

## PEAK DISTRICT LOCAL PLAN REVIEW HwAPC DRAFT RESPONSE

The review updates the policies that the Park will use to judge planning applications in the light of changed government guidance. This is our chance to tell them what we think of the changes. We have to be reasonable and constructive and to reflect the views of our community as far as we are able. Our answers to the questions they pose are based on the following premises:

1. Recreational pressure has increased and we as a Parish are concerned about this.
2. We don't want any major housing development in the Parish but would like our area to have a vibrant and, ideally, mixed aged community, so wish to see housing policies that will encourage that e.g. some more affordable housing if needed and appropriate. Policies should also address the issue of increasing numbers of holiday lets.
3. We wish existing local services to be retained for the benefit of residents.
4. Traffic is a major concern, though the Local Plan policies can only address some aspects of this problem.
5. The future of the Breedon site is a major concern.
6. There is broad support for enhancing biodiversity and addressing climate change issues.

### SPATIAL STRATEGY

1. A. Yes  
B. They are compatible with NPPF and reflect the main rationale for a National Park.
2. A. Yes  
B. Welcome changes to GSP 1, 2 and 3 that are compatible with changed environmental legislation and place greater emphasis on Nature Recovery, Biodiversity Net Gain and incorporation of environmental issues into Design Guides.
3. Hawthorn scrub?  
Hazel scrub in the Dark Peak too?  
Plantations – historic plantings from 19thC?  
Rewilding sites?  
Possibly extend lowland pastoral landscapes to valley bottoms of the Dark Peak?
4. A. Option 2. Retain but review.  
B. No.  
C. It makes sense to review the existing allocation of settlements to tiers, but insufficient evidence has been advanced to support the establishment of the more complex 5 tier system. Other factors may be hindering the provision of appropriate housing across the Park, which would not be addressed by complicating the existing system – we do not feel a 3, 4 or 5 Tier system would improve the situation. Monitoring the changing nature of settlements and reviewing allocation to Tier 1 or 2 is of course appropriate.
5. A. Option1.  
B. Keeping the existing approach of Exception Sites is compatible with managing site provision providing other policy initiatives (in this plan and outside of its policy context)

address the under-supply. Site allocation has too many disadvantages to be a justifiable change.

6. A. Option 1.  
B. Evidence that defining boundaries would improve the management of development is not provided. It could be argued that drawing boundaries might actually encourage inappropriate development and that the consultation process defining boundaries would be lengthy and potentially flawed.
7. A. Yes.  
B. Existing policies will not always defend locally valued green space. The health benefits of greenspace and nature are clearly now established and should be mentioned somewhere in the spatial strategy.
8. Making explicit reference to improving provision of electric vehicle charging infrastructure.

## **LANDSCAPE, BIODIVERSITY AND NATURE RECOVERY**

9. A. Yes we strongly support these but see B.  
B. The UK government 30 x 30 commitment (see <https://naturalengland.blog.gov.uk/2023/12/11/30-by-30-a-boost-for-nature-recovery/>) ought to appear in the spatial objectives. Also a mechanism needs to be found and specified in the objectives for longer term preservation of the most valuable sites for nature, beyond existing statutory sites such as SSSIs and NNRs, to ensure that biodiversity gains are not reversed in the future.
10. A. Yes but only partly.  
B. The policy also ought to spell out how existing biodiverse areas are going to be protected. Given the proposed shift towards a local list of cultural assets shouldn't natural assets also be protected through a local list, akin to the wildlife sites system operated elsewhere in Derbyshire? Such a site listing would significantly contribute to nature recovery in the Park. Also, the policy needs to be clear on the priority of preserving key resources such as hedgerows where these exist, even within areas which are primarily agricultural.
11. A. Yes.  
B. Given the aspiration of nature recovery, and the acknowledgement that nature in the Park is seriously degraded the target should be at the high end – 20%. Given the lack of development in the Park locally sourced BNG is likely to be minimal – this is a strong argument for the Park registering as a BNG broker, and for deciding the best areas where BNG credits might be implemented.
12. A. Yes. But rewilding projects might in the plan lifetime extend the boundaries of the natural zone in some places, and this ought to be reflected in the policy, so wording ought to take possible changes in the map into account.

B. The uses it identifies seem to be appropriate and compatible with the successful protection of the qualities of the zone.

