

**PEAK DISTRICT NATIONAL PARK
CORE STRATEGY
SUBMISSION VERSION
SUSTAINABILITY APPRAISAL
REPORT**

NON-TECHNICAL SUMMARY

**Prepared for
Peak District National Park
Authority
by
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NON-TECHNICAL SUMMARY

INTRODUCTION

1. This Sustainability Appraisal Report (Non-Technical Summary) concerns the Core Strategy for the Peak District National Park, which is being produced by the Peak District National Park Authority (PDNPA).
2. The Core Strategy sets out the long term spatial vision and objectives for the National Park, and the policies and principles that are required to deliver that vision over the period up to 2029. It sets out broad locations for delivering housing and other development needs such as employment, retail, leisure, community, essential public services and transport development.
3. Plans and strategies such as the Core Strategy are subject to a process called Sustainability Appraisal (SA), which assesses the likely impacts of a plan on social, economic, and environmental issues. Following the production of a Sustainability Appraisal Scoping Report in 2005, the Peak District National Park Authority appointed Land Use Consultants in 2007 to review the work undertaken to date and to carry out the subsequent stages of the Sustainability Appraisal of the Core Strategy. This has so far resulted in the publication of Sustainability Appraisal Reports on the Issues and Options, Refined Options, and Preferred Approaches stages of the Core Strategy. This Non-Technical Summary relates to the SA Report for the Submission Version of the Core Strategy.

THE CORE STRATEGY

4. The Submission Version of the Core Strategy sets out policies which determine the approach to planning for development in the Park up until 2029. It includes policies covering nine themes:
 - General Spatial Policies
 - Landscape and Conservation
 - Recreation and Tourism
 - Climate Change, Natural Resources and Sustainable Building
 - Homes, Shops and Community Facilities
 - Economy
 - Minerals
 - Accessibility, Travel and Traffic
5. The Core Strategy seeks to implement and be in general conformity with the spatial and transport policies of the Regional Spatial Strategy (the **East Midlands Regional Plan** published in March 2009) as well as incorporating its housing requirement.

6. In the National Park it is essential to make sure that all policy development (including the use of tools such as SA/SEA) focuses on and prioritises the purposes and duty of National Parks, as set out in the Environment Act 1995. The **purposes** are to:
 - ‘Conserve and enhance natural beauty, wildlife and cultural heritage’, and
 - ‘Promote opportunities for the understanding and enjoyment (of the Parks) by the public’
7. In pursuing these purposes the Authority has a **duty** to ‘seek to foster the social and economic well-being of local communities’.
8. Since the National Park Authority is bound by the purposes and duty set out in the Environment Act, this document seeks to embed them firmly within the SA/SEA process.
9. Where there is a conflict between the purposes themselves (perhaps from proposals for recreational development that would harm the valued characteristics of the National Park), the “*Sandford Principle*” has established that the conservation purpose should take priority.
10. The **Peak District National Park Management Plan 2006 – 2011** indicates that the National Park purposes and associated duty will be delivered through sustainable development and sets the framework for all activity pursued in the National Park by a range of stakeholders and it is vital that the Core Strategy and the Management Plan are aligned.
11. The Core Strategy also needs to be aligned with the Sustainable Communities Strategy. Because of the complex geography of the National Park 10 Sustainable Communities Strategies require consideration. In terms of population cover the **Derbyshire Dales and High Peak Sustainable Communities Strategy 2009 – 2014** is the most significant. It sets the aims for the area and provides policy priorities for the Local Development Frameworks (LDFs) being produced by the District / Borough councils and the National Park Authority to guide future development in the area. The Strategy sets out the following vision:

‘The Peak District will be a distinctive, high quality rural environment with...

