

Core Strategy policy check for consistency with the National Planning Policy Framework

Discussing implementation of government's intentions for the land-use planning system, the [National Planning Policy Framework](#) (NPPF) (paragraphs 211 to 216) deals with its relationship to statutory plans that were adopted before its publication: such as the Peak District National Park Core Strategy, with its stated reliance on detailed support from saved local plan policies.

The NPPF states that:

- the policies in the local plans should not be considered out-of-date simply because they were adopted prior to its publication (March 2012), although they may need to be revised to take it into account.
- for 12 months after its publication, full weight should be given to existing policies adopted since 2004, even if there is a limited degree of conflict between the two.
- following that, the balance of weight between pre-existing local plans and the NPPF should reflect the degree of consistency between them (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given to them).

In May 2012, the National Park Authority's Planning Committee agreed that

- a) An initial strategic level analysis showed the Peak District National Park Core Strategy provides a distinctive and proportionate approach to planning in the National Park that is consistent with the NPPF; and
- b) A further detailed analysis would be required before deciding whether any parts of existing adopted policy require review because of the publication of the NPPF.

The following interim analysis shows that the adopted Core Strategy policies are consistent with the NPPF and further its intention in a manner that is appropriate to the weight to be placed on landscape, conservation and enhancement in a National Park. This process of analysis will be concluded in the New Year with a report to the Authority.

Some readers of the NPPF might consider that the current combination of Core Strategy and saved Local Plan policies for the National Park does not cover the full extent of matters that the NPPF considers appropriate for a local plan. This is a different point to that of the existing policies' consistency or compatibility with the NPPF. It forms part of the process that is now under way to draw up a more detailed level of policy in a Development Management Plan, together with a revised Supplementary Planning Document on matters such as renewable energy opportunities. It is the Authority's intention to ensure that read together, the various layers of the National Park Development Plan and supporting material will provide content agreed by the Planning Inspectorate as being the most appropriate to local circumstances.

NPPF element(s) that the policy contributes / conforms to	In what ways does the policy contribute	Any possible uncertainties in policy interpretation or possible difficulties in understanding the conformity relationship to NPPF that need to be explained	Any respect in which the policy is additional to the NPPF
Core Strategy Policies			
GSP1: Securing national park purposes and sustainable development GSP2: Enhancing the National Park GSP3: Development Management Principles			
Presumption in favour of sustainable development (paragraph 14) Conserving and enhancing the natural and historic environment (paragraphs 109 to 141)	Policies GSP1, 2&3 provide for sustainable development in the context of National Park designation and therefore contribute to the implementation of NPPF presumption in favour of sustainable development (paragraph 14), which specifically caveats the "presumption" for plan making and decision-taking where policies in the Framework indicate development should be restricted. Footnote 9 to paragraph 14 refers (amongst other designations) to National Parks as an		GSP1 restates the Sandford principle explaining the relationship between national park purposes with priority given to conservation and enhancement if conflicts cannot be reconciled. GSP2 takes opportunities to remove undesirable buildings or features and also allows development justified by removal

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	<p>area of policy which may be exempted from the presumption.</p> <p>Policies also contribute to the Core Principles (paragraph 17)</p> <p>As sought by NPPF (for example in paragraphs 109, 113 – 115 & 156) the policies of the core strategy (supplemented by the local plan) include general spatial policies and more detailed criteria to ensure protection, conservation and enhancement commensurate with the Park's status as well as safeguarding living conditions, climate change and transport matters.</p>		<p>or relocation of non-conforming uses in settlements (the NPPF only deals with relocation in relation to risk of flooding.)</p>
GSP4: Planning conditions and legal agreements			
<p>Planning conditions and obligations (paragraphs 203 to 206)</p>	<p>GSP4 helps developers understand why and when conditions and obligations will be used: making sure that development is acceptable in pursuance of NPPF paragraphs 176 & 203-206.</p>	<p>NPPF paragraph 202 asks that the Authority should take account of changing market conditions when using legal agreements. Policy GSP4 and references to legal agreements for housing (in Core</p>	<p>Core Strategy text 7.28 and 7.31 explain how conditions and agreements can provide particular benefit in a national park context.</p>

