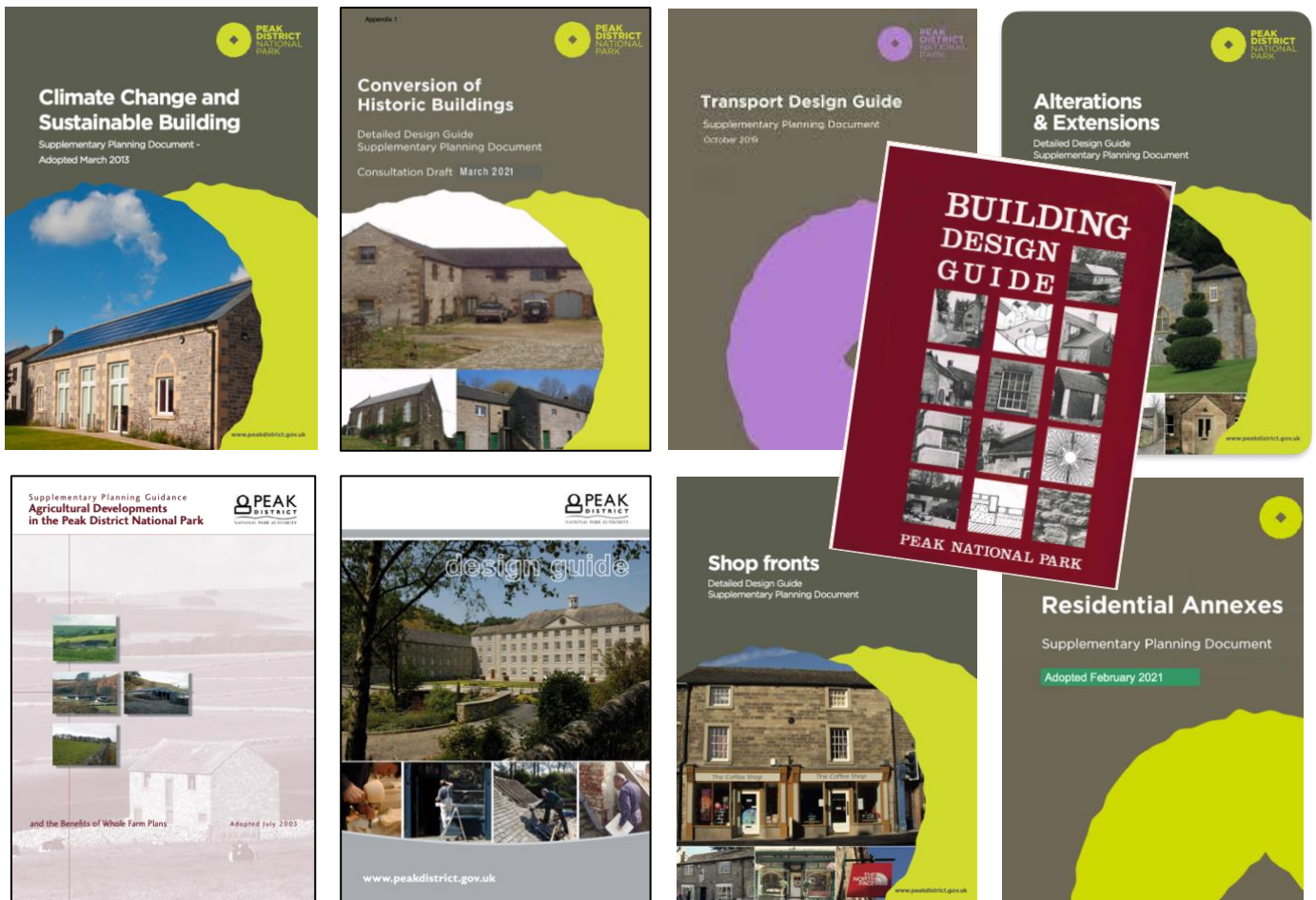


Peak District National Park Authority Local Plan Review

Baseline Review of the PDNPA Design Policies, Supplementary Planning Documents and Technical Guidance to inform the Review of the PDNPA Local Plan and Design Code and to consider Compliance with the National Design Guide

FINAL REPORT



June 2025





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REPORT SYNOPSIS

- i) The Peak District National Park Authority (PDNPA) is conducting a comprehensive review of its Local Plan and preparing its first Design Code to ensure compliance with the National Design Guide and recent legislative changes. The review aims to update baseline understanding of the PDNPA's design policies, Supplementary Planning Documents (SPDs), and Technical Guidance so that appropriate refinements will align with current national priorities and statutory requirements, including the Levelling-Up and Regeneration Act 2023 the Environment Act 2021 and the National Planning Policy Framework (2024)¹. The report highlights the evolution of national design policy and the need for the PDNPA to reassess its existing design guidance in this context.
- ii) The review process involves two main phases: assessing the compatibility of adopted design policies with the National Design Guide's ten characteristics of good design, and understanding the practical application of the design guidance by PDNPA officers.
- iii) Key findings indicate that while the PDNPA's design policies strongly align with principles of context, identity, and built form, there is room for improvement in addressing broader place-making, sustainability, and resilience principles. The report recommends expanding design policies to incorporate more holistic design considerations, enhancing cross-referencing to design guidance, and rationalising overlapping guidance documents.
- iv) The empirical evidence gathered from PDNPA officers suggests that the existing design guidance is highly valued but often disregarded in planning applications. Officers identified areas for improvement, including better integration of landscape, biodiversity, contemporary design, and sustainability principles.
- v) The report concludes with recommendations for the future status of design guidance, suggesting the transfer of relevant content to a new PDNPA Design Code, supplemented by technical guidance and supplementary plans. The aim is to create a coherent and comprehensive design framework that supports the conservation and enhancement of the Peak District National Park's special qualities while embracing contemporary design and sustainability principles.

¹ Unless otherwise stated, all references to the National Planning Policy Framework in this report refer to the December 2024 edition.

1. INTRODUCTION

- 1.1 The Peak District National Park is the UK's first national park with the purposes and duty of the National Parks and Access to the Countryside Act 1949 (as amended²) providing a statutory basis for all stakeholders whose activities, actions and functions have influence and impact on its management, conservation and development.
- 1.2 Over more than 70 years as the Local Planning Authority the Peak District National Park Authority (NPA)³ has adopted spatial planning policy seeking to secure the conservation and enhancement of its landscape and built and historic environments, informed by a raft of supporting design guidance.
- 1.3 National policy and guidance for the role of the statutory planning system in delivering high quality design in new development and public spaces has materially evolved in recent years. At the time this report was prepared, government's design policy and guidance continue to evolve, but statutory contexts and national policy now indicate that a review of the NPA's design policy and guidance portfolio is necessary as well as expedient. The Planning and Environment Studio Ltd has been commissioned to undertake a review of the PDNPA design policies, Supplementary Planning Documents (SPD) and Technical Guidance so as to inform the emerging replacement Local Plan process and actions in relation to the scope and status of future design-related policies, a new statutory PDNPA Design Code and supporting technical guidance.
- 1.4 The work has been commissioned by and carried out in close consultation with the Planning Policy team of the Peak District National Park Authority (NPA) alongside extensive consultation with development management officers, landscape, ecology and heritage specialists of the NPA. From a basis of understanding about extant design guidance and its usage, this report sets out how a refined, more focused, accessible and up-to-date suite of design policy and guidance might be prepared and embedded within the replacement Local Plan and meet the statutory requirements of the pertinent Acts and current government guidance.
- 1.5 This report does not seek to outline the detailed structure, format or content of a future Design Code for the Peak District National Park, which will be a significant stand-alone undertaking, nor to propose a coding method, a blueprint for which is set out in the National Model Design Code.
- 1.6 In this context the principal purposes and functions of this report are to identify:
- Compatibility of existing NPA planning policy and design guidance with the requirements of up-to-date legislative context and particularly the National Design Guide;

² s.61 Environment Act, 1995.

³ Formerly the Peak District National Park Joint Planning Board

- To consider if and/or which elements of existing NPA policy and guidance can be taken forward within the new context of national policy and legislative requirements and with what level of 'policy' status;
 - Identify gaps NPA in design guidance coverage;
 - Examine how functional links between the design policy and guidance suite may be improved or clarified.
- 1.7 In presenting consolidated evidence and thereby increasing understanding of the strengths and weaknesses of existing guidance (part derived from experience of its day-to-day application) the focus and scope of a Peak District National Park Design Code can be optimised and work progressed effectively.

2. CONTEXT AND FACTORS DRIVING THE REVIEW OF PDNPA DESIGN POLICY AND GUIDANCE

2.1 This report has been prepared at a point in time where the PDNPA's development plan review has coincided with recently changed statutory requirements, national priorities and policy for design objectives to be achieved through the operation of the planning system. The Government has announced its intention for further remodelling of the system in the near future⁴, reflecting a dynamic period of the planning reform following change of government. This chapter identifies the factors which can be seen to present a pressing need for a comprehensive review of PDNPA planning policy and guidance.

NPA Design Policy and Design Guidance

2.2 The Peak District National Park Authority (as the LPA) is distinct from most other planning authorities in that development plans and planning decisions must seek to further its statutory purposes and duty under the National Parks and Access to the Countryside Act 1949 (as amended⁵). These are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and
- To promote opportunities for the understanding and enjoyment of the park's special qualities by the public.

2.3 Consequently, the NPA has a longstanding requirement in law to adopt development plan policy that sets high expectations in relation to the design, quality and character of development proposals (where these require express planning permission), in order that the national park's special qualities (including its distinctive built environment) are conserved or enhanced. In particular, the Core Strategy (2011) sets high-level spatial policies which reflect those statutory purposes, and which subsequently present the critical strategic framework for the more detailed design policies of the Development Management Policies Development Plan Document (DMPDPD) (2019).

2.4 **Table 1** below sets out those adopted planning policies⁶ which have a strong design component and are the part-focus of this study. A number of these policies in full include criteria not related to design matters and those components are not addressed by this review.

⁴ For example a national Design Code for small sites

⁵ s.61 Environment Act, 1995.

⁶ As identified by the PDNPA project team.