 - a) *people of all ages who are healthy and safe;*
 - b) *high-wage, high-skill jobs;*
 - c) *affordable, decent homes for local people; and*
 - d) *towns and villages that offer a high quality of life.’*
12. The LDF (including the Core Strategy) should be the spatial representation of the aims set out in the Sustainable Communities Strategy.
13. The Core Strategy will be supported by the following statutory Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs):
 - Development Management Policies DPD;

- Proposals Map covering the whole National Park, plus detailed inset maps of villages;
 - Design Guide SPD (already produced);
 - Technical Design Supplements SPD;
 - Climate Change and Sustainable Building SPD; and
 - Replacements for existing supplementary planning guidance covering the local need for affordable housing and the design of farm buildings.
14. These documents in combination make up the Peak District LDF and when adopted, they will, together with the Regional Plan, become the Statutory Development Plan for the National Park.

SUSTAINABILITY APPRAISAL

15. Plans such as the Core Strategy are subject to a process called Sustainability Appraisal, which assesses the likely impacts of a plan on social, economic, and environmental issues. The Peak District National Park Authority (PDNPA) is therefore required by law to carry out a Sustainability Appraisal and a Strategic Environmental Assessment (SEA) of the Core Strategy, and has appointed Land Use Consultants in 2007 to undertake this process on its behalf. The Government recommends that these two requirements are met through one integrated process, which has been termed Sustainability Appraisal (or SA), with the aim of achieving the goal of sustainable development. The Sustainability Appraisal of the Peak District Core Strategy Submission Version is the subject of this report.
16. The purpose of Sustainability Appraisal is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making involving ongoing iterations to identify and report on significant effects of the plan and the extent to which sustainable development is likely to be achieved.
17. This Non-Technical Summary is part of the Sustainability Appraisal Report for the Submission Version of the Core Strategy. The Sustainability Appraisal Report has been produced alongside the emerging Core Strategy in order to provide sustainability guidance during its development. It is being published for consultation at the same time as the Submission Version of the plan to provide the public and statutory bodies with an opportunity to express their opinions on the Sustainability Appraisal Report and to use it as a reference point when commenting on the Submission Version of the Core Strategy. The Non-Technical Summary presents the key findings of the Sustainability Appraisal to date.
18. Sustainability Appraisals must be conducted in accordance with Government guidance, and must meet the requirements of the European Strategic Environmental Assessment (SEA) Directive. An overview of the method used in carrying out the Sustainability Appraisal of Peak District National Park Authority's Core Strategy is set out below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on scope

19. The Sustainability Appraisal process started in 2005 with the PDNPA producing the first draft of the Scoping Report. A second draft was produced in 2008 by Land Use Consultants, which added some additional information. This Scoping Report decided what the SA should cover by reviewing a wide range of policy documents (including Government policies) and other plans and programmes (such as the draft East Midlands Regional Spatial Plan), and by examining data and information to help identify what the key sustainability issues are in the Peak District.
20. This first draft of the Scoping Report was issued in June 2005 for consultation to various stakeholders and the following statutory consultees: English Nature, Countryside Agency, the Environment Agency and the Historic Buildings and Monuments Commission for England (English Heritage). The second draft of the Scoping Report was issued for consultation to the Statutory Consultees (Natural England, English Heritage and the Environment Agency) in May 2008. Comments received from both the consultations were analysed and any necessary changes were made to the scoping reports. Appendix A in the full SA Report lists fully the comments made and where they have been taken on board.

Stage B: Developing and refining alternatives and assessing their effects, and Stage C: Assessing the effects of the Core Strategy and preparing the Sustainability Appraisal Report

SA of the Alternative Options for the Core Strategy

21. PDNPA began to look at alternative ways to address issues in the National Park in 2005 and through a process of consultation and refinement developed these Alternative Options right through to 2008. These Alternative Options underwent four rounds of Sustainability Appraisal and each time the results of the Sustainability Appraisal were fed back to the team developing the Alternatives to help improve their sustainability effects.

Phase 3: SA of the Preferred Approaches of the Core Strategy

22. Having taken on board consultation responses relating to the Alternative Options and the findings of the Sustainability Appraisals carried out, PDNPA began to prepare the “Preferred Approaches” for the Core Strategy, which were those options that PDNPA consider to be the right ones to help deliver the Core Strategy. The draft Preferred Approaches underwent Sustainability Appraisal, the findings of which were taken into account when developing the final set of Preferred Approaches. A full SA was then undertaken for the Preferred Approaches, and the findings were fed back to PDNPA and were taken into consideration when developing the Preferred Approaches into policies.