13. A. Yes.  
B. A reasonable case is made for this.

## **CULTURAL HERITAGE AND THE BUILT ENVIRONMENT**

14. A. Yes.  
B. Incorporating low carbon issues into the objectives is important.
15. We very much support the listing of non-designated heritage assets.
16. A. Yes.  
B. A single Local List of non-designated heritage assets will help to conserve important buildings and would bring spatial consistency to their management. We welcome the suggestion that local communities should be involved in the designation of criteria.
17. A. Yes, but uncertain over the detail of the policy  
B. The fact that existing buildings suitable for re-use located around settlements have largely already been converted suggests pressure to convert isolated buildings will increase. However, isolated field barns are both an important part of the landscape and an asset for nature recovery, and any clearly defined policy relating to them should defend them against inappropriate conversion. In common with many other areas for policy development, full consultation with the communities affected will be critical as policies on managing cultural heritage and the built environment are developed.

## **CLIMATE CHANGE AND SUSTAINABLE BUILDING**

18. A. Yes but see B.  
B. The wording of some of the spatial objectives ought to be stronger given the trajectory of climate change. "Contribute to" and "Support" do not convey the crucial significance with sufficient weight. Could prioritize be used instead in some of objectives?
19. A. Yes.  
B. No.  
C. Yes.  
D. The policy ought to include reference to embodied carbon. In some cases, this might discourage the demolition of small houses and their replacement with larger more carbon neutral dwellings, so wording of this policy is crucial, and reference to encouraging retrofitting of existing smaller homes might be included.
20. A. Yes the policy ought to define in much more detail what sustainability measures are appropriate. But.....

B. C. and D. Clearly most applications will be for dwellings and more explicit advice is needed about what a sustainability guide ought to address. However, it can be argued that type of building is much less significant for setting out measures to reduce carbon, than the scale of the development, and the context in which the development takes place. Also why just focus only on homes, farm buildings and businesses? What about educational facilities, health facilities, holiday accommodation, or leisure facilities?

21. Developing a policy map is extremely difficult because of the many different factors that interact. Issues from every chapter of the plan are relevant here. The most significant are likely to be visibility, detracting from architectural qualities of settlements, and the nature of the landscape around the site. As mentioned under 17 above, full consultation with the communities affected will be key to developing a policy map.
22. A. Yes but only for industrial uses that are appropriate for reducing carbon e.g. cement production, not for power generation using fossil fuels.  
B. This policy should be only one of the Park's responses to reducing carbon. The Plan ought to also have a policy encouraging alternatives to carbon capture, involving reducing production and other more creative responses. It is also crucial that riders should be placed on the policy to minimise local environmental and social impacts.

## **RECREATION AND TOURISM**

23. A. No we strongly disagree with these objectives  
B. Pressure from recreational use of the Park has significantly increased since COVID. The spatial objectives for recreation and tourism ought to be more restrictive in their wording and should do more to manage and mitigate impacts of recreation and tourism, in relation to landscape impacts, but also on local amenity. We believe that supporting new and improved facilities for promoting understanding and development in existing settlements and hubs will exacerbate problems and encourage greater recreational use of places that are already nearing capacity. There is a risk that the policies as worded will contribute to further degradation of the character of the Park and its qualities. Doing so will neither support thriving communities within the Park nor deliver the experience that visitors to the Park are seeking. Along with this, we have strong reservations about encouraging conversion of existing heritage buildings, including farms, to visitor accommodation. Each such conversion removes accommodation from meeting local needs, and conflicts with objectives of supporting local communities and enabling continuation of small scale traditional farming which is part of the character of the Park.
24. A. No  
B. Planning policies for these heavily touristed sites must be sufficiently restrictive to prevent development that will lead to an increase of recreation impacts. There is a danger that defining hubs could actually exacerbate impacts in these sites. A positive spin seems to be put on the existence of hubs, and the term is too positive – tourist

pressures ought to be more strongly acknowledged – perhaps the term could be changed to pressure points.

C. We believe there should be a stronger recognition of the need to balance a focus on how to manage hubs (or pressure points) by an alternative focus on encouraging the dispersal of people across the breadth of the Park to avoid the problems which arise from over-concentration of people and vehicles in small areas, which are typically not adequately resourced to cope with this scale of concentration.

