possible future rail reinstatement.</p>	The respondent does not provide any specific comment on the Policy 15 – Recreation, environmental education and interpretation.

	Policy 15	PA--101-9	Hope and Derwent Woodlands Parish Council	The respondent is concerned that the policy will lead to inappropriate development. The respondent queries the meaning of 'sustainable travel' and voices concerns about the sustainability of EVs.	Any development under the policy is subject to strict criteria and the proscription of the Sandford Principle. In the context of the policy, sustainable travel encompasses active travel, public transport and EVs. However, the Authority recognises a sustainable travel hierarchy with active travel at the apex and Internal Combustion Engined private vehicles at bottom.
	Policy 15	PA--117-12	Hope Valley Climate Action	The respondent raises concerns about 15 A and the risk of inappropriate development and 15B and the inclusion of EVs as sustainable travel options. The respondent advocates demand management tools limiting access by private car, including the control of visitor parking. The last paragraph is a duplication of part of the response to Draft Policy Direction 22: Reducing the general need to travel and encouraging sustainable transport (117-16).	The respondent raises valid concerns, these are considered and addressed. In the context of the policy, sustainable travel encompasses active travel, public transport and EVs. The Authority recognises a sustainable travel hierarchy with active travel at the apex and Internal Combustion Engined private vehicles at bottom.
	Policy 15	PA--118-8	United Utilities	The respondent wishes for an early notification of any development that might impact their holdings or services. The respondent is supportive of criterion C. Part of this response is duplicated under Policy Direction 7 – Recreation Hubs (118-20).	As part of the planning process, the respondent would be consulted accordingly. We note and welcome the support for criterion C.

Policy 15	PA--127-7	individual		<p>The respondent makes some suggested changes to the criteria for the policy :- B Reword; Opportunities for access to new facilities must be by sustainable transport such as public transport, (electric) pedal cycles, walking and similar. D New facilities will not be allowed in open countryside. Such a position will support the Outcomes listed at the start of this document. E add at the end, ...new buildings will only be acceptable where they support the development of sustainable means of transport such as bus shelters, bike storage cycle routes etc. F Replace this with; there should be a presumption against development except in exceptional circumstances and then only when it doesn't detract from the quiet enjoyment of the National Park, or the amenities of residents or visitors. Add new paragraph G A well designed, environmental friendly and succinct sign posting system will be developed to communication the existence of the National Park, it's special place in UK culture and it's special qualities. With a succinct summary of the country code eg "take only photos, leave only memories".</p>	The suggested amendments to the criteria are considered and included if considered appropriate.
Policy 16	PA--7-10	Peak District NPA		The respondent wishes to ensure that everything necessary is covered under the policy including the other types of accommodation listed within Draft Policy Direction 10 – Caravans and camping.	The respondent raises a valid point, it will be made clear that the policy also applies to other structures covered within Draft Policy Direction 10 – Caravans and camping such as Shepherd's Huts and Camping Pods etc.

	Policy 16	PA--31-62	Edale Parish Council	The respondent does not agree that campsites should be limited to 9 months of operation.	The policy seeks to reduce the impact of campsite operations on the special qualities of the National Park and the amenity of residents living in close proximity to them. The policy would allow for individual campsite owners to apply remove or amend the restriction, based on the criteria supplied within the policy.
	Policy 16	PA--50-7	individual	The respondent requests a change to the title of the policy to include campervans. The respondent questions the need for the restriction to be set at 28 days; suggesting that this is unduly restrictive. They suggest that this could be amended to no more than 28 days in one block.	The policy tries to ensure that camping and caravan sites for holiday accommodation serve that purpose rather than being semi-permanent residence. We will consider the points made as the policy is further developed.
	Policy 16	PA--70-12	Emery Planning	The respondent believes that the policy doesn't reflect the year-round nature of the visitor economy. The respondent suggests alternative wording to positively frame the policy. The respondent believes that the policy would not allow sites to cater for the campervan market in winter months.	The respondent raises valid concerns, which are fully considered as the Plan is developed. The Authority also needs to achieve the appropriate balance between our statutory purposes to meet the requirements of the Sandford Principle.
	Policy 16	PA--121-28	Castleton Parish Council	In responding to Draft Policy Direction 11, the respondent included the comment "also see Policy 16" (response 121-22). For clarity, the whole of response 121-22 is provided as a response to this Consultation Point.	It is unclear whether, the respondent intended to add a linking comment in response to this policy and did not; or the respondent believes that a similar 'Article 4 Direction' should be applied to any part of this policy.
	Policy 16	PA--123-10	Devonshire Group	The respondent believes that criterion A is too stringent.	The comment is noted and is considered.
	Policy 17	PA--7-22	Peak District NPA	The respondent believes that elements of the policy repeat parts of other policies.	There may be an element of repetition for the purposes of clarity but this and this is assessed and removed where necessary.

	Policy 17	PA--18-11	individual	The respondent is concerned about the impacts of this policy on landscape and ecology. The respondent is also concerned about the adequacy of bridleways to support horse riding.	The Local Plan must be read as a whole - in combination with Core Policies landscape and ecology are protected.
	Policy 17	PA--57-11	British Horse Society	The respondent is supportive of this policy.	We welcome the support for this policy.
	Policy 17	PA--89-58	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 17	PA--135-3	DCC	The respondent recommends additional text to include temporary fencing associated with horiculture on the basis of its impact on the landscape. The respondent also believes that consideration should be given to incorporating the integration of the active travel network. Reference was also made to the inclusion of Recreation Hubs within wider transport hubs.	The respondent raises valid points. Temporary fencing associated with stables falls under the General Permitted Development Order. However, where we believe that there will be an issue we can remove those rights as part of the planning consent, specifically for boundary treatments etc. The policy does require that commercial stables have good access to the bridleway network. Where possible, opportunities will be sort to promote modal shift at Recreation Hubs, whether this is through active travel or public transport. These sites already exist, and the Peak District Walking Wheeling, Cycling and Horse-riding Infrastructure Plan incorporates a strategic high-level network that offers some links to Recreation Hubs. Development at Recreation Hubs would require Travel Plans, if it generated additional journeys. However, the provision of public transport to lies outside of the gift of the National Park Authority.

Climate change, flood risk and sustainable drainage

Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
52	Chapter 8	PA--16-2	Bamford PC	<p>Policy 18: In clause C, "benefits" should read "benefits and disbenefits".</p> <p>Policy Direction 13: This reads as if it is about the area immediately surrounding the development site. notes needs more recognition that the effects of development can also have a significant negative impact many miles away downstream?</p>	Addressed in re-drafting.

52	Chapter 8	PA--33-5	Peak Park Parishes Forum	<p>The respondent considers Draft Policy Direction 12 vague and seeks clearer thresholds, suggesting “larger schemes” be defined as more than five dwellings, while recognising that BREEAM certification may be disproportionate for small developments. They argue that the same sustainability principles should apply to all housing and that the PDNP should retain its standards if the Future Homes Standard proves less rigorous. They also stress that impacts on heritage and landscape should be balanced against the urgent need to reduce emissions, and that these considerations should be embedded in the Local Plan as well as design policy.</p> <p>They support Policy 18, subject to renewable energy schemes also meeting biodiversity and nature recovery requirements. Policy 19 is considered insufficiently robust on flood risk, though they acknowledge constraints imposed by the NPPF and the Sequential and Exceptions Tests.</p> <p>The respondent generally agrees with Draft Policy Direction 13 but recommends stronger wording: banning impermeable hard surfaces except in exceptional circumstances, requiring all new residential parking to be permeable, and tightening language such as replacing “where practicable” with “unless in exceptional circumstances,” with justification required.</p> <p>Finally, they emphasise that stronger, properly funded enforcement is essential, noting a perceived assumption among developers that policies will not be enforced.</p>	Addressed in re-drafting.
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52	Chapter 8	PA--84-3	individual	I cannot see any policy sections on climate and transport. Either highlighting the issue of how to reduce carbon emissions from road vehicles and transport mode shift or resilience of the road network to flooding!	Addressed in spatial objectives and chapter on travel and transport.
52	Chapter 8	PA--114-1	Over Haddon PC	The respondent emphasises that addressing climate change should be a top priority, recognising the challenges of managing an evolving landscape. They support exploring a wider range of renewable energy options, including hydro-electric power from rivers such as the Lathkill and wind energy at a local level, and encourage the PDNP to broaden its approach to acceptable renewables beyond solar, noting growing acceptance of wind turbines.	Noted reference to Lathkill Dale and hydro electric power and wind turbines.
52	Chapter 8	PA--116-5	Local Access Forum	The LAF welcomes protections to prevent water pollution and enhance climate resilience but is concerned that access to blue spaces is insufficiently addressed, particularly for recreation, and seeks policies that give blue spaces equal consideration to public rights of way, with enhanced access reflected in Policies 62 and 63.	Noted LAF. Noted concern about access to blue spaces and enhancement policies 62 and 63. Addressed in re-drafting and throughout the Draft Local Plan.

52	Chapter 8	PA--124-1	Historic England	<p>The respondent supports introducing an additional policy requiring development proposals to complete a climate change adaptation and resilience checklist. This policy would strengthen links to Spatial Outcome 8 on managing landscape change and adapting to climate change, and help meet the statutory duty under Section 19(1A) of the Planning and Compulsory Purchase Act 2004 to include policies on climate change mitigation and adaptation. The policy would require developments to demonstrate how climate change has been considered over the scheme's lifetime, including design measures to improve adaptability and resilience. It is suggested that the policy be based on the Broads Authority's 2019 requirement for a Climate Smart Checklist, with applicants submitting a clear, non-technical self-assessment checklist supported by guidance, prompting consideration of issues such as prolonged rainfall and extreme heat.</p>	<p>Noted: the requirements for a self-assessment checklist will be considered with regard to policy monitoring and in consultation with the DM Manager. Policy requirements are necessarily within what is permitted under national policy and guidance.</p>
53	Draft Policy Direction 12	PA--2-2	individual	<p>'The last policy in this space referred to the Code for Sustainable Homes, subsequently axed by central government. I suggest some specific guidance here - minimum energy rating per building use, for example.'</p> <p>User refers to Code for sustainable homes which is to be axed by central government. Some specific guidance is recommended to avoid any confusion.</p>	<p>New policy must necessary align with government guidance. Policy CC1 addresses issue.</p>

53	Draft Policy Direction 12	PA--23-1	individual	<p>The respondent and co-signatories argue that the Local Plan review is an appropriate opportunity to reduce barriers to domestic green energy installations. They request clear criteria to allow solar panels and similar technologies under permitted development in line with national policy, a low-cost fast-track approval process where consent is still required (such as for listed buildings and conservation areas), and a review of historic planning conditions to reinstate full permitted development rights at Fidlers Close. They express concern that current NPA policies deter residents from adopting green technologies, while acknowledging that some issues may be locally specific.</p>	<p>Thank you for your comments regarding green energy installations and permitted development rights. We note your suggestions on criteria for solar panels and other domestic renewable technologies, fast-tracking approvals where needed, and review of existing permissions at Fidlers Close. Where appropriate comments are addressed in Policy CC1.</p>
53	Draft Policy Direction 12	PA--31-53	Edale PC	<p>Draft policy direction 12 is rather vague</p> <p>There is a question re size of larger schemes: we suggest more than 5 houses (in many of our settlements developments are likely to be smaller than this). The same criteria should apply to all houses but we recognise that working to BREEAM standards and gaining certification may be too onerous for small developments.</p>	<p>Addressed in Policy CC1. Requirements are proportionate.</p>

53	Draft Policy Direction 12	PA--38-27	Peak Park Parishes Forum	<p>The respondent argues that the Authority has been overly inflexible on energy-efficiency measures for heritage buildings and that decisions should focus on visual impact rather than strict use of original materials. They support allowing measures such as interior insulation, high-quality double or triple glazing, insulated doors, heat pumps and rooftop solar panels for Grade II and II* buildings, balancing heritage considerations against the urgent need to reduce emissions and improve habitability. They note that enabling such measures would support sustainable communities, as some heritage dwellings are currently cold and damp. They also stress the importance of properly funded monitoring and enforcement.</p> <p>In addition, they consider Draft Policy Direction 12 to be vague and seek clarity on the definition of larger schemes, suggesting a threshold of more than five dwellings. While the same sustainability principles should apply to all housing, they recognise that BREEAM standards and certification may be disproportionate for small developments.</p>	<p>Thank you for your detailed feedback on energy efficiency measures for heritage buildings and Draft Policy Direction 12. We note your observations regarding visual impact, renewable technologies, building standards, and the size of developments, as well as your points on monitoring and enforcement. Addressed in Policy CC1. Requirements are proportionate.</p>
53	Draft Policy Direction 12	PA--115-4	CPRE	<p>The respondent supports the draft policy requiring sustainable design features and BREEAM “excellent” for larger developments but seeks clarity on the types and scale of development covered. They also recommend a policy requiring a proportion of on-site renewable energy where not mandated by Building Regulations, subject to consistency with any changes to the NPPF.</p>	<p>Noted. Policy aims to maximise potential but requirements must necessarily be within what is permitted under national policy and guidance. Addressed in Policy CC1. Requirements are proportionate.</p>

53	Draft Policy Direction 12	PA--117-13	Hope Valley Climate Action	The respondent welcomes the energy efficiency measures in Draft Policy Direction 12 but notes that it does not address energy generation. They suggest adding a requirement for development proposals to incorporate appropriate renewable energy generation, such as solar photovoltaics or small-scale wind turbines.	Thank you for your suggestion. We welcome the recommendation to expand Draft Policy Direction 12 to include energy generation. Adding a bullet point encouraging renewable energy, such as solar photovoltaics or appropriately scaled small wind turbines, would complement the existing energy efficiency measures and help ensure a more holistic approach to sustainable building design. Addressed in Policy CC1. Requirements are proportionate.
53	Draft Policy Direction 12	PA--123-11	Devonshire Group	The respondent argues that energy efficiency requirements should align with Building Regulations or other national standards, noting the difficulty of creating a robust, future-proof local policy. While supporting high standards of construction and refurbishment to reduce carbon emissions, they caution against imposing additional local requirements that could create unnecessary costs and deter investment within the National Park. Any mandatory measures, they state, must be supported by clear evidence of effectiveness and cost, which they consider currently lacking.	Thank you for your comments. We acknowledge that energy efficiency requirements for buildings should align with Building Regulations or other nationally-set standards. Addressed in Policy CC1. Requirements are proportionate.

53	Draft Policy Direction 12	PA--124-2	PDNPA - strategy	The respondent welcomes Draft Policy Direction 12 and its emphasis on energy efficiency and climate mitigation but considers its focus too narrow. They recommend reframing the policy to place greater emphasis on climate change adaptation and resilience, expanding the definition of sustainable design features to include future climate impacts, and adopting a more holistic, climate-smart approach that balances mitigation, adaptation and resilience for both new development and retrofit.	Thank you for your comments. We agree that while Draft Policy Direction 12 rightly emphasizes mitigation, it is important to ensure adaptation and resilience are equally embedded. Addressed in Policy CC1. Requirements are proportionate.
53	Draft Policy Direction 12	PA--125-16	Historic England	We are supportive of specific references to energy generation measures and the historic environment.	Noted.
54	Policy 18	PA--7-24	PDNPA - planning	C has been held at appeal (Parwich turbines) to be in conflict with the NPPF it needs to be deleted	Adressed in re-draft.
54	Policy 18	PA--31-39	Edale PC	Agreed. Also, renewable energy developments need to conform to the requirements of biodiversity and nature recovery.	Noted.
54	Policy 18	PA--38-30	Peak Park Parishes Forum	Councils are looking towards introducing Solar Panels and wind turbines, which can all be revenue earners. Should the Peak Park have a policy on these items, as well as telecoms masts.	noted.
54	Policy 18	PA--55-17	SMDC	The Council supports mapping suitable areas for renewable energy development across the whole district, including within the PDNP, despite the consultation favouring a flexible, criteria-based approach. It also notes that the plan gives no indication that large-scale renewable schemes would be acceptable in the PDNP and states that a blanket ban is not supported, as such development may be appropriate in certain circumstances.	The detailed Settlement Character Assessment and Local Landscape Sensitivity Assessment can be used to inform applications for small-scale renewable energy developments in or on the edge of settlements.

54	Policy 18	PA--68-9	HPBC	<p>The Council supports mapping suitable areas for renewable energy development within the PDNP, despite the consultation's preference for a flexible, criteria-based approach. It also notes that the consultation provides no clarity on the acceptability of large-scale renewables and states that a blanket ban is not supported, as such developments may be appropriate in certain circumstances.</p>	<p>The detailed <i>Settlement Character Assessment and Local Landscape Sensitivity Assessment</i> can be used to inform applications for small-scale renewable energy developments in or on the edge of settlements.</p>
54	Policy 18	PA--69-20	Tarmac	<p>The respondent argues that the draft renewable energy policy is not sufficiently aligned with the NPPF, which requires a positive strategy that supports and gives significant weight to low-carbon and renewable energy development and its contribution to net zero. They recommend that policy wording be revised to support such development where adverse impacts are appropriately addressed and the Park's valued landscape and Special Qualities are not compromised, including consideration of cumulative impacts. They also state that economic, social and wider environmental benefits should always be weighed in the planning balance, rather than treated as conditional, and that the policy should acknowledge and provide in-principle support for initiatives such as the Peak Cluster decarbonisation project, subject to criteria and future policy refinement as details emerge.</p>	<p>Thank you for your comments. We note that the draft policy could be strengthened to align more closely with the NPPF. Policy wording should provide a positive strategy for low carbon and renewable energy development, supporting proposals where adverse impacts on landscape character, Special Qualities, and heritage assets are appropriately addressed.</p> <p>We also note that cumulative impacts should be considered, and that the economic, social, and wider environmental benefits of renewable energy should be weighed as part of the planning balance, alongside landscape and heritage considerations. Issues are addressed in Policy CC2.</p>

54	Policy 18	PA--82-3	individual	<p>Add new Draft Policy Direction development management policy to Climate Chapter. Reducing travel emissions will be key to achieving net zero as promoted through the Vision and Outcome 8. However there is no mention of travel in Outcomes 1, 7 and 8. Nor do the transport policies indicate the link between reducing the need to travel and climate change.</p> <p>Add a new draft policy direction development management policy :</p> <p>Reducing climate emissions from travel to, from and within the National Park Development should be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with the transport policies. A sustainable travel hierarchy [https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/] will be used to assess the potential for access to facilities and to limit the need to travel by private car.</p> <p>Or add to DPD 22 (see comments on that policy)</p>	<p>Noted. The Development Strategy directs development to sustainable locations (settlements with good services and connectivity) where there is capacity for development.</p>
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54	Policy 18	PA--83-5	Bakewell Safer Cycling	The respondent highlights grid capacity constraints in the Wye Valley and supports local renewable generation and large-scale battery storage to address them. They argue that the visual balance between pylons and wind turbines should be reconsidered in light of climate urgency, call for leadership on renewable energy generation and storage, and support low-carbon transport solutions such as rail linked with electric buses to reduce the Park's carbon footprint.	Thank you for your comments. We agree that the Peak District faces constraints in the national grid and that local renewable energy generation and battery storage could play an important role
54	Policy 18	PA--89-55	Holme Valley PC	Not clear how well supported (or otherwise) onshore wind developments would be. Would smaller, domestic developments be supported? What would be the scale at which they would become unacceptable?	Detailed guidance is set out in the current Climate Change Design Guide which is carried forward until replaced.
54	Policy 18	PA--117-14	Hope Valley Climate Action	The respondent welcomes support for low-carbon and renewable energy development but considers the current requirement that it must not "adversely affect" landscape character to be overly restrictive and subjective.	Reference to adverse effects is to ensure that any development is in accordance with the first purpose of a national park.
54	Policy 18	PA--125-17	Historic England	We support heritage references.	Noted.
55	Policy 19	PA--7-43	PDNPA - planning	Is it necessary to repeat what is in the NPPF and PPG here? This policy could go out of date quite quickly.	Policy CC3 on Flood Risk aligns with comments from statutory bodies.
55	Policy 19	PA--31-79	Edale PC	Flooding is rare in Edale but occurs on roads. However, development and climate change may increase flooding. We think this should be stronger i.e. if there is a flood risk, how can this statement be applicable: "The development provides wider sustainability benefits to the community that outweigh flood risk ("The Exceptions Test").	Thank you for your comments regarding flood risk in Edale. We note your observations on the potential impacts of development and climate change, and your concerns regarding the application of the Exceptions Test in areas with flood risk.

55	Policy 19	PA--83-9	Bakewell Safer Cycling	The respondent proposes improving access to existing bridleways on National Trust land between Monsal Dale and the A6 to support new and connected trails in the Wye Valley. This would enable access to the floodplain beneath Monsal Head Viaduct for natural flood management measures, such as beaver activity and “slow the flow” interventions, helping to reduce flood risk in Ashford in the Water and Bakewell. They also suggest a raised, multi-user path linking Bakewell to Millers Dale to deliver significant recreation benefits while reducing flood risk, potentially funded through rail reinstatement on the Monsal Trail.	Thank you for your comments. We note the potential benefits of improving access to National Trust land between Monsal Dale and the A6, including enhanced connectivity for new and linked trails, opportunities for slow-the-flow flood mitigation, and the creation of multi-user paths connecting Bakewell to Millers Dale. Such measures could provide both significant recreational opportunities and contribute to flood risk reduction in Ashford in the Water and Bakewell, highlighting the value of integrated approaches to leisure, heritage, and environmental management.
55	Policy 19	PA--89-35	Holme Valley PC	Agree	The Detailed Settlement Character Assessment and Local Landscape Sensitivity Assessment can be used to inform applications for small-scale renewable energy developments in or on the edge of settlements.
55	Policy 19	PA--99-4	Hope & Derwent PC	There is a need for better underpinning modelling of the integrated water cycle to better understand the interrelationships between ground water levels, river flows, run off and moorland retention. This would enable better improved control of downstream flooding and water resources during climate change (Policy 67 and 68).	The Draft LocalPlan is supported by a Level 1 SFRA.

55	Policy 19	PA--118-11	United Utilities	The respondent requests that the policy be strengthened to address sewer and reservoir flood risk by requiring applicants to consult the relevant water and sewerage undertaker. This should confirm the nature and extent of flood risk, including sewer surcharge levels, past or nearby sewer flooding incidents, and any modelled flood risk from existing sewers. For sites at reservoir flood risk, applicants may need to undertake an assessment in line with national guidance, agreed with the reservoir owner. Where sewer flood risk is identified, it should inform site design and developable area, and applicants should not assume that level changes or sewer alterations will be acceptable.	Addressed in Policy CC3.
55	Policy 19	PA--125-18	Historic England	Where the Plan discusses flooding and flood alleviation measures or sustainable drainage measures. We would be keen to see consideration of how these measures may impact the historic environment and the significance of heritage assets.	Noted. Addressed in Policy CC3.
56	Draft Policy Direction 13	PA--7-31	PDNPA - planning	What if a combined mains sewer is the only option? Are we ok with septic tanks if approved by the EA? We should be asking for package treatment plants first.	Addressed in Policy CC4.
56	Draft Policy Direction 13	PA--19-10	Natural England	Natural England welcomes the point that requires the integration of Sustainable Drainage Systems with wildlife enhancement to create new green infrastructure.	Noted. Natural England welcomes the point that requires the integration of Sustainable Drainage Systems with wildlife enhancement to create new green infrastructure.

56	Draft Policy Direction 13	PA--31-63	Edale PC	<p>The respondent generally supports the policy but recommends strengthening it by banning impermeable hardstanding on development sites except in clearly justified exceptional circumstances, and requiring all parking for new homes to be permeable. They also suggest tightening the wording of bullets 7 and 8 by replacing “where practicable” with “unless in exceptional circumstances,” with any exceptions needing clear justification.</p>	<p>Thank you for your comments on the draft policy, including Bullet 6 and Bullets 7 and 8. We note your observations regarding impermeable surfaces, permeable parking provision, and the suggested wording changes. Addressed in Policy CC4 and other Local Plan Policies C10 and C11.</p>
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56	Draft Policy Direction 13	PA--66-4	Yorkshire Water	<p>Yorkshire Water broadly supports this draft Policy Direction but would comment that the following two referenced bullet points should be more ambitious.</p> <p>The sixth bullet point states: “With the exception of very minor developments (for example single dwellings) all proposals that will generate surface water run-off should be designed to maximise the retention of surface water on-site and minimise the volume, and rate of surface water discharge off-site.” This point should require demonstration and proposal of specific measures to achieve the stated objectives. A target threshold for run-off retention could also be considered such as demonstration of at least 30% of the generated run-off.</p> <p>The final bullet point states: “Where practicable, watercourses within development sites should be safeguarded, restored and improved for the benefit of flood management, amenity and the natural environment. Any culverted watercourses should be restored to open channels to restore a more natural stream environment.” We would comment that, where this is appropriate, it should be done in consultation with all the relevant authorities and agents to ensure all effects and implications can be taken into account.</p>	Addressed in Policy CC3. Design related issues are covered in Core Policies C10 and C11.
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56	Draft Policy Direction 13	PA--70-13	Emery Planning	The respondent considers the policy inconsistent with the Framework and PPG, arguing that it introduces requirements beyond national policy, such as mandatory separation of foul and surface water drainage without local justification, and duplicates matters covered by other environmental legislation.	Thank you for your observations. We acknowledge that the draft policy must remain consistent with the NPPF and PPG.
56	Draft Policy Direction 13	PA--97-8	Environment Agency	Positive	Noted.
56	Draft Policy Direction 13	PA--118-12	United Utilities	We note the policy direction included in your consultation document. In preparing your policy we recommend that you refer to our recommended policy for Sustainable Drainage – Foul and Surface Water in our enclosed ‘Supporting Policies’.	Noted:
56	Draft Policy Direction 13	PA--121-26	Castleton PC	We have concerns about potential pollution of water courses through “free campervan sites” and PDR campsites in our parish. DPD 13 is relevant here	Concerns over campervan sites noted.
56	Draft Policy Direction 13	PA-135 - 4	DCC	Supported in principle. However, it is important that sustainable drainage solutions respond to the specific characteristics of the landscape. For example, open water features are not typically associated with the free-draining landscapes of the White Peak, where infiltration basins may represent a more appropriate solution. It is recommended that the policy include wording to ensure drainage design is informed by local landscape characteristics.	CC4 operates alongside Core Policies so that landscape character is taken into account.

Housing

Draft Policy Direction 14 New housing				
Point #	Comment #		Summary for Comment	Response for Comment
58	PA--102-1	NHS Property Service	<p>Draft Policy Direction 14 sets the Councils expectations and identifies the types of housing developments to be supported in the delivery of new housing. This includes support for tied accommodation for key workers in key service sectors under Point G, to include those within the emergency services, health and social care sectors as outlined in the supporting paragraph. NHSPS welcomes the support being demonstrated by the Council towards new housing developments for key workers within the health and social sector. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a significant role in determining peoples choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitablehousing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. In further undertaking work towards the delivery of affordable housing for key workers such as NHS staff, we recommend that the Council;</p> <p>Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.</p> <p>Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or</p>	<p>Support noted for G. In response, the draft Local Plan has widened the local connection eligibility criteria to include people who have a business need to live close to their place of work.</p> <p>The Authority has made the decision not to allocate sites for housing.</p> <p>Note request to engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.</p>

			other economic policies).& Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.	
58	PA--104-3	Spring Planning	There should also be opportunities for new build open market housing in larger settlements, potentially as part of schemes to bring forward affordable local needs housing. These could be controlled in terms of an occupancy clause but with no restrictions on need or size. There should also be the potential for open market homes of exceptionally high design standard to come forward on infill sites in larger settlements. The policy should acknowledge that housing under B may not be possible to come forward as affordable local needs housing due to viability.	The National Park is not a location for unrestricted market housing. The focus in the National Park is on local affordable housing because this is where is need is greatest. The Local Plan does support open market housing on brownfield sites and through conversion and there is an existing supply of market housing. Evidence to support the local plan preparation has demonstrated that the provision of affordable housing under B is viable.
58	PA--106-19	Taddington and Priestcliffe Parish Council	<p>Clarify about solely in the first para. It can be interpreted as allowing some open market housing to release a site to enable affordable housing of the right sort to be built, and this is a sensible approach which would be supported, is likely to produce a better balance and be more likely to support Thriving and Sustainable objectives. The widening of the exceptions for new housing is welcomed. In order to achieve conservation/and/or enhancement is a proper requirement for development in the open countryside. Within or adjoining settlements, making use of existing buildings is a right way forward, and it should not be necessary to show that the development is necessary to achieve those objectives: it is sufficient that it does.</p> <p>G Whilst this additional recognition is welcomed, the provision of key workers accommodation can be expensive and will be rarely used.</p> <p>It does not adequately address the National Park Circulars encouragement of housing to support the local economy.</p>	<p>No need to clarify the word solely, but if it is an issue the word can be removed as the sentence and intention can be understood without the word.</p> <p>Rural exception sites are expected to deliver 100% affordable housing and this approach aligns with the NPPF. There may be enhancement sites where some open market housing is acceptable to support the delivery of affordable housing if viability requires it.</p> <p>The current balance of housing is already in favour of private market housing and the focus, as per the National Parks Circular 2010, is on local affordable housing needs for the reasons set out in the Circular. Housing development is not always necessary to achieve conservation and or enhancement and it would be wrong to make that assumption. This would encourage neglect as a perceived route for development.</p> <p>The support of G is noted. In response, the local connection eligibility criteria have been widened in the Local Plan to include people who have a business need to live close to their place of work. There are other policy mechanisms proposed that will support a range of housing options for people</p>

				living and working locally for example, requiring a housing mix that responds to the size of property needed rather than what the developer would like to build.
58	PA--111-7	Jane Newman Planning	Draft Policy Direction 14 sets out that subdivided property will be required to deliver affordable local needs properties. This is a significant change from the current policy position which is that the existing tenure is applied to the new unit. The impact of this policy is that in most cases, subdivision will not be viable or desirable. It is currently commonly used to deliver separate housing units to family members where no other accommodation is available or affordable in the area (without qualifying for ALN housing). This makes an important but small contribution to the housing delivery for the area and also ensures that communities remain cohesive. In the case of very large houses, subdivision will rarely meet the housing size requirements for ALN properties. Requiring units to only be affordable will rule out most subdivision. The policy equally sets out that the conversion of heritage assets must also result in the provision of affordable local needs housing and this appears at odds with policy 28. If this is the intention it is unsustainable and will lead to the loss of heritage assets. Barn conversions for listed or non designated heritage assets are commonly costing around £5k-£10k to get planning permission with the work required to support an application. The conversion itself are frequently costing over £250k with projects costing as much as £900k where bat licensing, alternative habitat provision, specialised craftsmanship and conservation materials are required. It is entirely unviable for even the most simple heritage asset to be converted to affordable local needs uses. Furthermore, the size of existing buildings would mean buildings had to be subdivided to create multiple units leading to harm to the asset. The quality and location of these buildings means that beyond first occupation they are extremely unlikely to remain affordable and the long term provision of affordable housing would not be delivered.	There is no change to the current policy approach only a merging of the two existing Local Plan policies (HC1 and DMH10) as we move to one Local Plan document. What is new is that the Authority may consider a financial contribution towards affordable housing elsewhere if this requirement is triggered and onsite provision is not considered suitable by the LPA. If as the representation states the accommodation is for family members the policy on annexes may apply. The Economic Viability Study by Three Dragons has assessed the viability of conversions, including barn conversions, and the recommendations have been incorporated into the Preferred Approach. There are examples of barn conversions that have local connection restrictions applied to them and a S106 agreement will ensure they remain affordable in-perpetuity. The Authority will take a flexible approach for heritage assets but the size of dwellings are expected to align as closely as possible to NDDS.
58	PA--121-16	Castleton Parish Council	The policy for housing schemes should be widened to allow a mix of market and affordable housing where this is appropriate to make the scheme viable. This could help attract families with young children to the village. An appropriate proportion of market: affordable housing would be 50:50.	In response, supporting evidence from Three Dragons on economic viability demonstrates that the majority of a rural exception site would have to be market housing to make it viable. This approach is not appropriate in a National Park where housing is built in response to local

				affordable need rather than to meet market demand. However, market housing may be acceptable on an enhancement site or if a community land trust (or similar) submitted an affordable housing scheme on a rural exceptions site and a small proportion was for market housing to make it viable.
58	PA--123-12	Devonshire Group	The specific reference to and support for tied accommodation for key workers in agriculture, forestry or other rural enterprises and provide tied accommodation for key workers in key service sectors is welcome. DG holds a broad portfolio of housing stock, both within and beyond the Core Estate, and seeks opportunities to expand that stock. The Chatsworth Whole Estate Plan references how The estates housing stock provides homes for hundreds of people who contribute to community life, events, and organisations. Approximately 51% of the housing stock is let into the open market by the estate, with the balance occupied by those who work on or have previously worked on the estate. DG seeks to maintain and enhance its role as a provider of housing for the communities of the National Park in this way. The opportunity to develop new housing for the benefit of people employed by the Devonshire Group in key sectors would help to attract and retain workers and contribute to sustainable communities.	Note the support however, in response the Authority has decided not to continue with this approach and instead widen local connection eligibility criteria to include people who have a business need to live close to their place of work.
58	PA--128-2	Bill Hanley	I strongly support draft policy direction 14 in prioritising local needs and affordable housing. Definitions need to be provided on local needs, affordable housing, social housing, and various ownership models such as social rent or part ownership.	Note the support to prioritise local needs and affordable housing. Definitions will be part of an appendix/glossary in the Local Plan.
58	PA--130-2	Peter O'Brien	The current policy of not permitting any market housing, other than on previously developed land (which is now almost exhausted) is proposed to continue. This plays a major part in the continuing decline in population of the Park. Critically it removes key rungs in the housing ladder, which enable younger working families to progress from affordable rented housing to lower cost home ownership; thus they are forced to move away. As a consequence, most primary schools are facing falling roles and class reductions. Most communities would welcome some limited new market housing development, of appropriate size and scale, to maintain their vitality; consideration could be given to the introduction of a Derbyshire Clause or similar, which evidence suggests results in a reduction of values of around 24%	Higher death rates than birth rates are a contributing factor to population decline which is also a nationwide and not specific solely to the National Park. The cost of housing is one reason people may leave the National Park but it is not the only factor. The Authority notes the concern over school admissions and the viability of local schools to function. Directing new housing to settlements and setting out in policy the size of properties needed is a positive response to supporting communities.