Phase 4: SA of the Submission Version of the Core Strategy

23. This is the current phase of work. Following the consultation on the Preferred Approaches and the accompanying SA, PDNPA developed the Preferred Approaches into a set of policies which comprise the latest version of the Core Strategy. These

policies have now been subject to the SA process and a full SA report has been produced which will accompany the Submission Version of the Core Strategy when it is published for consultation. This Non Technical Summary accompanies the full SA Report.

Stage D: Consultation on the Core Strategy Consultation Draft and on the Sustainability Appraisal Report

24. This SA Report will be published alongside the Submission Version of the Core Strategy, and both will be made available for a period of public consultation. Following on from this consultation, PDNPA will take on board the comments received and the findings of the SA Report, and will finalise the Publication Version of the Core Strategy. As this is not expected to differ greatly from the Submission version, it is anticipated that it will not be necessary to produce a further full SA report at that stage. Instead, an updated version of this SA report will be produced and made available alongside the publication version of the Core Strategy, or alternatively as an Addendum depending on what is most appropriate at that stage. The public will then be able to comment on whether the Core Strategy has met all the requirements necessary, although comments on the content of the plan will not be invited at this late stage. Any amendments required following this consultation will then be made and the Core Strategy will undergo examination by a Planning Inspector before being adopted.

Stage E: Monitoring the significant effects of implementing the Core Strategy

25. The Sustainability Appraisal Report makes recommendations for how the sustainability effects of the Core Strategy should be monitored.

POLICY CONTEXT

26. There are potentially a large number of plans and programmes that are relevant to the preparation of the Peak District National Park's Core Strategy. For example, the Core Strategy is required to take into account national Planning Policy Statements, and must generally be consistent with the East Midlands Regional Spatial Strategy.
27. The Core Strategy should also provide a spatial expression of other plans and programmes where relevant, to assist in their implementation. Relevant international, European, national, regional, sub-regional and local plans have been reviewed in detail in relation to their objectives, targets and indicators and their implications for the Core Strategy and Sustainability Appraisal. Examples include the Peak District National Park Management Plan, the Peak District Landscape Character Assessment, the Regional Economic Strategy for the East Midlands and the Derby and Derbyshire Minerals Local Plan. The full review can be seen in Appendix B of the full SA Report.

CHARACTERISATION OF THE PEAK DISTRICT NATIONAL PARK

28. The Peak District is an upland area located in central and northern England. In 1951 the Peak District¹ was the first National Park to be designated in Britain. It sits at the southern end of the Pennine Chain² sandwiched between Sheffield and Manchester

and covers 1438 km². Gritstone edges, wild heather moorlands, and gentle limestone dales shaped by humans over thousands of years, attract between 18-22 million day visitors and 2.5 million visitors who stay overnight annually, from all over the country and worldwide to visit the National Park.¹

29. The National Park is home to 38,000 people making up 20,000 households. 60% of the population is of working age with 25% being self-employed, twice the English national average. Tourism and catering make up 24% of all jobs within the National Park and quarrying and agriculture both create a further 12 % each.
30. Globally, climate change is the most significant threat and opportunity facing us all. Responding and adapting to climate change is a significant challenge for the National Park especially when there has been an identified need to sustain and enhance the local economy. Tourism plays a significant role in the local economy but brings with it high volumes of traffic (largely private vehicles) which is a significant contributor to climate change. There is also a shortage of modern office space with good access to services within the National Park which needs to be addressed in order to help create the high skill – high wage economy which is desired for the area in order to provide local jobs and ensure the future viability of services in the area. Yet developing more office space and creating this high skilled – high wage economy is also likely to increase greenhouse gas emissions and exacerbate climate change. Finding ways to tackle climate change whilst producing benefits for the local economy will be a key challenge for the Core Strategy.
31. Similar conflicts exist concerning housing. There is a lack of affordable housing in the National Park and an increase in affordable housing is needed benefiting not only those who would then be able to continue living in the area but the whole community by ensuring there is an adequate supply of local labour to carry out agricultural and other land management jobs and to ensure that facilities and services such as local shops and schools can continue to operate. Yet building additional housing may negatively affect the landscape of the National Park and also add to climate change.
32. It is therefore these challenges of creating sustainable communities and local economies whilst protecting the environment and tackling climate change that need to be addressed by the Core Strategy.
33. An outline of the current sustainability issues identified in the Park and their likely evolution without the Core Strategy is provided in sections 3.3-3.7 of the full SA Report.