Table 1: Key adopted 'design' related planning policy:

Design-Related PDNPA Local Plan Policy	Adopted
Core Strategy DPD	2011
GSP2 Enhancing the National Park	
GSP3 Development Management Principles	
L2 Sites of biodiversity or geodiversity importance	
L3 Cultural heritage assets of archaeological, architectural, artistic or historic significance	
Development Management Policies DPD	2019
DMC3 Siting, design, layout and landscaping	
DMC7 Listed Buildings	
DMC8 Conservation Areas	
DME1 Agricultural or forestry operational development	
DME7 Expansion of existing industrial and business development not involving farm diversification	
DME8 Design, layout and neighbourliness of employment sites including haulage depots	
DMH7 Extensions and alterations	
DMH8 New outbuildings and alterations and extensions to existing outbuildings in the curtilage of dwelling houses	
DMH9 Replacement dwellings	
DMS1 Shops, professional services and related activities in Core Strategy policy DS1 settlements	
DMS3 Retail development outside Core Strategy DS1 settlements	
DMS4 Shop fronts	
DMS5 Outdoor advertising	
DMR1 Touring camping and caravan sites	
DMT3 Access and design criteria	
DMU4 Telecommunications infrastructure	

- 2.5 To support the interpretation of the design policy framework in decision-making, the NPA has assembled a suite of design guidance documents. This set of supporting documents has now evolved and expanded over several decades. These provide more detailed guidance and design direction by which development proposals can be informed, such that compliance with design policy is more likely to be achieved.

2.6 **Table 2** sets out the design guidance suite as the second key focus of this study⁷.

Table 2 – Existing NPA Design Guidance

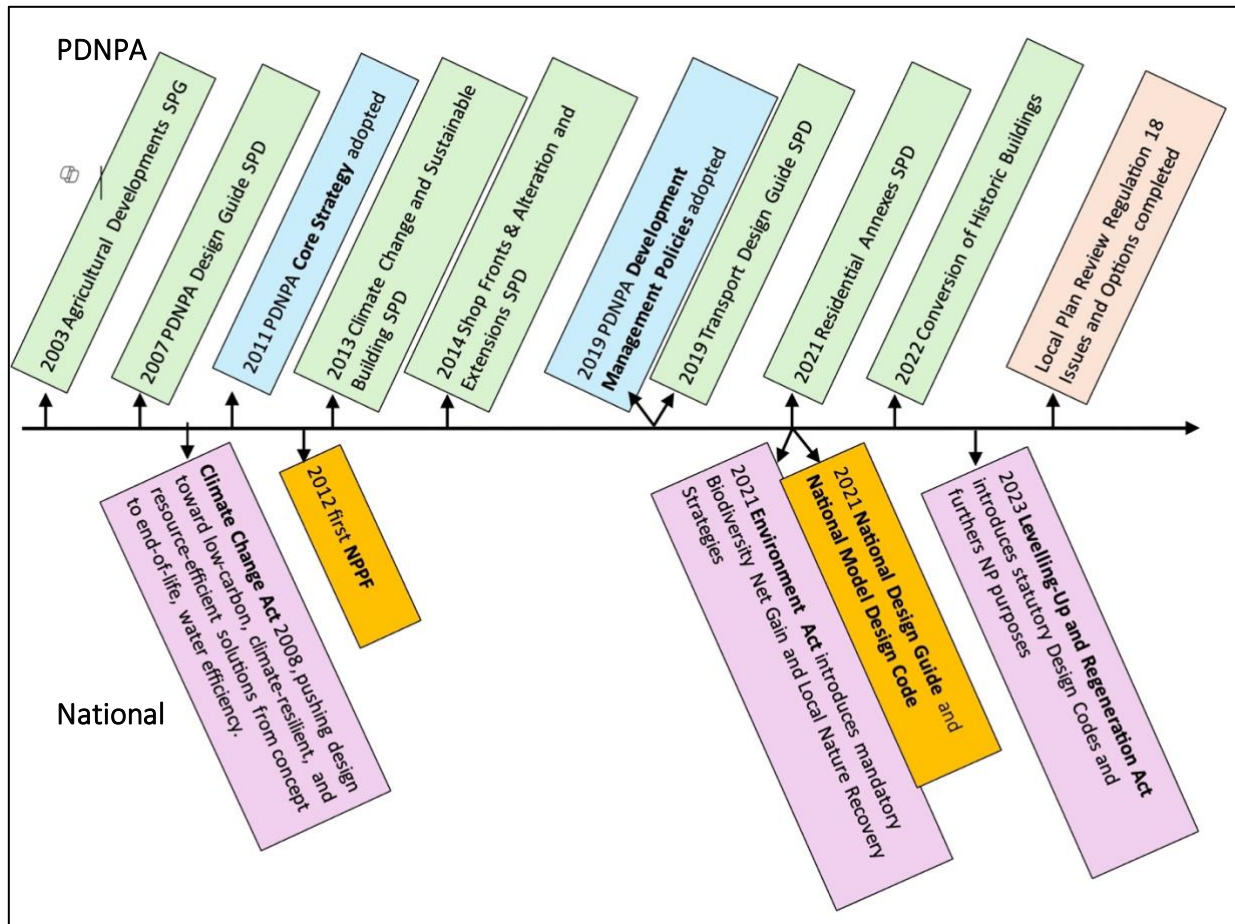
Design Guidance	Adopted/Published	Status
Building Design Guide	1987	Technical Appendix to BDG
Agricultural Developments	2003	SPG
Design Guide	2007	SPD
Climate Change and Sustainable Building	2013	SPD
Shop Fronts	2014	SPD
Alteration and Extensions	2014	SPD
Transport Design Guide	2019	SPD
Residential Annexes	2021	SPD
Conversion of Historic Buildings	2022	SPD

2.7 Whilst the statutory purposes remain of paramount significance in shaping local planning policy and influencing decision-making, the adopted NPA development plan documents were prepared either under now superseded national Planning Policy Statements (the Core Strategy) or under superseded NPPF iterations (the Development Management Policies DPD). The NPA must have regard to national planning policy objectives as set out within the National Planning Policy Framework (and supporting national guidance) to the extent that they do not undermine those purposes. National planning policy since adoption of the Core Strategy in particular, has been revised several times in respect to place-making and raising design standards generally. Similarly, the legislative framework within which the NPA must prepare development plans continues to evolve.

2.8 **Figure 1** sets out an indicative timeline of the sequence of adopted NPA design policy and guidance against keynote national policy and legislation publications.

⁷ As identified by the PDNPA project team.

Figure 1: Indicative sequence of national design-related legislation, policy and guidance against the NPA design guidance framework since 2003.



- 2.9 In addition a number of current NPA design guidance documents pre-date the publication of the first NPPF in 2012, including the cornerstone 2007 Design Guide (which itself references as an appendix the Building Design Guide dating from 1987). Most more-recent design guidance documents (with SPD status) still predate significant national contexts such as the Levelling-Up and Regeneration Act 2023 and the most recent iteration(s) of NPPF.

Evolved National Planning Policy and Practice for Design

- 2.10 As set out, the Peak District National Park Core Strategy, the principal strategic development plan document was adopted a year before the first iteration of the NPPF was published (and in doing so the former suite of government Planning Policy Statements and guidance under which the plan was prepared was superseded). The NPA keystone NPA Design Guide was published in 2007, 5 years prior to the first NPPF.
- 2.11 In addition to its underpinning drive to achieve more sustainable use of land and delivering needed development, the National Planning Policy Framework (2024) devotes Chapter 12 to how the planning system can, and should, support

development which delivers well-designed places - and that it should refuse permission for proposals that do not. It emphasises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to the objectives of the planning system, and by implication a legitimate aspect of sustainable development. Core NPPF principles (paragraph 135) for development plan policies and for decision-making regarding design matters are to create places which (are):

- Functional and add to the overall quality of the area over the lifetime of the development;
- Visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;
- Maintain a strong sense of place, creating attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of sites to accommodate and sustain appropriate amounts and mix of development supporting local facilities and transport networks; and
- Create safe spaces, which are inclusive and accessible, promote health and well-being, with a high standard of amenity, including the promotion of street trees.

2.12 The Levelling Up and Regeneration Act (2023) (LURA) has established that the planning system should pursue 'beauty' through new development and that good design should be considered at all spatial scales. To facilitate this s.53 of LURA requires (as a statutory requirement) that all LPAs shall prepare a **Design Code** for their whole plan area. In turn these area-wide Design Codes are expected to act as a framework for more detailed area and site-specific Design Codes which would be prepared either by developers, by the LPA or neighbourhood planning groups as appropriate to local circumstances and character.

2.13 The statutory role of Design Codes as part of the development plan (i.e. with full policy status afforded) is further clarified in NPPF through a policy requirement for Design Codes to be consistent with the principles set out within the National Design Guide (NDG)(2021) and National Model Design Code (NMDC)(2021)⁸. These related documents set out the scope of what a design issues a code should address, express key principles for good design and a guide to process as to how a Design Code might be prepared.

⁸ Ministry of Housing, Communities and Local Government

- 2.14 The NDG emphasises that well-designed places are unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings alone. It recognises that good design also demands that consideration is given to a wider spectrum of considerations in supporting place-making, reflecting the principles of the NPPF (outlined above). Central to the NDG are its 10 characteristics of well-designed places. The NDG stresses that when these characteristics are carefully embedded in design and decision-making processes, successful outcomes are more likely. Those design principles for the delivery of high-quality buildings and places should therefore inform the scope and content of area-wide Design Codes.
- 2.15 **Table 3** sets out the NDG characteristics of well-designed places setting a context for the scope of considerations when preparing a Design Code (depending on the grain of Design Code area/extent). Not all elements of the 10 good design principles would be expected in all Design Codes if these may be addressed elsewhere (such as in planning policy). The characteristics and scale of Design Code’s spatial coverage will significantly influence what may be appropriate content, and this will be particularly important in the case of a national park. The accompanying NMDC does however clarify that *some* design parameters are essential components of Design Codes’ effectiveness such as *movement, pattern, built form, height, land use, character of buildings and public spaces, open space and density*.