				<p>Note the support for a mix of housing size and tenure that provides choice and enables people to move from rented accommodation to home ownership.</p> <p>Note the support to restrict the occupation of housing to people with a local connection e.g. Derbyshire Clause or similar. In the Peak District this would be either a primary occupancy condition / a local connection requirement.</p>
58	PA--15-1	Allen Newby @ PME Planning Services	Welcomes the general approach to new housing. The focus for housing for local needs with restricted sizes in named settlements perpetuates the pastiche design of housing embedded in the current and previous local plans. The draft plan doesn't refer to exceptional design as per the NPPF para 84 e.	Note the support for the general approach towards housing. In response to concerns about pastiche design, it is envisaged the forthcoming Design Code will set out how development can respond to local character without copying. With regard to NPPF para 84 e, it is not the role of the Local Plan to repeat the NPPF or set out every exceptional circumstance.
58	PA--20-8	William Weston	New Housing Strategy policy Strategic Policy E and G It is not uncommon for new development to be agreed under these (and other) policies as a means to acquiring development permission. I would add and is likely to do so for the foreseeable future or a minimum off 10 years.	<p>Properties for key workers in agriculture, forestry or rural enterprise, and as assisted accommodation are secured by Section 106 agreement to ensure they occupied under the terms agreed.</p> <p>G has been replaced in the draft Local Plan with a widened local connection eligibility criteria that includes people with a business need to live close to their place of work.</p>
58	PA--28-1	Bamford with Thornhill Parish Council	While local needs do need to be suitably considered, too much emphasis can at times be placed on this, while failing to recognise that there are also valid needs in the non-affordable housing sector - for instance it can be difficult for an incoming local GP to find a home. Arguably, anyone who adds social or economic benefit to the immediate area has a valid case for needing a home. And why (clause E) is tied accommodation a special case for only agricultural or forestry workers? - when tied accommodation may be just as important for other folk too, e.g. local shopworkers.	The market housing sector is provided for through existing housing and for new housing on brownfield and conversion sites. Essential worker dwellings are justified when there is an essential need for someone to live on a farm etc, this is not the case for shopworkers etc who can travel to work. The local connection eligibility criteria has been widened in the draft Local Plan to include people who have a business need to live close to their place of work.

				<p>The National Park is not a place for unrestricted market housing, the National Parks Vision and Circular (2010) requires the Authority to focus new housing on the affordable housing needs of the local community and key workers.</p>
58	PA--30-4	Bradwell Community Land Trust	<p>The policy precludes provision solely to meet open market housing, it states that land will not be allocated in the plan for new housing and that new housing will only be allowed exceptionally (e.g. to meet eligible local needs, to conserve heritage assets etc). We object to this policy because:</p> <p>It sees new housing as an exception to be tolerated rather than something which is essential to support viable communities and to provide people with a home to live in;</p> <p>It should expressly support the use of cross-subsidy where market housing is used to deliver a proportion of affordable housing (rather than denying a key delivery mechanism for affordable housing);</p> <p>It is inconsistent with draft policy direction 2 which provisionally supports housing schemes of more than 10 units in larger villages such as Bradwell on greenfield land in or on the edge of the settlement;</p> <p>It will prevent new homes being provided to meet local needs, with the adverse consequences set out above;</p> <p>The policy should be redrafted to allow small scale developments within and on the edge of larger villages, subject to criteria to ensure quality and prevent harm. If Settlement Capacity and Landscape Assessments are to be carried out to identify the capacity of settlements to accommodate new housing, they should also be capable of being used to identify sites which can be positively allocated for new housing allocations provide certainty for communities and developers (including those who provide affordable housing) and therefore help ensure delivery;</p> <p>At the previous consultation stage, a majority of respondents favoured allocations in tier one settlements and there is no reason why it would not be possible to adopt a twin-track approach - with specific allocations where sites can be identified now and a criteria-based policy which can be used to assess proposals on sites which are not allocated;</p> <p>As drafted the policy is unsound because it fails all 4 tests set out in the NPPF.</p>	<p>The approach aligns with the National Park Vision and Circular 2010 and National Park purposes and duty.</p> <p>If a community group would like to bring forward a scheme for affordable housing that required some cross-subsidy, the Authority may support it, as per the NPPF.</p> <p>The Authority does not propose to allocate sites for housing.</p> <p>The National Park is not a location for unrestricted market housing and there are other planning policy and non-planning mechanisms to support thriving and sustainable communities.</p>

58	PA--31-40	Edale Parish Council	<p>We think conversion to a second home should need planning permission. Planning authority should define holiday accommodation as a separate class. Holiday use is a separate use class and therefore to convert housing into holiday accommodation requires planning permission. We welcome the possibility to subdivide an existing dwelling. Regarding need - this should include the possibility of families expanding, not be solely dependent on need at a specific point in time, including for self-build.</p>	<p>The Authority cannot control existing properties from being converted to a second home, only those that have conditions/S106 agreements through planning to control use.</p> <p>The Authority cannot define holiday accommodation as a separate use class, it is not in its powers to do so.</p> <p>Note support for sub-division of property policy.</p> <p>Note the request that need should not be based on the current need and should allow for expanding families. The Housing Authority determines how affordable dwellings are allocated. The draft Local Plan policy H8 has been amended to provide more flexibility for people building to meet their own need.</p>
58	PA--38-1	Peak Park Parishes Forum	<p>The document frequently interchanges affordable and social housing. There needs to be clear definitions of what each is and then used appropriately. E.g. policy 22, which uses affordable throughout: a. refers to affordable and social b. refers only to social c. applies to affordable d. affordable e. affordable and social.</p> <p>We strongly agree there should be no right to buy on social housing.</p>	<p>Note the need for consistency in using terms regarding social and affordable housing and this is clarified in the draft Local Plan and its glossary.</p> <p>The right to buy is not a planning issue.</p>
58	PA--45-26	Eyam Parish Council	<p>We are concerned that the consultation does not differentiate between "affordable" and "social "housing. Control of holiday lets in settlements would go some way to meeting the housing crisis in many settlements. We strongly believe that it is crucial to include permanent residency clauses requiring new properties to be permanently occupied and not used as second homes or holiday lets. Housing Policy needs to ensure that it does not preclude developers being prepared to work in the National Park through inappropriate restrictions. We need a different framework for such small developments in national parks or they simply will not happen. There should not be restriction of housing size as this creates an immediate block to natural community growth via family growth. It is also socially a cruel policy since it will mean that couples will have to weigh up any desire to have children against the practical possibility they will be able to find a larger house in their community.</p>	<p>Note request to differentiate between the types of affordable housing.</p> <p>Note support that control of holiday lets will help with housing provision.</p> <p>Note support for primary occupancy condition.</p> <p>The Local Plan does not intend to put off developers with overly restrictive policies.</p> <p>Draft Local Plan policy H16 provides more flexibility for housing size.</p>

			<p>In other words, this will artificially restrict the very sustainable community development that it seeks to provide. The local plan cant separate itself from the reality of funding and the processes of individual and therefore community development in this way if it is to serve any meaningful purpose.</p> <p>Policy 22 has issues with future-proofing as housing surveys look at a point in time, families expand and need to move from 2 to 3 or 4 bedrooms.</p> <p>We strongly endorse the idea that parish councils MUST be consulted when considering housing needs and planning.</p>	<p>In response to Policy 22 the Authority is required to assess housing need in accordance with the NPPF and PPG. The Local Plan will continue to require local needs housing surveys to.</p> <p>Note disagree with limiting housing size. Note concern that policy 22 is limiting with regard to future proofing.</p> <p>In response, the draft Local Plan policy provides greater flexibility for people building a house to meet their own needs. Market housing is required to align closely with the NDSS. Affordable housing size is retained to ensure it remains affordable and responds to affordable housing need.</p> <p>Note support for consultation with Parish Councils regarding local housing needs and planning. This currently happens and will continue under the new Local Plan.</p>
58	PA--52-1	Tideswell Parish Council	<p>Housing; a positive, proportionate approach TPC supports provision of housing where it is appropriate and sympathetic to the National Park setting. We urge the Local Plan to encourage and enable suitable, well- designed housing in Tideswell so that local needs (including affordable housing and homes for local workers and families) can be met. We are keen to see an affordable housing scheme in response to the recent housing needs survey for Tideswell Ward brought forward as a priority, particularly since the planning application for a 23 unit affordable housing scheme in Tideswell was recently withdrawn.</p>	<p>Support noted and the request for support to help Tideswell deliver affordable housing for their local community noted.</p>
58	PA--58-1	DDDC - Planning	<p>Derbyshire Dales District Council generally welcomes the preferred approach and strategic objectives and policies as set out in the Plan for the period to 2045. However, there remains concerns and objections to the strategic approach to the provision for housing in the contents of the Draft Policy Direction 14 New Housing (Strategic Policy) as set out below. The definition of Thriving and Sustainable Communities in the context of the Peak District National Park Management Plan includes & resources and infrastructure, including appropriate new development and the provision of a sufficient supply of safe, energy efficient homes in a mixture on tenures. It is considered the provision of new homes in the review</p>	<p>Comments noted.</p> <p>Disagree that there are insufficient new homes proposed to support thriving and sustainable communities. The definition refers to appropriate development within the context of a protected landscape. The Local Plan evidence sets out the Authority's approach to how much housing it can deliver over the Plan period, which will be subject to examination.</p>

		<p>of the Local Plan is insufficient to meet these aspects of the achievement of thriving and sustainable communities. Whilst it is acknowledged that the character and appearance of settlements and special characteristics of the Peak District National Park should be protected, the Local Plan must deliver positive benefits for the social and economic wellbeing of communities. The Local Plan must provide a flexible set of planning policies which will ensure appropriate development is facilitated to deliver sufficient housing to meet local needs. Using the standard method for calculating housing need, the Consultation Document sets out that this is between 270 and 362 dwellings per annum. DDDC supports the acknowledgement on page 29 of the Preferred Approach Consultation document where it states for the purpose of apportioning standard method housing need, the Authority accepts Derbyshire Dales District Council assessment of 158 dwellings per annum in the Derbyshire Dales part of the National Park. It is also noted that footnote 17 states that this figure is slightly lower than the Authorities own analysis due to the methodology applied. The Council notes that the consultation document sets out an alternative approach to calculating housing need using a locally derived method. Using this method gives an annual housing need of 95 dwellings per annum, of which 63 dwellings per annum relate to land within the Derbyshire Dales District Council area. The provision (dwellings per annum) 2025-2045 for Derbyshire Dales within the White Peak Area is set out in the Table presented on page 27 as part of Spatial Objective Outcome 6 of the PDNP consultation preferred approach document. The table shows a total housing provision of 52 dwellings per annum. This is 106 dwellings per annum less than the housing need when calculated using the standard method. If the Planning Inspectorate when examining the future Plan consider the housing requirement for the PDNP should be higher, DDDC expects PDNP to explore every opportunity to maximise delivery. Of those 52 dwellings, 39 are expected to be brownfield/enhancement/ conversion, open market, affordable homes and intermediate homes and 13 dwellings per annum are expected to be new homes on greenfield sites in or on the edge of villages being restricted to market affordable and intermediate homes to meet local needs. As drafted the District Council contends there remains scope to deliver further housing within the Peak District National Park to deliver the Plans vision and aspirations and meet a greater proportion of housing need above that</p>	<p>Housing delivery is not the sole indicator of a thriving and sustainable community. There are other planning policy mechanisms and non planning mechanisms that play a part in supporting thriving and sustainable communities. The landscape sensitivity evidence to demonstrate the capacity of settlements will influence the level of development considered appropriate in principle.</p> <p>A more detailed response by the Authority to this representation is given in the Authority response to the Spatial Outcome 6 consultation response.</p>
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			<p>acknowledged in the Plan as currently prepared. DDDC supports the intention of the PDNPA (as set out in the supporting PDNPA housing topic paper) to continue its policy position regarding development required to achieve heritage objectives and development of self-build housing. It is however considered that the approach relating to the total level of housing provision has not been sufficiently justified. In particular, with respect to potential mixed development schemes where market homes enable affordable housing provision including exception sites. The Housing Need Assessment table on page 32 of the Preferred Approach Consultation document sets out that there is an affordable housing need in the PDNP between 88-112 dwellings per annum. Informed by the most recent evidence on viability assessment including subsidies and grants, Derbyshire Dales District Council consider that the meeting of local affordable housing needs should be explored further, particularly with respect to a more flexible approach to enabling development. Sites in Eyam and Hathersage, and settlement edge and other sites elsewhere within the Derbyshire Dales area, should be reviewed further in terms of suitability to accommodate mixed affordable and market housing developments in contributing to meeting local affordable needs over the plan period. We note that the accompanying Sustainability Appraisal considers that option 3 of the spatial options, more settlement tiers and different types and levels of development performs most positively. Whilst the Sustainability Appraisal has considered different spatial strategy options, it does not seem to have considered different levels of development, such as meeting objectively assessed housing needs in full. The Preferred Approach consultation document on Page 34 Housing Provision sets out that the housing provision is subject to a detailed Settlement Capacity and Landscape Assessment currently being undertaken by consultants. The PDNPA need to be clearer on the potential scale and location for future developments to deliver the Strategic Plan objectives and Policy direction as part of its overall vision to allow communities to thrive. The District Council respectfully requests that the evidence to demonstrate the delivery or otherwise of sites within settlements should be re-examined. There remains a high risk that if development is restricted in settlements where capacity issues have been identified development will be unable to meet the need for local housing, with associated implications for the ability of the Plan to meet the wider social and economic needs and its</p>	
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			<p>inherent vision and objective to create thriving and sustainable communities. The Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised, and comments provided above are fully addressed through revisions to the Plan prior to Regulation 19 stage of Plan preparation. As you will be aware the District Council is in the process of reviewing and preparing a revised Derbyshire Dales Local Plan and welcomes the opportunity to work continuously and collaboratively on cross boundary housing matters. We look forward to engaging with the Peak District National Park constructively to explore how we can collectively meet the housing needs of our communities and specifically any unmet local housing need which may arise through the District Councils own plan preparation process.</p>	
58	PA--70-14	Emery Planning	<p>The policy states that provision will not be made for housing solely to meet open market demand. This indicates that an element of open market housing could be permissible. However, open market housing does not appear to feature in any of the exemptions set out in the policy. There is also no exemption for where open market housing could facilitate the delivery of affordable housing to meet local needs, noting that the local need for affordable housing is very significant (between 88 and 112 affordable homes per annum). The approach also appears to be inconsistent with Policies 27 and 28 (which does allow for the provision of market housing). In addition, the policy also states that housing land will not be allocated in the development plan. This appears to be at odds with the approach in Outcome 6 and the HTP which indicates that potential sites will be identified, and furthermore that Settlement Capacity and Landscape Assessments (SCLAs) will be undertaken to identify the potential capacity for settlements to accommodate new development. If new sites are not to be allocated, then the policy needs to set out a positive approach to enable such settlements to grow sustainably through the provision of new housing. As we have set out in response to Outcome 6, there is clear justification for establishing a housing requirement and identifying deliverable and viable sites which can cross-subsidise and meet the need for affordable housing. Exceptions B and C states that open market housing can be accepted where it is required in order to achieve conservation and/or enhancement or a heritage strategy or conservation and/or enhancement in or on the edge of a settlement</p>	<p>Market housing is acceptable in principle on brownfield land, through conversion, and on exception sites. The NPPF also states that for community led housing schemes a proportion of market housing may be required to make the scheme viable. It is not the role of the Local Plan to repeat the NPPF.</p> <p>The Authority has made the decision not to allocated housing sites.</p> <p>Note the need for a positive approach to enable settlements to growth sustainably through the provision of new housing. This is reflected in the Draft Plan and supported by the landscape sensitivity evidence.</p> <p>Unless required to, the National Park will not set a housing requirement.</p> <p>The removal of holiday occupancy conditions will need an application to remove the condition.</p> <p>Note support for primary occupancy condition.</p> <p>The Authority will consider the policy wording suggestions.</p>

			<p>listed in the settlement strategy. We consider that the wording should be amended to state: B. (x is required in order to x) achieves conservation and/or enhancement of a heritage asset; or C. (x is required in order to x) achieves conservation and/or enhancement in or on the edge of a settlement listed in the settlement strategy Finally, a further exception should be applied to enable the removal of holiday occupancy restrictions granted under previous policy where an application for use as open market residential would now be policy compliant. This would foster the social and economic well-being of local communities. We are supportive of the proposed primary residence clause (Draft Policy Direction 15) in this context.</p>	
58	PA--7-37	Adam Maxwell	<p>E remove tied wording as that is imposed via a S106 agreement in delivering policy on agricultural worker dwellings. The occupancy of the dwelling is controlled by planning condition.</p> <p>F can this be in the open countryside What are key workers? How will this policy be applied and monitored? Can it be in the open countryside which would be in conflict with the NPPF. Very concerned about G.</p>	<p>Note the comments about E. Policy amended so that it states that the 'tie' relates to the use of the land and is controlled via a S106 and occupancy is imposed via planning condition.</p> <p>Note the concerns about the application of G and how it aligns with the NPPF. G is deleted and instead the local connection eligibility criteria has been widened to include people who have a business need to live close to their place of work.</p>
58	PA--77-1	Habinteg Housing Association	<p>Habinteg strongly supports Draft Policy Direction 14: New housing (strategic policy) that states All new housing shall be constructed to M4(2) accessibility and adaptability standards (or any future standard) unless it can be evidenced that this is impractical and unachievable. M4(2) standard homes have significantly more accessible features and are more realistically liveable as well as truly visitable. For example, the entrance level WC is large enough to be used independently by a wheelchair user, or for a person to receive assistance if needed. The standard also requires step free thresholds to both main and secondary entrance. Under this plan, the Peak District National Park is doing its bit in increasing the availability of accessible homes so that disabled people can secure suitable housing options on an equitable basis. The benefits of M4(2) homes are well understood and have been highlighted by a range of parliamentary and government commissioned inquiries, including the recent Older Peoples Housing Task Force and the MHCLG inquiry into Disabled people in the housing sector. Among the benefits noted are: faster hospital discharges less costly and speedier adaptations when required reduced local government expenditure on domiciliary care packages by supporting individual</p>	<p>Note the support from Habinteg for all properties to be built to M4(2) standards. Note the request that 10% of builds are built to M4(3) standards. In response, this was not considered viable to impose across all development. Local Needs Housing Surveys will identify any local need to build to M4(3) standards.</p> <p>Note the reading reference to Inclusive Housing Design Guide and Living not Existing.</p>

			<p>independence within the home delayed or avoided moves to more expensive residential care settings providing a better environment for ongoing independence when needs change. Habinteg recommends that all new homes meet Building Regulations M4(2) accessible and adaptable standard as a minimum - to increase the proportion of homes in Peak District that are capable of meeting the changing needs of disabled and older people. This approach not only supports inclusive communities but also reduces long-term costs which may otherwise fall to the local authority, for example, stairlift installation in an M4(2) home costs significantly less (£2,500£4,000) than in a home built before the standards came into effect (£9,000£10,000). While the ambition for M4(2) homes is significant in the plan, we believe that the same ambition for M4(3) wheelchair user homes falls short. The local plan doesn't make any provision for the supply of wheelchair user housing. Habinteg recommends that at least 10% of all new homes meet Part M4(3) Standard (wheelchair user dwelling). The Peak District National Park has an opportunity to be more ambitious in supporting older and disabled people. Homes designed to these standards can help reduce hospital discharge delays and prevent falls in the home. Additionally, they foster social participation by ensuring that disabled and older people can live with dignity, fully connected with their community and maintaining vital relationships, thereby supporting wellbeing, reducing loneliness and mental ill-health. Homes built to M4(3) standards are more likely to comply with the Equality Act 2010, as they are specifically designed to meet the needs of wheelchair users and those with significant mobility impairments. We recommend mandating a minimum build rate of 10% for homes meeting the M4(3) wheelchair-accessible standard. Setting this requirement ensures that residents of the Peak District National Park have access to housing that meets their needs, both now and in the future. A 10% provision helps address the significant shortage of fully accessible homes and supports an inclusive community where people with mobility impairments can live independently. At the very least, a policy should be developed to ensure that a proportion of homes built in the Peak District National Park are for wheelchair users. Habinteg's "Living not existing: The economic social value of wheelchair user homes" report, conducted with the London School of Economics (LSE) found that over a 10-year period, the benefits of living in a wheelchair-accessible home are valued at approximately £94,000 for a working-age adult,</p>	
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			<p>£100,000 for an older adult, and £67,000 for a household with a wheelchair-using child. The long-term economic benefits outlined in the report underline the case for adopting a specific target of at least 10% wheelchair user homes in all new developments, strengthening the soundness and sustainability of the Peak District National Parks local plan. Moreover, providing wheelchair user homes helps reduce or eliminate the cost of in-home care assistance, increases individuals disposable income, lowering reliance on welfare benefits, and enabling greater contributions to tax. The cost-benefit of planning more wheelchair user homes reduces pressure on health and social care services, allowing resources to be redirected to those with the highest, most acute needs. The benefits of M4(3) homes are plentiful, and amongst them, new homes that meet category M4(3) will: Remove or reduces the cost of care assistance in the home Improve confidence, independence, and self esteem, Enable greater social inclusion and community participation, Reduce trips and falls in the home, Increase economic participation disabled people of working age who have their access needs met at home are four times more likely to be in employment. We believe a defined percentage of new homes (10% as a starting point) should be specified to M4(3) standards in order to meet the current and future needs of the population of wheelchair users. Moreover, mandating for 100% or all other (non-M4(3) homes to meet the M4(2) standards offers older people a better choice of accommodation to suit their changing needs helping them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. The local plan could also help address disabled peoples housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning. Accessibility requirements should not be limited to specialist or affordable housing. The need for and potential to benefit from access features is not restricted to the occupants of one type of tenure. Impairments that lead to disability can emerge in any household at any time and nationally we have an ageing population which drives an increasing incidence of age-related disability. M4(2) features benefit everyone by enabling people to remain in their homes longer, supporting families to have healthy, active lives, and improving overall housing quality. M4(3) features</p>	
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			<p>may be equally as relevant to the private housing market as the social sector (although disabled people as a demographic group tend to be disproportionately represented within the social sector). Analysis of DFG expenditure shows that the majority of funding is spent adapting homes in the private ownership sector. Therefore, embedding these standards across all tenures, market and affordable, and house types is vital to creating inclusive, adaptable communities that meet current and future needs. Dwelling mix and quality for older people. Considering the wide range of needs experienced by older people the Authority should ensure that the local plan stipulates a proportion of older persons housing, where newly developed, to be designed to fully wheelchair accessible standard. Habinteg also recommends referring would be developers to the recently published Inclusive Housing Design Guide which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people. Location and context of developments Disabled and older people have told Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and amenities are all important to providing places that are truly liveable which enable people participate in their local community. Consideration should therefore be given in the local plan as to how the Authority wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity. Recommended reading:https://www.habinteg.org.uk/download.cfm?doc=doc Living not Existing: the social and economic value of wheelchair accessible homes,Habinteg</p>	
58	PA--83-6	Bakewell Safer Cycling Group	<p>Sustainable travel is now a consideration for all new housing developments. Currently the majority of Peak Park residents have a least one car and many use local or national delivery services for food or other commodities, bringing the problems of congestion and road damage etc. A rail reinstatement would offer a number of opportunities adjacent or local to new railway stations and local bus services for more remote villages. This would assist communities</p>	<p>Please see the Authority response to representations on sustainable travel and rail reinstatement, and the Draft Local Plan policies T1 and T6.</p>

			to consider jobs further afield and keep families together and communities vibrant. A big difference from the current situation.	
58	PA--92-3	Grindleford Parish Council	Grindleford PC believes the proposed restriction on solely market development is too tight. There is no evidence that this proposal is necessary to meet environmental protection objectives. Open market housing may be the best way to attract professionals such as health care workers and teachers into the area, and a way to attract families with young children. We believe it is important not to put more obstacles in the way of such development than is needed (noting that the settlements strategy and wider planning considerations will be important in guarding the core environmental objectives here).	The focus for housing in National parks is for local affordable housing as set out in the national parks vision and circular 2010. The Government acknowledge that National Parks are not suitable locations for unrestricted open market housing. There is no moratorium on market housing as it can be delivered on brownfield sites, through conversions, on enhancement sites and through community-led development.
58	PA--93-17	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplodale	Concern that affordable housing is not genuinely affordable. Very few areas where building is possible, as small developments not economically viable. Affordable housing sizes small, shared parking, little or no outside amenity space, not flexible in terms of growing families. Need to consult with local Parish. Councils/residents. Need to take into account the needs of growing families who wish to set up a home to remain in and contribute to their sustaining their communities rather than housing they could quickly outgrow which would necessitate them having to leave the communities.	The definition of affordable housing is set out in the NPPF. The size of affordable dwellings reflects the standards set out in the Government's nationally described space standards. It is expected that market housing aligns with the NDSS. Parking provision is in accordance with parking standards. Residents can apply to extend a property.
58	PA--96-9	Winster Parish Council	Can only echo what has previously been written and was written in our response to the previous draft of this plan: Simply rejecting provision for open market demand ignores wider needs of sustainable communities to balance the impacts of years of rising prices and secondary homes. Restricted open market housing that is affordable and targets families, with restrictive covenants to prevent second or holiday home use, should be encouraged alongside more specific local area needs. Further, somewhere must be a policy that bans second homes. It should also seek to return homes to permanent residences by ensuring that when second homes come onto the market they can then only be sold as permanent occupancy.	In response, the majority of housing in the National Park is open market housing. Open market housing can be built through brownfield development, through conversion, on enhancement sites, and as a means to support a community-led affordable housing scheme. There is no rejection for open-market housing but rather a focus on what communities need as per the National Parks Circular, 2010. The introduction of policies on size and number of bedrooms is to target affordability and families. The draft Local Plan provides more flexibility on house size. The proposal for a primary occupancy condition will apply to all new homes unless it is to support farm diversification or is not capable of being a permanent home.

58		Derbyshire County Council	In relation to Direction 14, we agree that new housing should address local need and strongly advocate for all new accommodation to be built to M4(2) accessibility standards.	Note support. The Draft Local Plan Policy C11 and Appendix 2 Peak District Design Vision and Principles requires all new housing to be built to M4(2) standards.
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Policy 20 Gypsy, traveller and travelling show people				
Point #	Comment #	Representor name	Summary for Comment	Officer response
59	PA--106-20	Taddington and Priestcliffe Parish Council	As drafted, this policy is open ended in terms of local connection to qualify for a site and why it should be in a National Park rather than elsewhere.	Noted that this policy is open ended in terms of local connection to qualify for a site and why it should be in a National Park rather than elsewhere. Policy amended to require a housing need to be demonstrated and justification for a particular location.
59	PA--28-2	Bamford with Thornhill Parish Council	Needs also to recognise please that likely detrimental effects on community infrastructure locally must also be considered.	Unsure what the respondent is trying to say.
59	PA--89-20	Holme Valley Parish Council	Note support	Note support

Draft Policy Direction 15 Primary residence				
Point #	Comment #	Representor name	Summary for Comment	Officer response
60	PA--106-21	Taddington and Priestcliffe Parish Council	This policy is supported.	Note support for policy.
60	PA--11-2	Glyn Ratcliffe	Representation owns a holiday property they have sought to convert to a local needs house but have had no interest from buyers. Refer to a lack of mortgage companies offering mortgages on local connection housing and that selling market housing is much easier and it accrues value. A more radical approach is needed. Supports a permanent residence clause instead of a local connection requirement for holiday lets as written in current Local Plan policy RT2.	Note the request for a policy change to support holiday accommodation to residential dwellings with permanent residence clause instead of local needs housing. Amend policy RT2 to align with primary occupancy condition and affordable housing provision of more than 1 dwelling.
60	PA--128-3	individual	Strongly support Draft Policy Direction 15 in specifying that all new housing is subject to a primary residence clause. 1.The Local plan should go further and use available legislation and mechanisms, including article 4 directions, to insist that all existing primary residential properties need to apply for planning consent for change of use to a short term holiday let, including a second home. This would normally not be granted unless the applicant can demonstrate that there is no local housing need and that there is insufficient provision of holiday accommodation in the wider area. 2. The PDNPA will, furthermore, establish a register, in conjunction with the local	Thank you for the support for primary residence clause. In response to Article 4 Directions, a permanent residence and a holiday home is the same use class and as such the Authority cannot remove rights in this regard. The proposal to create a register would not prevent existing properties that are not restricted in any way from being used as holiday homes and as such would not be a good use of Authority resources. Local Authorities may be better placed to hold a register as they have access to business rates data.

			authorities, of holiday lets/accommodation on a parish basis. This will provide a quota (eg a maximum of 10%) of allowable holidays in an area (to be defined).	
60	PA--25-2	Froggatt Parish Meeting	If the second homes and holiday lets were brought back into dwellings for inhabitants of the Peak Park we would not need a significant (sentenced stopped)	The Authority does not have planning control over existing properties being used as second or holiday homes. However, the Authority can affect the use of new dwellings and by doing so less new homes will become holiday homes and therefore the response to the indicative housing figures is more impactful.
60	PA--31-23	Edale Parish Council	Edale PC Agreed. However, we would say most housing including conversions should be a primary residence in perpetuity, and the conversion of holiday to primary accommodation should be regarded favourably if at all possible, especially in places such as Edale with high house prices and little housing for those who are in greatest need. Planning authority should define holiday accommodation as a separate class. Holiday is a separate use class and therefore to convert housing into holiday accommodation requires planning permission, as vice versa. This needs to be reinforced in the Local Plan.	Note support for primary residence and for conversion of holiday units to primary accommodation. The Authority cannot amend the Use Class Order.
60	PA--38-2	Peak Park Parishes Forum	We agree new affordable/social homes should be primary residence, but there are many loopholes. Primary residence should be where tax is registered. Enforcement is key. We think conversion to a second home should need planning permission. Planning authority should define holiday accommodation as a separate class. Holiday is a separate use class and therefore to convert housing into holiday accommodation requires planning permission.	Note support from PPPF for primary residence. It is not within the jurisdiction of the Authority to separate holiday accommodation or second homes into a separate use class for the purposes of planning control.
60	PA--45-2	Eyam Parish Council	We fully support this and would go further to say new social housing must be allocated to local people.	Note Eyam PC support for primary residence and their support that local housing should be allocated to local people.

60	PA--48-1	Middleton and Smerrill Parish Council	[The Parish] Council agrees that a policy to support thriving and sustainable communities that requires new housing, and proposals to convert holiday lets to housing, should be subject to a primary residence cause will be effective. It is hoped that this will restrict the number of dwellings that are unoccupied as a primary residence and if it also results in an increase in the number of local young people who can afford to live in them it will contribute to community cohesion and sustainability.	Support noted.
60	PA--50-8	individual	There is an internal conflict with the wording of this Policy Direction. The underlying purpose is to ensure that all housing is occupied as a primary residence whereas for holiday accommodation the underlying intent is that this form of accommodation is NOT occupied as a primary residence.	Note the concern about conflict between primary residency for new dwellings and occupation of holiday residence. The Draft Local Plan has addressed this conflict.
60	PA--55-2	Staffordshire Moorlands District Council	SMDC The Council supports a park-wide primary residence clause	Note support from SMDC.
60	PA--68-18	High Peak Borough Council	The High Peak Borough Council supports a park-wide primary residence clause.	Support from HPBC noted.
60	PA--7-21	Adam Maxwell	Market housing through farm diversification would be compatible with the policy. State if the policy does not apply to holiday accommodation. Do not use the term 'tied' when you mean key worker accommodation, which it is assumed would be primary residence. What is the legal teams opinion on the policy? Do they support it being delivered using a condition?	Note the comments on the application of policy. Key worker accommodation removed from the policy and instead local connection eligibility has been widened to include people who have a business need to live close to their place of work.
60	PA--80-2	individual	Agreed this is a very good policy, helping to protect communities.	Support noted.
60	PA--92-1	Grindleford Parish Council	Grindleford Parish Council strongly support this approach. It is self-evidently justified to achieve the thriving communities objective, and for a host of environmental reasons	Noted support. Thank you

60	PA--93-12	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	We agree in principle, but it needs to be sufficiently onerous that it has effect. We need better clarity as to enforceability.	Note concern regarding enforceability. Primary residence will be secured through condition or S106 agreement.
60	PA--96-4	Winster Parish Council	Farms should be encouraged to provide affordable housing for their families.	Noted and they are supported as per the policy.

Policy 22 Second and subsequent occupation				
Point #	Comment #	Representor name	Summary for Comment	Officer response
63	PA--106-24	Taddington and Priestcliffe Parish Council	PPPF Even if the first occupation criteria take no account of employment issues, it would make sense for people employed locally to be able to qualify under the second and subsequent occupation policy.	Note the recommendation by PPPF that Even if the first occupation criteria take no account of employment issues, it would make sense for people employed locally to be able to qualify under the second and subsequent occupation policy.
63	PA--31-22	Edale Parish Council	See above re residence clause, which should be 5 years in the first instance, in all cases, not 10. The document frequently interchanges affordable and social housing. There needs to be clear definitions of what each is and then used appropriately. We strongly believe there should be no right to buy on social housing.	The policy allows for 5 year local connection. Note request for clarity of terms used.
63	PA--38-6	Peak Park Parishes Forum	Policy 22 has issues with future-proofing. Housing surveys look at a point in time, but families expand and need to move from 2 to 3 or 4 bedrooms. Divorced couples get new partners and have new families. We strongly endorse the idea that parish councils MUST be consulted. Assisted housing add we strongly support new assisted housing within the Peak Park to cater for local needs, close to where people have lived all their lives. But should be small scale.	Housing surveys have to have a baseline to report on as housing is provided on current need. Housing Associations are best placed to understand how to survey the local community. People can move as their circumstances change. Disagree the parish councils need to be consulted with regards to the allocation of housing and people's personal circumstances. The allocation of housing is for the Local Housing Authority or a registered provider to manage in accordance with the relevant government legislation and any planning restrictions.
63	PA--45-14	Eyam Parish Council	We support the principles identified here but question some of the time constraints, as discussed in the previous response. If there are clear linkages to family and/or	The time constraints are to be reduced as proposed. A clear and fair approach to allocating housing will not impact on vibrant, healthy and productive living and working communities.

			dependents irrespective of the time living in the Parish, then occupation of housing should be allowed. Failure to acknowledge this will serve to negatively impact vibrant, healthy and productive living and working communities.	
63	PA--55-9	Staffordshire Moorlands District Council	The Council considers that eligibility for social housing should be based on housing need rather than parish boundaries and cascade mechanisms. The Council considers that eligibility criteria for privately owned and managed affordable housing should be the same as social housing. The Council considers that local connection should be the same as social housing, suggest 5 years would be an appropriate local connection period. To help sustain communities, the Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10. The Council considers that there should be no exception to the requirement for a local connection.	Note SMDC concerns that housing should be based on need and not parish boundaries and cascades. The Council considers that eligibility criteria for privately owned and managed affordable housing should be the same as social housing. The Council considers that local connection should be the same as social housing, suggest 5 years would be an appropriate local connection period. To help sustain communities, the Council would support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10. The Council considers that there should be no exception to the requirement for a local connection.
63	PA--68-17	High Peak Borough Council	The Council considers that eligibility for social housing should be based on housing need rather than parish boundaries and cascade mechanisms. The Council considers that eligibility criteria for privately owned and managed affordable housing should be the same as social housing. High Peak Borough Council considers that local connection should be the same as social housing, suggest 5 years would be an appropriate local connection period. To help sustain communities, the Council would	Note HPBC support for the local connection. Note the request to reduce the local connection from 10 years to 5 years and base the allocation on need rather than geographical location.

			support redefining the local connection test to allow people who grew up / went to school in the park to return. The Council is concerned about affordable homes being allocated to children of wealthy incomers rather than those with local connections in need. Also suggest criteria of 5 years in 10. The Council considers that there should be no exception to the requirement for a local connection.	
63	PA--70-15	Emery Planning	The policy should provide further clarification of the mechanism through which the search should take place. At present, the majority of s106 Agreements refer to advertising in newspapers for example which is an outdated method for communicating with interested parties. In that context, the approach should also recognize the changes in how the housing market now operates in terms of sales and advertising through online portals where a much greater potential audience is reached much more quickly. Whilst the cascade approach to the marketing and sale of affordable, or in particular, local needs housing can be supported, the current timeframes and methods of communication alongside subsequent approval need to be adjusted to modern marketing and sales approaches to ensure the market is reacting to needs and not unnecessarily delaying sale or occupation of housing where a need elsewhere in the relevant cascade could be addressed.	Note the suggestion to update the mechanisms for advertising properties and the timescales.
63	PA--75-2	individual	The local needs housing/ affordable housing criteria, which is very discriminatory against local people that are running businesses within the Peak Park but who do not live within the boundary: - Policy 21 states that a person must have	Comments noted. The local connection eligibility criteria has been widened to include people who have a business need to live close to their place of work.