THE PEAK DISTRICT NATIONAL PARK'S SUSTAINABILITY APPRAISAL FRAMEWORK

34. The review of other policies, plans and programmes and existing data and information helped identify key sustainability issues for the Peak District. These key sustainability issues, and input from stakeholders, provided the basis for a set of sustainability objectives. The sustainability objectives have been the main tool at each

¹ Tourism in the Peak District – Fact Sheet 2. Peak District National Park Authority.

stage of the SA for assessing the Alternative Options, Preferred Approaches and policies within the Core Strategy, and are set out below. The table also illustrates the SEA Directive topics and other key sustainability topics that are addressed by each SA objective.

Sustainability Objectives	SEA Directive and Other Key Topics
1. To protect, maintain and enhance the landscape and townscape of the National Park	Landscape
2. To protect, enhance and improve biodiversity, flora and fauna and geological interests	Biodiversity, flora, fauna
3. To preserve, protect and enhance the National Park's historic and cultural environment	Cultural heritage including architectural and archaeological heritage
4. To protect and improve air, water and soil quality and minimise noise and light pollution	Soil, water, air
5. To minimise the consumption of natural resources	Material assets
6. To develop a managed response to climate change	Climatic factors
7. To achieve and promote sustainable land use and built development	Material assets
8. Increase understanding of the special qualities of the National Park by target groups, young people (14-20 years); people from disadvantaged areas, with disabilities and from ethnic minority backgrounds	Population, human health
9. To promote access for all	Population, human health
10. Promote good governance	Population
11. To help meet local need for housing	Population, built environment
12. Encourage better access to a range of local centres, services and amenities	Services and facilities
13. Promote a healthy Park-wide economy	Economy
14. To reduce road traffic (especially private cars and freight), traffic congestion and improve safety, health and air quality by reducing the need to travel, especially by car	Air, human health

35. We have used each sustainability objective to help decide whether the Core Strategy would be more likely to affect each aspect of sustainability and how, and they proved to be a very useful tool for determining the sustainability strengths and weaknesses of the policies, and when making recommendations for improvements.

ALTERNATIVE OPTIONS

36. National guidance requires Sustainability Appraisal to include an appraisal of the alternative objectives and policy options considered during the preparation of the Core Strategy. The Peak District National Park Authority's Core Strategy has been through a number of stages identifying alternative options, and Sustainability

Appraisals have been conducted alongside these various iterations, as described above.

37. The Strategic Environmental Assessment Regulations require the Peak District National Park Authority to explain their reasons for choosing the policies within the Core Strategy rather than the alternatives considered. These are summarised below.
38. As already described, the Peak District National Park Authority undertook extensive engagement and consultation in developing its Core Strategy, including consultation on:
 - Core Strategy Issues and Options – September 2008
 - Core Strategy Refined Options – January-April 2009
 - Core Strategy Preferred Approaches – October-December 2009
39. The Preferred Approaches document set out in detail the alternatives and explains why the Peak District National Park Authority did not take them forward. A Sustainability Appraisal has been undertaken and informed each of the stages in the development of the Core Strategy.
40. The Core Strategy Submission Version has been prepared to take account of the complex issues and challenges facing the National Park as well as:
 - Responses from the Preferred Approaches consultation (and previous consultations).
 - On-going dialogue with Peak District National Park Authority.
 - Current, newly emerging, and changes to, Government legislation and guidance.
 - The findings of the Sustainability Appraisal / Habitats Regulations Assessment from the Preferred Approaches.
41. The supporting text within the Core Strategy provides the narrative and justification for each policy.