Table 3: National Design Guide’s 10 Characteristics of Good Design

NDG Design Characteristics	Summary Objectives and Scope
Context	Enhances and respects the surroundings. References: Character Types, Site Context, Historic Assessment, Heritage Assets.
Identity	Attractive and distinctive place making. References: Building Design, Local Character, Legibility, Masterplanning.
Built form	Coherent patterns of development. References: density, types and forms, building lines, height.
Movement	Accessible and easy to move around. References: Street Hierarchies, Public Transport and Walking, Inclusive Streets, Parking etc.
Nature	Biodiversity and habitats enhanced. References: Street Trees, BNG, Flood Risk/SuDS, On-site habitat/species provision.
Public spaces	Safe, social and inclusive places. References: Hierarchy of public realms, multifunctionality of space, residential zones, security.
Uses	Mixed and integrated. References: Mixed uses, active frontages, community and local services
Homes and buildings	Functional, healthy and sustainable. References: Space Standards, Accessibility, Amenity, outdoor spaces.
Resources	Efficient and resilient. References: Energy efficiency/hierarchy, Sustainable construction

Lifespan	Built to last. References: energy hierarchy, energy efficiency
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- 2.16 The LURA also provides for revised and enhanced formal status for planning guidance to support adopted policy, currently set out in Supplementary Planning Documents (SPDs). Under LURA⁹ SPDs will be replaced by Supplementary Plans which can carry the full weight of policy, removing any debate about the status and weight to be afforded to current SPDs. This affords LPAs the opportunity of preparing specific and focused direction on design matters - or for defined spatial areas, which might otherwise be inappropriate within the body of the local plan or area-wide Design Code, but with enhanced status to that previously presented by SPD.
- 2.17 The provisions of LURA and 2024 iteration of the NPPF attach heightened importance to ensuring that development plans should set out a clear design vision and expectations, grounded in an understanding and evaluation of an area's defining characteristics, so that developers and other plan users have as much certainty as possible about what is likely to be acceptable in respect to proposals for new built development and the change in the public realm.
- 2.18 In addition to LURA, another legislative change with some potential influence on the design review and across the NPA development plan is the Climate Change Act 2008 (and its later amendments, especially the 2019 *net zero by 2050* target) which has clear implications for design, as it legally commits the UK to reducing greenhouse gas emissions and adapting to climate impacts. In addition, the Environment Act 2021 formalised the concept of Biodiversity Net Gain through the grant of planning permission and introduced the concept of Local Nature Recovery Strategies (LNRS) which NPPF confirms is material consideration in plan-making. Both these positive concepts are likely to influence the way that design solutions should have regard to potential impacts on biodiversity and then to positively integrate habitat creation within sites from the earliest stages of design, and where possible to link to (or enhance) natural systems and habitats in the wider landscape setting to further LNRS aims.
- 2.19 Together the changed statutory context for plan content and evolved national design policy in the NPPF and national Design Guide set a clear requirement for positive reassessment, scoping, refinement, expansion/rationalisation and repackaging of design policy and guidance for all LPAs reviewing development plans. Whilst the national park's first statutory purpose will remain the central foundation of planning policy for design related matters, this wider design agenda set out in national policy and law also applies within the park, and the current plan review presents a significant opportunity for reappraisal of policy scope and direction, such that broader place-making and sustainability principles alongside the national park's statutory purposes shape future design policy and local guidance.

⁹ Section 15cc Levelling Up and Regeneration Act 2023.

2.20 In commissioning this study the NPA envisages that much of the essence of existing design policy and much of the detailed content of the supporting suite of guidance will be taken forward through the local plan review and preparation of a Design Code within that process. However, gaps in NPA policy and its guidance suite are anticipated in relation to achieving compliance with the NDG, the NPPF and in response to climate change mitigation and adaptation and attaining net zero by 2050. In parallel, given the passage of time since the current development plan documents and design guidance were adopted, architectural fashion, construction technologies and building materials have continued to evolve, whilst the challenging effects of climate change have become more tangible and demand policy responses. Furthermore, as well as the duty on the NPA to have regard to these matters in decision making, the Planning Inspectorate will be expected to afford appropriate weight to the provisions of LURA and NPPF in design matters at appeal, further adding to the need to undertake this review and subsequent transition to a Design Code policy approach.

3. METHODOLOGY

Overview

- 3.1 The approach to this design policy and guidance review has been to undertake two main phases of primary information gathering, with findings thereof analysed so that a platform of evidence-based recommendations and baseline of understanding supports the NPA in moving towards the preparation of a new Design Code.
- 3.2 Those twin phases of evidence-gathering principally comprised:
- **Stage 1:** Assessment of compatibility and scope of NPA adopted design policy and guidance against the ten characteristics of good design of the National Design Guide and pertinent elements of the NPPF; and
 - **Stage 2:** Empirical examination of how the suite of NPA design guidance is used by NPA officers, how it is reflected in planning application proposals and a general examination of its strengths and weaknesses, scope and opportunities for evolution.
- 3.3 In addition, discussion with NPA officers in relation to how design policy and guidance have been afforded weight in planning appeal decisions provided additional qualitative evidence.
- 3.4 Analysis of findings from the main stages of evidence gathering have been distilled to a broad series of recommendations to inform policy evolution within the local plan review and point towards (but not detail) how extant design guidance can be integrated, expanded or rationalised within a new Design Code. Recommendations are made principally in relation to compliance with the new statutory requirements of LURA and the NPPF which will shape format and coverage of the new local plan in respect to design matters.

Stage 1 Method:

Assessment of compatibility and scope of NPA adopted design policy and guidance against the NDG 10 characteristics of good design

Review Policy and Guidance Sample Selection

- 3.5 The initial stage of the review entailed the identification of the agreed scope of NPA design policy and guidance documents. The scope of documents to be covered by the research, was confirmed by the NPA project team. **Table 1** sets out the policy framework, and **Table 2** public design guidance documents assessed by the review. For this purpose, relevance of policy to 'design' was taken at a broad grain of inclusion to where policies set out some level of expectation for the physical outcomes of planning permissions such as setting, layout, form, appearance, character etc. of development in order to be granted. Those elements of policy which more closely

address matters such as the principle of development or broader expectations for development such as control over use/occupancy, application processes and sequence, need, consultation or spatial constraints (amongst many other factors) were not included within the appraisal.

- 3.6 The suite of NPA design guidance is accessible on the NPA website and presents publicly available design advice to assist proposals meeting with pertinent planning policy criteria. Inclusion within the sample of core design guidance documents was set by the NPA project team.
- 3.7 The suite of individual design guidance documents presents a range of age and formal status from adopted Supplementary Planning Documents (SPD), through to older Supplementary Planning Guidance (SPG) and technical reference document. The status of the individual documents theoretically can influence the degree of weight that could be afforded to it in decision-making contexts, a variable which further adds to the justification for the review as whole.
- 3.8 The scope and specificity of the design guidance sample varies considerably. Dating from 1987 The Building Design Guide remains in use as a detailed technical appendix to the 2007 Design Guide. At the other end of the spectrum of design guidance the Transport Design Guide, Residential Annexes and Climate Change and Sustainable Building documents include only limited detailed design elements within wider scopes of policy advice, procedures and general principles in relation to those matters. Between these examples most of the NPA Supplementary Planning Documents provide focused design guidance.
- 3.9 Guidance which remains publicly available but have been omitted from the scope of this review include the detailed Landscape Strategy and Action Plan / Character Statements as a consequence of its low grain of detailed design components, and the Peak District National Park Farmsteads Assessment Framework which is highly specific to historic farmsteads and is a jointly adopted documents with Historic England.

Compatibility Appraisal Principles

- 3.10 The policies (or pertinent parts) and guidance suite sample were then considered against the NDG's 10 characteristics of good design within an expansive appraisal matrix. **Table 3** (above) sets out those headline components of the NDG and a simple summary of their objectives. The NDG clarifies the government's position on design, and that in order to deliver beautiful and well-designed, functional, inclusive, biodiverse, climate resilient and safe places consistent with NPPF aspirations, then the design process (and assessment against planning policy/Design Codes) should cover those 10 characteristics. Those characteristics are not however prescriptive for design outcomes, but seek to ensure that a locally appropriate and holistic (partly-systematic) approach to creating successful and sustainable places is embedded in all LPA decision making, and that appropriate policy is in place to enhance status and clarity in respect to those design expectations.

- 3.11 As appropriate, adopted NPA spatial policies were filtered and/or broken down into 'design' relevant parts or criteria to ensure focus within the primary evidence collation. The threshold for whether policy sets out 'design' criteria was set low to ensure the appraisal did not exclude pertinent components of the development plan to this review.
- 3.12 As the assessment of compatibility of the policy sample to the 10 characteristics of good design is a subjective matter and not one where precision or binary values of compatibility can be simply identified, the appraisal relies heavily on professional judgement. Within the matrix document, each policy, or section of a policy was considered as to whether it reflected or supported the 10 characteristics of good design, either overtly/strongly or positively but less clearly or indirectly. The interactions of the appraisal were then colour coded to aid visual assessment over the large and fragmented sample components.
- 3.13 Whilst the process sought to identify any clear conflicts or incompatibility between adopted policy and the 10 characteristics, in practice such negative findings were not readily identified. Rather, the process enabled a clear indication as to where existing policy and guidance fell short in embracing the wider holistic approach to good design presented by the NDG, rather than overt conflict arising where existing policy and guidance were clearly incompatible with the NDG. Hence, appraisal of the evidence was mainly focused on general compatibility/compliance with the 10 characteristics of good design, and consequently in identification of gaps in policy and guidance coverage for those matters.
- 3.14 Following identification of consistencies and/or absence of clear compliance between the design policy and guidance samples with the NDG 10 characteristics of good design, each sample was provided with a concise summary of alignment. Recommendations were then set out as to where existing compliant components of policy and design guidance might be embedded within future NPA planning policy, Design Code, Supplementary Policy or Technical Guidance.
- 3.15 This component of the review also entails a significant degree of professional judgement, given that the NPA as plan-making authority will be able to exercise considerable discretion as to how the emerging plan is structured and how policies therein are presented. This review adopts a reasoned expectation that the new local plan will reflect an evolution of existing policy direction with focused rationalisation and/or expansion within a single (key) development plan document (of strategic and non-strategic policies) that will (must) sit alongside (and inform) a new Peak District National Park Design Code as required by LURA. There is no guidance or statutory basis to suggest that there should, or can be, no overlap between the development plan policy framework and the new Design Code. Consequently, flexibility arises in relation to where existing policy and guidance that are to be retained, refined or expanded might be placed within the new local plan. Recommendations at this stage are therefore based upon a broad principle of placing clear design concepts, scheme evolution and successful outcomes within a new NPA Design Code, but that the

overarching spatial policy foundation which seeks for those detailed approaches to be exercised and applied, to be retained in conventional local plan policy format. This would not however limit or bar some overlap, particularly of policy into a Design Code although it would be paramount for such overlap in the Design Code to be wholly consistent with principal or parent policies.

Stage 2 Method:

Empirical examination of how the suite of NPA design guidance is used by NPA officers, how it is reflected in planning application proposals and a general examination of its strengths and weaknesses, scope and opportunities for evolution.

- 3.16 This stage of the research sought to elicit the views and experiences of NPA planning service officers using the design guidance sample (**Table 2**). This stage of the work did not entail any reference to the National Design Guide, which it is understood is not used to any significant extent by Development Management officers in the course of normal determination of planning applications .
- 3.17 To enable as full an engagement as possible NPA officers were requested to complete a questionnaire survey proforma which was developed in consultation with the NPA project team. The proforma was structured to record the views of officers in relation to:
- Patterns of use of design guidance by officers;
 - Value attached of specific elements of the design guidance sample to a range of normal 'design' considerations;
 - Identification of strengths and weaknesses of the design guidance suite;
 - Identification of which elements of design guidance are not reflected in planning applications;
 - Why this may be the case;
 - Which existing guidance may be rationalised or expanded beyond the requirements of the NDG Characteristics of good design and those SPDs proposed within the 2007 Design Guide;
 - How design guidance and design policy can be better linked.
- 3.18 Officers were invited to complete the questionnaire as a reflection of their individual professional experience. No requirement for standard responses was structured into the questionnaire, recognising that the responses could only be used as empirical evidence where statistical analysis would not be appropriate.
- 3.19 The questionnaire form is set out at **Appendix 2**.