			<p>been a resident in the parish or adjoining parish.- Policy 22 states that a person may rent/buy an affordable home if they live in the parish or adjoining parish but only if this adjoining parish is within the Peak Park boundary.- iii) goes on to say that this can be widened out to the whole of the Peak Park. However there is no recognition for those who run businesses within the parish/ Peak Park. I have lived in the adjoining parish of Leek (3 miles away) for over 20 years and I have worked in Leekfrith for over 15 years, yet someone (and their dependants) who lives in Hathersage, which is 25 miles away and has no local connections with the parish of Leekfrith, would meet the criteria (subject to other criteria) for local housing needs, whereas me and my children would not meet any of the cascade criteria. Surely those people who are running local businesses in the Peak Park should have the same equal rights to live in the parish where they work as every other resident of that parish? Leekfrith has strong connections with Leek, being the main market town in the area and both being within the Staffordshire Moorlands. I ask what are the local connections between Hathersage and Leekfrith that give priority for people from Hathersage to live in Leekfrith? Your policy states that your justification of affordable housing criteria is to ensure that these affordable houses are occupied by people with a strong local connection. I don't think you can get a much stronger example of a local connection than someone who has lived locally for over 20 years and wants to live in the same parish as they actually work.</p>	
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63	PA--89-30	Holme Valley Parish Council	Agree. Approve of the reduction of waiting time from 6 to 3 months, to ensure that dwellings are not left empty for too long.	Note support to reduce time period of cascade.
63	PA--93-15	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Rent is also expensive in the Park, and this can only be made more affordable if there is more local housing stock. There is a need for statutory support to maintain the differentiation between short and long-term rentals.	The National Park is a sort after place to live, as such rents are generally higher. There is the provision for build to rent within policy. Note the need to help maintain the differentiation between short and long-term rental.
63	PA-135-	Derbyshire County Council	We also endorse Policies 21, 22, and 23, which prioritise new accommodation and subsequent occupation for local residents. We believe this approach will help younger adults remain in the area, improve affordability, and foster thriving communities rather than those dominated by holiday lets or second homes. This is particularly important given the current difficulty in sourcing care workers due to housing unaffordability.	Support noted.

Policy 23 Essential Worker Dwellings				
Point #	Comment #	Representor name	Summary for Comment	Officer response
64	PA--106-25	Taddington and Priestcliffe Parish Council	Particularly in remoter areas, there has to be more recognition of rural needs. Farms, for example, may only be able to employ someone part time, and that person may earn their living working for others in the locality or with their own business with a client base in that area. The tests in Policy 23 for a new house can be justified. The conversion to housing of barns, whether heritage or not, is now has permitted development outside the National Park. There is a strong argument for reflecting this in National Park local plan policy and offering more flexibility for conversion of existing buildings on farmsteads to residential to support the farm and other rural interests without the strict essential agricultural need test, i.e. reasonable need and local connection/employment should be an adequate reason.	In response to the issue regarding part time farm worker accommodation, policy is flexible to allow for the conversion of farm buildings to accommodation which could include worker accommodation. Some modern farm buildings have been permitted only to support the workings of the agricultural business and are required to be removed when no longer needed for the business. Such conditions were required to make the development acceptable within a protected landscape. It is incorrect to assume that because a building exists in a protected landscape it should have permitted development rights. Farming requires buildings on site, the same infrastructure requirements do not apply to local business that are not based on farming or land management and can be located in more sustainable locations e.g. settlements, where there is access to public transport and amenities.
64	PA--31-24	Edale Parish Council	Edale PC Workers who are not needed 24 hours a day may need accommodation on a farm, which in turn would contribute to a thriving village. It may be hard to prove profitability in a very volatile business such as farming and the lack of profit may in some	In response to the issue regarding part time farm worker accommodation, policy is flexible to allow for the conversion of farm buildings to accommodation which could include worker accommodation. Note support for the policy.

			cases be related to lack of decent accommodation for workers. Agree new build should be allowed only if there is no other option. Agree conversion of buildings rather than new build where possible.	
64	PA--83-3	Bakewell Safer Cycling Group	As businesses in that Park expand access to sustainable travel will allow them to attract workers from regions outside of the park. A rail reinstatement would open up both Manchester and Derby residents to consider work within the Peak Park. The PDNPA could have real control of the situation and the increased funding to support it.	Refer comments to the transport chapter.
64	PA--89-63	Holme Valley Parish Council	Note support	Note support
64	PA--93-8	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Excessively complex policy. Need to find a much simpler and more straightforward way of dealing with this. Currently unworkable and unenforceable.	Disagree. The policy is currently in use and is workable and enforceable.
64		Derbyshire County Council	We also endorse Policies 21, 22, and 23, which prioritise new accommodation and subsequent occupation for local residents. We believe this approach will help younger adults remain in the area, improve affordability, and foster thriving communities rather than those dominated by holiday lets or second homes. This is particularly important given the current difficulty in sourcing care workers due to housing unaffordability.	Support noted.

Policy 24 Assisted housing				
Point #	Comment #	Representor name	Summary for Comment	Officer response
65	PA--31-5	Edale Parish Council	Edale and other villages are not large enough by themselves to justify assisted housing, but residents often need it. "Local needs" should include the needs of several parishes, eg the Hope Valley, and should anticipate future need from an ageing population as well as current need. .	Noted. Assisted living accommodation will be able to respond to a local and wider National Park strategic need.
65	PA--89-66	Holme Valley Parish Council	Note support	Note support
65	PA--93-2	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Care homes will only be affordable if they are profitable, and further complexity will interfere with this.	The policy is a continuation of existing policy. Flexibility is provided to ensure care homes remain viable.
65		Derbyshire County Council	For Policy 24, we support widening the definition of assisted housing to include anyone requiring this type of accommodation, regardless of age.	Note support

Draft Policy Direction 17 Tied accommodation				
Point #	Comment #	Representor name	Summary for Comment	Officer response
66	PA--123-14	Devonshire Group	Support the approach and the opportunity to develop new housing for the benefit of people employed by DG in key sectors would help to attract and retain workers and contribute to sustainable communities.	Note the support the approach and the opportunity to develop new housing for the benefit of people employed by Estates in key sectors would help to attract and retain workers and contribute to sustainable communities. However, in response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.
66	PA--31-93	Edale Parish Council	Edale farm and hospitality businesses support provision of tied accommodation, which would make it easier to recruit workers. Other rural enterprises such as forestry, woodworking, drystone walling should also be included.	Note support for tied accommodation. However, in response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.

66	PA--38-5	Peak Park Parishes Forum	We think it is important to bring back qualified people into the area, but we think that tied accommodation brings its own problems with insecurity of housing and should be dealt with in other sections of the Plan instead, with more flexibility in Policy 21, allowing for exceptional circumstances for workers who contribute to the local area such as firemen, NHS workers, teachers, farm and land workers, key workers and people working in hospitality, emergency services workers and care workers. We think that, when employers have houses for their workers, that is a contractual arrangement between employer and employee and not the business of planning. In the case of eg the caretakers bungalow at HVC, a section 106 will keep it tied to the school in perpetuity.	Note support for people working in the PDNP and that it could be addressed in Policy 21. In response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.
66	PA--55-14	Staffordshire Moorlands District Council	SMDC The Council considers that in respect of the introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities.	Note concerns by SMDC that in respect of the introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities. In response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.

66	PA--64-5	Youlgrave Community Land Trust	We generally agree with all suggested Housing Policies, in particular the introduction of tied accommodation for key workers, and trust this means that the quantity allocated will be over and above the needed units to satisfy local needs as identified by a survey.	Note support. The indicative housing figure is unlikely to change as a result of tied accommodation. In response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.
66	PA--68-11	High Peak Borough Council	The High Peak Borough Council considers that in respect of the introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities.	Note HPBC concerns that in respect of the introduction of a separate criteria relating to employment, implementation could be subjective and open to interpretation and also place an additional administrative burden on housing authorities. In response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.
66	PA--93-10	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	We would question whether tied accommodation is appropriate in the modern housing market. It is in essence a variation of the affordable homes, with the same issues and problems attached.	Note concern about whether tied accommodation is appropriate in the modern housing market. In response the Authority has decided to delete this policy direction and instead widen the local connection eligibility criteria to include people who have a business need to live near their place of work.
66		Derbyshire County Council	Regarding Direction 17, we recommend broadening the definition of key worker accommodation to include care workers.	Draft Plan Policy H3 has replaced the term key worker with employment that has an essential requirement for a person to live near their place of work.

66	PA-136-2	Housing – Derbyshire Dales District Council	<p>We consider the shift to allowing additional tied accommodation for key workers to be a positive move. However, insofar as this may rely on employers to provide or facilitate this tied accommodation, its impact may be limited. For example, schools, residential homes, smaller shops, tourist and leisure providers, may not operate on sufficiently large a scale to be able to provide tied accommodation. A more impactful change would be to allow employment location to be a factor in assessing compliance with local connection requirements, but for key worker employment types only. For example, being employed at a Fire Station does not qualify under current PDNPA criteria, though this would seem to be unnecessarily restrictive. We appreciate the need to safeguard against excessive new development on the grounds of location of employment, but believe this could be achieved by clearly limiting the employment types that qualify.</p>	<p>Comments noted. In response, Draft Plan Policy H3 has replaced the term key worker with employment that has an essential requirement for a person to live near their place of work.</p>
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Draft Policy Direction 18 Planning conditions, developer contributions and legal agreements (core strategic policy)				
Point #	Comment #	Representor name	Summary for Comment	Officer response
67	PA--106-26	Taddington and Priestcliffe Parish Council	The wording of this is unclear. If it is saying that s106 agreements will be required in all these cases, it is at odds with Policy 26 C, which recognises that planning conditions can be used.	The draft policy direction 18 refers to S106 agreements only. The policy includes annexes if these cannot be controlled by condition (depends on the situation).
67	PA--31-47	Edale Parish Council	Edale PC Agreed. The problems mentioned above regarding capacity for enforcement and necessary funding apply.	Note support. In response to capacity for enforcement and funding the Authority has a delivery plan to accompany the Draft Local Plan.
67	PA--38-7	Peak Park Parishes Forum	Support the policy direction provided that it specifies affordable and social housing but it requires clarification.	Note the support for the policy direction provided that it specifies affordable and social housing but it requires clarification.
67	PA--45-4	Eyam Parish Council	Eyam PC support Draft Policy Direction 18.	Note Eyam PC support Draft Policy Direction 18.
67	PA--7-14	Adam Maxwell	Use the term affordable housing not local need home. What is a tied dwelling? It does not refer to occupancy.	Comments noted. Use of terminology refined.

<p>67</p>	<p>Derbyshire County Council</p>	<p>From the perspective of County Planning Policy, we welcome the publication of the <i>Economic Viability Assessment 2025</i> prepared by Three Dragons, which forms part of the evidence base for the Local Plan review. From the County Council's perspective, and in accordance with its Developer Contributions Protocol, all housing developments comprising 10 or more dwellings (whether market or affordable) are assessed for potential requirements for new infrastructure and associated developer contributions. Contributions are typically sought for dwellings of two bedrooms or more, as affordable housing developments in particular are likely to be occupied by families with school-age children, necessitating the provision of additional school places. Where there is insufficient capacity at existing schools, the County Council will seek developer contributions to fund the expansion of existing schools and, in the case of very large developments, the provision of new schools.</p> <p>Across the County, Derbyshire County Council is increasingly encountering viability challenges in securing contributions for County-level infrastructure and services. While it is acknowledged that previous Section 106 (S106) requirements within the Peak District National Park have reflected its protected status, concerns remain regarding the allowance for general S106 contributions factored into the 2025 Assessment – specifically, the figure of £2,700 per unit referenced in paragraph 4.25 and Table 4.7. Contributions per dwelling could be much higher than this, particularly in settlements where the normal school is at capacity. Some settlements within the 'Town and Larger Villages' category, such as Hope,</p>	<p>The viability assumptions in the Economic Viability assessment 2025 were made following consultation with DCC officers regarding developer contributions. Local schools in the National Park are not at capacity and given the limited levels of brownfield land in the National Park status and the ageing population, it is unlikely they will be at capacity during over the Plan Period.</p> <p>The response given is not proportionate and fails to acknowledge that the level of development that occurs in the National Park is so low it does not trigger contributions towards County-level infrastructure.</p> <p>Affordable housing development on greenfield land is expected to be grant funded with assistance through the collection of S106 monies.</p> <p>Draft Local Plan Policy C12 Local infrastructure and developer contributions addresses contributions required to make development acceptable.</p>
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			<p>Calver, Taddington, and Stoney Middleton, may experience capacity constraints based on the attached data. If helpful, we would be happy to run some scenarios to produce example calculations for developments of 10 dwellings or more to illustrate potential contribution levels.</p> <p>It is noted that affordable housing requirements are often prioritised over other obligations, which can significantly affect the level of contributions available for County infrastructure. The Viability Assessment 2025 acknowledges that Greenfield sites are unlikely to deliver 100% affordable housing without grant funding. However, the Preferred Approach document indicates that Greenfield sites will be 100% affordable housing. Clarification is sought as to whether this implies that grant funding will always be available to support such provision.</p> <p>On page 63, from a County Policy perspective, it should be recognised that obligations and legal agreements may be required to secure contributions for County infrastructure to ensure developments are acceptable in planning terms, in line with national requirements. Similarly, page 113 should acknowledge the national position that S106 agreements may be necessary to make a development acceptable in planning terms.</p>	
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Policy 25 Sub-division of dwellings to create multiple units				
Point #	Comment #	Representor name	Summary for Comment	Officer response
68	PA--31-58	Edale Parish Council	Agree as an efficient way to use buildings and in some cases support families.	Support noted.
68	PA--38-8	Peak Park Parishes Forum	Any converted dwellings will need a section 106 agreement for primary residency.	Noted. Primary occupancy can be conditioned.
68	PA--7-12	Adam Maxwell	Presumably need to add 'tied' worker if we are taking this approach.	Noted. Policy alignment has been reviewed.
68	PA--89-24	Holme Valley Parish Council	Note support	Support noted.
68		Derbyshire County Council	We agree with Policies 25 and 26, which propose that ancillary and subdivided accommodation should be subject to checks to ensure they do not undermine the main building and remain in keeping with the landscape.	Support noted.

Policy 26 Ancillary dwellings				
Point #	Comment #	Representor name	Summary for Comment	Officer response
69	PA--106-27	Taddington and Priestcliffe Parish Council	The Policy is generally supported except: 1. Whilst sharing an existing access is obviously preferable, it is unreasonable to prevent an alternative access where circumstances require this. 2. Sharing services and utilities (if that means sharing financial and functional arrangements) goes beyond what is required to protect reasonable planning interests. It is an internal matter for the family to arrange in which the National Park Authority has no role in investigating or interfering.	Disagree with the comments made for the reason that this policy refers to ancillary dwellings and are therefore not independent of or to the main dwelling house.
69	PA--31-51	Edale Parish Council	An ancillary dwelling, as all new dwellings, will need an S106 agreement for permanent residency.	Noted. Primary occupancy can be conditioned.
69	PA--38-9	Peak Park Parishes Forum	Policies 25, 26, 27 and 28 any converted dwellings will need a section 106 agreement for primary residency.	Noted. Primary occupancy can be conditioned.

69	PA--70-16	Emery Planning	We support the inclusion of this policy which has worked positively over the previous plan period.	Note support.
69	PA--7-44	Adam Maxwell	Is it necessary to repeat points about heritage and landscape?	Noted. And points B iv and B v have been removed.
69	PA--89-32	Holme Valley Parish Council	Note support.	Note support.
69	PA--92-9	Grindleford Parish Council	Grindleford Parish Council supports this policy	Note support.
69	PA--93-13	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplodale	This policy needs more consultation as it could have unintended consequences.	The policy is brought forward from the current local plan. The response does not explain what unintended consequences are.
69		Derbyshire County Council	We agree with Policies 25 and 26, which propose that ancillary and subdivided accommodation should be subject to checks to ensure they do not undermine the main building and remain in keeping with the landscape.	Support noted.

Policy 27 Housing development on brownfield land				
Point #	Comment #	Representor name	Summary for Comment	Officer response
70	PA--30-6	Bradwell Community Land Trust	We support a policy which seeks 20-40% affordable housing when brownfield land is redeveloped and buildings are converted. However, the policy should be extended to apply the same requirements to greenfield sites.	Support noted. In response greenfield sites are 100% affordable and the Draft Local Plan makes this clearer.
70	PA--31-59	Edale Parish Council	Edale PC For clarity, this should make clear the meaning of "affordable". should these homes include homes for social rent? We would argue that it should, to provide accommodation to those who most need it and can least afford to live in Edale even though they may work here.	Comments noted and clarity is provided in the Draft Local Plan.
70	PA--38-10	Peak Park Parishes Forum	PPPF Policies 25, 26, 27 and 28 any converted dwellings will need a section 106 agreement for primary residency. Policy 27 - should also include social housing. 2- 9 dwellings 30% affordable, the 30% should be divided into social and affordable.	Comments noted and clarity is provided in the Draft Local Plan.
70	PA--45-28	Eyam Parish Council	There is no differentiation between affordable and social housing; this needs clarification	Comments noted and clarity is provided in the Draft Local Plan.

70	PA--70-17	Emery Planning	We support the proposed approach to give certainty on the level of affordable housing required. However, the requirements need to be subject to viability assessment, taking into account the other policy requirements of the plan and Section 106 costs. The assessment also needs to take into account local build costs, which tend to be significantly higher than the national averages due to design requirements and the absence of economies of scale.	Support noted. The requirements, including local build costs, have been subject to a viability assessment by consultants in the supporting evidence. Applicants can submit a viability assessment if there are material reasons that prevent their development from being policy compliant.
70	PA--7-18	Adam Maxwell	What is the main market value area? If the percentages remain the same can presumably just be one column?	The main market value area was shown in Appendix 5 of the Preferred Approach consultation document. Comments noted. The Draft Local Plan sets out the requirements.
70	PA--89-2	Holme Valley Parish Council	Support	Support noted.
70	PA--93-4	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Agreed in principle. Need to find ways of allowing older residents to downsize without having to move out of their community.	Support noted.
70	PA--96-6	Winster Parish Council	A	Nothing to respond to.
70		Derbyshire County Council	We support Policies 27 and 28, which encourage brownfield development and conversions that meet eligible local needs.	Support noted.

Policy 28 Housing development through conversion				
Point #	Comment #	Representor name	Summary for Comment	Officer response
71	PA--30-7	Bradwell Community Land Trust	We support a policy which seeks 20-40% affordable housing when brownfield land is redeveloped and buildings are converted. However, the policy should be extended to apply the same requirements to greenfield sites.	Note support. Draft Local Plan sets the requirements out more clearly.
71	PA--31-16	Edale Parish Council	We would argue that all such development should provide 40% affordable homes with a primary residence clause.	Note support for 40% affordable housing on developments. In response, evidence on economic viability has determined the thresholds for affordable housing, which are set out in the Draft Plan. All new housing will have a primary occupancy condition attached to it. This has been made clearer in the Draft Plan.
71	PA--38-11	Peak Park Parishes Forum	Policies 25, 26, 27 and 28 any converted dwellings will need a section 106 agreement for primary residency. Policy 26 development of outbuildings etc close to a dwelling should come under permitted development already?	Note support for primary occupancy. All new housing will have a primary occupancy condition attached to it. This has been made clearer in the Draft Plan. In response to policy 26, permitted development rights are withdrawn for affordable housing to prevent overdevelopment that would take a property out of the affordable housing category.

71	PA--70-18	Emery Planning	Again, we support the proposed approach to give certainty on the level of affordable housing required, but the requirements need to be underpinned by robust viability evidence. In terms of the threshold for affordable housing, we would suggest that it should only be required on schemes of 3 or more dwellings, as 2 dwellings creates issues with the percentages (i.e., 30% or 40% of 2 is less than 1).	Note the support. The need is for on-site affordable housing provision in the first instance to ensure delivery. The policy remains as is in the Draft Plan.
71	PA--89-8	Holme Valley Parish Council	Support	Note support
71	PA--93-5	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowlale	This is another category that seems destined to further complicate matters rather than benefit the community.	Disagree. The purpose of the policy is to ensure that homes delivered through the conversion of buildings support the provision of affordable housing for local people to benefit the local community.
71	PA--96-10	Winster Parish Council	Overly restrictive and may discourage conversion. First principle should be: Permanent residency (with no holiday let or second home use). Second should be maximising number of affordable/family homes that can be achieved whilst maintaining the character of the building. Whilst the focus should be on local residents need to live there, this should not discourage the opportunity to perhaps create two dwellings from a barn conversion for example. Especially where doing so may make the conversion affordable for a local in housing need.	Disagree. The purpose of the policy is to ensure that homes delivered through the conversion of buildings support the provision of affordable housing for local people to benefit the local community.
71		Derbyshire County Council	We support Policies 27 and 28, which encourage brownfield development and conversions that meet eligible local needs.	Support noted.

Policy 29 Housing mix				
Point #	Comment #	Representor name	Summary for Comment	Officer response
72	PA--130-4	Peter O'Brien	Mixed tenure developments should be promoted. This will provide for a wider range of housing opportunities for local working families, and increase the financial viability of affordable housing provision.	Note support for mix tenure.
72	PA--28-4	Bamford with Thornhill Parish Council	The 'Affordable housing' table seems perverse. A young couple setting up a family home, even if as yet they have no children, will want a 3-bedroom house, because in the not too distant future they will need that. The idea therefore that only 35% of the mix needs to be 3- bedroomed feels unhelpful - we contend that the 3-bedroom percentage should be higher than the 2-bedroom percentage.	The housing mix is a result of evidence from the in the Population Projections and Housing Needs Assessment and in consultation with the Local Housing Authority and Registered Providers. It also takes into account viability. People who live in affordable housing can apply to the Local Housing Authority for a larger or smaller house if or when their circumstances change.
72	PA--30-8	Bradwell Community Land Trust	The application of the required mix of house types should be treated flexibly where local evidence indicates that need varies (for example, where there is an identified shortage of family housing) and this should be stated in the policy.	Comments noted and agree. Draft Plan policy on housing mix has been amended to set this out clearly.
72	PA--38-12	Peak Park Parishes Forum	Policy 29 socially rented/affordable, delete affordable. The first column also refers to market social rented houses.	Note the comments. Policy has been amended to provide clarification.

72	PA--45-11	Eyam Parish Council	Again there is a failure to differentiate between social and affordable housing, this needs clarification. Housing mix should be determined locally with input from Parish Councils and whilst it is admirable to define a target housing mix there will inevitably be a financial input derived from development costs. Will policy look to override such commercial inputs?	Note the comments. Policy has been amended to provide clarification. Housing mix will refer to local housing needs in the first instance. Housing mix is a target and clarity on this has been provided in the Draft Plan.
72	PA--7-41	Adam Maxwell	Per discussions with DDDC can we have in policy that the mix of affordable housing types will be secured by the planning obligation?	Comments noted. The Draft Plan policy sets out the mix of affordable housing types will be secured by the S106 planning obligation.
72	PA--89-18	Holme Valley Parish Council	Support	Note support
72	PA--93-3	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplwdale	Principle is acceptable. Villages have older populations living in large properties who wish to stay within their parish, and there is no suitable housing. Planning needs to be simplified so that self-build and special cases etc are more straightforward.	Note support
72	PA--96-14	Winstar Parish Council	Restricted provision for 4 bed housing under affordable housing further restricts larger families from living in the Peak Park, impacting school demand and the make-up of communities with fewer and fewer children. This is also short-sighted. With the catastrophic collapse of birth rates meaning we are well below replacement rates, future governments will have to actively encourage families to have more children. This breakdown of accommodation will fail to address current and future needs.	The policy has been amended to include an affordable housing size for 5/6 person. If a person building to meet their own need can demonstrate a 5 bed house is needed the applicant can make the case. The breakdown of accommodation responds to current and future needs as evidenced in the Population Projections and Housing Needs Assessment by Lichfields.
72		Derbyshire County Council	We endorse Policy 29 on housing mix.	Support noted

Policy 30 Housing size				
Point #	Comment #	Representor name	Summary for Comment	Officer response
73	PA--10-1	individual	Placing a maximum size on market housing is not something a local council should do - owners ought to be able to build to a size that suits them as long as the impacts on others are appropriate. This feels like yet another stick to beat developers with - and undermines work done by architects to make best use of available land. NDSS is a minimum standard, not a maximum one. It would be preferable to articulate minimum housing size, not impose a maximum - which feels like a well-meaning but one-size-fits-all approach which won't take into account the realities on the ground. If this is about limiting a knock down and replace approach, simply put maximum % changes instead. Making 'best use of the site' might well mean putting something bigger on a plot to echo nearby buildings or conserve converted buildings or simply use a plot in a more efficient way. This is overreach and should be dropped.	Comments noted. The housing size is retained for affordable housing in the Draft Local Plan policy but for market housing it has been removed and replaced with a requirement to align with NDSS. Size constraints ensure that the local community has access to housing they need and can afford. Proposed housing policies refer to different house sizes in response to what type and size of housing is needed (evidenced in the Population Projections and Local Needs Assessment). Making most effective use of land does not mean build one larger property, rather that two or more could be built in response to local housing needs rather than an individual's ability to afford a bigger house.

73	PA--104-15	Spring Planning	<p>Planning policy should not regulate the size of market housing. Minimum sizes could be specified, but setting maximums has the potential to be at odds with heritage policies regarding subdivision. It is suggested this is deleted.</p>	<p>Comments noted. The housing size is retained for affordable housing in the Draft Local Plan policy but for market housing it has been removed and replaced with a requirement to align with NDSS.</p> <p>There is good reason to set size standards - to ensure a good mix of house size that responds to housing need and to ensure effective use of land. Proposals to convert heritage assets may be able to demonstrate material considerations that due to their significance prevent them from adhering to these sizes.</p>
73	PA--106-28	Taddington and Priestcliffe Parish Council	<p>Table A is not understood. It is headed number of bedrooms and then refers to number of occupants, and its intention is not mentioned. The Parish Council recognises that some limit should be placed upon the size of new housing, but supports a policy that encourages people building their own affordable housing with their own energies and resources to be able to build to their anticipated long term needs, without undue inquiry into their personal circumstances. It expects to see policies that help young people to stay in the community which, after all, is what the National Park Authority has signed up to in its definition of Thriving and Sustainable communities. There needs to be a more flexible approach to all building conversions, so that opportunities to provide local affordable housing are not lost because the strict limits of the policy cannot be met. A policy that prohibits garages or outhouses in an area most of which is on high ground needs clear justification beyond a mere assertion (see also the drafting of Policy 31 and 32). Garages and outbuildings protect the street scene, to the benefit of the National Park. The alternative is temporary sheds and open-air storage of materials, play equipment etc that should properly be kept elsewhere. They may support home working. Such a policy is strongly opposed.</p>	<p>Comments noted.</p> <p>Note the request for more flexibility in size for people to build for their own future needs. Young people also move away for reasons other than the cost of housing. Not all buildings are capable or suitable for conversion to residential. The restrictions on garages and outbuildings for affordable housing is to prevent overdevelopment and reduce their affordability. If someone specifically wanted a garage they could incorporate it into their build size allowance.</p> <p>The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.</p>

73	PA--120-5	Fawfieldhead Parish Council	<p>We feel strongly that the proposed size restrictions for affordable homes should not be retained. The sizes should be increased significantly (even given the interim amendment in 2021). The proposed guidelines are completely inadequate and will still lead to small and cramped accommodation and discourage people from building this type of accommodation, and provide a poor quality of life for occupants. We note that the proposed market size restrictions are significantly more spacious. Despite the interim amendment in 2021 the affordable size restrictions still do not 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. For example, even if you need a relative to stay after a hip operation, this would be extremely difficult given the current standards. We also think that any changes should be backdated so that existing affordable homes can be made fit to live in and expanded to provide more suitable accommodation. There was no mention of how this would affect existing affordable homes and we think it is very important to address this for these occupants. Affordable homes should provide a reasonable standard of comfort and quality of life and they are manifestly failing to do this at present.</p>	<p>Note the request to increase the size restrictions for affordable housing to allow for people to work from home, have people to stay over, allow families to grow, allow for car provision. And that this allowance be backdated for previously approved/built affordable housing.</p> <p>The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.</p>
73	PA--128-4	individual	<p>The Local Plan should not have small limits on the size of self build houses for local needs, subject to a maximum. This is so that local people can plan ahead for future needs, including raising families.</p>	<p>Comments noted.</p> <p>The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.</p>

73	PA--2-4	individual	It would be preferable to articulate minimum housing size, not impose a maximum - which feels like a well-meaning but one-size-fits-all approach which won't take into account the realities on the ground. If this is about limiting a knock down and replace approach, simply put maximum % changes instead.	Comments noted. The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.
73	PA--28-5	Bamford with Thornhill Parish Council	In the "Affordable housing size" table, 97 sq m is unlikely to be adequate for 4 or 5 people, so there needs to be an extra band added to the table.	Comments noted. Draft Plan Policy has been amended to include a larger dwelling size for 5/6 person dwelling.
73	PA--30-9	Bradwell Community Land Trust	The policy requires affordable housing to be within stated size thresholds. However, the maximum sizes are the same as the national described minimum space standards. This means the policy could be used to support developments where the space provided falls below that set by national guidance. Nor is there any compelling reason why those living in affordable housing should be constrained to the smallest house sizes which are regarded as acceptable by national guidance. This policy is unnecessary and is not justified. If the aim of the plan is to make sure that land is used efficiently, this is more usually and effectively achieved through applying a minimum density policy.	NDSS are widely used by planning authorities. Housing size standards ensure that properties are built to respond to local needs. The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.

73	PA--31-89	Edale Parish Council	<p>Edale PC We do not see why market housing is larger than affordable. The argument re efficient use of land should apply to both. We would question the policy of restricting size of new dwellings by the number of initial occupants. This does not adequately support families needs, as families grow and circumstances change. There are instances across the Park where families have moved out of Edale and the Hope Valley, which is emptying the Park of its younger population. We argue that this policy should be revisited in the light of the importance of retaining younger families and bringing in a younger demographic from outside the Park, which the residency clause does not support well. This is also relevant to the thriving and sustainable draft policy direction.</p>	<p>Restricting house size is a mechanism to keep values for affordable housing lower. NDSS are widely used by planning authorities. Housing size standards ensure that properties are built to respond to local needs.</p> <p>The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.</p>
73	PA--45-18	Eyam Parish Council	<p>Housing Size is contentious. Strict size thresholds, risk removing flexibility from schemes that could otherwise meet genuine local need. It also seems contradictory that character and landscape considerations can allow variation, but only where it doesn't affect viability or developer contributions, which is exactly where flexibility is usually needed! We are concerned that the Planning Departments interpretation of these thresholds is likely to be far stricter in practice than the policy wording suggests. Across all of these policies, the recurring issue remains the same: the Peak Park Planning Department ultimately controls interpretation, implementation, and exceptions, and this is where projects seem to get stopped. Regardless of how carefully written the policies are, if the Planning Department continues to apply an inflexible, highly restrictive approach, then local needs wont be met, and the Parishes ability to shape sustainable housing will remain severely limited.</p>	<p>Note concern about lack of flexibility in housing sizes.</p> <p>NDSS are widely used by planning authorities. Housing size standards ensure that properties are built to respond to local needs.</p> <p>The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.</p>

73	PA--55-5	Staffordshire Moorlands District Council	The Council considers that Policy 30 is confusing and the Council is unsure how this would be implemented. The NDSS states: 2b3p =70 sqm, 2b4p =79 sqm, 3b4p =84 sqm, 3b5p =93 sqm, 97sqm is actually larger than a 3b5p dwelling. Is this a maximum house size? It doesn't provide any support when trying to achieve appropriately sized 2b4p units rather than 2b3p. In response to affordable housing size the Nationally Described Space Standards (NDSS) should be seen as the minimum standard acceptable not the maximum to ensure healthy living conditions in social housing. The Council considers that the same size standards should be applied to RSL and privately developed homes.	Note SMDC concern about application of policy 30 and the NDSS standards and sizes and that 97sqm is actually larger than a 3b5p dwelling. And that the policy doesn't provide any support when trying to achieve appropriately sized 2b4p units rather than 2b3p. The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.
73	PA--68-14	High Peak Borough Council	High Peak Borough Council considers that Policy 30 is confusing and the Council is unsure how this would be implemented. The NDSS states: 2b3p =70 sqm, 2b4p =79 sqm, 3b4p =84 sqm, 3b5p =93 sqm. 97sqm is actually larger than a 3b5p dwelling. Is this a maximum house size? It doesn't provide any support when trying to achieve appropriately sized 2b4p units rather than 2b3p. In response to affordable housing size the Nationally Described Space Standards (NDSS) should be seen as the minimum standard acceptable not the maximum to ensure healthy living conditions in social housing. The Council considers that the same size standards should be applied to RSL and privately developed homes.	Note the concern that policy 30 is overly prescriptive and the request to apply the same standards to affordable and market housing. The purpose of the policy is to ensure the market responds to the size of properties needed locally. NDSS are widely used by planning authorities. Housing size standards ensure that properties are built to respond to local needs. The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.
73	PA--70-19	Emery Planning	The policy should identify development involving the conversion of buildings as a further exception to the house size limitations, to ensure efficient use of an existing building.	Note comment that the policy should identify development involving the conversion of buildings as a further exception to the house size limitations, to ensure efficient use of an existing building.