THE INFLUENCE OF SUSTAINABILITY APPRAISAL ON THE DEVELOPMENT OF THE CORE STRATEGY

42. Sustainability Appraisal has been carried out at each iteration of the Core Strategy - Issues and Options, Refined Options and Preferred Approaches. There is clear evidence that the conclusions of this Sustainability Appraisal work have been taken into account in the ongoing refinement of the Core Strategy policies.
43. PDNPA took account of the recommendations made in the Scoping Reports and meetings with Land Use Consultants when developing and refining options for the Core Strategy. Land Use Consultants also prepared four assessments of the sustainability of the Alternative Options as they were developing between 2005 and 2008, including early recommendations on ways to strengthen the proposed policies. These were taken into account in preparation each new version of the Alternative

Options and during the development of the Preferred Approaches. Once the Preferred Approaches were developed in draft these also underwent a Sustainability Appraisal with the findings and recommendations feeding back into the development of the final Preferred Approaches. Following this stage, the findings of the SA of the Preferred Approaches were taken into consideration when developing the policies included within the Submission Version of the plan, which this SA Report Non-Technical Summary accompanies.

SIGNIFICANT EFFECTS OF THE CORE STRATEGY SUBMISSION VERSION

What are the sustainability effects of the Core Strategy likely to be?

44. There is much to welcome in the Core Strategy and it is likely to have a largely positive effect on the sustainability of the National Park. However there is still a level of uncertainty about the effect some of the policies. Therefore, following on from this consultation, adjustments may need to be considered to the policies when drawing up the final Publication Version of the Core Strategy to try and reduce the amount of uncertainty about the likely effects and to ensure that any negative aspects of the mixed effects identified are reduced.
45. The overall likely effects resulting from the Core Strategy on each of the Sustainability Objectives is given below. It was decided to scope out SA Objective 10 “Promote good governance” as the various iterations of options and Preferred Approaches had showed a neutral impact on this SA Objective.

Sustainability Objective	Likely overall effect
SA Objective 1: To protect, maintain and enhance the landscape and townscape of the National Park.	++
SA Objective 2: To protect, enhance and improve biodiversity, flora and fauna and geological interests	++
SA Objective 3: To preserve, protect and enhance the National Park’s historic and cultural environment	++
SA Objective 4: To protect and improve air, water and soil quality and minimise noise and light pollution	+
SA Objective 5: To minimise the consumption of natural resources	+/-
SA Objective 6: To develop a managed response to climate change	++
SA Objective 7: To achieve and promote sustainable land use and built development	+
SA Objective 8: Increase understanding of the special qualities of the Park by target groups, young people (14-20 years); people from disadvantaged areas, with disabilities and from ethnic	0

minority backgrounds	
SA Objective 9: To promote access for all	+
SA Objective 10: Promote good governance	N/A
SA Objective 11: To help meet local need for housing	+
SA Objective 12: Encourage better access to a range of local centres, services and amenities	+
SA Objective 13: Promote a healthy Park wide economy	+
SA Objective 14: To reduce road traffic (especially private cars and freight), traffic congestion and improve safety, health and air quality by reducing the need to travel, especially by car	+

Key to symbols:

++	Likely to have a significant positive impact
+	Likely to have a positive impact
0	Likely to have no/neutral impact
-	Likely to have a negative impact
--	Likely to have a significant negative impact
+/-/?	Mixed /uncertain impact

CUMULATIVE EFFECTS

46. The Strategic Environmental Assessment Directive requires that the assessment of effects should include “secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects”. The cumulative effects of different policies within the plan have been shown for each sustainability objective in Chapters 4-16 of the full SA Report. In many instances, given the strategic level of the Core Strategy, it is difficult to be precise about when and in what form the effects will arise, and how one effect might relate to another.
47. The Peak District National Park does not exist in isolation. In theory, there is the potential for cumulative effects arising as a result of the combination of development proposed in the Peak District National Park Core Strategy with that of neighbouring districts and boroughs. In practice, however, the scale of development proposed within the National Park is so much smaller than that in neighbouring districts that the relative contribution of the Peak District National Park Core Strategy to any cumulative effect is unlikely to be significant.