25. A. Yes we strongly support increasing the Park's capacity to regulate the existence of such sites.  
B. Use should revert to 28 days when site is acceptable for that use, but some sites need to have permitted development rights removed.  
C. Sites that are very visible, where access is an issue, and where there are too many sites already nearby. There also needs to be a strong focus on issues of adjacency and nuisance to local communities. Sites which are discreetly located in terms of visual impact on the environment and which are well separated from residential areas may be acceptable, but other sites should be controlled/prevented.  
D. 60 days has encouraged too many sites to be opened for too long a period in some areas. This impacts visual quality and generates traffic in sometimes inappropriate locations.
26. A. Yes.  
B. Yes.  
C. Introducing seasonal restrictions can potentially reduce landscape impacts.
27. A. Yes.  
B. Given visitor pressure very few exceptions should be made.  
C. Woodland locations in many cases may be inappropriate in winter when trees lose leaves. Close to the facilities of the farmstead may well be too ambiguous to defend as a policy.  
D. Restricting to a single unit in an appropriate location and of a particular type may be more defensible.

## **HOUSING**

28. A. Yes.  
B. The spread and the range of guideline numbers for different areas seem to be carefully thought through, and the objectives are suitably detailed.
29. A. Option 2.  
B. A Park-wide policy is needed. Option 1 fails to limit holiday accommodation. Option 3 would simply lead to more holiday homes where there was no restriction. We do not support more holiday homes and believe there is already an adequate level of provision. We argue this kind of development should be restricted. Option 2 makes most sense. We also believe that any exemptions for the reasons specified under

Option 2 (farm diversification, conversions not suitable as permanent residences, or buildings in the open countryside) should be tightly controlled to ensure that these exemptions do not lead to wholesale diversion of accommodation in these categories from the local community to holiday homes.

30. A. Yes.  
B. Yes.  
C. Yes.  
D. The most important issue is to meet existing demand for affordable accommodation and to meet the needs for those with family links. However, most workers employed in the Park (and in particular in hospitality, care provision and emergency services) are not able to afford to live anywhere in the Park and as such extending housing need to any Park parish will not address demand for affordable accommodation. We should increase eligibility to address this issue for both RSL and privately managed affordable housing and also develop a tied policy.
31. A. Reduce to five years.  
B. Reduce to five years.  
C. Yes but extend to incorporate issues raised in Question 30.  
D. Yes.  
E. Vibrant local communities need to have a more liberal policy framework on local connection. Other policies can be used to determine whether this development is locally appropriate. Any policies set should be sufficiently flexible to recognise the specificity of individual locations and their needs, and to be responsive to local consultation about the priorities for the communities involved.
32. A. No.  
B. No.  
C. House size is clearly one appropriate mechanism for managing long term affordability and subject to national policy changes might be one mechanism for managing demand. However, families also need affordable housing and therefore restrictions on size should not limit the kind of family home being built. Affordable homes need to offer an appropriate variety of housing.

### **SHOPS, SERVICES AND COMMUNITY FACILITIES**

33. A. Yes.  
B. the objectives seem appropriate and sensible.
34. A. No.  
B. Local communities want local services, but cafés and restaurants and offices and light industry seem to be unnecessary extensions. We do however agree (as above under housing) that any conversion of such services into residential accommodation should be restricted to meeting local residential needs, not for conversion into holiday accommodation.

35. No comments

- A.
- B.
- C.
- D.

## **BUSINESSES**

36. A. Yes.

B. Might be worth adding phrases relating to nature recovery, climate change, landscape and cultural heritage to the first sentence, to make the objectives more compatible with central government guidance.

37. A. A definition of piecemeal is needed. Other tests relating to the crises of climate and nature are also needed.

B. The current focus is only on landscape. In the light of central government guidance this needs to be broadened.

## **FARMING**

38. A. No.

B. No.

C. As currently drafted the shift from not permitting holiday accommodation to supporting conversion in certain circumstances and where appropriate is too radical a change. A policy encouraging some diversification is needed, but we should not be encouraging more holiday accommodation given existing pressures.

39. A. Yes.

B. The risks are that farms become industrial units with no link to the landscape.

C. Maintaining links to the landscape, preserving architectural context and cultural consistency with Park objectives.

D. The Park is still predominantly a farming landscape, policies should seek to support this, not to encourage and support changes away from this cultural history and context.