73	PA--80-10	individual	It is unreasonable to be to prescriptive on house size, flexibility needs to be allowed for e.g. a young couple going to the expense of building their own house, surely we should make allowances for the future growth of their family. Saying that extensions to the house can be added is not financially feasible.	Points noted about the need for flexibility when building one's own property. NDSS are widely used by planning authorities. Housing size standards ensure that properties are built to respond to local needs. The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.
73	PA--89-41	Holme Valley Parish Council	Support	Note support
73	PA--93-6	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowlale	Size quite small. Concerns re parking and amenity space. Seek to ensure housing is suitable for long-term occupation and supports sustainable communities. However, in practice, minimum internal space standards risk delivering homes that are quickly outgrown by families. In smaller villages, where opportunities to move within the parish are extremely limited, this can force households to leave the community altogether. This outcome conflicts with the objective of sustaining rural communities, as it discourages long-term settlement and participation in village life. Greater flexibility or higher space expectations for family housing in smaller settlements would better support community sustainability	NDSS are widely used by planning authorities. Housing size standards ensure that properties are built to respond to local needs. People can extend if required. The housing size is retained for affordable housing in the Draft Local Plan policy, amended to provide flexibility for people meeting their own need, and for market housing it has been removed and replaced with a requirement to align with NDSS.
73		Derbyshire County Council	[We] largely support Policy 30 on housing size; however, we recommend that one-bedroom units be slightly larger at 45m ² to allow for adaptations, storage of mobility aids, and flexibility for changing circumstances, such as accommodating a sleep-in carer. We feel the proposed 39m ² may not adequately address these needs.	Support noted. The Draft Local Plan removes specific size standards for market housing and refers instead to aligning with the NDSS. For affordable housing, the Draft Local Plan provides a housing size range rather than specific sizes, this change addresses the concerns raised.

Policy 31 Extensions and alterations				
Point #	Comment #	Representor name	Summary for Comment	Officer response
74	PA--103-11	Darwent Architecture	Remove 30% limit as any extension should be considered wholistically in regard to the existing house and impact on the wider landscape. Smaller properties will generally only be able to support smaller extensions but the 30% factor it too prescriptive and limiting for a number of properties / scenarios.	Agree that 30% was prescriptive and limiting as the purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.
74	PA--104-16	Spring Planning	It is considered that the previous policy approach regarding the capacity of a site and potential extensions is sufficient to address extensions and alterations. Reference back to original is not necessary in this context.	Agree that 30% was prescriptive and limiting as the purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.
74	PA--111-8	Jane Newman Planning	Policy 31 suggests a limit on extensions of 30%. This is too prescriptive and should be dealt with on a case by case basis.	Agree that 30% was prescriptive and limiting as the purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.

74	PA--118-13	United Utilities	We recommend that the following et point is added to this policy. Proposals must have no adverse impact on the operation of, or access to, existing utility services such as water mains and public sewers.	Note the request. Draft Plan Policy on design and development management principles addresses these areas.
74	PA--31-88	Edale Parish Council	Agreed	Support noted.
74	PA--45-32	Eyam Parish Council	Support	Support noted.
74	PA--70-20	Emery Planning	There is no justification for a limit on the percentage increase on the size of an extension to a dwelling. Whether an extension is acceptable in size would be adequately controlled by criterion ii to v. The primary consideration should be the relationship of the extension to the host dwelling and also its impact on the character and appearance of the surrounding area and the National Park, this will vary depending on the specific circumstances of the proposals. In our experience, where local planning authorities have a policy setting out that extensions should be limited to 30%, this is in Green Belt locations where national policy states that extensions should be disproportionate. National policy does not include such a policy in respect of extensions in settlements or in the open countryside. There is no justification for this in the National Park.	Agree that 30% was prescriptive and limiting as the purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.

74	PA--7-38	Adam Maxwell	The justification for 30% needs to be clear. What do we mean by original floorspace? As originally built (may be 200 years ago) or as it existed at a certain date? Or at the time of the adoption of the policy? What if they get permission for a 30% extension. Can they apply for another 30% later? Presumably not. Do we consider PD fallbacks? Do outbuildings count against this? Conversion of outbuildings to ancillary accommodation? Is v just repetition of other policy? Is D repeating other policy?	The purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.
74	PA--89-9	Holme Valley Parish Council	Support noted.	Support noted.
74	PA--93-9	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Complex policy. Is there a straightforward route towards agreeing exceptions?	Comments noted. The purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.
74	PA--96-15	Winster Parish Council	Extensions that increase the number of dwellings created for permanent occupation (with restricted covenants on second or holiday homes) should be actively encouraged and part of policy framework. It is crazy that chances to enhance the housing stock are being missed.	The purpose of the policy was to limit overdevelopment of properties and to maintain a mix of house sizes available. Draft Plan policy has been amended to reflect current local plan policy; respond to character, scale and massing rather than a prescriptive size.
74		Derbyshire County Council	For Policy 31, we agree that extensions should be subject to demonstrable need but suggest that Clause B should include the same exceptional circumstances outlined in Policy 30, Clause A.	Support noted.

Policy 32 New outbuildings and alterations and extensions to existing outbuildings in the curtilage of dwelling houses				
Point #	Comment #	Representor name	Summary for Comment	Officer response
75	PA--31-17	Edale Parish Council	Edale PC - agreed	Note support
75	PA--45-7	Eyam Parish Council	Supported	Note support
75	PA--70-21	Emery Planning	The policy only permits new outbuildings, or alterations and extensions to existing outbuildings, where extensions or alterations to a house are impractical or undesirable. There is no justification for such an approach. The only requirement should be that the new outbuilding, or alterations to an existing outbuilding, conserves and/or enhances the valued character and special qualities of the National Park. Whether the dwelling could be extended is irrelevant.	Note comments. In response, this policy is brought forward from the existing Local Plan.

75	PA--7-17	Adam Maxwell	B is this necessary? When would we do this? We consider this anyway C this vague. Do they need to demonstrate housing need? How do we assess whether it would no longer be affordable?	Comments noted. Draft Local Plan amended to delete B and clarify C. Issue regarding affordable housing is in regard to overdevelopment and how this could occur e.g. creation of habitable ancillary rooms in the garden like an office.
75	PA--89-11	Holme Valley Parish Council	NULL	NULL
75	PA--93-16	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Generally agreed in principle. Needs some clarification.	Support noted. Draft Local Plan clarification included.
75		Derbyshire County Council	We confirm our agreement with policy 32.	Support noted.
Policy 32 New outbuildings and alterations and extensions to existing outbuildings in the curtilage of dwelling houses				
Point #	Comment #	Representor name	Summary for Comment	Officer response

75	PA--31-17	Edale Parish Council	Edale PC - agreed	Note support
75	PA--45-7	Eyam Parish Council	Supported	Note support
75	PA--70-21	Emery Planning	The policy only permits new outbuildings, or alterations and extensions to existing outbuildings, where extensions or alterations to a house are impractical or undesirable. There is no justification for such an approach. The only requirement should be that the new outbuilding, or alterations to an existing outbuilding, conserves and/or enhances the valued character and special qualities of the National Park. Whether the dwelling could be extended is irrelevant.	Note comments. In response, this policy is brought forward from the existing Local Plan.
75	PA--7-17	Adam Maxwell	B is this necessary? When would we do this? We consider this anyway C this vague. Do they need to demonstrate housing need? How do we assess whether it would no longer be affordable?	Comments noted. Draft Local Plan amended to delete B and clarify C. Issue regarding affordable housing is in regard to overdevelopment and how this could occur e.g. creation of habitable ancillary rooms in the garden like an office.
75	PA--89-11	Holme Valley Parish Council	NULL	NULL

75	PA--93-16	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplowdale	Generally agreed in principle. Needs some clarification.	Support noted. Draft Local Plan clarification included.
75		Derbyshire County Council	We confirm our agreement with policy 32.	Support noted.

Policy 33 Replacement dwellings				
Point #	Comment #	Representor name	Summary for Comment.	Officer response
76	PA--103-12	Darwent Architecture	Amend wording of similar floor area, volume and scale as some sites may be suited to a larger replacement where the surrounding context is of larger houses for instance. Too prescriptive	The policy is meant to be prescriptive to prevent loss of smaller properties that make an important contribution to the mix of house sizes available.
76	PA--104-17	Spring Planning	The requirement under this policy that the replacement dwelling has a similar floor area, volume, scale and curtilage to the existing dwelling is at odds with other policy considerations. For example, in applications for the replacement of a bungalow historically the policy direction has been towards replacing this with a two-storey dwelling. This now would not meet this policy test and the opportunity for enhancement would be lost.	To consider enhancement to be purely about the visual is limiting and does not consider other mechanisms for enhancement. There is no policy that states bungalows should be replaced with two storey dwellings. Bungalows and other single storey dwellings provide a much needed type of property and are highly valued in the National Park. Whilst bungalows do not reflect local vernacular, they are part of the architectural story of the 20th century.
76	PA--106-29	Taddington and Priestcliffe Parish Council	The principle behind this policy is understood, but the concern must be whether as worded it is too rigid and will prevent opportunities for significant environment gain, or perhaps for redevelopment that might secure more houses.	The level of environmental gain will be proportionate. Draft Local Plan has supporting text on the need to consider site suitability for more than one dwelling if the situation arises.

76	PA--111-9	Jane Newman Planning	Policy 33 requires clarity in relation to whether this refers to embodied or operational carbon.	The policy refers to embodied and operational carbon. Clarity provided in the Draft Local Plan.
76	PA--117-15	Hope Valley Climate Action	Support restrictions on replacement dwellings. New dwellings should take the opportunity to incorporate state of the art home energy efficiency as well as renewable energy generation. The requirement to minimise new carbon consumption must mean moving away from fossil fuel use for heating (gas, heating oil) towards air or ground source heat pumps. We suggest therefore adding the following criterion: g the new dwelling incorporates renewable energy generation such as rooftop solar photovoltaic panels.	Note the support for restrictions on replacement dwellings. Adaptations for climate change mitigation are addressed in the policy. Clarification is provided in the supporting text.
76	PA--31-57	Edale Parish Council	Clause a. seems redundant. Residential use may have been abandoned due to unfitness for habitation, in which case replacement may be the best option. Add that upgrading an existing building is preferable to replacement because of the environmental impact of replacement. Every effort should be made to use existing buildings.	Note comment that clause a seems redundant. In response, this is removed. Note support for the rest of the policy.
76	PA--38-13	Peak Park Parishes Forum	PPPF Policy 33 add that upgrading an existing building is preferable to replacement because of the environmental impact of replacement. Every effort should be made to use existing buildings.	Note request regarding Policy 33 to add that upgrading an existing building is preferable to replacement because of the environmental impact of replacement. Draft Plan policy has been amended for clarity that retaining the existing dwelling is preferable.

76	PA--70-22	Emery Planning	<p>Part b of the policy states that replacement dwellings will only be permitted where the existing dwelling lacks basic amenities or is in a state of disrepair that cannot be feasibly repaired or retrofitted through alteration and/or extension to make it habitable. There is no justification for such an approach, which appears to assume that a replacement dwelling would be harmful to the special qualities of the National Park. Each case needs to be considered on its own merits, but in principle it is entirely possible that a replacement dwelling can be of sufficiently high quality such that it would conserve and/or enhance the valued character and special qualities of the National Park, noting that not all existing dwellings in the National Park are of high quality.</p>	<p>In response, replacement is not harmful, but the purpose of the policy is to protect the availability of smaller dwellings and to reduce unnecessary carbon production.</p>
76	PA--7-7	Adam Maxwell	<p>Can we specify this does not apply to residential caravans? This is a very restrictive policies. There will be very few proposals that meet b. How do we assess whether it is feasible to repair or retrofit? What does feasible mean? It will not be feasible to the applicant who desires a replacement dwelling. Do we mean possible? c original dwelling can not be removed beforehand if it is occupied. e what is similar? We had many arguments about this in the past. Do we consider PD fall back. Becomes an equation and misses the point about enhancement.</p>	<p>Note the request that it does not apply to residential caravans. Agree it is a restrictive policy because it is about more than what a property looks like and what the visual impact a new dwelling may have on the landscape, which has up until now been the baseline for how replacement dwellings have been assessed. The new policy takes a more holistic approach to replacement dwellings and includes protecting smaller sized properties that contribute to the choice and range of housing stock; supporting small families, couples, individuals and ensuring there is a range of house prices. Note the practicality issues of the policy and clarity is provided in the policy and supporting text. The purpose of the policy is that it addresses more than visual enhancement.</p>

76	PA--89-31	Holme Valley Parish Council	Support noted.	Support noted.
76		Derbyshire County Council	We confirm our agreement with Policies 32, 33, and 34.	Support noted.

Policy 34 Residential gardens				
Point #	Comment #	Representor name	Summary for Comment	Officer response
77	PA--31-13	Edale Parish Council	Edale PC We agree that gardens could be used as specified, unless it damages the surrounding area. The parish council must be involved in decision making.	Note support. Parish Councils are consulted on planning applications in their area.
77	PA--38-14	Peak Park Parishes Forum	Policy 34 residential gardens we agreed that these should be used, unless it damages the surrounding area. The parish council must be involved.	Support noted. Parish Councils are consulted on planning applications in their area.
77	PA--45-12	Eyam Parish Council	NULL	NULL

77	PA--64-6	Youlgrave Community Land Trust	We trust that clear guidelines regarding residential gardens refers to hard-standing for off-road carparking to existing properties, where some planting and porous surfaces should be encouraged. (In Youlgrave this applies to the Grove Place estate).	Note request that planting and porous surfaces should be encouraged. This will be addressed in the Design Code (future publication).
77	PA--7-32	Adam Maxwell	Will all garden extensions need a separate access? d is repeating other policies.	Draft Plan policy wording amended and the design aspects taken out as these are addressed in other Draft Plan policies.
77	PA--89-53	Holme Valley Parish Council	Support noted.	Support noted.
77	PA--93-14	Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplwdale	Properties need amenity space outside and designated parking, without adversely affecting the surrounding area.	Noted. Draft Plan policy wording amended and the design and parking aspects taken out as these are addressed in other Draft Plan policies.
77		Derbyshire County Council	We confirm our agreement with Policies 32, 33, and 34.	Support noted.

Rural economy

Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
78	Chapter 10	PA--16-5	Peter Leppard on behalf of @ Bamford with Thornhill Parish Council	Policy 35: The designation of Station Rd, Bamford is OK on the west side of the road, but the east side of the road is arguably very suitable for housing, so an "employment sites" designation of the east side is unhelpful and unsuitable. Policy 38: Clause A(v) is too prescriptive - such detail is arguably unnecessary.	Policy 35 The existing safeguarded site of Station Road Bamford is located on the west side of the road. The proposal does not relate to the east side that is open countryside and is not suitable for development. Disagree that Policy 38 Clause A(v) is too prescriptive. To justify a new agricultural building it is reasonable to require the submission of details of stocking type, numbers and density per hectare. This existing Local Plan policy is taken forward as part of the review.
78	Chapter 10	PA--31-70	Ms Joanna Collins @ Edale Parish Council	Policies to support the rural economy need to consider hospitality businesses (including need for accommodation for workers) and rural activities such as small scale makers as well as land based businesses and provision for homeworking.	The Preferred Approach consulted on accommodation for workers. The Authority decided that it would be most appropriate to support people who have a business need to live close to their place of work to access affordable housing. That's not to say that policy could not support accommodation for workers. There is already a route for accommodation through the provision of annexes and this will be taken forward. Policy supports local businesses and will continue to support local businesses, for example through safeguarding employment sites, supporting business extensions. Housing policy supports the provision of extensions or annexes to support homeworking. Policy will continue to support in principle business use in heritage assets in the countryside subject to location. Policy will continue to support homeworking.
78	Chapter 10	PA--33-3	Mrs Sarah Battarbee on behalf of @ Peak Park Parishes Forum	Peak Park have indicated that it wishes to have a status quo policy were identified and current brownfield sites are maintained as far as possible. Any greenfield development for businesses is discouraged. A certain amount of increase in home working is considered to be a way forward but no consideration is	Note the request to maintain employment sites as they are and resist new employment sites on greenfield land. In response, the draft Local Plan takes forward existing safeguarded employment sites and seeks to safeguard a further 5 sites. This is to support the provision of business space for current and future needs. Building on greenfield sites in policy will be restricted to demonstrating

			<p>being given in the policy of how the internet can either be more widespread or speeds increased to make homeworking viable. We feel improved connectivity is essential to support both homeworking and other aspects of the rural economy. The Local Plan should therefore actively support improvements to telecommunications, balancing this with consideration of landscape character. Policy could include consideration of the potential for telecoms companies to share masts. Items that seem to be missing, here and throughout this chapter, are support for Community Shops and support for training of local skills, eg dry stone walling and animal welfare. We support the idea of a local community advisory service. Policy 37 includes the provision that Previous extensions, alterations and increased activity that have required planning permission will be taken into consideration. We strongly support this and suggest that it is extended to all planning applications. Peak Park support farm diversification, which is surely greenfield development, certainly if ground-mounted solar panels and tourist sites are the diversifications that are allowed. The section on slurry treatment could and should be important because of its effect on greenhouse gases. We support constraints on anaerobic digesters. This section overall does not consider sufficiently how to cope with future changes such as climate change and other legislation. It also does not mention the possibility of green energy farms. Councils are looking towards introducing Solar Panels and wind turbines, which can all be revenue</p>	<p>exceptional circumstances and to prioritise locating on an existing safeguarded or business site in the first instance. Note the request to support homeworking and improve internet connection. In response, housing policy supports homeworking through extensions and annexes. Improved internet connection is a requirement of new development through the utilities policies. Note the request for mast sharing. This is already policy in the Local Plan that is taken forward. Note the concern that the topic lacks support for community shops and the support for training local and traditional skills. In response, text will be strengthened to give clarity that the Authority does support community shops and training of local and traditional skills. Note reference to a local community advisory service - need more information on what this is. Note the support to take into account previous extensions and alterations to businesses and that this should be a principle thread for all planning applications. Note the support for farm diversification. Note the support to manage slurry treatment and the constraints on anaerobic digesters. Note the concern that the topic does not sufficiently respond to climate change or the possibility of green energy farms and that the plan should have a specific policy on solar panels and wind turbines as well as telecoms masts. In response, climate change issues are addressed in Local Plan chapter on climate change. It is not good practice to repeat policy throughout the plan. Telecoms mast policy is addressed in the Utilities chapter of the Local Plan.</p>
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				earners. Should the Peak Park have a policy on these items, as well as telecoms masts.	
78	Chapter 10	PA--64-8	Youlgrave Community Land Trust.	The proposals will better ensure thriving communities.	Support noted.
78	Chapter 10	PA--69-21	Tarmac	This chapter should make reference to and/or acknowledge the mineral industry and the contributions it makes to the local rural economy through business rates and local employment (both skilled and unskilled).	Noted that the chapter should make reference to and/or acknowledge the mineral industry and the contributions it makes to the local rural economy through business rates and local employment (both skilled and unskilled). The introduction section of the chapter on the Rural Economy in the draft Local Plan makes reference to this and directs people to the draft Local Plan Minerals chapter.
78	Chapter 10	PA--120-6	Fawfieldhead Parish Council	We strongly disagree and are very concerned that only farmsteads that are on the edge of settlements, physically well related to a settlement, and in a sustainable location with direct and close access to a road would be considered suitable for low intensity uses. This change would have a tremendous impact on our Parish, as we have no central village and the vast majority of which would be classed as open countryside. Has the Peak Park considered how it would impact parishes like ourselves? We have good examples in Fawfieldhead of where farmsteads in the open countryside have been converted successfully to provide housing to serve the local community. This has provided much needed local accommodation. One of the major problems in rural areas is decreasing populations, isolation and reduction in services. We need thriving communities and the conversion of farmsteads, away from the edge of settlements would do much to alleviate this. We are short of residential accommodation and not visitor accommodation. Holiday accommodation does little to support the local community.	Note the request that isolated farmsteads are permitted to be converted to new uses and not restricted to holiday homes, which are not considered by the respondent to be less intensive than permanent residential use. And that parishes that have no main settlement are struggling to maintain an active local community. In response, the Local Plan introduces a primary occupancy condition for all new housing development where it is appropriate (there are some exceptions that are listed in policy). The draft Local Plan acknowledges the role hamlets have and supports limited housing development in hamlets. With regards to farmsteads, if it is a designated heritage asset and the optimum viable use is business then this could be considered acceptable in the open countryside to preserve and support the continued conservation of a heritage asset, subject to its location and impact on the landscape. This would be assessed on a case-by-case basis as the impact of conversion to residential use can bring with it urbanising features like driveways and gardens that can be harmful to the special qualities of the National Park.

				<p>We also think it is important that if farmsteads wanted to start a business, this should be retained. Again we have examples in the parish of where farmsteads are being used for businesses to support the local community. The Peak Park continues to refer to holiday accommodation as 'less intensive use'. Often farm buildings are converted for group accommodation that brings a much greater numbers of cars than residential and a greater intensity Of noise and disturbance (fireworks, parties, late nights etc). The Peak Park sites residential gardens etc, but if it's possible to restrict outdoor space for holiday, then it would also be possible to restrict outdoor space for residential if this is an argument against residential? Holiday accommodation equally provides outdoor space for guests, with areas for recreation/games, seating, hot tubs etc. This does seem not to be taken into account in the policy. Residential, is in fact less intensive, but the Peak Park still fails to appreciate this. Due to figures showing the percentage drop in population of both young and working people within the Peak Park, it is even more important that building in farmsteads should be-able to be converted for residential use in the open countryside.</p>	
79	Draft Policy Direction 19	PA--7-13	Adam Maxwell @ Peak District National Park Authority	In or on the edge of settlements in the strategy?	Clarify that the policy aligns with the Development Strategy. The Business Development Strategy sets out a requirement for businesses to locate on existing safeguarded employment sites or other business sites or on previously developed land before considering a greenfield site.
79	Draft Policy Direction 19	PA--20-5	individual	Business Development Omit permission on greenfield sites in principle on the edge of settlements	Note request. In response, the Business Development Strategy sets out a requirement for businesses to locate on existing safeguarded employment sites or other business sites or on previously developed land before considering a greenfield site.

79	Draft Policy Direction 19	PA--31-56	Ms Joanna Collins @ Edale Parish Council	A certain amount of increase in home working is considered to be a way forward but no consideration is being given in the policy of how the internet can either be more widespread or speeds increased to make homeworking viable. We feel improved connectivity is essential to support both homeworking and other aspects of the rural economy. (See under Utilities) Items that seem to be missing, here and throughout this chapter, are support for Community Shops and support for training of local skills, eg dry stone walling and animal welfare. We support the idea of a local community advisory service.	Comments noted. Note the request to support homeworking and improve internet connection. In response, housing policy supports homeworking through extensions and annexes. Improved internet connection is a requirement of new development through the utilities policies. Note the concern that the topic lacks support for community shops and the support for training local and traditional skills. In response, text will be strengthened to give clarity that the Authority does support community shops and training of local and traditional skills. Note reference to a local community advisory service - need more information on what this is.
79	Draft Policy Direction 19	PA--38-15	Peak Park Parishes Forum	Draft Policy direction 19 Peak Park have indicated that it wishes to have a status quo policy were identified and current brownfield sites are maintained as far as possible. Any greenfield development for businesses is discouraged. A certain amount of increase in home working is considered to be a way forward but no consideration is being given in the policy of how the internet can either be more widespread or speeds increased to make homeworking viable. We feel improved connectivity is essential to support both homeworking and other aspects of the rural economy. The Local Plan should therefore actively support improvements to telecommunications, balancing this with consideration of landscape character. Policy could include consideration of the potential for telecoms companies to share masts. Items that seem to be missing, here and throughout this chapter, are support for Community Shops and support for training of local skills, eg dry stone walling and animal welfare. We	The Business Development Strategy sets out a requirement for businesses to locate on existing safeguarded employment sites or other business sites or on previously developed land before considering a greenfield site. Policy E8 supports homeworking. Policy U6 address improved infrastructure connectivity. Policy S1 supports the provision and retention of community shops, facilities and services. Note policy needed to explicitly reference shops and that this had been omitted by mistake. Note the request to specifically refer to support for the training of local skills such as dry-stone walling and animal welfare. There is no policy in the Local Plan for this but it could be included as a material consideration as part of a planning application as it would be in pursuant of National Park purposes. Unsure what a local community advisory service is and perhaps this is a service that should be provided by the Local Administrative Authority.

				support the idea of a local community advisory service.	
79	Draft Policy Direction 19	PA--45-15	Dr Peter Silley on behalf of @ Eyam Parish Council	NULL	NULL
79	Draft Policy Direction 19	PA--52-3	Tideswell Parish Council	Supporting local enterprise and sustainability of businesses within the Parish We encourage the Plan to contain positive policy signals for small local businesses, hospitality, social enterprises and other community-focused uses so that parishes can flourish economically and socially. This includes supporting adaptive reuse of derelict or underused buildings where proposals conserve character, enable employment and bring community benefit.	Support for local enterprise and business noted, including supporting adaptive reuse of derelict or underused buildings where proposals conserve character, enable employment and bring community benefit. The conversion of heritage assets is supported through Policy CH2 and new business is supported through Policy E1.
79	Draft Policy Direction 19	PA--93-7	Mr Nicholas Williams on behalf of @ Parish of G Hucklow, Grindlow, Windmill, L Hucklow and Coplwdale	We don't see that the economic needs assessment is correct in saying that greenfield sites are unlikely to be viable. There is such a business space shortage that there is an effective local market for that kind of property.	In response, it is a matter of opinion and we are guided by our consultants on the matter. Policy E1 supports business development in principle on greenfield land subject to existing employment sites and previously developed sites being considered first. Disagree that there is a large business space shortage, the Icen report on employment land does not identify that, moreover it recommends further space can be accommodated on existing employment sites.
79	Draft Policy Direction 19	PA--106-30	Taddington and Priestcliffe Parish Council	There are many buildings, mainly agricultural, that may not be fully used and which the National Park Authority cannot deal with under Policy 6 for legal or practical reasons. They are a resource that could be put to other uses, especially commercial, but also housing. Outside the National Park they will have permitted development rights for such uses. The conversion of heritage assets is also recognised as a potential route to business development, many such buildings being on or close to farmsteads and need to be	Policy CH2 provides opportunities to convert heritage assets and Policy E6 supports farm diversification. Some buildings are isolated and are either not worthy of conversion or are not located in a suitable location without harming first purpose Special Qualities.

				reconciled with Policy 39, which would limit such opportunities.	
80	Policy 35	PA--7-45	Adam Maxwell @ Peak District National Park Authority	In policy or supporting text we need to be very clear what we mean by Employment use Business use / other suis generis uses	Greater clarity has been provided in the Local Plan economic policies.
80	Policy 35	PA--29-1	Bamford with Thornhill Parish Council	The designation of Station Rd, Bamford is OK on the west side of the road, but the east side of the road is arguably very suitable for housing, so an "employment sites" designation of the east side is unhelpful and unsuitable.	The east side of Station Road Bamford is not recommended for employment safeguarding. Policy E2 proposes to take forward the existing designation on the east side.
80	Policy 35	PA--49-1	Mrs Amanda Brown on behalf of @ DDDC	Calver Garden Centre could be considered as a new safeguarded employment site.	Note request from DCC asking if Calver Garden Centre could be considered as a new safeguarded employment site. In response, the Authority have decided not to safeguard this site as Calver already has a safeguarded employment site and the site in question would be more suited to a mix of uses.
80	Policy 35	PA--55-16	Mrs Claire Sansom on behalf of @ Staffordshire Moorlands District Council	SMDC The Council is concerned over rural employment, the lack of which is surely a driver for the aging population etc. and as such supports the safeguarding of Upper Hulme Mill as stated.	Note the concern from SMDC about rural employment. The ageing population is a national issue, but historically the National Park population has tended to be older. Note the support from SMDC to safeguard Upper Hulme Mill. In response the Authority acknowledges that the community has put a lot of effort into the Neighbourhood Plan(NP) and how it would like to see the Mill site developed. The Authority supports the community in this respect. If/when planning applications are submitted for the redevelopment of the site, they will be assessed against the policies in the Local Plan and the Authority will need to give weight accordingly.
80	Policy 35	PA--62-1	individual	I have just received an SES notification for Upperhulme mill site proposal to change to a safeguarded employment site .I would like to point out that this proposal is incoherent and in direct conflict with the already adopted neighbourhood planning policy for Leekfrith parish 2019- 2033 . The policy document was accepted and agreed by all at its inception , it clearly states that the greater needs of the local population are not for employment have	Note concern that a lot of work had been put into the Leekfrith NP and that this would change the approach that the community had supported. In response the Authority acknowledges that the community has put a lot of effort into the NP and how it would like to see the Mill site developed. The Authority supports the community in this respect. If/when planning applications are submitted for the redevelopment of the site, they will be assessed against the policies in the Local Plan and the Authority will need to give weight accordingly.

				not been in recent history and unlikely to be in the future .This is outlined in the policy and has not changed . Please provide reasons for the proposed change and confirm if there are any proposed changes to the outlined areas in the Neighbourhood policy documents .	
80	Policy 35	PA--70-23	Mathew Fenton @ Emery Planning	We support the identification of the proposed safeguarded employment sites, particularly Riverside Business Park (incorporating Lumford Mill). In order to ensure that business parks such as Riverside continue to operate successfully, it is imperative that there is flexibility within the policy to encourage the sustainable growth and expansion of all types of employment generating businesses and enable the businesses to respond to the changing economy. This has already been a successful approach at Riverside Business Park where the range of approved uses already extends beyond the use classes now identified in the draft policy as set out above. An extant consent exists for hotel accommodation with retail and food and drink uses at ground floor and there area number of established commercial and retail type uses within the site already. These uses play a positive role both in providing a complementary service role to the wider business park but also through improving the vitality and viability of the business park as they provide greater variety of offer. There are a range of uses which would be complementary to the established primary employment use including Class E (d) indoor sport, recreation and fitness, Class E (e) medical or health services and Class E (f) day nursery. Such uses are all employment generating and would	Note support to identify safeguarded employment sites and in particular Riverside Business Park. Note the request for flexibility within the policy to encourage he sustainable growth and expansion of all types of employment generating businesses and enable the businesses to respond to the changing economy. In response, it is important to ensure that the Local Plan safeguards sufficient space over the life time of the plan for B2, B8 and E(g) uses. Over the Local Plan period business demand is for a further 5.5ha of B2, B8 and E(g) employment space. Existing safeguarded sites can help contribute towards approximately 2ha of this through intensification and redevelopment. Therefore, it is important to protect the employment space that already exists in light of the fact that there is not a surplus of employment space in the National Park. Other uses should be directed towards town centres and Local Plan policy requires this.

				<p>support the existing provision on the site. The following wording is therefore suggested to meet the aim of the policy: A The following sites are identified on the Policies Map and will be safeguarded for employment uses (primarily B2, B8, E(g)).B Any proposals for alternative uses must ensure that: i employment use remains the primary use, and;ii the new use is compatible with employment use, including by size, scale and operation. C Applications for sui generis use that are compatible with B2, B8 and E(g) are acceptable in principle.</p>	
80	Policy 35	PA--75-1	individual	<p>As you are aware, there was a neighbourhood plan drawn up for Leekfrith with a significant focus on the Upper Hulme Mill site. The neighbourhood plan consulted with local residents and businesses and resulted in a referendum in 2021. There was a majority vote to accept the neighbourhood plan and our understanding was that the neighbourhood plan would be incorporated into the the wider Peak District National Park Local Plan, having been supported by the Peak District National Park Authority. Regarding the buildings that are referred to in Policy 1: Redevelopment of Upper Hulme Mill of the neighbourhood plan as detailed in red and blue hatching on the site plan (figure 2). An extract from the neighbourhood plan is given below: Policy 1: Redevelopment of Upper Hulme Mill A. Redevelopment of the Upper Hulme Mill site broadly in line with the requirements set out below, and as indicated on the site plan (figure 2) is supported: (i) in the red hatched area, significant enhancement of the site and its surroundings is required by removal of non-traditional</p>	<p>Note the request to maintain the status of the Leekfrith NP in the Local Plan. In response the Authority acknowledges that the community has put a lot of effort into the NP and how it would like to see the Mill site developed. The Authority supports the community in this respect. If/when planning applications are submitted for the redevelopment of the site, they will be assessed against the policies in the Local Plan and the Authority will need to give weight accordingly.</p>

				<p>structures and buildings and the replacement with new build, traditionally designed dwellings with associated parking and garaging. (ii) in the blue hatched area all the existing traditional buildings should be retained. Conversion to new dwellings/apartments, holiday accommodation, and B1 business (small craft businesses with ancillary retail) may be suitable. The red hatched area states that there is support for residential redevelopment from the current commercial buildings. The blue hatched area states that there is support for conversion of existing buildings to either permanent residential or holiday accommodation as well as B1 business use. As the red and blue identified areas include residential redevelopment this seems at odds with the proposal in the draft Local Plan Review to designate these areas as safeguarded employment sites which would prevent any residential use in the future. The justification given for safeguarding this area as an employment site is "to avoid the permanent loss of the best business sites" and "supply of well-located business sites". The reality is that the red and blue hatched areas of the Upper Hulme Mill site are not ideally located for businesses due to the single track road that passes though the site and makes parking and deliveries particularly challenging, especially with delivery vehicles needing to block the whole carriageway. This was highlighted in the answers provided to question 2 in the neighbourhood survey and one of the justifications for proposing residential redevelopment, Also moving industrial units away from the main</p>	
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				<p>thoroughfare would eliminate the issues we have with loading/unloading. The full justification for the redevelopment of the site is given in the neighbourhood plan so I will not repeat it here. A lot of time and effort was put into developing the Leekfrith Neighbourhood Plan that was shown to meet all legal criteria and was in agreement with local residents, businesses and support from both Staffordshire Moorlands District Council and the Peak District National Park. This culminated in an official referendum on 6th May 2021 where a majority yes vote endorsed the plan. We ask that the Peak District National Park adopt Policy 1 of the Leekfrith Neighbourhood Plan, as agreed in the referendum and without further amendments, into the Local Plan and remove the requirement to assign the Upper Hulme Mill site as a safeguarded employment site.</p>	
80	Policy 35	PA--89-3	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Support noted.	Support noted.
80	Policy 35	PA--121-23	Castleton Parish Council	Policy 35 has a list of employment sites. In reality, how many local people work at these businesses, and is this a factor in determining which business sites to safeguard? For the purpose of this policy should local (people) be defined as Hope Valley?	Like any Local Planning Authority area, the Local Plan must plan for current and future business needs of the local economy. A local business isn't defined by the number of local people working for it.
80	Policy 35	PA--133-1	individual	I would like to make you aware that we own the largest proportion of Upperhulme Mill and have not received any correspondence from yourselves regarding this matter. We also facilitate 90% of the parking, free of charge, for the use of other mill owners and their employees. The car park also provides a pull in area which enables the constant flow	Note the request to maintain the status of the Leekfrith NP in the Local Plan. In response the Authority acknowledges that the community has put a lot of effort into the NP and how it would like to see the Mill site developed. The Authority supports the community in this respect. If/when planning applications are submitted for the redevelopment of the site, they will be assessed against the policies in the Local Plan and the Authority will need to give weight accordingly.