Method Limitations

- 3.20 It is appropriate to recognise limitations to the method and findings arising from the above method, and to acknowledge that this study represents the initial baseline-establishing steps on the path to preparing a Peak District National Park Design Code.
- 3.21 The assessment of compatibility between NPA policy and guidance with the 10 characteristics of good design does not lend itself to quantitative or binary findings, and therefore relies on professional judgment to be applied. Similarly, empirical evidence derived from the survey of NPA officer experience in utilising design policy and guidance must acknowledge that individual opinions are offered, with some contrary views presented, reflecting relative extent of use of the guidance and specific casework experiences.
- 3.22 The scope of NPA design policy, design guidance and the new national context for those is extremely broad. The new national framework for Design Codes, supplementary plans and technical guidance affords a very significant latitude for how the NPA can achieve compatibility within that national framework in terms of format, plan/policy/guidance status and detailed direction for design direction itself. The method therefore does not seek to distil a blueprint for a Design Code for the national park.
- 3.23 It does seek to identify whether existing guidance can be rolled forward within that, and identify how more generally shortcomings of existing guidance such that a range of enhancements can be embedded into the update Design Code and supporting policy/documents.

4. REVIEW FINDINGS

- 4.1 This chapter sets out the findings of the primary evidence gathering stages as set out in the previous chapter, in relation to the project requirements of:
- a) Assessment of the effectiveness of NPA design policy and guidance in the context of new legislative requirements, and in relation to its practical application in decision-making;
 - b) Recommendations on design elements to be brought forward and whether this should be included in a:
 - o Design Code,
 - o Local Plan or
 - o Technical Advice Note, or
 - o Justify duplication across documents.
 - c) Identification of gaps in design advice that should inform a future commission to create a Peak District Design Code.
 - d) Advice on potential spatial planning links that could be made between Local Plan topics and the new PDNP Design Code, in order to create a coherent approach to place-making and character in the National Park between these two new documents.
- 4.2 Reflecting these requirements but also recognising that there are *significant overlaps* between these objectives, the review findings are set out in the **3 sections**:
- 4.3 *Firstly*, a series of **16 tables** for each of the study sample policies and design guidance documents, setting out:
- Summary NPA policy and guidance compliance with NDC characteristics of good design;
 - Recommendations for expansion or deletion of policy and guidance to reflect NDG objectives;
 - Recommendation(s) for future status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance;
 - Summary NPA Officer observations on NPA Design Guidance (only).
- 4.4 *Secondly*, an overview and summary of findings in respect to NPA Design Policy and Design Guidance compliance with National Design Code characteristics of good design (and in doing so the National Planning Policy Framework and Levelling-Up and Regeneration Act provisions). This section is presented as summary narratives extracting key points from the twin stages of primary evidence collation.

- 4.5 **Thirdly**, in addition to those aspects of the NDG considered to be under-represented from the summary findings tables of the stage 1 work, the report sets out perceived gaps or detailed short-comings in coverage of current NPA design guidance presented. Those issues identified are presented as potential matters that might be introduced into the new Design Code and/or supporting Supplementary Plans and/or Technical Guidance in step with those changes necessary to achieve NDG compliance.

Review Findings Part 1:

Summary Appraisal Tables**Compliance of NPA Design Policy and Design Guidance with the 10 National Design Code Characteristics of Good Design**

4.6 The following tables present summary information from the more detailed analysis of the study sample policies and design documents set out in full at **Appendix 1**.

Policy - Local Plan Core Strategy 2011:-

Core Strategy Strategic Design-Related Policies			
Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary plans or Technical Guidance
GSP2 Enhancing the National Park	Overarching strategic policy setting high level expectations for broad consideration of site context in proposed development. Reflects key components of NDG in relation to general development character, but is less explicit in relation to wider community, amenity and sustainability components of NDG.	Expand this key overarching design policy position in relation to holistic design, sustainability and place-making characteristics of NDG	Retain as Policy Option to duplicate within Design Code
GSP3 Development Management Principles	Overarching development management policy. Sets out a broad scope of policy application which reflects strongly NDG scope. In relation to other policies GSP3 addresses a fuller scope of site development principles which go well-beyond building design focus and hence reflect NDG. Policy itself does not specifically address design in detail. Weaker compliance is noted in relation to NDG principles for movement and public space, possibly reflecting the predominantly small scale of proposals arising within the national park, but indicate aspects of policy which may benefit from future expansion at this overarching level. Policy can be seen to be weak in relation to biodiversity enhancement considerations.	Expand to cover design characteristics of nature and place-making within overarching design policy statements in relation to holistic design characteristics of NDG	Retain as Policy Appropriate to duplicate within Design Code with policy status
L2 Sites of biodiversity or geodiversity importance	Policy L2 is Specific to Biodiversity and Geodiversity considerations in development proposals and consequently sets a high level of compliance with the 'nature' and 'context' objectives of the NDG but is	limited expansion to address mandatory BNG	Amend and Retain as Policy Not appropriate as Design Code content

	silent on other aspects. The policy pre-dates statutory BNG requirements and although seeks to enhance biodiversity value through proposals it may not reflect contemporary expectations and duties in this respect.		
L3 Cultural heritage assets of archaeological, architectural, artistic or historic significance	Policy L3 is specific to historic environment considerations in development proposals which is an area of the NDG characteristics which are less than explicitly set out. However, Context, Built Form, Identity and Lifespan can be seen to be pertinent to valued time-depth in design considerations.		Retain as Policy Option to duplicate within Design Code

Policy - Development Management Policies (DMP) 2019:-

DMP Conservation Policies			
Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DMC3 Siting, design, layout and landscaping	<p>High level, general compliance with built design and context aspects of NDG, highlighting the significance in particular of setting, both built and wider landscape. The policy is less clearly aligned with NDG principles in relation to resources, lifespan and nature.</p> <p>Detailed criteria of DMC3 presents a cornerstone of NPA design policy. Across the policy criteria all elements of the NDG Characteristics are covered to some extent.</p>	Some refinement of policy which emphasises more holistic approach to place-making and natural systems, as integral parts of development management principles.	<p>Retain as Policy</p> <p>Option to duplicate in PDNP Design Code with policy status</p>
DMC7 Listed Buildings	Focus DPD policy relating to Listed Buildings overlaps NDG in relation to form and identity and indirectly to building lifespan, but lesser relevance to broader place-making or sustainable design principles.		<p>Retain as policy</p> <p>unnecessary to embed in Design Code - which should focus on</p>

			positive design guidance
DMC8 Conservation Areas	Principles for acceptable development within or affecting the setting of Conservation Areas reflect pertinent elements of NDG particularly in relation to context, identity, form and public space. More holistic design considerations such as resources, lifespan and nature are not reflected directly by the policy.		Retain as Policy Option to duplicate in PDNP Design Code with policy status

DMP Economy Policies			
Core Design Components	Summary Compliance with the National Design Code	Suggested Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DME1 Agricultural or forestry operational development	<p>DME 1 addresses agricultural development. Modern agricultural development ordinarily does not closely reflect traditional design principles, with a post-war agricultural design 'norm' of portal-framed buildings to provide cost-effective covered space to meet modern agricultural practices. The policy therefore seeks to minimise impact on setting and landscape and to reflect establish building scale, mass and colour. In relation to the NDG this closely reflects context priorities and reasonably-well reflects built form and identity, but with some acceptance that existing built form and materials may be non-traditional in a vernacular sense. Policy affords some indirect importance to natural systems through overt reference to the Natural Zone.</p> <p>The policy is silent on matters of use, movement, residential amenity and resources.</p>	Potentially expand to address consideration of adaptability in use, durability and sustainability in construction and climate change issues/resilience and to contribute to ecological opportunities through development.	Expand and Retain as Policy Option to duplicate selected criteria in PDNP Design Code with policy status.
DME7: Expansion of existing industrial and business development not involving	DME7 A) applies to existing employment site development proposals in/on the edge of settlements . It performs well in relation to amenity considerations of the NDG and also in respect of traffic and movement implications. Setting/context impacts are referenced but only in	Expand policy to better integrate fuller design considerations for proposals in or on the edge of settlements (DME7 (A))	Edit and Retain as Local Plan policy Option to duplicate selected criteria issues

farm diversification	relation to new buildings but general design considerations not a significant factor so less clearly reflect NDG. For sites outside settlements the policy presents greater compliance with NDG principles in relation to a site's context, amenity, movement and local identity. The policy is largely silent on matters of detailed design .		in PDNP Design Code with policy status.
DME8: Design, layout and neighbourliness of employment sites including haulage depots	Policy DME8 relates specifically to development character matters for employment sites (and as such partially addresses several areas not specifically covered by DME7). Nevertheless, the policy relates more to the avoidance of harm to valued characteristics of the national park than to the specific design expectations for new development. Therefore, the policy performs strongly in relation to NDG principles for setting, context and identity and to some degree amenity and uses. The policy is generally silent on wider NDG matters such as sustainability, ecology and new build character.	Expand to have regard to wider place-making and sustainability matters including climate change resilience.	Edit and Retain as LP Policy Option to duplicate in PDNP Design Code with policy status

DMP Housing Policies			
Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DMH7 Extensions and alterations	Policy presents high level design context relating to the setting of the proposed extension. It therefore preforms well in relation to NDG principles for context and identity but is silent on wider design matters		OPTION Retain as LP Policy OR embed in NPA Design Code OPTION to transfer and remove policy elements to NPA Design Code OR duplicate selected criteria issues in PDNP Design Code with policy status
DMH8 New outbuildings and alterations	Strong correlation between policy and NDG principles relating to siting and design but with generally absent references to more holistic design		OPTION Retain as LP policy OR embed in NPA Design Code

and extensions to existing outbuildings in the curtilage of dwelling houses	considerations around sustainability movement etc. Given the focus of the policy it is of note that residential amenity principles supported by NDG is not clearly covered.		OPTION to transfer and remove policy elements to NPA Design Code OR duplicate selected criteria issues in PDNP Design Code with policy status
DMH9 Replacement dwellings	Strong compliance with NDG in relation to setting, functionality and sustainability. The policy explicitly relies in part on NPA Design Guidance. The limited scope of the policy in relation to its application suggests wider NDG principles are less pertinent.		OPTION Retain as LP policy and/or embed in NPA Design Code OPTION to transfer and remove policy elements to NPA Design Code OR duplicate selected criteria issues in PDNP Design Code with policy status