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			strategy paragraph 12.18 and policy HC1 (c)) do not specify amounts and are, therefore sufficiently flexible.	Policy GSP4 also provides for the use of broader mechanisms such as Community Infrastructure Levy which the NPPF says should be worked up “alongside” the local plan.
DS1: Development Strategy				

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Achieving sustainable development and Core Planning principles	<p>Policy accords with NPPF sustainable development and core planning principles (e.g. paragraphs 9,10, 14 & 17:</p> <ul style="list-style-type: none"> a) Enabling improvement in the quality of the built, natural and historic environment, as well as in people's quality of life and social and cultural well-being b) responding to different opportunities for achieving development in areas of differing role and character. c) setting the spatial framework for other policies in the plan to address the needs of the area unless to do so would significantly outweigh benefits or contradict NPPF policy d) managing patterns of growth so as to increase opportunities for sustainable travel, conserve and enhance the natural environment and heritage assets. 	<p>The principles include the need to objectively identify and then meet housing, business, and other development needs, and respond positively to opportunities for growth. It includes the need to take account of factors such as land prices and housing affordability, and have a strategy to allocate sufficient developable land for homes and business. However, The Inspector's report page 18 paragraph 80 http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0016/141217/LDF-InspectorsReport.pdf explains why the Core Strategy and Local Plan do not allocate further sites for business. The response to policy HC1 below explains why the NPA does not identify housing sites for the settlements named in policy DS1. Placing the national park into the wider spatial context of a housing market area illustrates that some needs may be met in the nearby towns of adjacent local planning areas.</p> <p style="text-align: center;">5</p>	It builds in direct reference to (the statutory purpose of) conserving and enhancing the national Park.

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L1: Landscape character and valued characteristics			
Conserving and enhancing the natural environment	Policy L1 provides a basis for landscape conservation and enhancement commensurate with national park status and attaches most value to areas of natural zone. This furthers policy set out in NPPF paragraphs, 17, 109, 113, 115, 116 & 170		Policy L1 protects other valued characteristics (special qualities) identified by the Core Strategy, firmly linking landscape to its wider heritage context. It also links decision making to landscape character analysis via the strategy and action plans. It uses the Natural Zone designation to protect the wildest, least developed landscapes.
L2: Sites of biodiversity or geodiversity importance			
Conserving and enhancing the natural environment	Policy L2 provides protection for sites of biodiversity or geo-diversity importance from national to local designations in furtherance of NPPF policy (in particular paragraphs 113, 114, & 115).		
L3: Cultural heritage assets of archeological, architectural, artistic or historic significance			
Conserving and	Policy L3 enables protection of heritage		The policy includes the settings of

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enhancing the historic environment.	assets in furtherance of NPPF paragraphs 126 to 141.		historic assets as well as the asset itself. It also links management of cultural heritage to the Cultural Heritage Strategy and thereby promotes local distinctiveness.
RT1: Recreation, environmental education and interpretation RT2: Hotels, bed and breakfast and self-catering accommodation RT3: Caravans and camping			
Supporting a prosperous rural economy	Policies RT1, RT2 and RT3 contribute to the implementation of NPPF paragraph 28 by helping to support a prosperous rural economy: enabling sustainable rural tourism and leisure developments that respect the character of the countryside.	Policy RT1 involves the use of landscape character analysis as one of the ways in which the Core Strategy ensures solutions to recreational business aspirations that are compatible with national park purposes, rather than simply “support...growth and expansion of business and enterprise in rural areas” (NPPF paragraph 28). This approach was accepted at Examination as being appropriate (see Inspector’s report in link above paragraphs 40 and 41) and remains compatible with the NPPF since it ensures that business development remains sustainable (NPPF paragraph 28).	Policy links development to the statutory purposes of promoting opportunities for enjoyment and learning whilst conserving and enhancing valued characteristics. Explanatory text links it to the Recreation Strategy, Government’s vision and Circular for National Parks and the long established Sandford Principle (which ensures that where there is irreconcilable conflict between enabling people to enjoy and understand the National Park and its conservation and