				<p>of traffic to pass through the village with minimal interruption. Due to the fact we do own a part of the mill we feel that we should have had notification from yourselves and have a right to give an opinion. We do not fully understand what the SES notification is about or why there is a need for it as there is a Neighbourhood plan already in place. Upperhulme Mill provides units for a number of successful small businesses, providing employment for a large number of local people. We do not see the necessity for change, particularly anything that would jeopardize the Neighbourhood Plan. We understand that there may not have been a lot of activity within the Neighbourhood Plan at present but our concern is that your "proposed safeguarded employment site" may affect the Neighbourhood Plan in the future. The Neighbourhood Plan took a lot of time, planning, effort and money by various people including yourselves. The owners of Upperhulme Mill work together with the local community to ensure a happy community, another reason not to have any change.</p>	
81	Policy 36	PA--31-15	Ms Joanna Collins @ Edale Parish Council	Add to last point: and to thriving communities	Noted.
81	Policy 36	PA--49-2	Mrs Amanda Brown on behalf of @ DDDC	Significant enhancement to SQ with the site seems a high bar to set that may prevent reasonable development	Note concern that significant enhancement to SQ with the site seems a high bar to set that may prevent reasonable development. Local Plan policy requires enhancement to be proportionate but expected in a National Park in accordance with the requirement to further purposes.
81	Policy 36	PA--70-24	Mathew Fenton @ Emery Planning	We suggest that the requisite marketing period is reduced to 6 months. 12 months stagnates the site, often leaving it vacant and derelict (with adverse landscape and visual consequences for the National Park), and	Note the request to reduce the marketing period to 6 months from 12. An applicant can already put forward reasoned justification to the LPA to market a property for a reduced period that the Authority will consider however, exceptional circumstances would need to apply for the Authority not to follow policy.

				results in significant additional costs for landowners. Where sites have been unsuccessfully marketed for 6 months, a further 6 months worth of marketing will almost certainly prove unnecessary and futile and once the planning process is factored into any redevelopment proposals, could mean the site could be vacant for 2-3 years if it was necessary to progress a proposal through appeal. Given this is by definition the redevelopment of previously developed land, a more positive and proactive approach should be taken that can rely on expert evidence on site marketability that could be subject to independent scrutiny as part of the application process.	
81	Policy 36	PA--89-4	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Should questions about sustainability and energy efficiency be asked?	Note the request for the policy to include details on sustainability and energy efficiency. In response these issues are considered in the climate change policies. The Local Plan should be read as a whole, it is not good plan-making practice to repeat policies.
82	Policy 37	PA--7-20	Adam Maxwell @ Peak District National Park Authority	A ii - we allow on the edge in other policies? iii and iv are repeating? B not precise - subservient could mean an extension 90% of the size of what is there? Then they could extend again? Needs to be emphasis on small scale accommodated without harm.	Policy E3 has been amended to include C that allows some greenfield development in exceptional circumstances and subject to strict criteria. Policy E3 has been amended to state that extensions must be small scale without harm.
82	Policy 37	PA--31-71	Ms Joanna Collins @ Edale Parish Council	Previous extensions, alterations and increased activity that have required planning permission will be taken into consideration. We strongly support this and suggest that it is extended to all planning applications.	Note strong support in the consideration of previous extensions and alterations and that this be extended to all planning applications
82	Policy 37	PA--38-16	Peak Park Parishes Forum	Policy 37 includes the provision that Previous extensions, alterations and increased activity that have required planning permission will be taken into consideration. We strongly support this and suggest that it is extended to all planning applications. Peak Park support farm diversification, which is surely greenfield	Note the support that all planning applications consider previous extensions and alterations in the decision making. Note the support for farm diversification. Note the support to control slurry treatment and the constraints for anaerobic digesters. Note the request that the policies could do more for climate change and consider green energy farms and specific policies on

				<p>development, certainly if ground-mounted solar panels and tourist sites are the diversifications that are allowed. The section on slurry treatment could and should be important because of its effect on greenhouse gases. We support constraints on anaerobic digesters. This section overall does not consider sufficiently how to cope with future changes such as climate change and other legislation. It also does not mention the possibility of green energy farms. Councils are looking towards introducing Solar Panels and wind turbines, which can all be revenue earners. Should the Peak Park have a policy on these items, as well as telecoms masts.</p>	<p>solar and wind, and telecom mast sharing. These issues have been addressed in other policy areas.</p>
82	Policy 37	PA--70-25	Mathew Fenton @ Emery Planning	<p>The blanket restriction on the expansion of existing businesses into the open countryside under Part A ii) and the arbitrary restriction on scale and form for expansion of existing businesses already located within the open countryside under Part B ignores the support that successful local businesses should be afforded. The Policy already provides protection and an ability to resist development that results in harm through either landscape impact or for other locational reasons and therefore it is unnecessary and unreasonable to add a further restriction simply because a pre existing business may be located in the open countryside or on the edge of a settlement where the only option may be to expand into the open countryside to safeguard the future of the business. The policy approach is unrealistic in expecting a business to potentially relocate where it could otherwise expand without harm and that in itself would be harmful to the local economy and</p>	<p>Note concern that policy does not provide support that successful local businesses should be afforded. Note that the policy already provides protection and an ability to resist development that results in harm through either landscape impact or for other locational reasons. Note concern regarding further restrictions on size. Note concern that the policy expects a business to potentially relocate where it could otherwise expand without harm and that in itself would be harmful to the local economy and population as well as resulting in the potential for further out-migration from the National Park.</p> <p>In response, Policy expects businesses to understand that in locating in the National Park they understand the restrictions and limitations that prevail and the possibility that they may have to relocate if their business outgrows the site.</p>

				population as well as resulting in the potential for further out-migration from the National Park.	
82	Policy 37	PA--89-69	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Should account be taken of the impact on surrounding residents and building users? For example the impact of emissions, noise, light etc	Yes, agree. Core Policies address these issues.
82	Policy 37	PA--106-31	Taddington and Priestcliffe Parish Council	B Businesses in the open countryside can be important to the local economy, provide local services and employ local people. The main issue is not the size of the premises nor history of extensions but how it sits in the landscape and its impact on, e.g., environment, traffic, nature etc. This policy requires a balanced approach that takes account of these but also considers issues such as the extent to which its staff live locally, the impact on the local economy, alternative travel, the availability of realistic alternatives for the business in the locality and so on.	The policy and when read with other relevant policies on landscape and development management address the points made. If a business requires to expand beyond the capacity of the landscape in which it sits it will need to relocate. It is not for the landscape to adapt to the business but rather the business adapt and if required move to a more appropriate location that meets its needs.
83	Policy 38	PA--7-3	Adam Maxwell @ Peak District National Park Authority	A just say agricultural and forestry development? Again B should just say the above?	Noted and the policy has been amended.
83	Policy 38	PA--29-2	Bamford with Thornhill Parish Council	Clause A(v) is too prescriptive - such detail is arguably unnecessary.	Clause A(v) is required to justify a new agricultural building. It is established policy and is proposed to be taken forward.
83	Policy 38	PA--31-49	Ms Joanna Collins @ Edale Parish Council	Agreed, but there may be problems of enforcement. Also problematic may be balancing these requirements with the need to support upland farmers (as in Edale) for mixed and thriving communities.	Support and concerns noted.
83	Policy 38	PA--89-54	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Should questions be asked about the disposal of waste and by-products, sustainability and energy efficiency?	Note request for policy to consider the disposal of waste and by-products, sustainability and energy efficiency. Policy E7 seeks to do this. Other Local Plan policies address energy efficiency.

84	Policy 39	PA--31-65	Ms Joanna Collins @ Edale Parish Council	<p>Farm diversification is surely greenfield development, certainly if ground-mounted solar panels and tourist sites are the diversifications that are allowed.</p> <p>Diversification should not detract from the Park's Special Qualities. The section on slurry treatment could and should be important because of its effect on greenhouse gases. We support constraints on anaerobic digesters. This section overall does not consider sufficiently how to cope with future changes such as climate change and other legislation. It also does not mention the possibility of green energy farms.</p>	<p>Note concern that farm diversification is greenfield development and that diversification should not harm Special Qualities. Local Plan policies when read as a whole make it clear that development should not harm Special Qualities. Note support to control slurry treatment and the constraints on anaerobic digester. Note the request to consider better climate change and the possibility of green energy farms, this is addressed in Local Plan policy CC2.</p>
84	Policy 39	PA--89-5	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	<p>How does this take into account the conversion of farm buildings into holiday lets and the construction of things like Shepherds Huts and Yurts? Again, question sustainability and energy efficiency of new buildings.</p>	<p>Policy E6 supports farm diversification through holiday accommodation. The Recreation and Tourism policies also support holiday accommodation on farms. These issues are addressed in other topic areas. Sustainability and energy efficiency are addressed in Core Policies and policy CC1. It is not good practice to repeat policies.</p>
84	Policy 39	PA--123-15	David Peck on behalf of @ Devonshire Group	<p>The premise of the part A of the policy is misguided. There is no need to distinguish between new and primary business and ownership/control is irrelevant since what matters is that the business(es) are sustainable (economically, environmentally) and operate within acceptable parameters (traffic, noise, landscape, building design etc). The question presupposes that the agricultural business (i.e. the use of the land) is and will remain the predominant generator of value. This may be incorrect. The largest proportion of a business assets (by area or value) may be the land but the use of, for example, 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</p>	<p>Note the hypothetical situation that a business could generate more financial value than the financial farm land or land management value. However, the primary purpose of farm diversification is the farm and to support land management. Businesses can locate in settlements; they don't need to locate on farms. Disagree farm diversification stifles innovation. Innovation can occur elsewhere.</p>

				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 seeks to restrict new business opportunities in-so-far as they must be linked to an existing agricultural operation risks stifling innovation and ultimately be detrimental to the economic fabric of the NP, with negative consequences on social and environmental issues.	
85	Policy 40	PA--19-11	Natural England	Natural England would wish to ensure that the impact of ammonia emissions from anaerobic digesters on natural habitats are fully considered. The impact of ammonia should also be considered within the HRA.	Note concern. The impact of ammonia will be considered within the HRA and any advisory notes to amend policies acted on.
85	Policy 40	PA--89-22	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Agree.	Note support

Shops, services and community facilities

Point Name	Total Comments	Name	Summary for Point	Response for Point
Chapter 11	PA--33-4	Mrs Sarah Battarbee on behalf of @ Peak Park Parishes Forum	We generally support these policies. In particular, we would encourage retention and development of village shops and pubs. Policy Direction 20 we suggest that the last point should apply to all decisions regarding community facilities. This needs to be consistently followed since Parish Councils are often best placed to understand and consult on their communities needs.	Note the support for the retention of village shops and pubs. Note the suggestion that Parish Councils are often best placed to understand and consult on their communities needs and should be involved regarding all community facilities. Policy S4 requires applicants to consult with Parish Councils as part of their applicant process.
Chapter 11	PA--64-9	Youlgrave Community Land Trust	We agree with the continued support of shops services and community facilities policies	Support noted.
Chapter 11	PA--83-13	Mr Dave Locke @ Bakewell Safer Cycling Group	A rail reinstatement and the subsequent development of both active travel routes and improved local bus services would ensure our shops, services and community facilities thrived. If we are trying to develop a flourishing economy then please look at other reinstatement projects and the difference they have made.	Refer to the transport chapter on rail reinstatement. The Authority supports active travel.
Chapter 11	PA--114-4	Over Haddon Parish Council	The majority of PDNPA villages have lost their schools and shops and even their public transport and Over Haddon is no exception. Currently 1 in 4 of the houses in our village is a holiday home. We need to have a cap on second homes and holiday homes and have a regular bus service that would be beneficial to both residents and visitors	Note support to limit second homes and holiday homes. The Housing chapter supports primary occupancy. Note support for a regular bus service, the Authority supports active travel, but it is not in charge of the public transport network.
Policy 41	PA--7-16	Adam Maxwell @ Peak District National Park Authority	B ii - do we want to lose every pub until there is one left?	Policy S4 has strengthened the policy approach regarding the protection and retention of shops and community services and facilities.
Policy 41	PA--31-75	Ms Joanna Collins @	Mostly agreed although we do not think development should be allowed on sports facilities, especially as any	Note support in general and that sports facilities should be protected as any replacement is likely to encroach

		Edale Parish Council	replacement is likely to encroach on the countryside. We generally support these policies. In particular, we would encourage retention and development of village shops and pubs	on the countryside. Note the support to retain and support village shops and pubs. The policy approach to village shops and pubs and sports facilities in policies S4 and S5 has been strengthened.
Policy 41	PA--43-3	Bakewell Town Council	Business, Retail, and Community Facilities: Developments in these sectors should be permitted, provided they adhere to sequential tests and policies that favour a town centre location and help maintain a thriving local economy. Efficient Land Use: All development proposals should utilise land efficiently, with a preference for reusing existing buildings whenever possible. Traffic Considerations: Regarding new housing development, the Council requests that careful consideration be given to the potential impact of increased traffic movements on existing homes from any new home development.	Note support for business, retail and community facilities provided they adhere to sequential tests and policies that favour a town centre location and help maintain a thriving local economy. Policies S1-4 work together to support town centre locations. Note support for the efficient use of land and a preference to reuse existing buildings wherever possible. Agree and policy reflects this. Note request for careful consideration of increased traffic movements on existing homes from any new home development. Agree and policy reflects this.
Policy 41	PA--45-24	Dr Peter Silley on behalf of @ Eyam Parish Council	Fully supported, this is very important	Support noted
Policy 41	PA--46-2	Stuart Morgans @ Sport England	The policy and the supporting text is clear that the policy is to be applied to proposals affecting sports facilities and land. Whilst Sport England supports the principle of including a policy that protects sports facilities, as drafted, the wording of the policy is not consistent with national policy, set out within para 104 of the Framework. In particular, the wording in Part D of the policy including 'satisfactory replacement' and 'no longer required' raises cause for concern regarding interpretation as this phrasing is looser than the wording in national policy. Furthermore, the wording of the policy does not address para 104c) of the Framework. Also, the wording of the policy would seem to relate solely to the loss of use of existing sports facilities and does not address proposals in the vicinity of a sports facility that may prejudice its use. We would recommend that part D of the policy is removed, and that the policy justification	Note objection by Sport England to the wording of the policy. The policy approach has been reviewed and Policy S5 has been written to reflect the wording as requested.

			is amended to clarify that policy 41 relates solely to other community services and facilities that are not sports facilities, explaining that sports facilities are covered by policy 42. In the absence of appropriate amendments to the policy to address these points, Sport England wishes to object to the policy as drafted	
Policy 41	PA--48-2	Mr Matthew Lovell on behalf of @ Middleton and Smerrill Parish Council	Proposals to change the use of buildings on sites which provide community services and facilities including shops, and financial and professional services to non-community uses must demonstrate that the service or facility is: i no longer needed; or ii available elsewhere in the settlement; or iii can no longer be viable. It is our view that this Policy is critical. In some settlements the loss of a community asset or facility would be an unacceptable and irretrievable loss. It is one of the Special Qualities of the Peak District that it contains characteristic settlements with strong communities and traditions including communities that are able to sustain things that are important to them such as local events and Well Dressing. A local example of an essential community facility is Middleton Village Hall which is the hub of social events, meetings and group activities throughout the year	Note concern regarding how to policy was written. The policy approach in S1-4 has been significantly strengthened to address the concerns raised.
Policy 41	PA--52-2	Tideswell Parish Council	Enabling community facilities, parking and local improvements: The Parish Council wishes to see the Local Plan actively support parishes seeking to improve community facilities. In particular, we ask that the Plan makes it easier for parish councils and local organisations to bring forward improvements such as community car parking, sports and recreation facilities, and essential infrastructure. Practical, proportionate policy guidance and clear, timely advice from the Authority would help parishes deliver beneficial local projects. Community assets and recreation & health and social well-being TPC would like to see the Local Plan explicitly recognise and support community assets and recreational provision as important contributors to public health and social wellbeing. Policies that help secure improvements to open spaces, recreation facilities and	Comment noted. Policies in the Draft Local Plan chapter on Shops and community services and facilities has strengthened the Authority's approach to supporting and retaining community shops, services and facilities. The Authority supports new and improved provision where there is a need and community support. Draft Local Plan policy refers to public health and social wellbeing. Community assets can be registered with the Local Administrative Authority.

			community venues will deliver long-term benefits for residents and visitors alike	
Policy 41	PA--55-15	Mrs Claire Sansom on behalf of @ Staffordshire Moorlands District Council	NULL	NULL
Policy 41	PA--68-13	Mrs Claire Sansom on behalf of @ High Peak Borough Council	HPBC have no comments	HPBC have no comments
Policy 41	PA--89-43	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Agree	Support noted
Policy 41	PA--102-3	Hyacynth Cabiles @ NHS Property Service	NHS comments. Draft Policy 41 focuses on the provision of new community services and facilities and redevelopment of existing community services and facilities. Specifically, draft Policy Direction 20 concerns the change of use of buildings or sites which provide community services and facilities as existing, reflecting the criterion under Part B of draft Policy 41. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form with regards to the loss or change of use of existing community services or facilities. Where healthcare facilities are included within the Local Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHSs ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility with regards to the use of its estate to deliver its core	Note the request from NHS for flexibility and the request to amend the policy. The Draft Local Plan policy addresses these concerns in Policy S4.D.

			<p>objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification to Draft Policy 41 or supporting paragraphs to ensure the principle of alternative uses for NHS land and property will be fully supported: Proposed Modification to draft Policy 41:D. The redevelopment of a community recreation site or sports facility for other uses will not be permitted until a satisfactory replacement site or facility</p>	
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			<p>has been provided, or it can be demonstrated that the facility is no longer required. E. Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part B to C of the Policy will not apply. Proposed addition to supporting paragraphs of draft Policy 41: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part B to C of the Policy will not apply. Proposed Modification to draft Policy Direction 20: Strategic policy sets out that proposals to change the use of buildings or sites which provide community services and facilities to non-community uses must demonstrate that the service or facility is: i.no longer needed; or ii. available elsewhere in the settlement; or iii. can no longer be viable; or iv. declared surplus to the operational requirements of the NHS or identifies as part of a published estates strategy or service transformation plan. Proposed addition to supporting paragraphs of draft Policy Direction 20: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered as sufficient evidence to demonstrate the loss of an existing healthcare facility.</p>	
Draft Policy Direction 20	PA--31-90	Ms Joanna Collins @ Edale Parish Council	We think community facilities must be retained if possible	Support noted
Draft Policy Direction 20	PA--38-29	Peak Park Parishes Forum	We suggest that the last point should apply to all decisions regarding community facilities. This needs to be consistently followed since Parish Councils are often best placed to understand and consult on their communities needs	Note the request for Parish Councils to be actively involved on all planning decisions regarding community facilities. This has been added to Draft Plan Policy S4.

Policy 42	PA--31-29	Ms Joanna Collins @ Edale Parish Council	We do not support development on our sports facility. This policy could be stronger e.g. no alternative uses that do not serve community need (including housing).	Note the request to strengthen the policy to resist development on sports facilities and that there should be no alternative uses that do not serve the community need. Draft Local Plan Policy S5 has strengthened the Authority's approach to sports provision and resist redevelopment (in accordance with the requirements set out in the NPPF and advice from Sport England) and that where redevelopment can occur for it to be replaced and the site development only for uses that serve community need (including housing).
Policy 42	PA--45-6	Dr Peter Silley on behalf of @ Eyam Parish Council	Fully supported	Note support
Policy 42	PA--46-3	Stuart Morgans @ Sport England	Sport England broadly supports the intent of this policy to provide protection of existing sports facilities and land. To ensure that the wording of the policy is consistent with national policy within the Framework (para 104), and with Sport England's Playing Fields Policy and Guidance Playing fields policy Sport England, Sport England would recommend the following amendments to part A of the policy: Development that would lead to the loss of use or would prejudice the continued use of community recreation sites or sports facilities, including playing fields (including those identified on the Policies Map), will not be permitted unless: i) a robust and up to date assessment has been undertaken which has clearly shown the site or facility to be surplus to requirements for sport and physical activity is no longer required; and ii) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or iii) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss of the current or former use. The reasoned justification should then be expanded to appropriately reference that the policy is consistent with National Policy within the Framework	Note the objection by Sport England. Draft Plan Policy S5 implements the policy recommendations made by Sport England.

			and Sport England's Playing Fields Policy and Guidance. We support the reference to playing pitch strategies of the constituent authorities. The policy should be expanded to set out within a new part C of the policy that proposals for new community sports facilities, or proposals for enhancements to existing community sports facilities will be supported providing :i) The proposal can be demonstrated to meet an identified local need ii) Has been demonstrated to meet relevant design guidance for the facility proposed iii) Makes appropriate provision for accessibility for all, including by active means of travel iv) Otherwise accords with other policies within the plan. In the absence of appropriate amendments to the policy to address these points, Sport England wishes to object to the policy as drafted	
Policy 42	PA--47-2	Mr Hugh Lovell on behalf of @ Stanton in Peak Parish Council	We would request that Stanton in Peak Cricket Ground be added to the list of protected spaces Grid Ref SK24478 64282	Note Stanton in the Peak Parish Council would like Stanton in Peak Cricket Ground be added to the list of protected spaces Grid Ref SK24478 64282
Policy 42	PA--89-33	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	Agree	Support noted
Policy 43	PA--7-19	Adam Maxwell @ Peak District National Park Authority	What is the policy for LGS for development?	LGS written as a policy but is actually a draft policy direction. Need to write a policy that addresses any development proposals on a LGS.
Policy 43	PA--18-2	individual	It is difficult to know how PCs responded to the call to identify important green spaces but locally there are at least two e.g Stanton Village Green, Birchover Recreation Ground that should be included	Note the request to allocate Stanton Village Green and Birchover Recreation Ground as Local Green Space.
Policy 43	PA--20-9	individual	Local Green Spaces This is a very small list for such a large area. I do not believe many local people are aware of the possibility of including such spaces in the	Noted that the LGS list shouldn't be a moment in time but rather an evolving list. Will look into this further.

			plan. Perhaps this could be a minimum list which can be added to at any time after consideration and there could be a further program to encourage local communities to consider this opportunity?	
Policy 43	PA--31-34	Ms Joanna Collins @ Edale Parish Council	There are none in Edale	None submitted for Edale
Policy 43	PA--47-3	Mr Hugh Lovell on behalf of @ Stanton in Peak Parish Council	Stanton in Peak Parish Council would request the Village Green grid ref SK24186 64235 be added to the list of protected spaces.	Note Stanton in Peak Parish Council request the Village Green grid ref SK24186 64235 be added to the list of protected spaces.
Policy 43	PA--59-1	Mike Galsworthy @ DDDC - Estates	I refer to the proposed designation of Rutland Recreation Ground, Haddon Road, Bakewell, DE45 1AW as a Local Green Space (LGS). I write on behalf of Derbyshire Dales District Council as land owner of this site to confirm that, whilst we have no significant objections to its allocation as LGS, our only concern is that this would not curtail the limited non commercial development on the site which may be required in the future commensurate to its use as a public park and sports recreation ground. An example of this would be the future replacement of structures on the site such as the Sports Pavilion, Splash Pad, Tennis Courts and Public Conveniences. I would be most grateful if this could be considered as part of the consultation	Note comment about future development by DDDC to ensure the continued use of the open space as public open space. E.g. the future replacement of structures on the site such as the Sports Pavilion, Splash Pad, Tennis Courts and Public Conveniences
Policy 43	PA--70-26	Mathew Fenton @ Emery Planning	The evidential basis for the Local Green Space (LGS) designations is not clear. The table provided from page 143 does not explain how each site meets the criteria for LGS. Furthermore, it is incorrect to say that LGS designation does not place any new restrictions on landowners, as the Framework is clear that decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts. The PPG is clear that the LPA should contact landowners at an early stage about proposals to designate any part of their land as LGS. It is essential that this takes place. However, any landowners would	Note concern that the consultation document does not give reason for why sites have been chosen. Note concern about the text and that LGS designation does place new restrictions on land owners.

			currently be prejudiced in responding, given the evidential shortcomings identified above	
Policy 43	PA--89-21	Mr Andy Wilson on behalf of @ Holme Valley Parish Council	No comment	Noted.
Policy 43	PA--100-11	Hope and Derwent Woodlands Parish Council	The definition should be widened to include green spaces that are not in Local Plans. Just because such a space is in a village with no LP does not mean it is less important to residents. Currently there are so few on the list that they're not worth including	The definition of LGS is set out by government policy. The Local Plan acknowledge the importance of green spaces generally as amenity areas or as important open areas that contribute to local character, for example in Conservation Areas or in the landscape setting
Policy 43	PA--106-32	Over Haddon Parish Council	Having established that such spaces have been identified as important to local people, it is unclear what policy or weight is to be applied to them or whether, for example, they are eligible to be considered as exception sites as they have an equivalent status to Green Belt. The Parish Council raised its concern about whether valued open spaces in conservation Areas would be identified as Local Green Spaces. It also raised the question of whether the Conservation Area could be extended to cover the important strip field areas north of the village. It has received no response	Valued open spaces in Conservation Areas may also be identified as Local Green Spaces if the space meets the criteria for LGS and is put forward for consideration. In identifying LGS and attributing them the same status as Green Belt any development proposed would be assessed against NPPF para's 153 and 154. If the Parish Council wish to extend the Conservation Area to include new areas, they will need to contact the Cultural Heritage Team to discuss further. This request is not part of the consultation.
Policy 43	PA--118-14	Andrew Leyssens @ United Utilities	We note the sites listed under this policy. We would welcome sight of these in a GIS shp file format so that we can assess the implications for our operations.	Note request for GIS shape file to assess implication for operations.
Draft Policy Direction 21	PA--7-9	Adam Maxwell @ Peak District National Park Authority	What is small scale in the countryside? Farm shops - how do we control this?	Small scale is a matter of fact and degree. Draft Local Plan policies S1 and S2 set out the parameters for what would be considered acceptable.
Draft Policy Direction 21	PA--31-42	Ms Joanna Collins @ Edale Parish Council	In small communities such as Edale, the presence of existing facilities and services should be considered before new ones are permitted.	Noted
Draft Policy Direction 21	PA--70-27	Mathew Fenton @	The first bullet point of the policy is poorly worded, and could be interpreted to suggest that all retail development needs to be subject to the sequential test.	Note the request to be specific as to what development will require a sequential test. Draft Local Plan Policy S1 addresses this.

		Emery Planning	We assume that is not the intention of the policy. It therefore needs to be more specific as to what development will require a sequential test	
Draft Policy Direction 21	PA--83-10	Mr Dave Locke @ Bakewell Safer Cycling Group	Derbyshire County Council have assessed the spend of visitors to Bakewell and the Park, the few that arrive on public transport ie bus have a far greater spend per person than those arriving by car. Were the PDNPA to enable a rail reinstatement with the accompanying active travel routes and local bus services we would see visitors stay longer and use more facilities. Thus ensuring vibrant centres not just during the car park times but later and even overnight. Bakewell is dead most evenings at the moment.	Please refer to the transport chapter on rail reinstatement.
Draft Policy Direction 21		Derbyshire County Council	From the perspective of the County Council's Landscape Architect, Policy 43 (page 142) seeks to protect important local green spaces, which is supported in principle. However, the current list of designated spaces does not appear to be comprehensive and includes areas, such as churchyards, that are highly unlikely to face significant development pressure. Conversely, there are large areas of open space that would be desirable to protect but are not included, such as the recreation ground at the heart of Great Longstone. It is recommended that the policy be reviewed to ensure that all key local green spaces are appropriately identified and safeguarded	Great Longstone recreation ground is already identified as an area of open space. Open spaces are taken forward from the existing policy map. Policy S5 in the Draft Local Plan seeks to protect existing provision whether it be identified on a Policies map or be recreational use without formal identification.

Minerals and Waste

Insert ..\..\2025 PA Reg18 Consultation Event\Consultation event summary for reporting\Minerals\Responses and Summaries.pdf

Policy 44 Minerals Development

Consultee Organisation	Summary	Response
Marchington Stone Limited	Concern that the definition of the term 'meaningful' in this policy context restricts extensions of time at building stone sites that may prevent the secondary production of aggregates to facilitate the extraction of building stone. Noted.	The intent of the definition is such that it applies to major aggregate producing sites and/or sites that produce aggregates as their primary purpose. Sentence B supports extensions of time at such sites in principle. It does not preclude extensions of time at building stone sites that may wish to continue to produce aggregates as a secondary product. Extension of time at building stone sites will be considered against the proposed revised building stone policy. Para 224 (f) of the NPPF states 'consider how to meet any demand for the extraction of building stone needed for the repair of heritage assets, taking account of the need to protect designated sites'. which gives the flexibility required to consider whether secondary aggregate extraction is acceptable if it facilitates the provision of buildings stone for which there is a proven need.
Historic England	The response recommends the inclusion of 'ensuring that any restoration principles conserve or enhance the significance of heritage assets and heritage landscapes' in restoration principles.	Noted. Policies have scope to enhance heritage assets.
Castleton Parish Council	Response would like to see renewable energy added to quarries as part of restoration as it is not incompatible with nature recovery.	This is noted. However, proposals for renewable energy generation will need to be judged on their own merits and should not compromise restoration. May not be

		legally possible when a site is still in mandatory 5 year aftercare period.
Peak District National Park Local Access Forum	The responder supports the inclusion of access as part of restoration schemes in policies 44 and 50 - but wishes for access to be included with the definition of amenity as it currently is specified as nature conservation.	Not necessary to define access as amenity, it will be provided through restoration on a case by case basis.
CPRE Peak District and South Yorkshire	Response supports the policy and notes the prospect of redeveloping HCW - encourages the PDNPA to develop a masterplan for the site.	Noted.
Hope and Derwent Woodlands Parish Council	The response believes that the PDNPA could strengthen the position against further mineral extraction by including date on the associated HGV movements. They note the emission impacts associated with lime products.	HGV movements will cease when the permission expires. Emissions are reviewed as part of new planning applications.

Breedon	<p>Whilst on first reading, policy 44 appears to be broadly consistent with Paragraph 190 of the NPPF, there is a distinction that the NPPF makes reference to the term minerals whereas policy 44 makes specific reference to aggregate producing sites and the footnote makes specific reference to the steady and adequate supply of aggregates. In order to be consistent the policy should be amended to reflect the wording within the NPPF.</p> <p>A detailed schedule of productive capacity should be provided to demonstrate the steady and adequate supply of aggregates and industrial minerals, where relevant, for the plan period and beyond. This should also include details of capacity and flexibility to respond to market demand. The schedule would take account of planning end dates and identify where planning applications will be necessary to maintain supply.</p>	<p>Minerals of national importance e.g. high purity limestone are capable of meeting the major development tests and thus scope exists to grant consents where appropriate. General construction aggregates can be supplied from outside the NP and new proposals may not meet the major development tests, as such the policy seeks to make provision for extension of time at existing aggregate producing sites to maintain the landbank and their steady and adequate supply.</p> <p>Policy seeks to define 'meaningful' to give flexibility to refuse applications at sites with limited remaining reserves or where there is no clear intent to work them.</p> <p>A productive capacity assessment of sites will be produced to support the Plan.</p>
Environment Agency	Add 'habitat' to restoration outcomes focus.	Acknowledge suggestion, consider addition to draft policy.

Holme Valley Parish Council	The responder is concerned about operators entering liquidation instead of completing site restoration. This concern is noted.	
Tarmac	<p>A. Support inclusion of reference to exceptional circumstances tests for mineral development. Appropriate weight should be given to economic benefits and recognition given to the 33% replenishment rates of crushed rock over the last 10 year period.</p> <p>B. Recognition should be given to remaining reserves within the National Park that contribute to the national landbank as well as just the regional landbank. East Midlands region accounted for 73% of the limestone/dolomite total UK provision for non-aggregate purposes.</p> <p>C. Reference to BNG should be removed or altered to 'biodiversity enhancements' as not all developments will be caught by mandatory BNG requirements. Support preference for nature conservation focused restored but need to recognise desires of landowners to return land to economically productive uses.</p>	<p>A. Accept points made, NPPF makes provision for mineral extraction in National Parks in exceptional circumstances and specifies weight shall be given to the economic benefits of mineral extraction as well as the need to maintain a steady and adequate supply.</p> <p>B. Accept that remaining reserves at current end dates are accounted for in the national landbank as well as the regional one. Draft policy will be amended accordingly. Acknowledge point regarding national importance of non-aggregate limestone provision from within the National Park. Proposals for industrial grade limestone extraction are potentially capable of meeting the exceptional circumstances tests so do not need specific reference in this policy.</p> <p>C. This section seeks to align with the restoration policy that seeks BNG enhancements in relation to all mineral developments where feasible, not just those caught by mandatory BNG. The intent is to further National Park purposes and aid nature recovery. Alternative after uses are not precluded by the policy seeks to favour the purposes of the National Park given the landscapes special designation for said purposes.</p>

<p>Mineral Products Association</p>	<p>Suggest re-worded policy so the it is phrased in a more positive manner The policy needs to address industrial limestone and cement as these are nationally important minerals. For aggregate sites the word meaningful should be deleted as it can only mean that the policy could allow workable reserves to be sterilised. Delete reference to biodiversity net gain as this has a specific meaning and does not apply to all planning applications. Improvements to biodiversity is already covered by reference to wildlife enhancement in the policy</p>	<p>Not considered necessary to rephrase, policy is in accordance with NPPF position on major development in National Park “should be refused other than in exceptional circumstances”</p> <p>‘Meaningful’ included so sites with very limited reserves or sites that are unlikely to be worked can lapse meaning other sites that will contribute to the landbank can be brought forward.</p> <p>Reference to BNG amended to ‘where applicable’</p>
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Stanton in Peak Parish Council	The responder wishes to reiterate comments made in the previous consultation, that mineral developments need clearly defined end-dates. Permissions have end-dates though extensions may be granted following the standard decision process.	All mineral permissions will have end dates, but these are subject to future application to extend which will be judged on their own merits.
Eyam Parish Council	The response supports mineral activity within the NP, stating it is an aspect of the park's cultural heritage.	Noted
Peak Park Parishes Forum	The response agrees with Policy 44	Noted
Edale Parish Council	The comment agrees with the policy	Noted

<p>DCC</p>	<p>Having reviewed Policies 44 and 49 in the Preferred Approach, the County Council considers that there may be sufficient ‘flexibility’ in the policy approach to ensure that the requirements of the NPPF for MPAs to demonstrate 10 year land banks for crush rock can be met in the National Park in the event that the compensatory policy approach in the DDMLP in Policy SP8 is ultimately deleted from the Plan as required by the Inspectors for soundness reasons and NPPF compliance. This ‘flexibility’ appears to be accounted for in both policies 44 and 49, that recognise that proposals for new minerals extraction or extensions to existing minerals operations will not be permitted other than in exceptional circumstances and where evidence is provided for the need for the minerals; and that proposals for extensions of time at aggregate producing sites that retain previously consented reserves that make a meaningful* contribution</p> <p>producing sites that retain previously consented reserves that make a meaningful* contribution to the regional landbank at their existing end dates will be supported in principle.</p> <p>On the basis of the above, the County Council supports the policy approach in policies 44 and 49 in principle. However, the County Council would welcome the opportunity to engage in further discussions with officers at the PDNPA to secure a mutually agreeable position that can be carried forward in the DDMLP and Preferred Approach which ensures that both MPAs are able to meet their 10-year land bank requirements set out in the NPPF.</p>	<p>PDNPA will provide a minimum 10 year land bank as required by NPPF.</p>
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Policy 45 – Fluorspar

Name	Summary	Response
Holme Valley Parish Council	Response agrees with the draft policy.	Noted.