DMP Shopping Policies			
Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DMS1 Shops, professional services and related activities in Core Strategy policy DS1 settlements	Policy mainly sets out qualifying principles for development to be permitted but otherwise complies well with NDG principles of movements, uses and indirectly to resources identity. Wider design considerations in relation to building character and form etc are not addressed even though the policy allows for new build in principle.		Edit and Retain as Policy Not appropriate for Design Code content
DMS3 Retail development outside Core policy DS1 settlements	To the limited extent that the policy addresses design matters DMS3 partly embraces those elements of NDG relating to identity, context, uses, and residential amenity	Potentially expand to clarify holistic design expectations or cross-refer to key design policy and DC	Edit and Retain as Policy Not appropriate for Design Code content
DMS4 Shop fronts	Within the focused application of the policy, DMS4 complies strongly with		

	NDG principles for context and identity. Reference to restriction of external shutters supports the NDG in relation to public space and identity.		Edit and Retain as policy Option to duplicate in PDNP Design Code with policy status
DMS5 Outdoor advertising	Within the narrowly focused application of the policy, DMS5 complies strongly with NDG principles for context and identity. Reference to restriction of external shutters supports the NDG in relation to public space and identity. The policy effectively seeks to conserve and enhance the public realm and hence reflects NDG principle for public space and identity. Policy explicitly refers to shop front design guidance as well as presenting highly specific design requirements	Retain policy but edit back to broad principles only with detailed elements moved to new Design Code.	Edit and Retain as policy Option to duplicate selected criteria in PDNP Design Code with policy status

DMP Recreation Policies

Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DMR1 Touring camping and caravan sites	DMR1 has a limited relevance to design matters but in respect to context and relationship to other uses it performs reasonably well against NDG principles and to a lesser extent to principles for nature through development, amenity considerations and the overall form of development.	Opportunity for further clarification of design expectations for recreational development involving new building or structures which also has regard to holistic design principles of NDG	Retain as Local Plan Policy Option for part duplication and expansion of design matters in Design Code

DMP Transport Policies

Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DMT3 Access and design criteria	DMT3 presents relatively narrow design-related policy relating to access proposals but nevertheless accords well with NDG principles on context,		Retain as Local Plan Policy

	movement, identity and also in relation to nature as pertinent.		Option to duplicate selected criteria in PDNP Design Code with policy status
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DMP Utilities Policies			
Core Design Components	Summary Compliance with the National Design Code	Expansion or Deletion of Policy to Reflect NDG Objectives?	Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance
DMU4 : Telecommunications Infrastructure	The policy seeks to minimise any harm to the valued characteristics of the national park through control of siting, scale and design of any proposals for utilities infrastructure, rather than more specific reference(s) to design considerations. As such design is a part of the policy approach but its focus is generally limited to the NDG principle of context although some very minor overlap/compliance with built form and public space can be found.		Retain as Local Plan Policy Option to duplicate selected criteria issues in PDNP Design Code with policy status

NPA Design Guidance:-

[Incorporating NPA Officer Survey Responses]
(in chronological order of adoption/publication)

PDNPA Building Design Guide 1987 (as Technical Appendix to 2007 Design Guide SPD)	
Summary Compliance with the National Design Code	The Building Design Guide 1987 provides detailed direction in respect to built development in the national park, particularly at the smaller and domestic scale. In these respects it provides strong consistencies with the NDG in relation to distinctive design principles, local context and built identity of new built development. It is however broadly silent or indirectly implicit in relation to the wider scope of design principles of the NDG as they apply to concepts of sustainability, multi-functionality, public spaces, movement and the natural environment. As well as a mixed compatibility with the NDG, aspects of the Building Design Guide can be seen to be outdated in parts, particularly in relation to the promotion of some building materials which would be unlikely to be supported should these be proposed in contemporary planning applications.
Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Well-used and strongly valued by senior officers in particular • Detail is valued • Graphics/examples/detail strongly supported • Good technical guidance and helpful terminology

	<ul style="list-style-type: none"> • To some officers more helpful than 2007 Design Guide. • Some elements are out-of-date and/or superseded by Alterations and Extensions Design SPD • No contents page for online version so difficult to use • Out-of-date in some specific support of materials and some detailing • Weak on contemporary design and sustainability • Some technical detail i.e. planting scheme species etc now obsolete. • Officers note application submissions frequently disregard this guidance on massing, form and detailing.
Expansion or Deletion of Guidance to Reflect NDG Objectives?	The 1987 BDG is afforded the status of technical appendix to the 2007 Design Guide. Despite its heritage it is considered to remain a useful source of design guidance even after the adoption of the Design Guide and elements of the guide remain valid in design terms today. Its presentation and format is accessible and can be unambiguously interpreted in the main. It presents levels of technical detail not provided for in the Design Guide. It does however contain limited elements of design advice (e.g. some suitable materials etc) which are now obsolete.
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	Retain as Technical Guidance with caveats or addendums as appropriate

PDNPA Agricultural Developments SPG 2003	
Summary Compliance with the National Design Code	The Agricultural Development SPG predates the current NPA development plan and all iterations of the NPPF. It provides good general principles for the consideration of siting and design matters in farm establishment or expansion. Much of the document is not specific to operational development principles <i>per se</i> but looks at wider implications of changes of use of land and agricultural impacts on the natural environment and of procedures. Where the SPG addresses new built development and farm layout the SPG reflects a partial range of NDG principals as far as is pertinent to its narrow scope. SPD is weaker in respect to NDG matters of lifespan and identity principles.
Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Widely valued • Useful reference for new officers • Siting guidelines valued • Clear, concise and pertinent • Good balance of graphics and text • Sound design principles • Becoming out of date • Low frequency of reference in casework • Needs updating in relation to modern farming practice and sustainable farming • Farming practice has evolved – new requirements/equipment • Too detailed such as Whole Farm Plans – unrealistic expectations

	<ul style="list-style-type: none"> • Some aspects too vague • Landscaping advice needs updating • Not landscape Character Area specific • Ignores farmstead assessment frameworks.
Expansion or Deletion of Guidance to Reflect NDG Objectives?	Introduce considerations of building lifespan and identity
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	<p>Part transfer to Design Code - in relation to operational development considerations, setting, location landscaping and wider sustainability matters.</p> <p>Content in relation to procedures, agricultural practice and consenting matters to be omitted from Design Code content.</p> <p>Option for procedural matters to be presented in Technical Guidance</p>

PDNPA Design Guide SPD 2007	
Summary Compliance with the National Design Code	The PDNPA Design Guide is generally a narrative format document in respect to the approach to be taken in achieving good design outcomes across the National Park. It is supported by a range of photographic examples. At a high level, it broadly reflects NDG objectives and scope to a varying degrees. All of the NDG principles are addressed by the Guidance to varying extents. The SPD performs strongly in NDG terms in respect to external character, appearance and context/setting of new built development in particular. Other aspects of holistic good design promoted by the NDG, such as public realm, connectivity and access are generally afforded light-touch coverage, but are nevertheless recognised. The Design Guide does cross-refer to other more focused guidance which serves to mitigate its generally high level approach to setting out a range of principles for appropriate design within a diverse protected landscape. All NDG components are therefore supported by the Design Guide but the design for nature being relatively poorly reflected.
NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Widely used by officers in negotiations and reporting • Good structure and graphic/visual content • Remains mostly up-to-date • Good overall encapsulation of valued Peak District design / built character. <ul style="list-style-type: none"> • Some concerns about age of guidance • Reference to other Design SPD still necessary • Officers find this guidance frequently disregarded in application materials, notably in respect of massing/form, detailing, materials and extension design.
Expansion or Deletion of Guidance to Reflect NDG Objectives?	The 2007 Design Guide contents would largely be appropriate to transfer to a PDNPA Design Code. Notwithstanding beneficial updates, refinement of presentation and format, other amendments should be directed towards a closer reflection of the more holistic approaches to place-making, sustainability, flexibility, and resilience promoted by the NDG - where these align with National Park statutory purposes. None of the NDG 10 Characteristics of good design are wholly absent from the Design Guide, but there is more focus and emphasis on individual building design rather than a wider place-making approach. Whilst the former need not be diluted, <i>the wider spectrum of</i>

	<i>design considerations should be enhanced.</i> Wider rationalisation of content is likely to be appropriate in relation to more recent NPA design related SPD.
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	<p>Move most content to Design Code</p> <p>Much of the 2007 Design Guide in relation to the Peak District vernacular may provide substantive underpinning element of future Design Code content.</p>

PDNPA Shop Fronts SPD 2014	
Summary Compliance with the National Design Code	The Shop Fronts SPD presents a narrow scope of design guidance applicable mainly to existing shops. As such it reflects NDG closely in aspects relating to identity, setting and public space. There is no clear conflict within the overlap in scope of the national and local guidance and specific compliance is therefore strong. The guidance can be seen to be relatively weak in relation to the NDG characteristic for movement and nature, although the relevance in these respects is highly limited.
Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Valued in very specific cases relating to shop front proposals. • Good reference resource. • Simple, clear and focused • Good technical and terminology content • Very good use of examples <ul style="list-style-type: none"> • Could better address advertisements/signs associated with shops. • Weak in respect to contemporary options <ul style="list-style-type: none"> • Officers found good compliance in application materials (but infrequent)
Expansion or Deletion of Guidance to Reflect NDG Objectives?	No fundamental change to content proposed in relation to NDG
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	Move to Design Code

PDNPA Alterations and Extensions Detailed Design Guide SPD 2014	
Summary Compliance with the National Design Code	The Alterations and Extensions Detailed Design Guide SPD focuses tightly on vernacular design principles specific to the Peak District when extensions and alterations to existing housing is proposed. Its application is therefore quite limited in relation to the wider scope of design principles set out within NDG relating to the public realm and flexible uses etc. There is strong compliance with issues relating to design

	<p>characteristics of setting and identity. However, strong application of those principles which may serve to limit the scale of extensions in particular, which in turn may conflict with NDG objectives in relation to Homes and Buildings and movement given that the design principles may constrain scale and capacity (such as for growing family contexts). This observation does not diminish the design value of the guidance in these or other but highlights win-win outcomes may not always be feasible within the context of National Park principal statutory purpose.</p>
<p>Summary NPA Officer Observations on Design Guidance</p>	<ul style="list-style-type: none"> • Strongly valued with good structure, focus and specificity • High frequency of use and referral • Helpful graphics • Good structure/core principles • Good referral/negotiation in relation to amenity considerations • More useful than 2007 Design Guide • Good use of photographs • Up-to-date • Too prescriptive in places • Limited contemporary design guidance • Issues missing such as internal lighting • Can be open to interpretation • Text heavy • Officers find this guidance frequently disregarded in application materials, notably in respect of massing, form, detailing, materials and extension design
<p>Expansion or Deletion of Guidance to Reflect NDG Objectives?</p>	
<p>Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance</p>	<p>Move to Design Code</p>