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			enhancement, the latter is given highest priority.
CC1: Climate change mitigation and adaption CC2: Low Carbon and renewable energy development			
Meeting the challenge of climate change, flooding and coastal change	Together with the Development Strategy (policy DS1), policies CC1 and CC2 act in furtherance of NPPF paragraphs 95, 97 & 99, promoting reduction of greenhouse gasses, energy efficiency and the use of renewable and low carbon sources in a manner that ensures satisfactory minimization of adverse impacts in the context of National Park designation and statutory purposes.	In its consideration of whether to identify suitable areas for renewable or low carbon sources and infrastructure (NPPF paragraph 97), the NPA has collaborated on the identification of suitable sites for water powered renewable energy projects, through an evidence report produced by Friends of the Peak District, and a jointly commissioned study into the potential for renewables across the National Park but has not identified specific areas as being suitable for renewable and low carbon energy infrastructure in the plan itself. This sound approach for the National Park was arrived at following modification during the Core Strategy Examination (see Inspector's report paragraphs 50 and 51). A Supplementary Planning Document is scheduled for adoption in December and	

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		will give greater clarity on the scope for renewables across the National Park using a 'landscape first' approach informed by the landscape character and sensitivity evidence.	
CC3: Waste Management CC4: On-farm anaerobic digestion of agricultural manure and slurry			
Achieving sustainable development, plan making and infrastructure	Policy CC3 sets out principles and enables a strategic plan for waste in furtherance of both NPPF paragraphs 7, 156 & 162 and the still extant policy in PPS10. Policy CC4 makes specific provision for anaerobic digestion of a size and type suited to the National Park.	This particular policy approach was endorsed by the Core Strategy examination (see Inspector's report paragraphs 52 to 55). Policy CC3 was found to be sound and policy CC4 amended to avoid repetition and potential confusion.	
CC5: Flood risk and water conservation			
Meeting the challenge of climate change, flooding and coastal change	Policy CC5 and its explanatory text enables management of development in furtherance of NPPF (paragraphs 100 to 104) and its associated Technical Guidance (paragraphs 2 to 19).		

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HC1: New Housing			
Delivering a wide choice of quality homes	<p>Policy HC1 helps implement NPPF paragraphs 47 to 55 by</p> <ul style="list-style-type: none"> • being based on objectively assessed needs across a Housing Market Area that is wider than the National Park alone and • (in effect) accepting as much affordable housing as possible subject to landscape capacity and harm to national park purposes • enabling some open market housing where justified by conservation and enhancement • providing for key workers in agriculture, forestry or other rural enterprises • (Together with saved Local Plan policies and Supplementary Planning Guidance) enabling a relevant mix of housing (including size and type) • Allowing for affordable housing to be provided elsewhere (via financial contribution) if they cannot be 	<p>HC1 meets need <u>in the context</u> of Strategic Housing Market Assessment, duty to cooperate, regional plans, national park purposes, and NPPF paragraphs 6, 10, 14 (2nd bullet and footnote ref to National Park), 17 (5th 7th and 10th bullets) and 115 (with ref to Vision and Circular).</p> <p>The policy does not “identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5%” OR “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. This deliberate approach based on an absence of any “target” for housing delivery was accepted via the Independent Examination into the Core Strategy. In any event, whilst the NPPF states that planning authorities should identify sites, it does not state that this</p>	<p>It links national park purposes to development opportunities where they are thought necessary to achieve conservation and enhancement (C&E). The wider housing market context is reflected in the NPA’s use of duty to cooperate (NPPF paragraph 54) with requests made to surrounding authorities to monitor provision in the National Park and adjust their targets accordingly thereby achieving market flexibility (e.g. NPPF paragraph 50). This is consistent with the provision of the East Midlands Regional Plan and consideration both there and in the core strategy about the limited degree to which open market housing is appropriate in the National Park, and the extensive use of rural exception sites inside the National Park.</p>