Policy 46- Building Stone

Name	Summary	Response
Marchington Stone Limited	Inclusion of 'Proposals will need to be accompanied by a suitable legal agreement' is unsound. Policy has been amended to state that 'where necessary ... accompanied by legal agreements'	Accept point made and policy will be amended to include the precursory text 'Where necessary'. The potential need for a legal agreement is on the basis of aspirations for long term management of sites for nature conservation and public access which seek

		to further the purposes of the National Park post mineral extraction.
Historic England	Response recommends an additional clause referring to ensuring that a supply of building stone suitable for heritage asset repair will be available.	Noted and reference to retaining stone for use in heritage assets is include in policy and supporting text.
Devonshire Group	Support long term assured availability of building and roofing stone to maintain and repair traditional and other buildings, especially those of heritage value. Policy that recognises demand for local stone is welcomed. Noted	Support for draft policy noted.
Birchover Parish Council	Building stone extracted in the National Park should be used locally. Concern noted, sites need to be economically viable to ensure steady supply to NP	The draft policy seeks to align with the NPPF which does not place restrictions on the sale of building stone to ensure the plan is sound. The draft policy seeks to make provision to meet local demand for building stone but does not restrict sales to elsewhere.
Holme Valley Parish Council	The responder is concerned about operators entering liquidation instead of completing site restoration.	Concern noted. Bonds can be stipulated in exceptional circumstances i.e. where risk is clear.
Mineral Products Association	The supporting text correctly identifies the issue over viability and Outcome 10 seeks to allow small scale building stone quarries, however the policy as drafted is neither supportive nor positive. Working of building stone has a number of sustainability benefits. Policy needs to allow for extensions of time. Legal agreements not required. Policy adapted	<p>Policy to retain 'only' given need for control in National Park. Provision for extensions of time is already inherent in the policy and does not require specific mention.</p> <p>Retain reference to make provision for local use of stone. Important sites serve the National Park, but policy doesn't preclude them serving other markets as well.</p> <p>Clause B to be removed as covered adequately by clause A.</p> <p>Redraft clause E to include 'Where necessary'</p>

Stanton in Peak Parish Council	SiPPC response: having a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites, would go against the principal of reducing and ending quarrying within the NP. Open ended planning permissions would give no certainty of restoration nor would they give benefits of long term nature conservation which is stated as a requirement. Concern is noted, extensions of time can be necessary to avoid the sterilisation of mineral.	The principal of reducing quarrying in the National Park was established by the East Midlands Regional Plan (2008) which was revoked in 2009 by the then Government. The NPPF now sets the overarching minerals policy and it does not support the principle of a reduction in quarrying in the National Park, instead stating landbanks of non-energy minerals should be provided for outside of National Parks where practical. The NPPF also recognises the need for flexible end dates for building stone sites. In order to ensure the new policy is found sound at examination it must align with the NPPF.
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Policy 47 – Mineral Safeguarding

Name	Summary	Response
Breedon	Minerals safeguarding should relate to all development, not just major, as any development could sterilise important mineral. Noted.	Policy will be amended to include all development excluding domestic proposals as these would be at existing properties so wouldn't cause further sterilisation and to require a mineral viability appraisal would be an undue burden.
Holme Valley Parish Council	Responder agrees with the draft policy.	
Tarmac	The sterilisation of minerals can occur through any non-mineral development, not just major development. Policy should apply to all non-mineral applications in the safeguarded areas, not just major development. Noted	Acknowledge point. Consider amendment to policy to reflect all surface development, but excluding domestic proposals as these would relate to existing properties and not in themselves sterilise mineral, requiring a full assessment would be an unnecessary burden on applicants.
Mineral Products Association	Safeguarding should include the gritstone resource and should include 'minor' development. Noted	Gritstone resource is safeguarded by Policy 53. Policies can be merged. Amend policy to refer to 'non-mineral' surface development, but to excluded domestic proposals

		as these would not sterilise mineral and place an undue policy burden on applicants to prepare a mineral sterilisation appraisal.
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Policy 48- Waste Management

Name	Summary	Response
Holme Valley Parish Council	Responder agrees with the draft policy.	Noted
Peak Parishes Forum	Response agrees with draft policy 48 but notes that more should be done about fly tipping.	Fly tipping is outside the remit of the MPA but this response is noted.
Edale Parish Council	The response opposes waste facilities that are too large for the community they are serving.	Scale is considered and response is noted.
Derbyshire County Council	Policy 48 set out in the Preferred Approach is supported in principle as being likely to be compatible with the emerging policy approach in the DDWLP Review.	Noted

Policy 49- Justification of Minerals Development

Name	Summary	Response
Breedon	"Minerals and waste development will 'only' be permitted where evidence is provided in relation to the viability and need for the development. Request removal of 'only'. In addition, it is recommended that Section B is deleted as this is essentially a repetition of Policy 44. These concerns are noted."	Only' included to recognise that it is a restrictive policy given National Park status. Section B to be retained as DM policies in draft revised NPPF will not be statutory, inclusion in the Plan will ensure statutory status.
Holme Valley Parish Council	Responder agrees with the draft policy.	Noted.
Tarmac	Tarmac support in principle the requirements set out in Policy 49 regarding the justification for minerals and waste development within planning applications. The introduction of the exceptions test in Policy 44 means it could be deleted from Policy 49. Noted	Draft policy to be retained with tests.

Mineral Products Association	delete only so the policy reads positively. Point v is an impossible test as how will applicant predict what projects they will supply over the life of the development delete B “ re-introduces the tests in national policy which strategic polices already cover. It is not necessary to repeat them here and they should be deleted.	Point v removed. Section B to be retained as DM policies in draft revised NPPF will not be statutory, inclusion in the Plan will ensure statutory status.
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Policy 50 – Restoration and Aftercare

Name	Summary	Response
Marchington Stone Limited	Requirement for a BNG above the mandatory 10% and on applications outside the scope of the Environment Act 2021 are unsound and do not comply with national policy and guidance. Defra BNG metric is not suitable to assess mineral development. The highest 'possible' BNG may not be feasible given specific site parameters. Noted	The intent of the policy is to seek a biodiversity uplift on all mineral development in the interest of National Park Purposes and nature recovery. There is significant scope for BNG beyond the mandatory 10% at mineral sites, be this at new sites, through extension of time or by amendments to schemes. It is possible to run an existing restoration scheme through the metric calculator to ascertain a restoration baseline score, which could then be improved upon, where feasible, through a revised restoration scheme. Development Plans have been adopted that require a greater than 10% BNG, so a precedent for an uplift greater than 10% is established. It is however accepted that the highest possible BNG as calculated through the Defra metric may not be the highest which is feasible at a specific site and the draft policy will be amended to reflect this.
Peak District National Park Local Access Forum	The responder supports the inclusion of access as part of restoration schemes in policies 44 and 50 - but wishes for access to be included with the definition of amenity as it currently is specified as nature conservation.	Not necessary to define access as amenity, it will be provided through restoration on a case by case basis.

Breedon	With regard to Policy 50 Restoration and aftercare (development management policy), Breedon are generally supportive of the text, however we would welcome the removal of the word only in Section A and the removal of Section D, as it is not for policy to dictate as and when a legal agreement is required. Noted but D retained.	Only' to be retained as previous stated. Section D seeks to make clear that legal agreements may be required to achieve long term management of sites.
Environment Agency	Suggest add Habitats that are adjacent to the redline boundary within the operators land ownership should be included in restoration proposals even if they were not directly effected by the minerals extraction. Noted	Could be considered on a case by case basis if appropriate and necessary to make the development acceptable, possibly caught by BNG requirement. Too prescriptive to include as policy. Not supported by NPPF.
Holme Valley Parish Council	The responder is concerned about operators entering liquidation instead of completing site restoration. Addressed on response to policy 44	
Tarmac	It is not considered appropriate to seek more than the mandatory 10% BNG requirements and as such, part vi) should not reference 'the highest percentage Biodiversity Net Gain possible'. Wording adapted	Other LPAs have adopted Plans that have required greater than 10% BNG. There is significant potential for BNG through the restoration of minerals sites. The draft policy seeks to achieve this where feasible to aid nature recovery and further National Park purposes.
Mineral Products Association	BNG does not apply to all applications and highest possible is not an appropriate test; too open ended and 10% is the mandatory target. Following local nature recovery strategies will deliver enhancements appropriate to the area and this should be the test. There are already tests for when a legal agreement is appropriate so there is no need for a policy - delete. Noted	Amend policy to relates to BNG where applicable and to achieve highest possible 'feasible' BNG. Restoration of mineral sites provide significant opportunities to deliver considerable BNG, beyond the mandatory 10%. Given National Park status and the need for nature recovery, not considered unreasonable or unachievable to try and maximise delivery of BNG. Examples of >10% BNG provided in updated Topic Paper. Reference to legal agreements where necessary to be retained.
Stanton in Peak Parish Council	The response supports this draft policy.	Noted

Natural England	The response is supportive of vi of policy 50.	Noted
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Policy 51 – Ancillary Minerals Development

Name	Summary	Response
Holme Valley Parish Council	Responder agrees with the draft policy.	
Tarmac	<p>Part i) close should be removed from the phrase 'close link'. It lacks clarity and provides uncertainty to any applicants.</p> <p>Part ii) is considered unnecessarily onerous on the mineral operator, as at certain phases throughout the greater scheme of development across large-scale quarry operations, plant, buildings and machinery may become temporarily redundant. Furthermore, in exceptional circumstances there remains a need for the retention of mineral-related facilities upon cessation of mineral extraction. The retention of mineral-related plant, buildings and machinery should be considered on a case-by case basis, and it is suggested that this policy be revised to remove the requirement for all plant, buildings and machinery to be removed when not in use in order to make development proposals for ancillary mineral-related development acceptable. Noted</p>	<p>It is important that there is an emphasis on a 'close' link between the extraction operations and the ancillary development.</p> <p>Given the National Park has been designated on the basis of its natural landscape, the policy seeks to remove incongruous development that is no longer required upon the cessation of mineral extraction to ensure the satisfactory restoration of the site. Temporarily redundant plant is not required to be removed by the policy.</p>
Mineral Products Association	<p>Point i how is close defined, surely a link is sufficient. Point ii delete final sentence as not necessary.</p>	<p>Close to be retained to ensure ancillary development is appropriately linked to on-site operations, rather than predominantly for other purposes.</p> <p>Current adopted policy, not considered necessary to amend regarding legal agreement or condition. Makes it clear what restrictions will be placed upon a site/operator.</p>

Stanton in Peak Parish Council	<p>The draft for policy 51 needs to clearly state the fact that it proposes to allow the importation of stone into the National Park for processing purposes, this proposed change to Policy 51 appears to be deliberately scant in outlining a very significant change to allow stone from outside the National Park to be transported in, worked and then transported out again, causing significant impact on the inadequate infrastructure required to support such work. Allowing additional tonnage to be worked at locations where it hasn't been won, would effectively over develop a site and would pose planning changes to be submitted.</p> <p>Council cannot see why there needs to be such a change, as previous locations utilised for such processing work have failed to be economically viable working the stone from within the NP.</p> <p>Importation for processing purposes would clearly outweigh the local vernacular need and would be major development, something which should not be permitted. Noted</p>	<p>The policy is clear in it's intent to allow for the importation of stone for processing at operational sites within the National Park. Such proposals would be subject to planning applications where all impacts of the proposals, included those on the highway network would be appropriately assessed on a case by case basis.</p>
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Policy 52- Processing Building Stone

Name	Summary	Response
Jane Newman Planning	Reference to 'active building stone sites' is unclear. Wording amended.	Acknowledge comment. Draft policy will be amended accordingly.
Birchover Parish Council	The end of New Pilhough Quarry transport through Birchover village's narrowstreet without the full haul road we campaigned for, could be replaced by transport through the village with stone for processing at Birchover Quarry. If such an application were made (just as for a new quarry) the case for a full haul road remains valid. Noted	If an application was made for the importation of building stone for processing and onward sale, highway impact would be considered and any necessary mitigation implemented.

Holme Valley Parish Council	Responder agrees with the draft policy.	
Stanton in Peak Parish Council	<p>Importation of stone for processing would be detrimental to the NP. There is no proof that it would foster social or economic wellbeing of local communities and if the worked stone was not for local use, how could it be deemed to be in pursuit of National Park purposes? Importation of stone into the NP would increase the CO2 emissions not decrease them due to additional transport movement, also there could be no guarantee that the imported stone was solely for use in the NP. This is an ill thought out new policy and cannot be justified other than to further the interests of quarry operators and increase the negative aspects of quarrying. It goes against all known purposes of reduction of quarrying in NParks. Noted</p>	<p>Alongside National Park purposes, the Government also places a corresponding social and economic duty upon National Park Authorities themselves – to be considered when delivering the two purposes. This reciprocal arrangement is designed to ensure a high degree of mutual cooperation, avoiding the risk either that the needs of National Park residents and businesses will be ignored, or that others will ignore its designation when undertaking activities.</p> <p>Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.</p> <p>CO2 emissions and other potential impacts from importation would be assessed during planning application stage. If they were deemed to be unacceptable the application would be refused.</p> <p>There is no longer an over arching policy basis for a reduction in quarrying in National Parks.</p>

Policy 53- Safeguarding Gritstone

Name	Summary	Response
Holme Valley Parish Council	Responder agrees with the draft policy.	
Mineral Products Association	Delete - this should be combined with policy 47. The Authority agrees and has made this change.	Policy to be combined with policy 47 to form overarching safeguarding policy.
Derbyshire County Council	From a landscape perspective, Policy 53, which seeks to safeguard the gritstone mineral resource, appears somewhat unusual given that much of the National Park is underlain by gritstone geology. While we recognise the broader	Noted and will be fully considered.

	<p>principle of preventing the sterilisation of mineral resources, similar to policies for coal measures in East Derbyshire, the practical application here is unclear. It is difficult to envisage how gritstone could realistically be extracted prior to non mineral development to avoid sterilisation. In this context, the necessity of such a policy is questionable, as any development within the Dark Peak would, by its nature, affect this resource.</p>	
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Policy 54- Impacts on Amenity

Name	Summary	Response
Holme Valley Parish Council	Responder agrees with the draft policy.	
Tarmac	Caveat required to allow otherwise unacceptable noisy operations necessary to facilitate mineral extraction should be included in policy to align with NPPF. This caveat has been added to the policy	Point accepted as per overarching NPPF policy. Draft policy to be amended to reflect this.
Mineral Products Association	Delete only so the policy is phrased positively. Concern noted.	Restrictive policy, considered appropriate to include 'only'.

Policy 55- Impact of mineral development environment

Name	Summary	Response
Historic England	HE Support reference to heritage assets but would like to see the wording amended - change 'impacts' to 'harm'. Noted	Noted and change made.
Holme Valley Parish Council	Responder agrees with the draft policy.	
Tarmac	Policy 55 relates to the need to make acceptable the impacts of development on the environment, and the requirement to ensure they are	Amend draft policy to include caveat to allow for short term noisy activities required to facilitate

	‘reduced to an acceptable level or eliminated’. As above, the policy should be reworded to align with NPPF and technical guidance on where the potential for planning controls to require the minimisation (as opposed to full elimination) of potential adverse environmental impacts is acceptable. Noted	mineral extraction that would otherwise be considered unacceptable.
Mineral Products Association	Delete ;only; so the policy is phrased positively Point v any potential effect is an impossible test – should be need to minimise impacts as in other parts of the policy Point xi it is not clear what this test is seeking to achieve, applicants would not invest in new buildings unless they are needed. Noted	Point v - opening sentence of the policy requires reduction of impacts to an acceptable level, so it is not a impossible test. Need to consider 'any potential effects' as they could be related to water quality, pollution, flow rates. Water quality is a significant issue in the NP, no intention to weaken policy in this regard. Point xi - will be given further consideration.
Edale Parish Council	Response agrees with policy	

Policy 56- Cumulative effect of Mineral Development

Name	Summary	Response
Holme Valley Parish Council	Responder agrees with the draft policy.	
Mineral Products Association	Delete only so the policy is phrased positively	Retain 'only' as consistent with existing policy approach.
Edale Parish Council	The comment agrees with the policy, that cumulative impact should be considered.	Noted.

Policy 57- Waste Management

Name	Summary	Response
Holme Valley Parish Council	Responder agrees with the draft policy.	Noted.

Edale Parish Council	The comment opposes waste management on greenfield sites or within the centre of settlements. Consideration regarding the siting of waste management facilities would be considered during an application.	Noted. Adequate protections in place, proposals to be dealt with on their won merits.
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Travel and transport

Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
	Outcome 9:	PA--100-6	National Highways	The respondent acknowledges the synergies between the Outcome and the respondent's statutory responsibilities.	This acknowledgement is noted and welcomed.
	Outcome 9:	PA--100-6	individual	The respondents raises a variety of concerns that suggest that the National Park Authority focuses solely on the multi-user trail network and PROW to deliver sustainable travel. The respondent questions the soundness of the Plan based on what he believes to be the above approach. The respondent advocates for settlement travel planning incorporating public transport and rail. The respondent is implicit in not agreeing with removing the safeguarding for rail reinstatement on the routes of the Monsal and Trans Pennine Trails The respondent suggests options for strengthening Outcome 9.	The Plan contains a total of 13 draft policies or policy directions for Chapter 13; 2 of which relate to multi-user trails or public rights of way. These are Policy 62 – Routes for walking, cycling and horse riding, and waterways and Policy 63 – Development affecting a public right of way. Both of these policies have formed part of the previous Plan(s), which were found to be sound at Examination. The policies have undergone fairly minor changes, none of which act to encourage development that would be prejudicial to the route of the former railways.
	Chapter 13	PA--16-3	Bamford with Thornhill Parish Council	The respondent offered a very supportive response	The support from the respondent is very much appreciated.

	Chapter 13	PA--20-10	individual	<p>The respondent wishes to see additional policies on: - Encouraging EVs; Redevelopment of petrol stations; Premium charging for larger vehicles in car parks; Growth of size of large commercial vehicles</p>	<p>It is intended to include a policy on the provision of EV charging within the final version of the Plan. For petrol stations, there are limited numbers in the National Park. As they go out of use as petrol stations, they may become EV charging stations. Such sites are often contaminated, with large underground storage tanks. Future redevelopment would be dealt with on a case-by-case basis. Charging regimes for car parks are set by the owners. The Peak District National Park has a mix of private and public sector owners / operators. The Local Plan is not able to control the pricing of parking spaces. We will however review the Parking Standards document alongside the Local Plan Review. The size of commercial vehicles is determined by the market. We do however have a policy on freight transport, and seek weight restrictions where HGV traffic is problematic, and where appropriate. This policy is amended slightly.</p>
	Chapter 13	PA--26-1	National Highways	<p>The respondent sets out the role of National Highways and the context for their response. The response also sets out their approach to the regulatory 'Duty to cooperate' role. The respondent explains the relative duties of National Highways and the National Park Authority under DfT Circular 01/2022 The Strategic Road Network (SRN) and the delivery of sustainable development. The respondent then advises on the requirement for a robust evidence base, particularly in assessing impacts on the Strategic Road Network. The respondent sets out the National Highways approach to Traffic Assessment and modelling; and its role in</p>	<p>This response is useful in setting out the role of National Highways in regard to the development of the Local Plan and the requirements of both parties through the Duty to Cooperate. In relation to future development and its impact on the SRN, the current Local Plan does not allocate land for development. It is anticipated that this approach will continue in the New Plan. The Peak District National Park boundary does not include many settlements adjacent to the SRN or through which the SRN travels. Both Langsett and Tintwistle are partially contained within the National Park and are traversed by the SRN. It is possible that small local needs housing schemes or enhancement sites will come forward during the life of the Plan at either settlement, within the National Park boundary.</p>

				<p>assessing the impact of development on the SRN. The response sets out the requirement for delivering on the Net Zero Carbon transition through the Local Plan. Finally, the respondent sets out the context of the SRN within and adjoining the Peak District National Park.</p>	<p>Should this be the case, then early engagement with National Highways will be undertaken.</p>
	Chapter 13	PA--33-8	Peak Park Parishes Forum	<p>The respondent has combined the responses to a number of policies – these are duplicated elsewhere at 33-19, 33-20, 33-21 and 33-22.</p>	<p>The comments are dealt with at the most appropriate policy response.</p>
	Chapter 13	PA--38-36	Peak Park Parishes Forum	<p>The respondent wishes to see the inclusion of a policy relating to ‘campervan’ parking, citing the current damage caused to verges by a popular form of accommodation. The following criteria were suggested: - no harm to the local or wider landscape no impact on communities (eg parking in farm gates, on footpaths) strict landscaping and screening conditions immediate access off the existing road network (to prevent creation of large access tracks and intrusion into the wider landscape) provision of well designed toilet and waste/chemical disposal facilities no detriment to local residents through noise or visual intrusion or traffic movement”s</p>	<p>A statement on 'Aires for campervans' is provided within the plan.</p>

	Chapter 13	PA--43-6	Bakewell Town Council	The respondent supports the ambition contained within the policies in the Chapter. The respondent advocates for a standalone access and sustainable transport plan to be developed with EMCCA and other MCAs.	The support is noted and welcomed. The current National Park Management Plan includes the delivery of a Sustainable Travel Framework. The suggested approach is supported, but falls outside of the direct scope of this Plan.
	Chapter 13	PA--78-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is really more suited to Policy 61, and has been copied there as response 78-2.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Chapter 13	PA--84-1	individual	The respondent's comments focus on rail reinstatement along the route of the Monsal Trail.	Generally speaking, for most people, bus travel offers a better alternative to the private car than rail. This is because it is cheaper and easier to provide, and it is not restricted to fixed corridors, and can be adapted more readily according to demand. Whilst a rail journey through a National Park can offer visual stimulation, it is not immersive and does not convey the sounds and scents of location that walking, wheeling or cycling can.
	Chapter 13	PA--84-1	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. The respondent did not make a response to Policy 62 - Routes for walking, cycling and horse riding, and waterways, so this	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route.

				response has been copied there as response 84-6.	Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Chapter 13	PA--87-1	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is really more suited to Policy 61, and has been copied there as response 87-2.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Chapter 13	PA--90-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement. This response is really more suited to Policy 61, and has been copied there as response 90-2.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

	Chapter 13	PA--114-6	Over Haddon Parish Council	The respondent raised specific comment and concerns regarding the public car park at Over Haddon.	Whilst acknowledging the issues raised, the specifics of the management of Over Haddon car park fall outside of the scope of the Local Plan.
	Chapter 13	PA--118-15	United Utilities	The respondent expressed a wish to work with the National Park Authority to find appropriate solutions to visitor pressure at their recreation sites.	The respondent's comments are welcomed.
	Chapter 13	PA--121-25	Castleton Parish Council	The respondent believes that the Plan should include more reference to buses. The respondent also believes that it should tie into the EMCCA Local Transport Plan.	Whilst recognising the importance of buses, the Local Plan is a development plan and the operation of the bus network falls outside its scope. The EMCCA Local Transport Plan is in an early draft consultation document form, with the final draft version not being available until 2027. It is anticipated that the final version of the Local Plan will be submitted to the Planning Inspectorate by the end of 2026. However, it is believed that the Local Plan will be in accord with the spatial elements of the EMCCA Local Transport Plan. It should be noted that whilst approximately two-thirds of the National Park lie within the EMCCA boundary, one third does not. The National Park Authority engages with the Local Transport Plan Consultations for all of its 6 constituent Transport Authorities.
	Draft Policy Direction 22	PA--2-10	individual	The respondent wishes the policy to include: - electrified public transport; electrified car clubs; integrated transport hubs; e-bikes at railway stations and Bakewell, and other major villages; 'park and stride' locations on the outskirts of villages, for the use of visitors and residents.	The respondent makes some interesting suggestions that will be considered for inclusion as the policy is developed

	Draft Policy Direction 22	PA--26-7	National Highways	The respondent advocates a vision led approach to planning as set out in National Highways' Planning for the Future guide. The respondent provides detail on a range of approaches within the guide including travel plans, the requirement for a development to reflect its end-user transport patterns, the provision of EV and SUDS infrastructure and the need for Construction Traffic Management Plans.	The response provides useful context around development and it's likely impacts on the road network; and how this can be managed and reduced. We will assess the information provided and make changes to policy where there are gaps.
	Draft Policy Direction 22	PA--31-27	Edale Parish Council	The respondent offers support for "all moves to reduce the use of private cars and hence the problems of congestion, parking and pollution they cause." They identify Chapter 13 including visitor traffic as a key concern. The respondent urges the Authority to work with EMCCA to deliver the Active Travel Plan and to improve public transport. The respondent advocates consideration for an environmental levy on cars within the National Park. Consideration of road closures is also advocated – access only. With Grindsbrook given as a possible example.	We appreciate the general support for the Policy, but recognise that the respondent would like to see additional measures. We will and do engage with EMCCA and our other constituent authorities on their Local Plans, Local Transport Plans, Bus Service Improvements Plans / Franchising schemes and Local Walking and Cycling Infrastructure Plans. We also seek to influence transport policy at the National Level. It is possible that during the life of the Plan, that some form of road user charge will come forward – the recent announcement of pay-per-mile charging for EV vehicles makes it likely that a national scheme will be introduced. At the local level, any road-user charge could only be delivered through our constituent highway authorities. There is an option for roads to be made 'Access Only', this could be via a direct approach to the highway authority or via a wider visitor management plan for an area. The Authority is working with partners to trial an Area Management approach in the Mam Tor / Castleton area. If successful, this will be rolled out to other areas within the National Park. Any measures must not worsen conditions elsewhere including Edale.

	Draft Policy Direction 22	PA--33-19	Peak Park Parishes Forum	<p>The respondent supports moves to reduce the use of private cars. The respondent believes that the Authority should learn from the Yorkshire Dales NPA, who have produced a ten-year Active Travel Plan funded by Active Travel, England concentrating on multi-user routes, improved accessibility and inclusive development. The respondent believes that the Yorkshire Dales NPA, identify public transport links, collaborate on regional transport and work within the Transport Plan. The respondent advocates for a pay-per-mile charge for motorists. The respondent also advocates for partial road closures (local traffic only). The response is a partial duplicate of the response to Chapter 13 – Chapter 13 (33-8) and a partial duplication to the response to Draft Policy Direction 23 – Reducing and directing traffic (33-20).</p>	<p>The support is noted and welcomed. The Peak District National Park Authority also received funding from Active travel England to produce a similar plan with similar aims – The Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. The Peak District National Park Authority also identifies public transport links – the Peak Sightseer routes were both initially developed by the Peak District National Park Authority. We also seek to influence regional transport – the main difference being the much higher number of constituent authorities that the Peak District National Park Authority has to influence. Road user charging is outside of the scope of the Plan and the National Park Authority’s powers. The Peak District National Park Authority has worked with partners to deliver partial road closures at the Upper Derwent and Goyt Valleys. National Park Authority staff operate the closures.</p>
	Draft Policy Direction 22	PA--43-8	Peak Park Parishes Forum	<p>The respondent appears to be supportive of the draft policy direction. The respondent identifies Chapter 13 and especially visitor transport as a major issue.</p>	<p>We appreciate the support provided for this draft policy direction.</p>
	Draft Policy Direction 22	PA--43-8	Bakewell Town Council	<p>The respondent wishes to see the ambitions in Draft Policy Direction 22 prioritised. The respondent welcomes measures to encourage modal shift to sustainable transport for residents and visitors. This response is a duplicate of part of the response to Chapter 7 – Recreation and Tourism (43-5).</p>	<p>The support for the policy and it’s aspirations are noted and welcomed.</p>

	Draft Policy Direction 22	PA--45-25	Eyam Parish Council	The respondent makes that case that demographics and the availability of public transport encourages car use.	The concerns raised are valid and noted.
	Draft Policy Direction 22	PA--54-11	Kinder and High Peak Advisory Committee	The respondent is supportive of the draft policy direction. Further comments are provided on Policy 58 in submission 58-12.	We welcome the support for this policy.
	Draft Policy Direction 22	PA--57-5	British Horse Society	The respondent wishes to see a reference to active travel within the policy. The respondent also makes the case for improvements to the PROW including better links and the removal of barriers, to enable better connectivity for all users, including horse-riders.	Whilst the policy does not explicitly mention active travel, it is implicit within the policy. Other policies within the Plan seek to improve access to the PROW network and allow for extensions to it. Policy amended to make the desire for improved active travel facilities explicit.
	Draft Policy Direction 22	PA--64-12	Youlgrave Community Land Trust	The respondent is supportive of Draft Policy Direction 22. The “resisting transport development” quote comes from Draft Policy Direction 23.	We welcome the support provided. The response is suggestive of support for the Chapter 13 chapter, stating that the respondent agrees with the Chapter 13 policies; although the response focuses on Draft Policy Direction 22. In addition, text from Draft Policy Direction 23 is quoted, but the Draft Policy Direction is not specifically referred to. The National Park Authority would welcome a Park-wide cohesive public transport strategy; however, that falls outside of the scope of this consultation. We will continue to seek to influence our transport authorities in pursuit of this aim, through their own plans and the National Park Management Plan.
	Draft Policy Direction 22	PA--68-4	High Peak Borough Council	The respondent is supportive of the policy direction.	The support is noted and welcomed

	Draft Policy Direction 22	PA--69-29	Tarmac	The respondent believes that the policy should only look to deter cross-Park traffic and minimise traffic impacts in environmentally sensitive locations where appropriate. The respondent makes that case certain traffic associated with mineral extraction is unavoidable and necessary - suggesting amendments to the existing policy.	Policy Direction 22 is a holistic policy from which other policies; including Policy 60 – Managing the demand for freight transport. There is a recognition that mineral can only be extracted where it occurs naturally, and that this extraction will in all likelihood generate road traffic. The aforementioned Policy 60 – Managing the demand for freight transport and Draft Policy Direction 23 – Reducing and directing traffic seek to manage and direct such traffic are the main policies which address this issue.
	Draft Policy Direction 22	PA--79-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is really more suited to Policy 61, and has been copied there as response 79-2.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Draft Policy Direction 22	PA--80-77	individual	The respondent believes that the Recreation Hubs policy conflicts with Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport.	We believe that provided that the criteria within Draft Policy Direction 7 – Recreation Hubs are applied; that the two policies are complementary.

	Draft Policy Direction 22	PA--82-17	individual	<p>The respondent recommends that reference to reducing the use of the private car should be included within Policy 2; Draft Policy Direction 2 Development Strategy (core strategic policy) and; Policy 15 recreation education and interpretation. The respondent has provided appropriate comment at each of the above policy comment points. The respondent suggests further bullet points for the policy: - Reducing climate emissions from travel to, from and within the National Park · Development should be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with the transport policies. New development will be conditional on access being possible without the need to use a car. · A sustainable travel hierarchy [https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/] will be used to assess the potential for access to facilities and to limit the need to travel by private car. Developers will be expected to contribute directly to sustainable travel and walking and cycling facilities including for visitors through s.106 agreements.</p>	We will consider the suggested amendments to the policy as the Plan is further developed
	Draft Policy Direction 22	PA--83-8	individual	The respondent believes that the Authority is supportive of rail reinstatement, presumably along the route of the Monsal Trail, based on response (83-1)	There is nothing with Draft Policy Direction 22 that points towards this conclusion.

	Draft Policy Direction 22	PA--84-2	individual	The respondent wishes to see a cohesive plan in support of active travel and public transport.	The Peak District Walking, Wheeling, Cycling & Horse-riding Infrastructure Plan sets out a high-level Strategic Network of existing and aspirational routes. This encompasses elements of the Derbyshire Key Cycle Network. The Local Plan also seeks to safeguard existing and aspirational active travel routes (where they are known). Whilst not a Transport Authority, the National Park Authority seeks to influence our six constituent transport authorities to provide public transport alternatives to the private car – this is through our response to Local Transport Plan and Bus Plan Consultations; and through the National Park Management Plan.
	Draft Policy Direction 22	PA--85-8	Peaks and Dales Line Ltd	The detail can be found at (132-1).	For respondent's comment and Officer response, see 132-1.
	Draft Policy Direction 22	PA--92-8	Grindleford Parish Council	The respondent believes that the policy lacks ambition.	The policy is an overarching holistic policy, which is updated to reflect the changes in transport over the life of the Plan. The other transport policies flow from this policy. As the respondent acknowledges, the National Park does not manage the highway and is not a transport authority. We do however, seek to work with and influence the appropriate bodies through their own plans and through the National Park Management Plan.
	Draft Policy Direction 22	PA--101-11	Hope and Derwent Woodlands Parish Council	The respondent queries the meaning of 'sustainable travel' and voices concerns about the sustainability of EVs.	In the context of the policy, sustainable travel encompasses active travel, public transport and EVs. However, the Authority recognises a sustainable travel hierarchy with active travel at the apex and Internal Combustion Engine private vehicles at bottom.