<p align="center">PDNPA Transport Design Guide SPD 2019</p>	
<p>Summary Compliance with the National Design Code</p>	<p>The Transport Infrastructure Design Guide provides a comprehensive narrative in relation to the balance to be sought between effective, safe and functional transport infrastructure provision and the multiple sensitivities to be considered within the national park. Across this focused scope the TDG provides positive design advice in relation to a number of NDG objectives, including references to public space, wider sustainability benefits and opportunities to be secured or protected. Whilst the TDG offers strong compliance with the NDG in some instances its summary Design Guidelines do not fully reflect some of the supporting narrative and hence emphasis can be overlooked, for example, in relation to the significance of bus stop buildings' built form and detail in relation to the historic built environment. The guidance does not materially relate to lifespan matters of the NDG. NOTE much work undertaken in relation to Transport Infrastructure constitutes permitted development, although this does not preclude design guidance from being embraced.</p>

Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Policy tool best for influencing PD work by partners • More strategic document than day to day design guide • Extremely low level of DM officer awareness, use or reference • Not pertinent to DM work • Policy rather than guidance
Expansion or Deletion of Guidance to Reflect NDG Objectives?	Expand to better emphasise/draw out detailed design guidelines
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	<p>Detailed design elements can be transferred to Design Code.</p> <p>Option to set out in separate Supplementary Plan or Technical Guidance reflecting very specific nature of the works and limited (private) developer scope of application.</p> <p>OPTION Non-design related elements could be removed for NPA guidance suite in light of national profile and widespread understanding since SPD prepared.</p>

PDNPA Conversion of Historic Buildings SPD 2019	
Summary Compliance with the National Design Code	The PDNPA Conversion of Historic Buildings SPD provides a detailed narrative in relation to the philosophy, design concepts and key principles for conversions with conservation and future viable uses being at its core. The SPD is highly specific in its scope (i.e. conversion of historic and important vernacular buildings of the Peak District) but within this focus has clear compatibility with regards to most NDG principles as far as might be pertinent to building conversions. Areas of lesser compliance are found in relation to movement and housing quality/amenity
Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Frequent reliance in relevant case work. • Principles and philosophies set out are highly valued. • Links well with planning policy • Well structured • Good illustrations • Up-to-date <ul style="list-style-type: none"> • Some inconsistency/uncertainty vis-à-vis protected species obligations/guidance • Can present conflict with SPD on Climate Change & Sustainable Building SPD • Repetition from other policy and validation requirements • Lengthy • Could expand good and bad examples • Over-emphasis for barn conversions • Setting and Conservation Area guidance needs expanding • Officers find guidance on detailing frequently overlooked in application materials
Expansion or Deletion of Guidance to Reflect NDG Objectives?	Not in relation to NDG
Recommendation(s) for Future Status in NPA Policy, Design	Propose transfer to (new) Supplementary Plan (<i>WITH POLICY STATUS</i>) reflecting very specific and detailed nature of the guidance.

Code, Supplementary Plans or Technical Guidance	
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PDNPA Climate Change and Sustainable Buildings SPD 2013	
Summary Compliance with the National Design Code	The expansive Climate Change and Sustainable Buildings SPD closely references and is interdependent with key development plan policies for design. As such it can be seen to reflect significant degree the more holistic sustainability principles of the NDG. A considerable proportion of the SPD relates to procedures, internal modifications and works to buildings which ordinarily would not require the grant of planning permission or involve matters with external design implications. Given the scope and focus of the Guidance it is not significant that some principles of the NDG are not directly addressed.
Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Good in respect of Renewable Energy installation siting considerations • Useful high-level guidance • Thorough with good use of examples • Low usage in comparison to other guidance/SPD • Out-of-date in relation to RE and sustainability technologies • Can be seen to conflict/ambiguous in relation to competing considerations such as protected species/biodiversity – or requires better links to such guidance • Out of date web-links • Not helpful in applying keynote policy CC1 • Could be more scale (of development) specific • Too lengthy for regular reference • Unhelpfully addresses ‘non-planning’ technical matters. • PV placement guidance needs review
Expansion or Deletion of Guidance to Reflect NDG Objectives?	Not in relation to NDG
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	<p>Transfer to Design Code where relating to operational development components of the SPD.</p> <p>OPTION for elements of procedure and non- design related content to be moved to technical guidance or deleted in context of national guidance and profile of sustainability matters.</p>

PDNPA Residential Annexes SPG 2021	
Summary Compliance with the National Design Code	The Residential Annex SPD focuses primarily on interpretation of policy context and clarification of important legally significant terminology but also outlines important siting/layout principles for residential annexes. In this limited respect it can be seen to have good compliance with NDG principles on context and the provision of adequate and liveable accommodation, and a subservient physical/scale relationship

	with the principal dwelling. The document directs the applicant to separate, more specific design guidance in relation to the construction / conversion of the proposed ancillary residential annex which generally reflects NDG. As such the absence of a wider scope of matters related to the wider NDG design considerations is not considered to be a shortcoming of the SPD.
Summary NPA Officer Observations on Design Guidance	<ul style="list-style-type: none"> • Good technical information • Policy element is strong • Widely valued by DM officers • Good clarity • Both good technical and broader principle detail • Valued caselaw references. <ul style="list-style-type: none"> • Specific and therefore limited reference • Suggested conditions in need of review • Procedural – is not design guidance • Not well supported at appeal regarding ‘need’ considerations • Silent on ecology/species considerations • Not accessible to the public • Outdated in some respects
Expansion or Deletion of Guidance to Reflect NDG Objectives?	Reference to NDG principles for Homes and Buildings which support adaptability to respond to the need for suitable homes.
Recommendation(s) for Future Status in NPA Policy, Design Code, Supplementary Plans or Technical Guidance	<p>Partly Transfer to Design Code- in respect to location and layout considerations only.</p> <p>Significant elements of the SPD are not applicable to design considerations but present helpful guidance in policy interpretation. – There is potential to move to Technical Guidance dependent on other evolution of planning policy within the plan review.</p>

Report Findings Part 2:

Overview and General Findings – Implications for the NPA in Achieving Design Policy and Design Guidance Compliance with National Design Code Characteristics of Good Design

- 4.7 **Appendix 1** to this report comprises an extensive spreadsheet / matrix assessing the 10 Characteristics of Good Design as promoted by the National Design Guide (**Table 3**) against the project sample of 20 adopted NPA planning policies (**Table 1**) and the design guidance suite sample (**Table 2**). The appraisal was undertaken consistent with the method and caveats set out in the preceding section of this report. Both overarching strategic policies from the Core Strategy 2011 (pre-NPPF) and more focused policies of the Development Management Policies (2019) DPD were assessed.
- 4.8 Acknowledging the grain of appraisal undertaken and the necessity for professional judgement to be exercised, the process revealed a number of significant *overarching* key findings which may influence the NPA in the preparation of the replacement Local Plan, its content and format.

General Findings and Recommendations for ADOPTED POLICY:

- GF(i) Overall, a very strong degree of compatibility was found between the adopted policy sample and 10 Characteristics of Good Design of the NDG in relation to:
- Context,
 - Identity and
 - Built Form.
- 4.9 The emphasis on securing development which conserves or enhances the special qualities of the national park in planning policy clearly stems directly from the statutory purposes of the NPA. Consequently, where planning policy addresses operational development (and hence design becomes a material consideration in decision-making) explicit profile and policy weight is afforded to conservation and enhancement across the policy sample - not only of the proposed development but of its effects on the immediate and wider setting or context. That context is inclusive of any of the special qualities of the national park and therefore covers landscape, built and cultural heritage, biodiversity and geodiversity.
- 4.10 In addition to identified compliance across the sample to these matters, 'keynote' design related policies within the Core Strategy and Development Management Policies DPDs (in particular GSP2, GSP3 and DMC3) serve to ensure that robust and widely scoped conservation and enhancement priorities apply to any and all proposals, whether or not, or to whatever degree more development-specific policies also set out such criteria. In decision-making it is understood that the development plan should be read and applied as a whole. As such this umbrella policy approach sets a catch all robustness to the development plan as a whole and from this it can be

seen that the adopted development plan strongly embraces those NDG characteristics of good design of context, identity and built form.

GF(ii) All 10 NDG characteristics of good design are found across the review policy sample but to varying specificity and frequency.

- 4.11 The appendix 1 and the summary tables below identifies that **all of the 10 Characteristics are found within the NPA policy sample**, but those pertaining to principles relating to place-making, sustainability, future proofing and amenity/liveability are less consistently and less frequently found or are implicit rather than explicit in comparison to those principles for context, form and identity.
- 4.12 The NDG 10 Characteristics set out principles which when applied in design processes – and through embedding in planning policy criteria, should support the creation of well-designed, or even beautiful places (as promoted by the NPPF). In doing so, the NDG can be seen to place emphasis and some priority on *place-making* - within which individual building design, architectural style and overall built character are integral considerations, but not necessarily to be considered in isolation. In making area-wide Design Codes a mandatory component of the development plan, with full policy status, it becomes incumbent on all plan-making authorities to integrate – or at least have regard to, all 10 characteristics within a Design Code, and by definition integrated into local plan policy.
- 4.13 Those NDG principles which are strongly reflected by adopted planning policy are:
- **Context**
 - **Identity**
 - **Built Form**
- 4.14 Policy relates less strongly, but still overtly and positively with NDG principles of
- **Movement**
 - **Nature**
 - **Public Space**
- 4.15 Lower levels of compatibility were found between adopted policy NGD principles:
- **Uses**
 - **Homes and buildings**
 - **Resources**
 - **Lifespan**
- 4.16 Importantly, it can be seen through examination of ‘keynote’ policies (in particular GSP3 and DMC3) that all of the 10 characteristics of the NDG can be seen to be embedded within those critical umbrella policies, and consequently the development plan as a whole can be generally considered to reflect the full scope of NDG principles at strategic levels.

4.17 Notwithstanding this highly significant finding, it is still evident that across more land use-specific policy sample that there is significant variation and inconsistency in the extent to which wider place-making and sustainability principles are laid out in policy.

GF(iii) To improve compatibility with the NDG, Integrate broader principles of holistic design and place-making within policy

4.18 Further to the preceding finding, the appraisal suggests that the new PDNPA Design Code (as policy) and accompanying Local Plan policy should seek to embrace the importance and profile attached to holistic design and place-making in relation to development proposals within the national park.

4.19 Existing compliance is less clearly apparent in those NGD design characteristics which address holistic design and durability concepts perhaps more usually applicable to larger scale redevelopment and regeneration scenarios less often encountered within the national park. Adaptability, multi-functionality and long-term resilience of public space and buildings, as well as overt measures focused on liveability and amenity are found to be less widely articulated in adopted policy. However, the development plan was found to *implicitly* support such measures, but strengthening of objectives and profile would be a valid objective in the local plan review process.