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	<p>provided on site</p> <ul style="list-style-type: none"> • Promoting, when used together with policy DS1 (Development Strategy), sustainable location of housing including (when read together with policy E1 for Business Development in Towns and Villages) the possible re-use of low quality employment sites. 	<p>needs to be part of the development plan (indeed the request for annual review implies that it is not).</p> <p>Consistent with the East Midlands Regional Plan, policy HC1 Does not set out an approach to density.</p>	<p>Despite the absence of a target for housing delivery the Core Strategy does include an indicative trajectory for the rate of delivery.</p> <p>The process of developing and adopting the Core Strategy concluded the debate about the balance between Strategic Housing Market Assessment of housing demand and need, the local need for new affordable housing and the limitations imposed by National Park purposes. The process established that the future population of the National Park should be an outcome of implementing policy rather than one of its drivers. LDF evidence base DO47</p> <p>http://old.peakdistrict.gov.uk/population-context.pdf outlines the</p>

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			evidence and rationale for this approach and it is accepted as one part of the evidence base underpinning HC1.
HC2: Housing for key workers in agriculture, forestry or other rural enterprises			
Delivering a wide choice of quality homes	Policy HC2 provides for key workers in agriculture, forestry and rural enterprises in furtherance of NPPF paragraphs 50 and 55.		<p>HC2 links this type of housing to rural enterprise in a manner that was considered to be appropriate for the National Park following Examination of the Core strategy (see http://old.peakdistrict.gov.uk/LDF-G052-Authorities-Topic-Papers.pdf paragraphs 5.18.1 to 5.18.3. ></p> <p>Additional flexibility is provided when read in conjunction with saved Local Plan policy LH3 which clarifies circumstances in which the rural worker tie might be removed.</p>

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HC3: Sites for Gypsies, travelers or travelling showpeople			
Delivering a wide choice of quality homes	In furtherance of NPPF paragraphs 4 and 159 and on the basis of evidence across an inter-authority area, policy HC3 provides for exceptional circumstances that might justify small scale provision.	Government Policy for Traveller Sites (March 2012) is to be read alongside the NPPF and may be revised before it is incorporated fully. Where appropriate, its recommended actions might then be incorporated into the local development plan when drawing up development management policies.	.
HC4: Provision and retention of community services and facilities			
Supporting a prosperous rural economy and Promoting healthy communities	Policy HC4 helps implement NPPF paragraphs 28 and 69-74 by planning positively for provision and use of community facilities, guarding against their loss and considering this type of development in the context of a development strategy that directs development to more sustainable places (DS1).		

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HC5: Shops, professional services and related activities			
<p>Ensuring the vitality of town centres</p> <p>and</p> <p>Supporting a prosperous rural economy</p>	<p>Policy HC5 and its explanatory text help implement NPPF paragraphs 23-28 in the context of a largely village service centre environment, whilst recognising Bakewell town centre as the heart of the National Park's largest community and promoting its viability and vitality. Policy promotes the retention and development of shops and local services subject to scale and includes consideration of their connection to recreation and tourism or status as ancillary to businesses that are already accepted under other economic policies.</p>	<p>Detailed NPPF considerations regarding sequential tests and central area definition are more suited to development management than to the Core Strategy.</p>	<p>Links between retail activity and the visitor and farming economy help to implement national park purposes.</p>
E1: Business development in towns and villages E2: Businesses in the countryside			
<p>Supporting a prosperous rural economy</p>	<p>Policies act in furtherance of NPPF paragraph 28 by promoting the retention and development of business and employment subject to:</p> <ul style="list-style-type: none"> • scale, appropriate location / impact • the needs of the local population 		<p>Policy E1 and explanatory text set out strong reasons why the change of use of some existing employment sites will not be permitted (see NPPF paragraph 51).</p>