## **TRAVEL AND TRANSPORT**

40. A. Yes

B. These spatial objectives seem to address appropriate issues. Perhaps the words active travel might be incorporated somewhere? And also, a key issue with sustainable transport, namely the integration of public transport services, might usefully be incorporated somewhere.

41. A. Option 1.

B. We believe that the current policy makes best sense. We should not expand car parking at all when it is for visitor parking but should instead offer policies to encourage modal shift. In occasional cases new parking might be needed, for example new station car parks, but only when local residents and their amenity are significantly enhanced. Given that any changes to parking provision can have major consequences for the local communities, full consultation is essential for any such changes.

42. A. Option 2.

B. Times have changed. The heavy recreational use of these routes supports the need for a new policy.

43. A. Yes, but the criteria for permitting such development need to continue to be very tightly controlled.

B. Road development should be permitted only in exceptional cases, for example where it would relocate large volumes of heavy industrial traffic from being routed through country lanes and village centres – redirecting such traffic to a more appropriate route, rather than creating additional capacity.

C. To recognise cases such as the above, we would suggest adding to the existing policy of ‘support road building when it is needed for new business or housing development, road safety and road maintenance’ words such as ‘or where it delivers major enhancement to the local environment’.

44. A. No.

B. Creating new facilities for camper van parking would simply encourage more camper van visits. It would do nothing to solve existing problems and would exacerbate them.

45. A. Option 1 but with the addition of stand by sites for emergency vehicles.

B. Yes.

C. The use of commercial drones is incompatible with the Natural Zone and arguably with the Park as a whole, and their use should be resisted. On the other hand, a policy about emergency helicopter stand-by-sites is a sensible extension to the existing policy framework.

## **UTILITIES**

46. A. Yes

B. It is important for the policy to specifically highlight visual impact, given likely increased need for extensions to National Grid power transmission lines. Environmental impact of pipelines (eg for CCS) might also be incorporated into this policy. For clarity, we do not mean that ‘visual impact’ implies that any increase in provision of wind turbines or pylons is unacceptable: we mean that the location of such turbines or pylons should be carefully managed to mitigate the visual impact on the landscape.

47. A. Option 2

B. Easier to defend in the event of a future proposal



## MINERALS AND WASTE

48. A. Yes  
B. However, the wording “allow” in several of the objectives is ambiguous as is the term “small scale”. Does allow relate to new or existing quarries and waste facilities? And how large is small scale? Also shouldn’t there be some recognition of changing climate and nature crises in the spatial objectives?
49. A. No.  
B. None.  
C. None.  
D. The remit of the National Park would be compromised were extensions of time to be granted.
50. A. Yes  
B. See above. It is unclear what any memorandum of understanding with neighbouring authorities would actually entail or why it might be needed.
51. The policy principles ought to ensure that future uses of the site are compatible with broader Park policy principles, but also reflect on the need for nature recovery and carbon reduction, and in line with local community priorities. Establishing those priorities should involve undertaking in depth consultation with the local communities (Bradwell, Hope and Castleton in particular) at all stages of development from initial conception through detailed planning to execution, in order to ensure that the community as a whole is given the optimum opportunity to contribute to shaping decisions about the future of the site.
52. A. Option 1.  
B. Option 2 seems to offer few advantages. Whilst it is important for a policy to be compatible with national guidance, option 3 seems to weaken the case against larger scale quarries satisfying national need. Option 4 is also likely to encourage development. So overall maintaining the existing policy seems most sensible.
53. A. No.  
B. Possibly.  
C. Planning policies ought to strengthen controls on winning and processing minerals across the Park. Processing in the Park is a new industrial use that is incompatible with Park policy principles and would weaken this control. Moving volumes of stone for processing within the Park would also impose heavy impacts on local communities, and detract from the amenity of the Park for visitors, as a result of increases in heavy industrial traffic through village centres and country lanes.
54. A. Yes  
B. Yes  
C. The logic of the existence of the national park is to seek to achieve higher levels of conservation and biodiversity than is true for the country as a whole, and BNG on these

sites could play a significant role in this process. These sites have a large potential for significant BNG gains, and as such could contribute significantly to mitigating the nature and climate crisis, were BNG levels to be set at 20%.