4.20 Whilst principles of detailed building design are a cornerstone of existing policy, and considerations of nature and public space are common considerations in development management decision-making, increased emphasis should be considered in the plan review alongside the Design Code for those characteristics of good design which address **movement, sustainability, amenity and future-proofing** (flexible uses). Whilst statutory purposes will remain the principal influence on the thrust and priority for policy, those wider matters are not inherently incompatible with the priority to conserve and enhance. It is necessary to acknowledge that in many development proposal scenarios a number of these considerations may be non-applicable, but nevertheless the approach to design should entail a screening of the 10 design characteristics in the first instance.

GF(iv) Cross-Referencing in Policy to Design Guidance

4.21 Within a small number of the *policy* samples, direct reference to NPA design *guidance* is made, however in most instances of policy with design implications this is not found. Policy GSP3 makes explicit reference to the NPA Design Guide and as such provides an umbrella reference, but specifically to that SPD and not to the wider suite of guidance. This may reflect the extent of design guidance documents published at the time of the development plans' adoptions, although reference to any subsequent or otherwise revised guidance would have probably been a legitimate policy reference. Under current development plan requirements under LURA to integrate a Design Code, such overt reference across the policy suite may not be necessary, but

it is likely that strategic or non-strategic policies within the main plan document should nevertheless benefit from reference to the Design Code and/or Supplementary Policy.

GF(v) Design Policy Placement within the Local Plan Review

- 4.22 As noted above, in reviewing the development plan the NPA has considerable discretion (within the scope of Development Plan Regulations' requirements) as to how to structure its new Local Plan, with the statutory Design Code separate and alongside, or integrated within a principal document. The summary tables (below) and appraisal matrix at **Appendix 1** set out opportunities where existing policy with a design element may be **repeated in** or **transferred to** the Design Code without loss of status. It should be noted that such recommendations represent professional judgement based on separating tangible design policy expectations from broader policy principles, sequences or qualifying criteria. In many instances an existing policy will present multiple elements, and as such only specific parts of existing policy pertaining to physical outcomes (as expanded) may be appropriate to transfer or repeat in the Design Code.
- 4.23 A single plan document with a comprehensive Design Code integrated within it is likely to present significant challenges to useability and length. However, this approach may also help remove any perceived equivocation about the status or weight afforded to descriptive, diagrammatic and visual content of a design guidance.
- 4.24 In terms of the complexity and length of existing policy criteria for physical outcomes, their inclusion within a Design Code would be unlikely to result in a significant lengthening when considered alongside written specifications and visual sketches, diagrams and photographic examples that would be expected to make up the body of a Design Code document. There may also be value in consistency and useability terms if design criteria of keynote policy (such as GSP2 and DMC3) are *repeated* within the Design Code. In such circumstances great care would be required to ensure inconsistencies in wording are avoided.
- 4.25 Alternative approaches to such limited repetition would be legitimate, however. A Design Code could integrate detailed or subject-specific design *policy* within it and alongside visual content - with only strategic emphasis on conservation, enhancement and design maintained within the main local plan document. The Design Code would then set out policy design criteria for a wider range of proposals (incorporating wider holistic and place-making considerations as noted above).

General Findings and Recommendations for NPA DESIGN GUIDANCE:

GF(vi) Compliance with all 10 Characteristics of Good Design is found across the NPA Design Guidance sample but to varying specificity, emphasis or frequency.

- 4.26 Existing NPA design guidance is broad in coverage and has been prepared across a significant timeframe, and in some instances under different development plan and national policy/guidance contexts. Guidance documents take a range of formal status, from technical appendix to fully adopted Supplementary Planning Document. Within this suite, design guidance scope tends to present strong compatibility with a number of the NDG 10 characteristics of good design, alongside a general absence of coverage of others (or at best implicitly or indirect compatibility).
- 4.27 Beyond this pattern there was no clear evidence of strongly conflicting guidance with the NDG which is important in relation to taking forward key existing guidance into a Design Code.
- 4.28 Compatibility (or consistency in scope) of NPA design guidance with other holistic and place-making NDG characteristics of good design is evident, but far less explicitly and/or less consistently than for *Context*, *Identity* and *Built Form*. Hence, whilst across the guidance suite implicit reference to all 10 of the NDG good design principles can be found they are the exception to a generally lower degree in compatibility.
- 4.29 A repeat of the findings for NPA *policy* compliance can be seen. Elements of the NDG which address more place-making principles, such as movement, public space, amenity, adaptable and mixed uses, and/or those where holistic sustainability and responsible use of resources are under-represented in the suite of guidance. NDG principles for *Nature* (habitat connectivity, enhancement, creation) is a notable example of under-representation across the guidance suite (although not entirely absent) yet is clearly a critical component of the national park's special qualities (and as such covered by the statutory purpose to conserve or enhance), with most development scenarios offering some opportunity for integrated biodiversity enhancement.
- 4.30 Where guidance addresses broader matters, such as the Climate Change and Sustainable Building SPD, stronger compliance with NDG objectives for resources, lifespan and residential amenity (liveability) is found, but these are less immediately relatable to the broader suite of guidance and/or where most attention is focused, particularly individual building design.

GF(vii) Overall, a strong degree of conformity was found between the Design Guidance sample and Characteristics of Good Design for *Context, Identity and Built Form*.

4.31 Reflecting findings for the policy assessment of compatibility, the NPA design guidance suite shows good overlap with the NDG in relation to supporting development which is appropriate to, reflects and strengthens established character and context of the proposals, as promoted by the *Context, Identity and Built Form* characteristics.

4.32 Design guidance for the NPA has tends to focus on site-specific operational developments' vernacular character, materials, massing and detailing. In these respects, there is a strong overlap in scope between the guidance and NDG characteristics of *Context, Identity and Built Form*. This can be seen to a greater degree right across the sample documents.

GF(viii) To a substantial extent, existing design guidance content can be integrated within a NPA Design Code, subject to review, rationalisation and refresh.

4.33 The study appraisal indicated that across much of the existing design guidance, specific elements of material remain relevant and of value within the established and special character of the national park's built heritage and landscape context. Accepting this report's findings that that a greater emphasis on holistic and sustainable design matters should be woven into the future Design Code should not equate to a need to disregard or abandon established material where it is seen to reflect the NDG well.

4.34 It is to be expected (but not pre-determined) that the preparation of a Design Code will entail a significant consolidation across SPD/SPGs. There will be multiple factors which shape the specific content, scope, presentation, and status of future NPA design guidance [see following empirical evidence findings (below) which illustrate pressures for amendment or retention]. Whilst a new NPA Design Code will present the body of that guidance (which will take the status of policy), Supplementary Plans and Technical Guidance remain available as tools to the NPA within which to present, separate, or to distinguish in status a broad span of design expectations for new specific types or spatial contexts of development.

GF(ix) Rationalisation of Design Guidance overlap is required.

4.35 The *2007 Design Guide* may be seen as the cornerstone element of the NPA design guidance suite. This presents a wider scope of application than most of the other guidance, but nevertheless remains more focused on individual site and building design than wider design characteristics as supported by the NDG. Moreover, the Design Guide can be seen to provide more of a narrative approach to design factors than technical specifications or limitations, and consequent to its broad scope, is

- necessarily *light-touch* in some aspects of its advice (excluding the 1987 Building Design Guide as its technical appendix).
- 4.36 The majority of the remaining NPA design guidance post-dates the Design Guide, and in several cases can be seen to reiterate or supersede parts of that document. For example, SPDs for Alterations and Extensions, Conversion of Historic Buildings and Shop Fronts can all be seen to provide more up-to-date and focused guidance than the Design Guide. However, it is also the case that further design guidance which was proposed by the 2007 Design Guide has not been prepared, for example *new housing, spaces between buildings* and *external works*, and in these respects the 2007 design guide remains the principal reference.
- 4.37 Consequently, as a Design Code is prepared there is a need to filter and select the most up-to-date elements of design guidance, at as consistent a degree of detail as is feasible, whilst abandoning effectively superseded elements of adopted advice. In terms of the overall volume of guidance, the removal or repetition and/or abandonment of older material should afford opportunity for those under-represented elements of the 10 characteristics of good design to be included without a substantial expansion in guidance overall.
- GF(x) The NDG affords significant weight to site context of new development, and does not necessitate a move towards contemporary design over established vernacular and heritage asset character, but it does support approaches which deliver durable, sustainable and useable places and buildings and support the sustainable use of resources and adaptability to climate change, which may entail more contemporary solutions being considered.**
- 4.38 The NDG 10 characteristics of good design are not in themselves determinative of any particular architectural styles, models or rigid parameters for new development (although it could be if desirable). Instead, the NDG seeks to ensure that a broad range of considerations are fully embedded in all design processes, both creatively and as a basis for assessing proposals (such as development management).
- 4.39 The NPA design guidance suite presents challenges in respect to the use or adoption of contemporary design within the established vernacular character of the national park's built environment - which is recognised as a component of its special qualities, and hence subject to the first national park purpose to conserve and enhance. Design guidance touches upon contemporary architectural concepts but in such respects relates rather weakly to *policy*. The tone of the guidance suite in relation to contemporary design is generally of inappropriateness within the context of the protected landscape, although examples of non-vernacular design and materials are set out within the Design Guide in particular. Greater consistency between design policy and design guidance in respect to non-vernacular design principles should be embedded with the Local Plan review and Design Code drafting.

Review Findings Part 3:

NPA Officer experience and aspirations in relation to current NPA Design Guidance

- 4.40 This element of the report considers day-to-day useability and effectiveness of the guidance in driving good design in through planning applications and pre-application discussions. Here it is pertinent to note that design guidance – as published documents is intended to inform planning applicants and their agents in bringing forward appropriate design schemes, as much as it is a reference for officers’ assessment of the merits of those schemes.
- 4.41 **Appendix 2** to this report sets out a questionnaire survey completed by 21 NPA planning officers and other non-planning heritage, landscape, ecological and woodland professionals who regularly engage in internal consultation development management processes. The purpose of the exercise was to elicit professional experiences, values and suggestions in relation to how useful, practical and effective existing NPA design guidance is in a day-to-day working context. In doing so a baseline of empirical evidence can be used to inform and target priorities and aspirations for the preparation of a national park Design Code and development plan policy content, adding practical value and effectiveness in subsequent use.
- 4.42 It is important to acknowledge in the consideration of responses made that the evidence gathered is not intended to be used in any statistically way or that quantitative values be ascribed suggesting levels of significance.
- 4.43 Notwithstanding this limitation, this stage of the overall research has presented a valuable qualitative resource and anecdotal evidence and one where practical day-to-day experiences indicate both commonly reflected views , themes and expectations, but also allow for individual officer comment to be taken into account in shaping the content and functionality of a future Design Code. It should be noted that officers were not asked to offer opinion in respect of the compatibility with the NDG, which remains infrequently utilised on a day-to-day decision-making basis.