	Draft Policy Direction 22	PA--112-1	Railfuture	<p>The respondent has provided a duplicate response to that submitted under the response to Policy 62 Routes for walking, cycling and horse riding, and waterways (112-3). The respondent wishes to see opportunities for visitors to preferentially use public transport to access the National Park. The respondent raises concerns about measures to reduce traffic. The above is also duplicated within the response to Draft Policy Direction 23 – Reducing and directing traffic. The respondent expresses preference for rail over car journeys and pledges support for increasing provision including for rail reinstatement along the Matlock to Buxton corridor. The respondent advocates improved public transport connectivity including links to gateway stations. The respondent advocates rails connectivity for walking and cycling within the National Park. The respondent advocates the transfer of freight onto rail. The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement. The above is also duplicate of the response to Policy 61 – Railway construction (112-4)</p>	<p>The response is largely focused on public transport and in particular rail. There is however an acknowledgement that the National Park is not a Transport Authority. Where appropriate, we will consider the response, where it applies to Draft Policy Direction 22. We have collated the responses to the other submissions that have contained all or part of this submission below: - 112-2 The respondent’s comments are noted as their acknowledgment is not a transport authority. We do however seek to influence the Local transport Plans and public transport proposals of our constituent authorities. 112-3 Where the response touches on Policy 62, our response is as follows: - The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park’s multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. We agree with the respondent on the need for walking and cycling routes to connect with transport hubs. The Derbyshire Key Cycle Network and the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan both seek better connectivity to transport hubs. In particular, both Plans include aspirations to connect the Monsal Trail with the</p>
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					<p>railheads at Matlock and Buxton. This forms part of the White Peak Loop Project. 112-4 The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park’s multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.</p>
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	Draft Policy Direction 22	PA--115-2	CPRE Peak District and South Yorkshire	<p>The respondent supports the principle of an aspirational policy for Chapter 13. The respondent refers to the need for a sustainable travel hierarchy to support the policy. The respondent believes that the policy should have similar levels of detail to the current equivalent Policy. The respondent refers to the need for development to be accessible by sustainable transport and supports higher density housing. The respondent suggests development of a new policy that concentrates on promoting sustainable transport in new developments. The respondent puts forward suggested changes for Draft Policy Direction 18 - Section 106 Agreements, Draft Policy Direction 12 – Energy efficiency and generation in buildings in relation to sustainable travel. The response also duplicates comments on the Proposed Spatial Objectives for Chapter 13 and on Policy 66 Visitor Parking.</p>	<p>The support for the principle of the policy is noted and welcomed. We will consider the suggested amendments to the policy as it is further developed. Where the comments relate to other policies. They will be dealt with under the appropriate policy.</p>
	Draft Policy Direction 22	PA--116-6	Peak District National Park Local Access Forum	<p>The respondent wishes see wheeling and accessibility added to the policy direction. The respondent also provides detailed comments of Policy 63 – these are also provided in the response to Policy 63 – Development affecting a public right of way.</p>	<p>The respondent raises a valid point, which has led to the policy being amended. The response to the comments on Policy 63 is provided under that policy response (116-4).</p>

	Draft Policy Direction 22	PA--117-16	Hope Valley Climate Action	The respondent supports the policy and recommends that reference to reducing the use of the private car should be included within Policy 2; Draft Policy Direction 2 Development Strategy (core strategic policy) and; Policy 15 recreation education and interpretation. The respondent has provided appropriate comment at each of the above policy comment points. The respondent suggests further bullet points for the policy: - <ul style="list-style-type: none"> • Promote travel hubs where modes interconnect seamlessly at all five Hope Valley rail stations, and within settlements at an appropriate scale. • Maximise sustainable travel opportunities from locations outside the National Park. 	The support is noted and welcomed. We will consider the suggested amendments to the policy as the Plan is further developed.
	Draft Policy Direction 22	PA--122-1	individual	The respondent welcomes the context of the policy.	The support is noted.
	Draft Policy Direction 22	PA--127-13	individual	The respondent wishes to see road new developments accompanied by bridleways, with segregated routes for bigger roads. The respondent also wishes to see verges protected for possible use for active travel.	The respondent raises useful points. Policy 63 (B) states: – “Where development occurs opportunities will be sought to provide better facilities for users of the rights of way network, including where appropriate, providing links between the development and the rights of way network, including the National Park’s Trail network.” The above includes road developments. Verges perform a range of roles, including acting as habitats. In some cases, they form part of designated areas including SSSI / Special Protected Areas and Special Area of Conservation. Use as active travel routes would depend on any other restrictions.

	Draft Policy Direction 22	PA--132-1	Peaks and Dales Line Ltd	The respondent offers in principle support, but subject to recognition that rail forms part of the National Park's transport solution. They also advocate for the prioritisation of public transport interventions, setting mode-share targets; and linking area management to demand management and rail access.	The in-principal support is acknowledged. The National Park Authority recognises the benefit of the existing Hope Valley Railway and the opportunities offered by the Park's gateway stations including at Matlock, Buxton, Glossop, Greenfield and Meltham. The policy is an overarching one for the Local Plan, the prioritisation / delivery of public transport interventions falls outside of the Plan's scope, but the Authority does support opportunities for public transport and has piloted public transport solutions. Modal share targets and the preparation of area management plans falls outside of the scope of this Plan, and is dependent on a partnership approach. Policy is amended.
	Draft Policy Direction 22	PA--135-28	DCC	The respondent wishes to see the policy provide a clearer link to encouraging modal shift, including promoting public transport services from surrounding urban areas. This response is a duplicate of that provided in response to Draft Policy Direction 24 – Minimising the adverse impact of motor vehicles and managing the demand for car and coach parks (135-29).	The respondent raises valid points. However, the suggestion falls outside of the scope of this policy. Elsewhere in the Plan we include measures to address modal shift, including through Travel Plans. However, promoting public transport does not specifically lie within the gift of the Local Plan.
	Draft Policy Direction 23	PA--6-6	Staffordshire County Council	The respondent suggests the following changes: - Resist developments rather than resist transport developments; Require Transport Assessments and Travel Plans for appropriate developments; Could also include text around encouraging travel by sustainable forms of transport - both visitors and local residents.	The respondent makes useful suggestions policy is amended.
	Draft Policy Direction 23	PA--31-26	Edale Parish Council	The respondent suggests additional criteria in relation to where developments take place and the density of development.	The comments are useful and are considered in the whole plan context.

	Draft Policy Direction 23	PA--33-20	Peak Park Parishes Forum	<p>he respondent supports moves to reduce the use of private cars. The respondent believes that the Authority should learn from the Yorkshire Dales NPA, who have produced a ten-year Active Travel Plan funded by Active Travel, England concentrating on multi-user routes, improved accessibility and inclusive development. The respondent believes that the Yorkshire Dales NPA, identify public transport links, collaborate on regional transport and work within the Transport Plan. The respondent advocates for a pay-per-mile charge for motorists. The respondent also advocates for partial road closures (local traffic only). The response is a partial duplicate of the response to Chapter 13 – Chapter 13 (33-8) and a partial duplication to the response to Draft Policy Direction 23 – Reducing and directing traffic (33-20). The respondent advocates that new development be close to existing / developing transport links. The respondent advocates for denser patterns of development. The response is a partial duplicate of the response to Chapter 13 – Chapter 13 (33-8) and a partial duplication to the response to Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport (33-19).</p>	<p>The support is noted and welcomed. The Peak District National Park Authority also received funding from Active travel England to produce a similar plan with similar aims – The Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. The Peak District National Park Authority also identifies public transport links – the Peak Sightseer routes were both initially developed by the Peak District National Park Authority. We also seek to influence regional transport – the main difference being the much higher number of constituent authorities that the Peak District National Park Authority has to influence. Road user charging is outside of the scope of the Plan and the National Park Authority’s powers. The Peak District National Park Authority has worked with partners to deliver partial road closures at the Upper Derwent and Goyt Valleys. National Park Authority staff operate the closures. The majority of policies direct development within or on the edge of settlements; where there is more likely to be access to sustainable transport. Draft Policy Direction 16 – Making effective use of land seeks to set higher densities for housing development.</p>
	Draft Policy Direction 23	PA--53-6	Peak Park Parishes Forum	<p>The respondent appears to be supportive of the draft policy direction. The respondent identifies Chapter 13 and especially visitor transport as a major issue</p>	<p>We appreciate the support provided for this draft policy direction.</p>

	Draft Policy Direction 23	PA--53-6	Ramblers Areas covering West Riding, SYNED, Derbyshire Dales, Staffs, Cheshire East and GM&HP	The respondent wishes to see the inclusion of measures to improve active travel links as part of any road scheme; including crossing points.	We acknowledge the need to ensure that any transport development includes measures to improve links to existing rights of way.
	Draft Policy Direction 23	PA--69-30	Tarmac	The respondent believes that the policy should recognise that mineral development may create unavoidable cross-Park traffic and suggests an amendment to reflect this.	There is a recognition that mineral can only be extracted where it occurs naturally, and that this extraction will in all likelihood generate road traffic. Policy 60 – Managing the demand for freight transport and Draft Policy Direction 23 – Reducing and directing traffic seek to manage and direct such traffic. We don't believe that the policy needs rewording to specifically reference mineral extraction.
	Draft Policy Direction 23	PA--82-4	individual	The respondent recommends strengthening the 1st bullet point to provide alignment with Policy 58. The respondent suggests alternative wording to bullet point 1: - 'Transport developments that increase the amount of cross-Park traffic or have other negative impacts on the National Park's special qualities will not be permitted unless there are exceptional circumstances and they are in the public interest.'	Policy amended in light of suggestion.
	Draft Policy Direction 23	PA--83-2	individual	The respondent makes the case for the introduction of 'Quiet Lane' schemes.	Agreed – this is a useful approach and is supported within the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan.
	Draft Policy Direction 23	PA--84-4	individual	The respondent wishes to see a cohesive plan to address congestion and its impacts.	The respondent raise a valid point. Whilst it is outside of the ability of this Plan to deliver this, the policies contained within the plan can contribute towards these goals.
	Draft Policy Direction 23	PA--85-6	Peaks and Dales Line Ltd	The detail can be found at (132-2).	For respondent's comment and Officer response, see 132-2.

	Draft Policy Direction 23	PA--92-5	Grindleford Parish Council	The respondents believes that the policies have failed over time and that a different approach is required.	The Draft Policy Direction is based on existing policies that have sought to reduce and direct traffic within the constraints of a Development Plan. Whilst the aspiration for the National Park Authority to lead a coalition with ambitions for a Park less dominated by the car are appreciated and welcomed, they fall outside of the remit of this Plan. The development of the new National Park Management Plan offers opportunities for a partnership approach to managing Chapter 13.
	Draft Policy Direction 23	PA--101-12	Hope and Derwent Woodlands Parish Council	The respondent supports the policy.	The support for the policy is noted and welcomed.
	Draft Policy Direction 23	PA--106-33	Taddington and Priestcliffe Parish Council	The respondent wishes to see road safety and support for sustainable transport included.	The respondent offers valid suggestions and Policies amended.
	Draft Policy Direction 23	PA--112-2	Railfuture	The respondent wishes to see opportunities for visitors to preferentially use public transport to access the National Park. The respondent raises concerns about measures to reduce traffic.	The respondent's comments are noted as is their acknowledgment is not a transport authority. We do however seek to influence the Local transport Plans and public transport proposals of our constituent authorities.
	Draft Policy Direction 23	PA--122-2	individual	The respondent expresses concern that the policy is aspirational rather than deliverable.	The Local Plan Chapter 13 policies work in combination to deliver Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport. Within this context, the policies are confined to what can be achieved within the scope of the Authority's planning remit.

	Draft Policy Direction 23	PA--127-15	individual	<p>The respondent wishes to see road new developments accompanied by bridleways, with segregated routes for bigger roads. The response is a duplicate of response 127-15 so should also include the following text. "All existing highways must be protected from verge development in anticipation of more active and sustainable travel in the future. This will be applied through this policy and the planning application process." The respondent also wishes to see verges protected for possible use for active travel.</p>	<p>The respondent raises useful points. Policy 63 (B) states: – "Where development occurs opportunities will be sought to provide better facilities for users of the rights of way network, including where appropriate, providing links between the development and the rights of way network, including the National Park's Trail network." The above includes road developments. Verges perform a range of roles, including acting as habitats. In some cases, they form part of designated areas including SSSI / Special Protected Areas and Special Area of Conservation. Use as active travel routes would depend on any other restrictions.</p>
	Draft Policy Direction 23	PA--132-2	Peaks and Dales Line Ltd	<p>The respondent requested enhanced travel plan requirements. The respondent calls for cross-boundary routing requirements. The respondent is opposed to the proposed change to safeguarding for rail reinstatement.</p>	<p>We have considered amendments to the Travel Plan element of the policy. We will consider options to influence cross-boundary routing as the Plan is developed. The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. Policy is amended.</p>

	Draft Policy Direction 24	PA--31-32	Edale Parish Council	The respondent made a request for a traffic management scheme for Edale. The respondents also makes the case that parking should not be seen as an alternative to public transport and traffic management.	The request for a traffic management scheme for Edale, whilst important, does not provide comment on the policy. There is an existing approach to area management being undertaken in the Mam Nick area, with the measures likely to extend northwards from Mam Nick into western Edale. This area management approach can only be undertaken through partnership across a range of bodies and the affected communities. It is hoped that the Mam Nick approach can be widened out to other areas within the National Park. This approach will be a key part of the next National Park management Plan. We agree with the second comment, unfortunately, the provision of public transport lies outside of the scope of the Local Plan and the national Park Authority's responsibilities.
	Draft Policy Direction 24	PA--45-20	Eyam Parish Council	The respondent believes that the National Park requires more car parks	
	Draft Policy Direction 24	PA--53-10	Ramblers Areas covering West Riding, SYNED, Derbyshire Dales, Staffs, Cheshire East and GM&HP	The respondent wishes to see the policy strengthened to emphasise the National Park Authority's commitment to working with partners to address parking issues.	The policy is linked to development rather than to visitor management. However, the National Park Authority intends to undertake a partnership approach to area management as is currently being piloted in the Castleton / Mam Nick area. This will be through the National Park Management Plan.
	Draft Policy Direction 24	PA--54-6	Kinder and High Peak Advisory Committee	The respondent wishes to see the policy approach strengthened by including a commitment to work with partners to manage the demand for parking.	The respondent raises an important point. The National Park Authority is working with others on a pilot area management approach in the Mam Nick area. This area management approach can only be undertaken through partnership across a range of bodies and the affected communities. It is hoped that the Mam Nick approach can be widened out to other areas within the National Park. This

					approach will be a key part of the next National Park management Plan.
	Draft Policy Direction 24	PA--80-11	individual	The respondent believes that Park & Ride is a good solution in some areas.	The respondent did not specify which areas. However, current visitor management schemes in both the Lake District and Eryri National Parks offset demand for parking through Park & Ride schemes.
	Draft Policy Direction 24	PA--82-32	individual	The respondent believes that in addition to managing traffic, the policy should aim to reduce it	Policy Direction 24 is not a traffic management policy per se. Instead, it deal with the review of existing visitor management schemes, and proposals for car parks / park & ride. However, the policy does assist with a pilot Area Management approach that the Authority is bringing forward with partners in the area around Mam Tor and Castleton.
	Draft Policy Direction 24	PA--101-19	Hope and Derwent Woodlands Parish Council	The respondent believes that in addition to managing traffic, it should aim to reduce it.	This policy is not focussed on managing traffic, it is focused on addressing the impact of vehicles at specific locations. Draft Policy Direction 23 – Reducing and directing traffic specifically aims to reduce and manage traffic. Policy Direction 23 is supported by the respondent (101-12).
	Draft Policy Direction 24	PA--123-18	Devonshire Group	The respondent suggests that there should be flexibility with regard to short-term overspill parking at times of peak demand.	Existing permitted development rights allow for the use of land for overspill parking for up to 28 days of the year. The text accompanying current policy DMT7: Visitor Parking advocates this approach to cope with particularly busy days, when usual parking facilities are at capacity. Overspill parking of more than 28 days would require a planning application.

	Draft Policy Direction 24	PA--127-14	individual	<p>The respondent has made suggested additions in relation to Park & Ride car parks and the materials used for surfacing car parks. 1. Park and ride facilities are encouraged where they do not cause detriment to National Parks purposes and there is at least an equivalent reduction in car parking provision in sensitive and overused recreational areas.</p> <p>2. Any new car parks should be constructed of water absorbent materials that reduce or eliminate run off and help meet the Local Plan policies on Climate Change, Flood Risk, and Sustainable Drainage.</p>	The suggested additions are considered. Desing policy amended.
	Draft Policy Direction 24	PA--135-29	DCC	<p>The respondent wishes to see the policy provide a clearer link to encouraging modal shift, including promoting public transport services from surrounding urban areas. This response is a duplicate of that provided in response to Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport (135-28).</p>	The respondent raises valid points. Through the review of traffic management schemes, there is scope to deliver modal shift, but only through a partnership approach. The 2 recreation and education policies are also linked to this in trying to deliver modal shift alongside improving facilities for visitors. Again, this is likely to be via travel plans and multi-agency area management approaches.
	Policy 58	PA--33-21	Edale Parish Council	The respondent wishes to see the wording in Policy 58(A) “not be supported” replaced with “opposed”.	The policy supports Draft Policy Direction 23: Reducing and directing traffic (strategic policy), which states that policy will continue to resist transport developments that increase the amount of cross-Park traffic. We will consider amending the wording of Policy 58 to ensure consistency across the two policies.
	Policy 58	PA--33-21	Peak Park Parishes Forum	The respondent wishes to see the policy strengthened regarding alterations to roads. The response is a partial duplicate of the response to Chapter 13 – Chapter 13 (33-8).	We will consider the suggested change as the Policy is developed.

	Policy 58	PA--54-12	Kinder and High Peak Advisory Committee	The respondent's 'Response 54-11' suggests that Policy 58 is welcomed. The respondents wishes to see additional controls to minimise any disruption on existing rights of way, and the possibility for rerouting to minimise disturbance caused by any development to cross-Park roads.	We welcome the general support for this policy. We acknowledge the need to ensure that any development to cross-Park roads does not worsen conditions on existing rights of way, and where possible improves them. We believe that Part A of Policy 62: Routes for walking, cycling and horse riding, and waterways (strategic policy) does in part address this point. However, we will ensure that the links between Policies 58 and 62 are made explicit as the Plan is developed. Policy amended.
	Policy 58	PA--81-5	Friends of the Derwent Valley Line	The respondent raise the point that the policy doesn't take account of rising traffic volumes on key routes. The respondent advocates explicitly linking the policy to rail reinstatement.	The respondent's suggestion is noted.
	Policy 58	PA--82-7	individual	he respondent supports the policy.	The support is noted and welcomed.
	Policy 58	PA--83-4	individual	The respondent advocates for rail reinstatement coupled with road user charging,	The respondent does not provide any specific comment on the Policy 58 – Cross-Park Roads.
	Policy 58	PA--85-10	Peaks and Dales Line Ltd	The detail can be found at (132-3).	For respondent's comment and Officer response, see 132-3.
	Policy 58	PA--89-6	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 58	PA--101-13	Hope and Derwent Woodlands Parish Council	The respondent supports the policy.	The support is noted and welcomed.
	Policy 58	PA--115-13	CPRE Peak District and South Yorkshire	The response appears supportive of the policy	We note and welcome the apparent support.

	Policy 58	PA--122-3	individual	The respondent has queried whether the National Park Authority will have any influence with this policy.	The respondent raises a valid question. The focus of the policy is to restrict schemes aimed at increasing capacity on roads within the National Park. The building of new roads within the National Park constitutes major development. Where the road is a Nationally Significant Infrastructure Project, it is subject to the major development test as set out within the National Planning Policy Framework (paragraph 190). Where a new road fell outside of the scope of being nationally significant infrastructure, it would require planning permission. The Levelling Up and Regeneration Act (2023) requires public bodies to further National Park purposes (section 245). The criteria offer scope to influence the outcome of any potential roadbuilding within the National Park.
	Policy 58	PA--127-16	individual	The respondent wishes to see road new developments accompanied by bridleways, with segregated routes for bigger roads. The response is a duplicate of response 127-15 so should also include the following text. "All existing highways must be protected from verge development in anticipation of more active and sustainable travel in the future. This will be applied through this policy and the planning application process." The respondent also wishes to see verges protected for possible use for active travel.	The respondent raises useful points. Policy 63 (B) states: – "Where development occurs opportunities will be sought to provide better facilities for users of the rights of way network, including where appropriate, providing links between the development and the rights of way network, including the National Park's Trail network." The above includes road developments. Verges perform a range of roles, including acting as habitats. In some cases, they form part of designated areas including SSSI / Special Protected Areas and Special Area of Conservation. Use as active travel routes would depend on any other restrictions.
	Policy 58	PA--132-3	Peaks and Dales Line Ltd	The respondent supports the presumption against major road capacity. The respondent suggests tests to demonstrate net traffic reduction and modal shift. The respondent wishes to ensure that any road	We note and welcome the support. We will consider the suggested tests as the policy is further developed. It is intended that safeguarding for rail reinstatement will be removed within the Plan. However, the proposed safeguarding for the Trails

				schemes do not prejudice safeguarded rail corridors.	would apply and would seek to prevent any development prejudicial with that use. In effect, this would also prevent any development that would prejudice rail reinstatement, should it ever come forward.
	Policy 59	PA--8-2	individual	The respondent wishes to see the reinstatement of the railway along the Monsal Trail. The respondent makes the case for the sustainable transport benefits of this approach. The response has been copied to a more appropriate policy – Policy 61 – Railway construction (8-3).	The response does not apply to Policy 59 – Local road improvements.
	Policy 59	PA--26-4	National Highways	The respondent is supportive of the policy.	The support is noted and welcomed.
	Policy 59	PA--31-33	Edale Parish Council	The respondent supports the policy.	The support is noted and welcomed.
	Policy 59	PA--82-13	individual	The respondent supports the policy.	The support is noted and welcomed.
	Policy 59	PA--85-7	Peaks and Dales Line Ltd	The detail can be found at (132-4).	For respondent's comment and Officer response, see 132-4.
	Policy 59	PA--89-50	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 59	PA--101-14	Hope and Derwent Woodlands Parish Council	The respondent supports the policy.	The support is noted and welcomed.
	Policy 59	PA--106-34	Taddington and Priestcliffe Parish Council	The respondent wishes to see the policy take account of sustainable transport.	The point is valid; however, the policy is specifically focussed on road building. However, Part B of Policy 62 – Routes for walking, cycling and horse riding, and waterways requires that: - "Where development occurs opportunities will be sought to provide better facilities for users of the rights of way network including where appropriate links between the development and the rights of way network, including the National Park's Trail

					network.” This applies equally to road developments. In the case of larger housing or business developments, (where access roads are planned), a travel plan and transport assessment would be required, which would assess other options for sustainable travel. Policy amendments made to other policies.
	Policy 59	PA--127-17	individual	The respondent wishes to see road new developments accompanied by bridleways, with segregated routes for bigger roads. The response is a duplicate of response 127-15 so should also include the following text. “All existing highways must be protected from verge development in anticipation of more active and sustainable travel in the future. This will be applied through this policy and the planning application process.” The respondent also wishes to see verges protected for possible use for active travel.	The respondent raises useful points. Policy 63 (B) states: –“Where development occurs opportunities will be sought to provide better facilities for users of the rights of way network, including where appropriate, providing links between the development and the rights of way network, including the National Park’s Trail network.” The above includes road developments. Verges perform a range of roles, including acting as habitats. In some cases, they form part of designated areas including SSSI / Special Protected Areas and Special Area of Conservation. Use as active travel routes would depend on any other restrictions.
	Policy 59	PA--132-4	Peaks and Dales Line Ltd	The respondent supports the focus of the policy. The respondent advocates cumulative impact assessment and verge protection. The respondent advises a coordinated approach with area management and visitor parking.	We acknowledge and welcome the support offered. We will consider the recommendations as we develop the policy.
	Policy 59	PA--135-26	DCC	The respondent does not believe that the policy adequately addresses network resilience.	We appreciate that the road network has and will come under significant pressure as a result of climate change. However, we believe that the policy offers sufficient scope in practice to cover remedial schemes, with resilience and safety often closely linked.

	Policy 60	PA--6-4	Staffordshire County Council	The respondent has suggested amendments relating to: - Driver welfare facilities and HGV parking; HGV routing agreements	The suggestions are useful and will be considered as the policy is further developed.
	Policy 60	PA--26-5	National Highways	The respondent welcomes the Policy and recommends that Freight Management Plans are conditioned to ensure routing via appropriate SRN sections outside the Park wherever possible, and to mitigate peak-time impacts.	We note and welcome the support provided.
	Policy 60	PA--31-14	Edale Parish Council	The respondent agrees with the policy provided that it doesn't compromise passenger services on the Hope Valley Railway.	The support is noted and welcome. The proviso is also acknowledged
	Policy 60	PA--81-4	Friends of the Derwent Valley Line	The respondent welcomes the focus of the policy in minimising road-borne freight, but points to the impact of freight from beyond the National Park boundary. The respondent suggests expanding the policy to cover this. The respondent advocates for the following: - a) Broaden scope of Policy 60 to mandate investigation of rail reinstatement options, their contribution to modal shift, protection of roads and the environment, through HGV traffic reduction. b) Expand policy to explicitly address the implications for the Park of quarry-related freight originating outside Park boundaries. c) Strengthen support for rail freight transfer, making it a requirement where feasible, to reduce quarry originated HGV volumes.	The general support of the policy is noted and welcomed. The Local Plan is a Development Plan for the National Park; the National Park Authority is not able to directly control the management of quarry freight originating from outside of the National Park. Where new development occurs outside of the National Park, it is the responsibility of the appropriate planning and highway authorities to assess the impact of the development and to introduce any appropriate measures to address that impact.
	Policy 60	PA--82-2	individual	The respondent supports the policy.	The support is noted and welcomed.

	Policy 60	PA--83-11	individual	The respondent believes that the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement is contradictory to this policy	We disagree, we are keen to see the transfer of road freight to rail freight using existing rail corridors. It should also be noted that the proposed change in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 60	PA--85-4	Peaks and Dales Line Ltd	The detail can be found at (132-5).	For respondent's comment and Officer response, see 132-5.
	Policy 60	PA--89-36	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 60	PA--101-15	Hope and Derwent Woodlands Parish Council	The respondent supports the policy.	The support is noted and welcomed.
	Policy 60	PA--122-4	Richard Bradford	The respondent is advocating for the reopening of the Matlock to Buxton railway.	Policy 60, part B states: - Infrastructure developments that enable the transfer of road freight, including minerals, to rail will be supported where appropriate. However, this is not a policy about rail development and it does not advocate the reopening of any former railways; including the Matlock to Buxton railway.
	Policy 60	PA--132-5	Peaks and Dales Line Ltd	The respondent supports the transfer of freight from road to rail. The respondent refers to expanding rail safeguarding. The respondent suggests identifying rail connected hubs and participation in a rail freight opportunities study.	The respondent's comments are noted. It is intended that safeguarding for rail reinstatement will be removed within the Plan, rather than extended. However, should opportunities be identified for further upgrade to the Hope Valley Railway, we will provide rail safeguarding associated with the upgrade, once the requirements are known.

	Policy 60	PA--135-27	DCC	The respondent makes the case that in some circumstances weight restrictions may be required to remove HGVs from vulnerable or structurally sensitive routes.	Agree – the policy makes it clear that the National Park Authority will seek weight restrictions where they consider it necessary. However, this power ultimately rests with the respondent and our other constituent highway authorities.
	Policy 61	PA--6-1	Staffordshire County Council	The respondent suggests adding ‘transport of bulk goods and materials’ to the justifications.	We will consider the suggested amendment as the policy is developed.
	Policy 61	PA--8-3	individual	The respondent wishes to see the reinstatement of the railway along the Monsal Trail. The respondent makes the case for the sustainable transport benefits of this approach. The response is a copy of the one submitted under Policy 59 – Local road improvements (8-2)	The previous issues and options consultation (2024) showed a strong preference for the safeguarding of the Monsal Trail as a Trail. The public consultation on our Peak District Walking, Wheeling, Cycling & Horse-riding Infrastructure Plan (2025) also identified the extension of the Monsal Trail as a priority. The preferred approach would not prevent rail reinstatement. The safeguarding protects the route from development that would prejudice its current use; and any potential rail / tram / guided bus use.
	Policy 61	PA--31-3	Edale Parish Council	The respondent supports the policy.	The support is noted and welcomed.
	Policy 61	PA--40-1	The British Emporium	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park’s multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

	Policy 61	PA--41-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--42-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--44-2	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also

					prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--51-4	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--67-2	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

	Policy 61	PA--67-2	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is a duplicate of that provided for Policy 62 – Routes for walking, cycling and horse riding, and waterways (67-1) – it has been copied across to Policy 61 to better reflect the appropriate policy.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--76-1	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--78-2	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is a duplicate of that provided for Chapter 13 – Chapter 13 (78-1) – it has been copied across to Policy 61 to better reflect the appropriate policy.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also

					prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--79-2	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is a duplicate of that provided for Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport (79-1) – it has been copied across to Policy 61 to better reflect the appropriate policy.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park’s multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--81-2	Friends of the Derwent Valley Line	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. The respondent advocates combining Policies 15 and 61.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park’s multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. Policy amended.

	Policy 61	PA--82-1	individual	The respondent wishes to see the removal of the reference to park & ride, suggesting that it will increase traffic around stations. They prefer interchanges outside of the National Park.	There appears to be confusion on this; the Parking element is not at new stations. The policy states that the station is the destination of an acceptable Park & Ride scheme rather than the origin. Policy is amended.
	Policy 61	PA--83-12	individual	The respondent advocates for the reinstatement of the railway along the Monsal Trail, listing the many benefits that they believe will come about as a result.	We believe that the existing Monsal Trail brings multiple benefits to a great many people as indicated by the large numbers of users. The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--85-11	Peaks and Dales Line Ltd	The detail can be found at (132-6).	For respondent's comment and Officer response, see 132-6.
	Policy 61	PA--86-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed

					approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--87-2	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is really more suited to Policy 61, and has been copied there as response 87-2.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--89-15	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 61	PA--90-2	individual	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement. This response is a duplicate of that provided for Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport (90-1) – it has been copied across to Policy 61 to better reflect the appropriate policy.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

	Policy 61	PA--99-6	Hope and Derwent Woodlands Parish Council	The respondent favours reinstatement of the Longdendale and Matlock to Buxton railways.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. It should be noted that the use of trams along the Monsal Trail route would prevent its use as a Trail. The two purposes are not compatible due to the constraints of the six tunnels. This is an additional comment on this policy area by the same respondent – Hope Valley Woodlands Parish Council. The previous response (101-16) focussed on Park & Ride.
	Policy 61	PA--101-16	Hope and Derwent Woodlands Parish Council	The respondent wishes to see the removal of the reference to park & ride.	There appears to be confusion on this; the Parking element is not at new stations. The policy states that the station is the destination of an acceptable Park & Ride scheme rather than the origin.
	Policy 61	PA--112-4	Railfuture	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed

					approach does not remove safeguarding; it changes its emphasis.
	Policy 61	PA--117-17	Hope Valley Climate Action	The respondent wishes to see clarity on Part F of the policy.	Policy is amended.
	Policy 61	PA--122-5	individual	The respondent is advocating for the reopening of the Matlock to Buxton railway.	The respondent refers to the development of 'viable, even improved alternatives' to the Monsal Trail. The National Park Authority is not aware of such alternatives. However, any proposed alternative would need to meet the criteria set out in Part A of Policy 63. The Authority does recognise the benefit of rail for users of the Monsal Trail and is keen to extend the Trail to meet the railheads at both Matlock and Buxton enabling Trail Users to arrive at both locations by rail before accessing the Monsal Trail.
	Policy 61	PA--129-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

	Policy 61	PA--132-6	Peaks and Dales Line Ltd	<p>The respondent strongly opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. The respondent suggests possible amendments to the criteria for rail development: -</p> <ul style="list-style-type: none"> • Demonstrate net environmental benefit and BNG • Passenger services for residents of the Park. • Continuity of PROW & Trails via alternatives but not as a precondition to safeguarding etc • Deliver traffic displacement • Undertake HRA / SEA • Any proposal would be subject to PDNPA policies 	<p>The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. The respondent's suggested amendments to the policy's criteria will be considered as the Plan is further developed.</p>
	Policy 62	PA--3-1	individual	<p>The respondent supports the preferred approach.</p>	<p>The support is noted and welcomed.</p>
	Policy 62	PA--5-1	individual	<p>The respondent strongly opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement.</p>	<p>The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.</p>

	Policy 62	PA--6-2	Staffordshire County Council	The respondent recommends the inclusion of 'wheeling' within the policy.	Agreed – the policy will be amended to include wheeling.
	Policy 62	PA--12-1	individual	The respondent recognises the value of the Monsal Trail, but believes that railway reinstatement would deliver greater sustainable travel benefits.	The previous issues and options consultation (2024) showed a strong preference for the safeguarding of the Monsal Trail as a Trail. The public consultation on our Peak District Walking, Wheeling, Cycling & Horse-riding Infrastructure Plan (2025) also identified the extension of the Monsal Trail as a priority. The preferred approach would not prevent rail reinstatement. The safeguarding protects the route from development that would prejudice its current use; and any potential rail / tram / guided bus use.
	Policy 62	PA--31-10	Edale Parish Council	The respondent supports the policy, but makes that case that active travel is not suitable for all people or all journeys.	We note and welcome the support. We acknowledge the need for other sustainable travel activities.
	Policy 62	PA--32-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The proposed shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--33-22	Peak Park Parishes Forum	The respondent supports the policy. The response is a partial duplicate of the response to Chapter 13 – Chapter 13 (33-8).	The support is noted and welcomed.

	Policy 62	PA--44-1	individual	The respondent expresses support for the reinstatement of the Derby to Manchester railway along the Monsal Trail.	The proposed change to Policy 62 safeguards the Monsal Trail (and the Longdendale Trail) as multi-user trails providing a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--45-5	Eyam Parish Council	The respondent stated that Eyam is lacking safe footpaths that access and move through the village.	The respondent's comments are noted.
	Policy 62	PA--51-2	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--53-4	Ramblers Areas covering West Riding, SYNED, Derbyshire Dales,	The respondent welcomes the policy, and suggests that they should be referred to in Policy Directions 3 and 4 and the new Design Guide.	We welcome the support for the policy. We have considered the suggestions made and changes are made throughout the Plan. Also will be considered within the Design Guide.