CONCLUSIONS

48. The Submission Version of the Core Strategy is likely to have a generally positive effect on the SA Objectives and the SEA Directive topics. There are, perhaps unsurprisingly, no significant adverse effects expected as a result of the policies, and only relatively few minor adverse effects. These are likely to be relatively small-scale,

localised and the result of policies that deliver significant benefits to other SA Objectives. However, some caution is needed as there are still a number of policies with mixed or as yet uncertain effects and so the way in which the policies are implemented will be the key determinant of their eventual impacts.

49. Although the predicted adverse effects are relatively minor, and overall the policies are likely to have a positive effect on the sustainability of the National Park, because of the very nature of the National Park, the NPA should be aiming to be an exemplar of sustainability for other Local Authorities to follow. The Submission Version of the Core Strategy is, rightly, quite protectionist in its defence of the special qualities of the National Park, yet it is our opinion that the Core Strategy could go further in actively promoting sustainable practices that would set the Peak District out as a leader in sustainability. This would not only help to improve the sustainability of the Park, but help to enhance and reinforce its image as one of the most important areas for the environment in the UK. Taking this approach would also help to redress the balance between landscape and other sustainability considerations, as presently the plan is heavily skewed towards protection of the landscape and biodiversity.
50. The Plan does not convey as clear a message or position in terms of the future direction of the National Park as it could potentially do. At present, the policies of the Core Strategy are very much focussed towards conserving the current natural assets of the Park, and although their conservation and enhancement is clearly of particular importance in the setting of a National Park, it is also important for the Core Strategy to adequately set out the future vision and direction of the Park in terms of climate change and also future socio-economic sustainability, considering the likely and desired future of the area in terms of its population, housing and key industries.
51. Specific recommendations relating to each of the SA Objectives are included in **Chapters 4 – 16** of the full SA Report, and these are to be taken into account during the implementation of the Core Strategy.

WHAT COULD BE DONE TO MAKE THE CORE STRATEGY EVEN MORE SUSTAINABLE?

52. A number of recommendations for amendments/additions to the Core Strategy policies have been made during the Sustainability Appraisal. These were mainly suggestions for strengthening the positive effects that may be a result of the Core Strategy and ensuring that the Peak District is an exemplar of sustainability in the UK, which would fit well with its role as a National Park. There also needs to be a clearer and stronger position given on the future direction of the National Park. Specific recommendations on how the Core Strategy could be improved are given in Chapters 4-16 of the full SA Report.

How will the sustainability effects of the Core Strategy be monitored?

53. Monitoring of the Core Strategy will be focussed on:
 - The significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused), and;

- The significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.
54. It will be conducted as part of an overall approach to monitoring the sustainability effects of the Core Strategy as a whole, and should be incorporated within other monitoring requirements for the Core Strategy (i.e. the Annual Monitoring Report). Suggested indicators are included within Chapters 4-16 of the full SA Report.
55. At this stage the monitoring proposals in the SA Report are suggestions only. Much of the data used for monitoring in many cases will be provided and collected by outside bodies (e.g. the Environment Agency, English Heritage, waste management industry). It is therefore recommended that PDNPA work with these outside bodies to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable as the Core Strategy is finalised.

What are the next steps in the preparation of the Core Strategy and its Sustainability Appraisal?

56. The SA Report will be published for consultation alongside the Submission Version of the Core Strategy. PDNPA is inviting consultation responses on the Core Strategy and the SA Report which this Non-Technical Summary accompanies. The Core Strategy and SA Reports will then be revised, taking into account the consultation responses, to prepare them for examination and adoption.

Where can I find out more about the Sustainability Appraisal?

57. More detailed information about the SA process and its findings can be found in the full SA Report which is available from the Peak District National Park Authority.

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