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	<ul style="list-style-type: none"> • preference for re-use of existing traditional buildings or developed sites • (for farmsteads or groups of estate buildings) support for primary land management business 		
MIN 1: Minerals Development MIN 2: Flourspar proposals MIN 3: Local small-scale building and roofing stone MIN 4: Mineral safeguarding			
Facilitating the sustainable use of minerals	Policies MIN 1,2,3 & 4 and related explanatory text help implement NPPF paragraphs 142 to 149 in the context of national park purposes by: <ul style="list-style-type: none"> • Being based on evidence (shared with an aggregates working party) that ensures a steady and adequate supply of aggregates (over a wide inter-authority area (the East Midlands) and industrial minerals • Dealing with the extraction of mineral resource of both local and national importance 		Policy for aggregates continues a long standing position (supported by recent agreement with other minerals planning authorities) that works towards a reduction in the proportion of total extraction that comes from the National Park. This is supported by the (still extant) East Midlands Regional Plan. The soundness of the Core Strategy approach towards mineral working, including

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	<ul style="list-style-type: none"> • Providing a basis for the definition of minerals safeguarding areas and prior extraction • Safeguarding railheads • Ensuring restoration of worked areas • Providing for the small-scale working of building and roofing stone in appropriate circumstances 		<p>underground working of fluorspar, is implicit in paragraphs 83 – 99 of the Inspector’s report into its Examination</p> <p>http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0016/141217/LDF-InspectorsReport.pdf</p>
<p>T1: Reducing the general need to travel and encouraging sustainable transport T2: Reducing and directing traffic T3: Design of transport infrastructure T4: Managing the demand for freight transport</p>			
<p>Promoting sustainable transport</p> <p>and</p> <p>Supporting a prosperous rural economy</p>	<p>Policies T1 and T2 (read in conjunction with policy DS1: Development strategy) help to implement NPPF paragraphs 28 to 41 and in particular paragraphs 29 & 34 which recognize that opportunities for sustainable transport solutions will be different in rural areas to those available in urban areas. Policy T3 links the design of transport infrastructure to the importance of good design as a part of sustainable development (NPPF paragraphs 8, 9 & 56 to 66).</p>		<p>Policy T1 links transport policy to national park purposes and policy T3 ensures that infrastructure design supports this by taking account of valued characteristics (including wildlife) and avoiding clutter.</p> <p>Policy T2 includes a road hierarchy for the purposes of managing traffic to appropriate</p>

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			routes. Policy T4 links this hierarchy and its potential impact on valued characteristics to the management of freight transport. These help ensure that business growth (see policies E1&2 above) is appropriately located.
T5: Managing the demand for rail, and re-use of former railway routes			
Promoting sustainable transport	Policy T5 helps implement NPPF paragraphs 29 to 32 & 41 and the objective to maximize sustainable transport options including rail: safeguarding and supporting improvements to existing rail line and safeguarding the potential to re-instate previously used lines. It is closely related to Policy T6.		Supporting text explains the relationship to use of linear routes to promote enjoyment of the national
T6: Routes for walking, cycling and horse riding, and waterways			
Promoting sustainable transport Achieving sustainable development	Policy T6 helps implement NPPF paragraphs 29 & 41 in particular. It links to other NPPF concerns about a healthy society with improved conditions for leisure, the re-use of land, conservation of heritage assets and a		Policy T6 links together transport policy and National Park purposes: promoting opportunities for enjoyment.

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<p>Core planning principles</p> <p>Supporting a prosperous rural economy</p> <p>Promoting healthy communities</p>	<p>prosperous rural economy (e.g. NPPF paragraphs 9, 17,28,70,73 & 75).</p>		
T7: Minimising the adverse impact of motor vehicles and managing the demand for car and coach parks			
<p>Promoting sustainable transport</p>	<p>Policy T7 helps to implement NPPF paragraphs 29, 30, 31, 39 & 40, minimizing the need to use motor vehicles and encouraging use of more sustainable methods of travel in a national park context.</p>		<p>Extends NPPF concerns to traffic management and park and ride schemes, neither of which it deals with.</p>