			Staffs, Cheshire East and GM&HP		
	Policy 62	PA--54-1	Kinder and High Peak Advisory Committee	The respondent welcomes the policy The response is duplicated in relation to Policy 63 – submission 54-9	We welcome the support for this policy.
	Policy 62	PA--55-1	Staffordshire Moorlands District Council	The response is generally supportive and specifically supportive with regard to the Manifold Trail.	We welcome the support provided.
	Policy 62	PA--56-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--57-2	British Horse Society	The respondent is generally supportive, but makes the case for the removal of barriers on PROW and multi-user routes. The respondent raises concerns about ongoing maintenance of routes within developments – public vs private designation. Concerns are also expressed about the continuation of PROW during construction of a development. Sharing of multi-user routes is also of concern – share with care advocated.	We welcome the general tone of support. We will consider the concerns raised as the Plan is further developed.

	Policy 62	PA--67-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. This response is really more suited to Policy 61, and has been copied there as response 67-2.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--68-12	High Peak Borough Council	The respondent is supportive of the policy.	The support is noted and welcomed.
	Policy 62	PA--74-5	TPT & WWCT (Ex Sustrans) Joint	The respondent acknowledges references to the Trans Pennine Trail and the National Cycle Network. The respondent recommends incorporating 'wheeling' into the title of the policy.	The respondent raises a valid point – policy is amended.
	Policy 62	PA--81-1	Friends of the Derwent Valley Line	The respondent advocates for the reinstatement of the railway along the Monsal Trail.	The National Park Authority is keen to enable users of the Monsal Trail to arrive by Train and other forms of public transport. To this end, the National Park Authority is keen to extend the Monsal Trail to provide direct links to the railheads at Buxton and Matlock. The White Peak Loop would also link the High Peak Trail to the railway at Buxton, Cromford Matlock Bath and Matlock.
	Policy 62	PA--82-16	individual	The respondent supports the policy. They offer suggestions on how to meet the SA recommendation through setting an indicator on monitored active travel routes: - "The indicator should be an increase in	The support is noted and welcomed. We will consider the suggested indicator.

				use of monitored Active Travel routes with a goal of a 15% increase on the 2019 baseline by 2030.	
	Policy 62	PA--83-7	individual	The respondent advocates for the reinstatement of the railway along the Monsal Trail, listing the many benefits that they believe will come about as a result. The respondent refers to a number of alternative routes that they have suggested instead of the Monsal Trail.	We believe that the existing Monsal Trail brings multiple benefits to a great many people as indicated by the large numbers of users. The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. The respondent has separately provided details of routes that would provide good additional connectivity for cycling. They do not however, offer the same level of provision for all users as the Monsal Trail.
	Policy 62	PA--84-6	individual	The respondent objects to the proposed change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement. The respondent made this response under Chapter 13 – Chapter 13)84-1). However, as it makes specific reference to Policy 62 - Routes for walking, cycling and horse riding, and waterways, the response has been copied across to this consultation point.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the

					reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--85-12	Peaks and Dales Line Ltd	The detail can be found at (132-7).	For respondent's comment and Officer response, see 132-7.
	Policy 62	PA--89-29	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 62	PA--92-7	Grindleford Parish Council	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	We believe that the Monsal Trail is unique, the Trail experience combining viaducts, tunnels and limestone gorges is not replicated elsewhere in the Peak District; or indeed nationally. This unique character has led to its undoubted popularity, and the wish to safeguard it. The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

	Policy 62	PA--101-17	Hope and Derwent Woodlands Parish Council	The respondent wishes to see Clearer guidance on how active travel infrastructure can be designed to maximise health, biodiversity and carbon reduction benefits.'	The comment is noted and will be considered within the Design Guide.
	Policy 62	PA--112-3	Railfuture	The respondent has provided a duplicate response to that submitted under the response to Draft Policy Direction 22 Reducing the general need to travel and encouraging sustainable transport (112-1). The respondent wishes to see opportunities for visitors to preferentially use public transport to access the National Park. The respondent raises concerns about measures to reduce traffic. The above is also duplicated within the response to Draft Policy Direction 23 – Reducing and directing traffic. The respondent expresses preference for rail over car journeys and pledges support for increasing provision including for rail reinstatement along the Matlock to Buxton corridor. The respondent advocates improved public transport connectivity including links to gateway stations. The respondent advocates rails connectivity for walking and cycling within the National Park. The respondent advocates the transfer of freight onto rail. The respondent opposes the change of emphasis in safeguarding the Monsal Trail as a Trail rather than for possible rail reinstatement. The above is also duplicate of the response to the to Policy 61 – Railway construction (112-4)	The response does not really pick up on the Policy under consultation and is either wholly or partly a duplicate of the response to the respondent's other responses (112-1, 112-2 and 112-4). Where the response touches on Policy 62, our response is as follows: - The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis. We agree with the respondent on the need for walking and cycling routes to connect with transport hubs. The Derbyshire Key Cycle Network and the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan both seek better connectivity to transport hubs. In particular, both Plans include aspirations to connect the Monsal Trail with the railheads at Matlock and Buxton. This forms part of the White Peak Loop Project.

	Policy 62	PA--113-1	individual	The respondent opposes the change of emphasis in safeguarding the Monsal and Longdendale Trails as Trails rather than for possible rail reinstatement.	We believe that the Monsal Trail is unique, the Trail experience combining viaducts, tunnels and limestone gorges is not replicated elsewhere in the Peak District; or indeed nationally. This unique character has led to its undoubted popularity, and the wish to safeguard it. The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--115-12	CPRE Peak District and South Yorkshire	The respondent supports the preferred approach.	We note and welcome the support.
	Policy 62	PA--116-3	Peak District National Park Local Access Forum	The respondent appreciates the approach of the policy and the safeguarding of the Monsal and Trans Pennine Trails. The respondent seeks further clarification on the safeguarding of blue and green spaces, and would like to see access land / rights of way included within development proposals.	We note the respondent's appreciation of specific areas of the policy. Draft Policy Direction 4 – Development management principles states: - All development proposals must where possible: <ul style="list-style-type: none"> • contribute to the green and blue infrastructure network, for example by linking to walking, cycling, horse-riding and wheeling routes, or by naturalising watercourses.”
	Policy 62	PA--117-18	Hope Valley Climate Action	The respondent suggests a need for clearer guidance on how active travel infrastructure can be designed to maximise health, biodiversity and carbon reduction	The comment is noted and will be considered within the Design Guide.

				benefits. This response is duplicated under Policy 63 – Development affecting a public right of way and Policy 66 – Visitor parking.	
	Policy 62	PA--122-6	individual	The respondent does not agree with the change in emphasis on safeguarding of the Monsal Trail – stating: - We should be finding ways to encourage modal shift to trail, not pulling the rug from under those who are trying to do so. Based on the previous comments, it's assumed that the comment, "We should be finding ways to encourage modal shift to trail," , actually means rail.	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.
	Policy 62	PA--123-17	Devonshire Group	The respondent expressed support for the policy.	The support is welcomed.
	Policy 62	PA--132-7	Peaks and Dales Line Ltd	The respondent offers some supportive words for the policy, but does not agree with the proposed shift in safeguarding, offering the following: - <ul style="list-style-type: none"> • Protect Trails for recreation/active travel and deliver improvements if rail reinstatement approved. • Respondent recognises value of trails but does not believe that they offer the levels of modal shift of public transport. • Respondent advocates safeguarding for an alternative trail if rail reinstatement happens; plus prioritising links to public transport infrastructure. 	The proposed change of emphasis in safeguarding the Monsal Trail (and the Longdendale Trail) as multi-user trails provides a consistent approach across the National Park's multi-user routes. It also recognises the popularity of these routes in their current form. The shift in safeguarding does not change the level of safeguarding given to the route. Preventing development that would prejudice the operation of the current multi-user trail, also prevents development that would prejudice the reinstatement of a railway. The proposed approach does not remove safeguarding; it changes its emphasis.

				<ul style="list-style-type: none"> Respondent believes that Trail continuity should be addressed during scheme design and consenting stages. 	
	Policy 63	PA--6-3	Staffordshire County Council	The respondent recommends the inclusion of 'wheeling' within the policy.	Agreed – the policy is amended to include wheeling.
	Policy 63	PA--31-11	Edale Parish Council	The respondent is supportive of the policy.	We note and welcome the support.
	Policy 63	PA--54-9	Ramblers Areas covering West Riding, SYNER, Derbyshire Dales, Staffs, Cheshire East and GM&HP	The respondent has provided a response to Draft Policy Direction 24 rather than Policy 63 – Development affecting a public right of way. This response has been copied across to Draft Policy Direction 24 – Minimising the adverse impact of motor vehicles and managing the demand for car and coach parks as response 53-10.	The response does not relate to this policy.
	Policy 63	PA--54-9	Kinder and High Peak Advisory Committee	The respondent welcomes the policy The response is duplicated in relation to Policy 62 – submission 54-1	We welcome the support for this policy.
	Policy 63	PA--57-9	British Horse Society	The respondent provides a quote from the NPPF – paragraph 105. The respondent also expresses concern over sharing on multi-user routes advocating the 'share with care' approach.	It is unclear whether the response is supportive of the policy or not. We believe that the policy fulfils the requirements of NPPF paragraph 105.

	Policy 63	PA--85-1	Peaks and Dales Line Ltd	The detail can be found at (132-8).	For respondent's comment and Officer response, see 132-8.
	Policy 63	PA--89-59	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 63	PA--101-18	Hope and Derwent Woodlands Parish Council	The respondent queries the impact of 'appropriate, new or existing visitor facilities are made available'. The respondent wishes to see Clearer guidance on how active travel infrastructure can be designed to maximise health, biodiversity and carbon reduction benefits.'	The facilities that may be required range from signage and interpretation, through to cycle parking, bike-hire, public transport interchange or parking facilities. It is likely that any new facilities would encompass the range available at other sites within the National Park providing access to multi-user trails. However, this would be subject to the criteria provided under Policy 15 and Draft Policy Direction 7. The respondent raises valid points that are considered. Also will be considered within the Design Guide.
	Policy 63	PA--116-4	Peak District National Park Local Access Forum	The respondent appreciates the approach of the policy and the safeguarding of the Monsal and Trans Pennine Trails. The respondent seeks further clarification on the safeguarding of blue and green spaces, and would like to see access land / rights of way included within development proposals. Both of the above are also included in the response to Policy 62 – Routes for walking, cycling and horse riding, and waterways. The respondent is concerned that access to blue spaces is not included within the policy. The respondent would wish to see the inclusion of 'wheeling' within the policy, along with accessibility. The respondent is concerned about how the criteria for a new route will	We note the respondent's appreciation of specific areas of the policy. Draft Policy Direction 4 – Development management principles states: - All development proposals must where possible: <ul style="list-style-type: none"> • contribute to the green and blue infrastructure network, for example by linking to walking, cycling, horse-riding and wheeling routes, or by naturalising watercourses." We agree with the need to include a reference to wheeling and general accessibility within the policy. Delivery of a new active travel route for would require a balanced approach in line with National Park purposes and the Sandford principle. This is the case for all for development within a National Park. The general delivery of an expanded PRow network falls outside of the scope of this Plan. Highway authorities are responsible for the PRow network. The Authority's Walking,

				be met. The respondent wishes to see an increase in the PRow network.	Wheeling, Cycling and Horse-riding Infrastructure Plan will have a role in delivering a strategic multi-user network, as will the National Park's constituent authority Local Walking, Wheeling and Cycling Infrastructure Plans. Policy amended.
	Policy 63	PA--117-19	Hope Valley Climate Action	The respondent suggests a need for clearer guidance on how active travel infrastructure can be designed to maximise health, biodiversity and carbon reduction benefits. This response is duplicated under Policy 62 – Routes for walking, cycling and horse riding, and waterways and Policy 66 – Visitor parking.	The comment is noted and will be considered within the Design Guide.
	Policy 63	PA--132-8	Peaks and Dales Line Ltd	The respondent offers support for retention. The respondent suggests integration with public transport interchanges. The respondent suggests improvements to access where appropriate.	We note and welcome the support. The National Park Authority is keen to extend the Monsal Trail to provide direct links to the railheads at Buxton and Matlock. The White Peak Loop would also link the High Peak Trail to the railway at Buxton, Cromford Matlock Bath and Matlock. We will take into account the suggestions of improving Access as the Plan is developed.
	Policy 64	PA--31-85	Edale Parish Council	The respondent advocates for permeable surfacing where parking facilities are necessary.	The comment is noted and will be considered within the Design Guide.
	Policy 64	PA--57-11	British Horse Society	The respondent advocates for the inclusion of parking facilities for equestrians.	It is unlikely that most business parking will require space for horseboxes / trailers beyond the normal provision for larger vehicles; dependent on the type of business. However, for visitor parking, particularly adjacent to multi-user routes or

					bridleways, should include some provision as appropriate. This will be considered in the further development of Policy 66.
	Policy 64	PA--85-5	Peaks and Dales Line Ltd	The detail can be found at (132-9). The response focuses on Policy 66 – Visitor Parking	For respondent’s comment and Officer response, see 132-9.
	Policy 64	PA--89-7	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 64	PA--106-35	Taddington and Priestcliffe Parish Council	The respondent seeks clarification on what policy would apply at Chatsworth – business or visitors parking? The respondent then provides quite a lot of comments on visitor parking. This response has been copied to Policy 66 – Visitor Parking (106-36), and will be largely dealt with under that policy.	In response to the respondent’s question re: Chatsworth, both the Business and Visitor parking policies could apply. If the proposal was for parking for staff, then it would fall under Policy 64 – Business Parking. If it was a proposal to enlarge the visitor car park near to the house or at Carlton Lees, then Policy 66 – Visitor Parking would apply.
	Policy 65	PA--31-36	Edale Parish Council	The respondent believes that : - Parking should be surfaced with permeable materials; Numbers of spaces should take account of existing / planned transport links; The Plan should be more specific about the maximum number of spaces for development size.	The comment is noted and will be considered within the Design Guide. Whilst this is a good idea, the general trend has been for a reduction in public transport links across the National Park. The policy aims for a balanced approach. We provide very clear guidance within the Peak District Parking Standards, allowing for a maximum and minimum number of spaces to allow for local circumstance. We will review the parking standards as part of the Local Plan Review.
	Policy 65	PA--45-27	Eyam Parish Council	The respondent supports the policy, but questions how well it is applied.	We note the support and welcome it. We note the issue raised.
	Policy 65	PA--89-39	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.

	Policy 66	PA--18-4	individual	The respondent is concerned that new car parks will not be accompanied with restrictions to limit on-street parking; or their enforcement. The respondent believes that the policy should restrict additional provision.	The respondent raises valid concerns. However, the current policy appears to be working. The Issues and Options consultation was split with the two most popular responses favouring either, a less restrictive policy or a more restrictive policy. The current approach seeks to limit new or expanded car parks to those locations where there is a demonstrable need that can't be met in any other way. The policy requires an equal removal of on-street parking and this would be a requirement of planning permission being granted. If necessary, measures other than TROs could be considered, and may be a requirement of the permission. Enforcement could also be delivered via relevant byelaws.
	Policy 66	PA--31-82	Edale Parish Council	The respondent is supportive of the policy.	The support is noted and welcomed.
	Policy 66	PA--45-16	Eyam Parish Council	The respondent provide locations where they believe that additional car parks are needed – these are around the Eyam, Grindleford, Longshaw, Curbar, Calver area.	The policy approach allows for the development of car parks where there is a demonstrable need, and an appropriate site. We are not able to comment on possible locations within this consultation.
	Policy 66	PA--61-2	individual	The respondent describes issues with obstructive parking in the Ladybower area and makes the case for additional car parks coupled with other measures to restrict vehicular access on inappropriate roads and to reduce speed limits	The current policy does allow for additional off-street parking provision, when coupled with the removal of on-street parking. There needs to be a demonstrable need for the additional parking and it must be in a location that does not harm the special qualities of the National Park. Within the quoted location, draft policy direction 7: Recreation hubs is also relevant.
	Policy 66	PA--72-8	National Trust	The respondent recognises the need for increased parking provision to be accompanied by a partnership approach to managing visitor pressure. The respondent seeks clarification on interaction between	The Local Plan is a Development Document, so doesn't act as a Visitor Management Plan. However, the Authority has been working with the respondent and other stakeholders to address visitor management issues in the area around Mam

				the *visitor parking policy* and the *recreation hubs* policy.	Nick. This Area Management Approach is something that will be taken forward as part of the National Park Management Plan. Policy amended.
	Policy 66	PA--82-8	individual	The respondent wishes to see additional criteria related to public transport: To 66A add 'and public transport alternatives have been shown to fail.' In 66C delete 'in the Natural Zone'. It conflicts with the stronger policy on development in the Zone. No car parks should be allowed in the Zone. Delete the reference to P&R which would mean more visitors use their car to access the Park. The emphasis should be on sustainable travel interchanges outside the Park.	The National Park Authority is not in the best position to assess the success or failure of public transport provision; or its ability to meet the needs of visitors to a particular location. The suggested amendments will be considered as the Plan is developed.
	Policy 66	PA--85-2	Peaks and Dales Line Ltd	The detail can be found at (132-9).	For respondent's comment and Officer response, see 132-9.
	Policy 66	PA--89-61	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 66	PA--101-20	Hope and Derwent Woodlands Parish Council	The respondent wishes to see additional criteria related to public transport.	The National Park Authority is not in the best position to assess the success or failure of public transport provision; or its ability to meet the needs of visitors to a particular location. We will consider the suggested amendment as the policy is developed.

	Policy 66	PA--115-36	Taddington and Priestcliffe Parish Council	The respondent seeks clarification on how the policy interacts with Draft Policy Direction 7 – Recreation Hubs. The respondent believes that the policy needs to be incorporated into Tourism Management. The respondent believes that impacts of increased parking on the surrounding area need to be considered. The respondent is concerned about highway authorities' abilities to deliver TROs in support of the policy.	The respondent raises valid issues: - The parking policy supports Draft Policy Direction 7 – Recreation Hubs. However, the criteria relating to the visitor car parks will still apply. Tourism management requires a partnership approach. Parking Control is an element of the Area Management Approach being trialled in Castleton and around Mam Tor. Where new off-street capacity is provided, it is generally to address negative impacts of uncontrolled on-street parking. Visitor car parks enable people to access the National Park, in support of the second statutory purpose. However, where this leads to increased footfall, there may be unintended consequences. A balanced approach is needed. Highway authorities are key consultees for planning applications and any would be consulted on any new car parks.
	Policy 66	PA--115-10	CPRE Peak District and South Yorkshire	The respondent seeks clarity on the meaning of 'a demonstrable need for parking'. The respondent advocates that trips to recreation hubs and attractions should be by improved public transport and active travel. The above comments are duplicated within the response to Draft Policy Direction 22 – Reducing the general need to travel and encouraging sustainable transport (115-8). The respondent requests consideration of the circumstances for an Article 4 direction to remove PD rights for pop-up car parks. The respondent advocates for Park & Ride parking to be outside of the National Park only, and suggest engagement with local and Mayoral Combined Authorities on this. The	We will provide additional clarification on the meaning of 'a demonstrable need for parking'. Some of the respondent's comments fall outside of the scope of this Plan, but may be picked up within the National Park Management Plan and the Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan. The suggestion for an Article 4 direction approach to pop-up car parks is interesting and will be considered. The general presumption is that parking for a park and ride scheme would be outside of the National Park. However, existing but underused private parking within the National Park could also fulfil this role e.g. business parking that is unused at the weekend / bank holidays. The Authority does engage with its constituent transport and highway authorities. Policy amended.

				respondent also advocates for a policy on EV charging in car parks.	
	Policy 66	PA--117-20	Hope Valley Climate Action	The respondent suggests a need for clearer guidance on how active travel infrastructure can be designed to maximise health, biodiversity and carbon reduction benefits. This response is duplicated under Policy 62 – Routes for walking, cycling and horse riding, and waterways and Policy 63 – Development affecting a public right of way.	This comment does not appear relevant to this particular policy.
	Policy 66	PA--121-27	Castleton Parish Council	The respondent does not wish to see more car parks in settlements, but would be happy to see additional parking capacity at Mam Tor. The respondent refers to the conversion of traditional buildings for visitor accommodation. – this has already been covered in the respondent’s response to Draft Policy Direction 8 (121-20). The respondent also wishes to see a specific objective in support of infrastructure for public transport. The respondent also refers to a response to Policy 13.	The specific comments on visitor parking are noted, but do not specifically require an amendment to the policy. The reference to the conversion of traditional buildings for visitor accommodation. – this has already been covered in the respondent’s response to Draft Policy Direction 8 (121-20). The request for a specific objective on public transport development is noted. Generally, and dependent on scale, this would be a matter for the appropriate transport authority. The reference to Policy 13, is believed to relate to the response on Chapter 13 (121-25).
	Policy 66	PA--122-7	individual	The respondent advocates for the reinstatement of the Matlock to Buxton Railway.	The response does not offer any specific comment on Policy 66.

	Policy 66	PA--128-1	individual	<p>The respondent agrees with the policy, but would like to see it apply to facilities for campervans etc. The respondent suggests additional policies for overnight parking, and the prevention of roadside parking in the open countryside: - Provision of small scale facilities for overnight paid for parking should be allowed subject to: -</p> <ol style="list-style-type: none"> 1. No harm to the local or wider landscape. 2. Strict landscaping and screening conditions. 3. Immediate access off the existing road network. This is to prevent the creation of access tracks and intrusion into the wider landscape. 4. Provision of well designed, small scale toilet and waste/chemical facilities. 5. No detrimental to local residents through noise, or visual intrusion or traffic movements. 6. There will be a presumption against the general parking of cars, campervans and other vehicles in open countryside and on land not designated specifically as car parks or car parking areas throughout the National Park. 	<p>We welcome the general support for the policy. We considered the suggested additional policies as the Plan is developed. However, generally restricting on-street parking lies outside of the scope of the Plan. Policy amended.</p>
	Policy 66	PA--132-9	Peaks and Dales Line Ltd	<p>The respondent supports a criteria led approach. The respondent suggests the introduction of a demand management approach where new off-street parking is installed. The respondent suggest EV and cycle parking, plus monitoring of displacement.</p>	<p>We note and welcome the support. The policy generally requires the removal of off-street parking. However, we considered the respondent's additional suggestions. Policy amended.</p>

	Policy 67	PA--7-40	Peak District NPA	The respondent believes that the policies are vague and require clarification.	The respondent raises a valid point, the policy is amended to provide greater clarity.
	Policy 67	PA--31-92	Edale Parish Council	The respondent appears to support the policy, advocating only for allowing helicopters and drones to land and take off where they are performing specific tasks which contribute to health and safety, nature restoration or the enhancement of the Special Qualities.	The support is noted and welcomed.
	Policy 67	PA--82-25	individual	The respondent supports the policy.	We note and welcome the support.
	Policy 67	PA--89-71	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
	Policy 67	PA--101-21	Hope and Derwent Woodlands Parish Council	The respondent supports the policy.	The support is noted and welcomed.
	Policy 67	PA--115-11	CPRE Peak District and South Yorkshire	The respondent is generally supportive of the policy, but advocates further study in relation to drones, including assessing potential impacts and benefits and identifying areas more sensitive to disturbance. The respondent is supportive of allowing for take-off and landing areas for emergency aircraft / helicopters / drones.	We note and welcome the general support for the policy. We also appreciate the general input and recommendations for taking the policy forward.

Utilities

Point #	Point Name	Comment #	Name	Summary for Comment	Response for Comment
Chapter 14	PA--33-10		Peak Park Parishes Forum	The respondent has provided a response that is a duplication of that provided for Chapter 13 – Travel and Transport (33-8).	The response is not applicable to Chapter 14 - Utilities.
Chapter 14	PA--64-11		Youlgrave Community Land Trust.	The respondent links the utilities policies with those of housing, principally building new houses on flood plains.	The comment provided does not really express any concern or support for the Utilities chapter. There is a connection to the housing and climate change chapters, which will be considered as the plan is developed.
Chapter 14	PA--114-7		Over Haddon Parish Council	The respondent provides examples for how renewable energy could be generated within Over Haddon parish.	The suggestions are noted.
Chapter 14	PA--119-1		Severn Trent Water	The respondent raises suggested changes within the draft NPPF (2025). The respondent provided a suggested new policy focussed on water infrastructure. Recommended new policy - New and Upgraded Water Company Infrastructure 1. Development of water company infrastructure will be permitted where it can be provided without harm to the Special Qualities of the National Park. 2. Any infrastructure and ancillary works or buildings should be located, designed and landscaped to minimise their impact on the built and natural environment, and on any other established activities.	The respondent raises valid points, policy is amended.

Draft Policy direction 25	PA--31-69	Edale Parish Council	The respondent agrees with the draft policy direction	We welcome the support for this policy direction
Draft Policy direction 25	PA--66-3	Yorkshire Water	The respondent advocates for: - • a stronger approach on SuDS • a requirement to separate foul and surface water • for housing schemes to be designed to minimise water use	The respondent raises valid points, policy is amended.
Draft Policy direction 25	PA--118-17	United Utilities	The respondent requests that the policy is amended to reflect the need for SUDS as detailed within paragraph 182 of the NPPF. The respondent requests that the policy also refers to wider recommendations regarding the content of a sustainable drainage policy for both foul and surface water as set out in our enclosed 'Supporting Policies'.	The respondent raises valid points, policy is amended.
Draft Policy Direction 26	PA--7-29	Peak District NPA	The respondent is concerned that the Draft Policy Direction repeats the requirement of Policy 6 to remove redundant buildings and infrastructure.	The respondent raises a valid point, we will consider the usefulness / need for a separate policy within the Utilities chapter as the Plan is progressed.
Draft Policy Direction 26	PA--82-19	Individual	The respondent supports the policy but wishes to see the inclusion of a clause on timescales.	We note and welcome the support. We will consider the suggested amendment as the policy is developed.

Draft Policy direction 25	PA--123-19	Devonshire Group	The respondent believes that Part B of the policy is too restrictive in requiring new housing to be restricted to locations that can connect to a mains sewer.	The suggested approach as detailed within Part B has been included based on the response by the Environment Agency to the Utilities Proposed Spatial Objectives in the Regulation 18 Issues and Options Consultation (2024). The respondent raises valid points, policy is amended.
Policy 68	PA--17-1	Individual	The respondent requested the opinion of the National Park Authority on the proposed Carsington to Tittesworth pipeline.	Whilst we are unable to provide specific comment on this proposal, our starting point would be Policy 69: New and upgraded utilities services (strategic policy). However, any development associated with this proposal within the National Park would be almost certainly be covered under the regulations for Nationally Significant Infrastructure projects. Our response to any such proposal would focus on National Park purposes, and the protection offered to National Parks through Section 190 of the National Planning Policy Framework. This focuses on: - <ul style="list-style-type: none"> • the need for the development • the ability to avoid the National Park • any detrimental affect on the National Park and the ability to mitigate or offset that harm. The support is noted and welcomed. New policy requires highest possible BNG not 20%
Policy 68	PA--31-21	Edale Parish Council	The respondent agrees with the policy and advocates for 20% BNG.	
Policy 68	PA--46-4	Sport England	The respondent suggests an amendment to allow for any new or expanded reservoirs to allow for watersports.	The respondent raises valid points, policy is amended.

Policy 68	PA--63-1	Canal and River Trust	<p>The respondent raises concerns as to what the policy means by expanded reservoirs and seeks clarification to ensure that it does not include necessary safety works to protect against dam failure. The respondent also seeks further clarity on the issue of: -</p> <ul style="list-style-type: none"> • BNG on the site • The requirement for a Net gain to Landscape Character <p>The respondent makes some suggested changes to the policy: - Summary of changes sought In summary we would request that Policy 68 is amended as follows</p> <ol style="list-style-type: none"> i) policy 68 and supporting justification be amended to provide further clarification on what is meant by an “expanded reservoir” and to confirm that this would NOT include modifications and works to existing reservoirs and other associated waterway infrastructure necessary to meet safety and operational requirements or address statutory obligations ii) Policy 68 B i be amended to refer to the delivery of biodiversity net gain in accordance with legislation / Biodiversity Net Gain Hierarchy. iii) Policy 68 B ii be amended to refer to delivery of landscape enhancement with suitable mitigation with deletion of reference to ensuring a net benefit to the landscape; 	<p>The respondent raises some valid points, which will be considered during the further development of the policy.</p>
Policy 68	PA--66-2	Yorkshire Water	<p>The respondent believes that the policy does not sufficiently take account of the requirement to consider the national importance of enabling the secure provision of a clean water supply. The respondent makes some suggested changes to the criteria within Part B of the policy to try and ensure that these are flexible around BNG delivery and the constraints of a site.</p>	<p>The respondent raise some valid concerns that will be considered in the further development of the policy.</p>

Policy 68	PA--82-28	Individual	The respondent strongly supports the policy.	We note and welcome the support.
Policy 68	PA--89-12	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
Policy 68	PA--97-11	Environment Agency	The respondent suggest the inclusion of 'water relevant ecosystem services' within the policy criteria.	The respondent raises valid points, policy is amended.
Policy 68	PA--99-7	Hope and Derwent Woodlands Parish Council	The respondent cites the environmental damage caused by new or extended reservoirs.	The response is additional to the Hope Valley Woodlands Parish Council response (101-22) which expressed support for the policy. The respondent raises valid points, policy is amended.
Policy 68	PA--101-22	Hope and Derwent Woodlands Parish Council	The respondent supports the policy.	The support is noted and welcomed.
Policy 68	PA--115-18	CPRE Peak District and South Yorkshire	The respondent supports the policy.	The support is noted and welcomed.
Policy 68	PA--118-16	United Utilities	The respondent wishes to see Criterion A of the policy removed. The respondent also wishes to see further clarity regarding service reservoirs and pumping stations. The respondent requests an addition to Criterion B: - • 'where it can be demonstrated that the development is in the public interest' as per Paragraph 190 of the National Planning Policy Framework (NPPF). The respondent highlights the possible future challenges of providing a secure water supply.	The respondent's concerns are noted and will be considered as the policy is developed.

Policy 68	PA--119-2	Severn Trent Water	The respondent requests amendments to the policy to provide clarification: - • The policy refers to exceptional circumstances and when “in the public interest”. along with a change to the wording for BNG, to tie in with the national hierarchy.	The respondent makes some valid points; these will be considered as the policy is developed.
Policy 68	PA--125-22	Historic England	The respondent wishes to ensure that any new reservoir development takes account of the impact on cultural heritage assets and their setting.	The policy seeks to prevent the development of reservoirs in the National Park unless there are exceptional circumstances, governed by National Need, and the inability for development of such infrastructure outside the National Park boundary. Whilst the Authority would not be the determining body for nationally significant infrastructure, the policy requires that “The recording and where possible conservation and safeguarding of any cultural heritage or archaeological features that may be affected by the development”
Policy 69	PA--31-55	Edale Parish Council	The respondent is supportive of the policy.	We will consider additional wording to address the respondent’s concerns. The support is noted and welcomed.

Policy 69	PA--55-12	Staffordshire Moorlands District Council	<p>The respondent expresses concern about the possible impact of the policy on the 'Peak Cluster'. The respondent is also concerned about the effects on distribution networks that might cross the National Park.</p>	<p>The respondent raises some useful points and policy is amended. We believe that in most cases distribution networks that cross the National Park will also serve National Park residents. In those cases where there is an impact of delivering networks, without benefit to the National Park or its residents, an alternative route, bypassing the Park should be assessed and discounted prior to development occurring within the National Park. This approach is in keeping with the National Planning Policy Framework, which directs major development away from National Parks unless there are exceptional circumstances.</p>
Policy 69	PA--60-1	National Grid	<p>The respondent requests an amendment to section a) of the policy to reflect the role of National Grid in delivering strategic distribution networks, whilst accepting the existing requirements (as set out within the policy) for delivery within a nationally designated landscape:</p> <ul style="list-style-type: none"> - • 'Development of utilities infrastructure will not be permitted unless it can be demonstrated that in doing so it would be in the public interest and can be provided without harm to the Special Qualities of the National Park, or other established uses. 	<p>The respondent raises valid points, policy is amended.</p>

Policy 69	PA--66-1	Yorkshire Water	The respondent is concerned that the policy is not sufficiently flexible to allow for future water network development. They suggest two options to rectify the situation: - <ul style="list-style-type: none"> • Rewording of the criteria for Policy 69 • A separate policy for water supply infrastructure. 	The respondent raises valid points, policy is amended.
Policy 69	PA--89-52	Holme Valley Parish Council	The respondent believes that policy should allow for National Infrastructure under exceptional circumstances.	The respondent raises a valid point. It is possible that a scheme as described by the respondent might be brought forward as a Nationally Significant Infrastructure Project. Our response to any such proposal would focus on National Park purposes, and the protection offered to National Parks through Section 190 of the National Planning Policy Framework. This focuses on: - <ul style="list-style-type: none"> • the need for the development • the ability to avoid the National Park • any detrimental effect on the National Park and the ability to mitigate or offset that harm.
Policy 69	PA--118-18	United Utilities	The respondent is concerned that the policy does not have sufficient flexibility to allow for the delivery of infrastructure that is in the wider public interest. The respondent also makes the case that it is not always possible to deliver water management infrastructure underground as required with Criterion C.	The respondent raises valid points, policy is amended.
Policy 69	PA--119-3	Severn Trent Water	The respondent is concerned that the policy is really focussed on power supply infrastructure, and as such might have unintended negative impacts on water infrastructure. They recommend an additional policy to address this.	The respondent raises valid points, policy is amended.

Policy 70	PA--89-45	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.
Policy 70	PA--118-19	United Utilities	The respondent is supportive of this policy.	The support is acknowledged and welcomed.
Policy 71	PA--31-72	Edale Parish Council	The respondent wishes amendment to the policy: <ul style="list-style-type: none"> - • insist that mobile phone providers improve the quality of their network • provision should be made for emergency power to be available for the transmitter in the event of a power failure so that people can continue to use their mobile phones in an emergency. • any policy needs to recognise the need for the roll-out of fibre broadband to continue. • The policy must not obstruct or in any way make difficult the installation and maintenance of a more robust mobile network. • Power must be maintained to masts in the event of a power failure, now that land-lines are being removed...to enable emergency calls. 	The respondent raises valid points, policy is amended.
Policy 71	PA--89-34	Holme Valley Parish Council	The respondent agrees with the policy.	The support is welcomed.

Policy 71	PA--99-8	Hope and Derwent Woodlands Parish Council	The respondent provided a comment on the impact of masts and satellite dishes.	The comment is noted.
Policy 71	PA--125-23	Historic England	The respondent requested a change to the wording of clause C, replacing “built heritage” with “heritage assets”.	The respondent raises valid points, policy is amended.