Officers’ perceived reasons why NPA Design Guidance is sometimes poorly reflected in planning application materials:

- 4.44 Officers were invited to suggest why design schemes submitted within some planning applications were often found to be incompatible with design guidance despite the guidance being publicly available.

Design Guidance Issue	Officer Key Observations
	<ul style="list-style-type: none"> • Design is a fundamentally subjective matter.

<p>Consistency, Format, Clarity and Useability of NPA Design Guidance</p>	<ul style="list-style-type: none"> • NPA Design Guidance is easily accessible <i>but</i> dispersed across multiple documents which complicates references by applicants. • Confusing repetition and overlap in some issues. • Some doubt on need to use stone in agricultural new builds. • Guidance not easily accessible or interpreted. • The content is sound but not simply presented or referenced. •
<p>Agent / Applicant Interpretation and Use of NPA Design Guidance</p>	<ul style="list-style-type: none"> • Generally shared view that agents are broadly aware of NPA Design Guidance in place. • Non-local agents do not have a strong excuse for not reflecting guidance - although this does arise. • Applying the design guidance – or taking the ‘path of least resistance’ results in formulaic/pastiche design outcomes rather than progressive architectural responses. • Despite length and breadth of guidance, the challenge remains of how to extend/remodel non-traditional buildings. • Agent / applicant committed to pursue preconceived or specific design concept - frequently perceived by officers. • Preconception, individual architects’ ‘style’ and applicant preferences for contemporary/open plan design is frequently pre-determining application scheme built form and detailing without reference to design guidance. • Agent / applicant seeking to reduce build costs. • Build costs usually but not always a constraint on submitted designs / specifications. • Cost seen to be cut in relation to landscaping. • Lack of understanding about statutory purposes for the NPA • Design guidance ‘examples’ being used by applicants out of context to support proposals.

4.45 Expansion, Inclusion and/or Rationalisation of NPA design guidance content/scope

Officers were invited to suggest areas of design guidance that could / should be integrated within the NPA design guidance, reflecting on experience and issues already expressed. This solicited a strong response and range of opinions which have been grouped to reflect related opinions. Note; the following table offers proposals not directly triggered by NDC drivers as addressed at Review Findings Part 1 (above), but may overlap in scope, or constitute additional valid considerations in preparing a Design Code.

Matters for New and/or Expanded Design Guidance	Reasoning
Landscape	<ul style="list-style-type: none"> • Need to guide better integration of proposals into sensitive (and diverse) landscapes
Landscaping	<ul style="list-style-type: none"> • To improve the quality of landscape design that is submitted in planning applications, and to have a specific guidance document to reference. • Introduce guidance on best practice screening/siting of developments in the landscape – and guidance on planted buffers / landform etc. • The importance of making sure landscaping is appropriate to an area is frequently overlooked in proposals and therefore it would be good to emphasise appropriate best practice in a Design Code – referencing appropriate species mix, linking with the Landscape Strategy, advice on hard landscaping materials. • Guidance on what is required in a landscape plan/proposal and what level of specification it should be included, and what is expected in terms of landscape maintenance.
Streetscape	<ul style="list-style-type: none"> • Need to deliver integrated Green Infrastructure, street/garden trees, Public Open Space built into new housing developments etc. • Managing the streetscape setting for historic buildings which if enhanced provides a more attractive and appropriate setting and public asset.
Biodiversity in Development	<ul style="list-style-type: none"> • In step with BNG requirements, expand guidance to help developments better incorporate biodiversity enhancements - and give guidance on how to do so (swift boxes, owl boxes, wildflower mixes, the need for tree planting etc)
Contemporary Design Contemporary Design in Extensions	<ul style="list-style-type: none"> • The role for contemporary design should be expanded in a future Design Code. Great examples today will be the listed buildings of the future. • There is limited advice in guidance in relation to contemporary design generally but the concept of non-vernacular design arises commonly – particularly to building extensions. Where these are traditional it is very hard to successfully integrate elements such as flat roofs, large glazed areas, varied shapes of glazing, and modern materials. Officers commonly resist proposals for these where not acceptable on purely the grounds of ‘failing to respect the character of the parent building/built environment’, articulating why in our own words. Better tools are required to assess non-vernacular design proposals.

	<ul style="list-style-type: none"> • SPD setting out broad circumstances and elements of contemporary design that could be supported would provide positive guidance to applicants, as well as officers.
Sustainability / climate / energy	<ul style="list-style-type: none"> • Need for more practical guidance energy sustainability and appropriate responses to this. • This should have a link with contemporary design, but not exclusively. • Need to address issues around retrofitting of historic buildings (a complex issues with fast-paced change).
Renewable energies in historic environments	<ul style="list-style-type: none"> • Appeal being allowed for renewable energy development in historic environments. Further information on how renewable energy can be achieved in these spaces without harm to significance or setting.
Boundary/amenity treatments for barn conversions	<ul style="list-style-type: none"> • Guidance on the internal and external works to historic buildings is good but further guidance on the space surrounding it would be useful.
Landscaping / BNG	<ul style="list-style-type: none"> • Guidance on green, brown and biodiverse roofs is absent from the current suite, including the Climate Change and Sustainable building SPD, which is a missed opportunity.
Resources & lifespan	<ul style="list-style-type: none"> • Missing from guidance generally. Expand on adaptability climate resilience and sustainable construction.
Heritage	<ul style="list-style-type: none"> • Need for specific section in Design Code on built heritage considerations.
Sustainable Urban Drainage Systems (SuDS)	<ul style="list-style-type: none"> • More detailed guidance/promotion needed on SuDS including examples to complement the information in the 'Climate Change & Sustainable Building SPD (2013)'
Materials	<ul style="list-style-type: none"> • Would be helpful to include examples of traditional and acceptable contemporary materials in Design Code. • Finish / colour could be covered in a section on 'details'.
New types of holiday accommodation (pods, huts, yurts etc)	<ul style="list-style-type: none"> • An expanding area of development that is under pressure and lacks clarity in policy and guidance, and where appeal decisions have reversed NPA decisions. Some commentary on the kind of structures that may be allowed (e.g. shepherds huts, yurts, pods etc) needed.
Nature/biodiversity	<ul style="list-style-type: none"> • Opportunity and need for fuller guidance with BNG requirements.
Conservation Area Management Plans	<ul style="list-style-type: none"> • They would offer tailored design guidance to a specific area but have not in the past been prepared in conjunction with character appraisals. This is required to comply with S71 of The Planning (Listed buildings and Conservation Areas act) 1990.

Listed Building Guidance.	<ul style="list-style-type: none">• Former detailed guidance notes not made public. A lot of time is spent going back and forth with heritage officers over simple matters such as appropriate mullion, latches, etc. that could be in a design document.
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4.46 These findings present a valuable reference of well-informed opinion as to the future scope of design guidance, complementing but potentially expanding beyond the 10 characteristics of good design set out in the NDG. All points recorded would appear to be valid and justify positive consideration in the evolution of the new Design Code or any Policy Statements pertaining to design and development.

5. SUMMARY AND GENERAL RECOMMENDATIONS

- 5.1 The comprehensive review of the Peak District National Park Authority's (PDNPA) design policies, Supplementary Planning Documents (SPDs), and Technical Guidance has allowed for the following key findings and recommendations to be made. This review aimed to examine how and if existing design policy and guidance can be used to achieve future compliance with the National Design Guide and recent legislative changes of the Levelling-Up and Regeneration Act 2023 and the Environment Act 2021.
- 5.2 The scope and volume of study documents have given rise to a large number of detailed proposals/options to achieve compliance with the National Design Guide and NPPF. These do not necessarily translate to more general headline findings and recommendations, although the following summary conclusions are offered as headline pointers.
- 5.3 The review findings indicate that while the PDNPA's design policies strongly align with NDG principles of *context*, *identity*, and *built form*, there is an identified need to address broader place-making, sustainability and resilience principles in a Design Code to improve compliance with national policy and to then facilitate appropriate, forward-looking design solutions for development across the national park.
- 5.4 Key recommendations therefore propose expanding design policies to incorporate more holistic design considerations (detailed in the Chapter 4 tables), enhancing cross-referencing to between policy and design guidance, and rationalising overlapping guidance documents where this can be taken forward. The empirical evidence gathered from PDNPA officers suggests that the existing design guidance is highly valued but often disregarded in planning application submissions. Officers identified multiple areas for improvement, including better integration of landscape, biodiversity, contemporary design, and sustainability principles, and new areas of guidance on small-scale tourist accommodation, for example shepherd's huts and yurts.
- 5.5 Existing design guidance to a significant extent should become design policy, suggesting a transfer of significant extent of current content to a new PDNPA Design Code, supplemented by technical guidance and Supplementary Plans. The aim should be to create a coherent and comprehensive design framework that supports the conservation and enhancement of the Peak District National Park's special qualities while clarifying and expanding on the NPA approach to contemporary design and materials, place-making and broader sustainability principles. The guidance should be unambiguous but also allow for appropriate flexibility, a very difficult task but one which should be better expressed in policy.
- 5.6 In doing so it is also critical to clarify/expand design policies' scope, incorporating holistic design considerations that address broader place-making, sustainability, and durability of the built environment principles. This should incorporate a clearer

expression of NPA approach to non-vernacular design (and materials) and how this can be approached whilst meeting the first statutory purpose.

- 5.7 Cross-referencing between design policy and guidance should be improved to ensure consistency and clarity, and/or limit the need for this through integrating current guidance (as expanded) as Design Code with policy status.
- 5.8 Rationalisation of existing design guidance documents is necessary to remove overlapping guidance in documents to reduce volume and complexity, remove inconsistencies and improve usability.
- 5.9 Integration of other key contextual influences to achieve broader benefits through design can be achieved through the preparation of a Design Code. Better integration into the Design Code of landscape (character area) aspirations, Local Nature Recovery Strategy compatible landscape proposals, contemporary design opportunities, and broader climate change and sustainability principles.
- 5.10 In having regard to these key points alongside the multiple and detailed proposals of Chapter 4, the foundations for creation of a coherent and comprehensive design framework for the Peak District National Park in the mid 21st century can be set.

APPENDICES

Appendix 1:

NPA Design Policy and Design Guidance against National Design Guide Assessment 10 Characteristics of Good Design Master Spreadsheet.

Attached separately.

APPENDIX 2:

Design Guidance Review 2025 – Towards a PDNPA Design Code
Officers' Survey and Questionnaire
January 2025

Attached separately.