

PEAK DISTRICT NATIONAL PARK AUTHORITY: LOCAL DEVELOPMENT FRAMEWORK

CORE STRATEGY REPRESENTATIONS

Reg 28 pre-Submission consultation

December 2010

Peak District National Park Authority

Member of the English National Park Authorities Association (ENPAA)

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LDF Administration

Key statistics

342 representations have been made so far. 44 were from Individuals, 28 were from Agents & 270 were from Organisations.

Representations received

Representation 1.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 8.21.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authoritys Local Development Scheme (LDS).

Details: n/a

Proposed changes: I do not consider that health, safety and well-being has anything to do with the PDNPA - this should be removed

Oral hearing requested? NO.

Details:

Representation 2.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 9.6.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authority's Local Development Scheme (LDS).

Details: n/a

Proposed changes: a stronger level of protection will apply to conservation areas - house and landowners are already aggrieved by the level of intrusion from the PDNPA. This suggestion should be re-appraised

Oral hearing requested? NO.

Details:

Representation 3.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 9.33.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authority's Local Development Scheme (LDS).

Details: n/a

Proposed changes: as custodians of the national park, the NPA will provide robust protection of the assets - this is an arrogant assumption made by the writer of this Core Strategy - the real guardians should be the people who live in and own the land and property

Oral hearing requested? NO.

Details:

Representation 4.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 4.18.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authority's Local Development Scheme (LDS).

Details: n/a

Proposed changes: states that the Authority will make efforts to prevent the change of use of buildings away from retail and community - if shops and pubs are economically unviable will the PDNPA provide finance to help? I do not think so. This policy should be re-thought

Oral hearing requested? NO.

Details:

Representation 5.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 4.31.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: public transport is not generally good enough to discourage car use - but the Authority plan to make the use of cars more difficult - they should get real

Oral hearing requested? NO.

Details:

Representation 6.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 4.14.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authority's Local Development Scheme (LDS).

Details: n/a

Proposed changes: not replace expensive fossil fuels with incongruous renewable energy infrastructure - I doubt that we can have it both ways. Preventing huge wind turbines is one thing but preventing homeowners from installing solar panels is totally unreasonable

Oral hearing requested? NO.

Details:

Representation 7.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.10.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authority's Local

Development Scheme (LDS).

Details: n/a

Proposed changes: encouraging the use of cycling - do the PDNPA seriously think that everyone is young and fit enough to ride a bike to work on a dark wet winters morning? Another rubbish policy

Oral hearing requested? NO.

Details:

Representation 9.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.14.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authoritys Local Development Scheme (LDS).

Details: n/a

Proposed changes: there will be innovative and sustainable mechanisms of alleviating the adverse impacts of traffic along the A628 - this may well affect me personally - so the Authority should spell out exactly what it is planning to do so that the people who will be directly affected can make a judgement before this Core Policy becomes official

Oral hearing requested? NO.

Details:

Representation 10.

From: Mr William Moss (no organisation)

Personal Correspondence Address: Morley Lodge, , , , S32 1BB

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.39.

Legally compliant? Yes

Sound? Unsound - It has not been prepared in accordance with the Authority's Local Development Scheme (LDS).

Details: n/a

Proposed changes: successive local policies have kept parking in housing developments to a minimum. This is madness - all it achieves is cars being left in totally unsuitable places

Oral hearing requested? NO.

Details:

Representation 11.

From: Martin Clayton, Geoplan Limited

Work Correspondence Address: Unit 7, Heritage Business Centre, , Belper Road
Derby, , DE56 1SW

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Agent on behalf of Marshalls Natural Stone

Representation on **Section:** MIN3 **Subsection:** 14.12 - 14.32.

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

Details: This representation is made on behalf of Marshalls Natural Stone, one of the largest suppliers of natural dimensional, building and walling stone in the country.

My clients object to the text in relation to Minerals Development as set out in the strategy document, with specific reference to those paragraphs and policies detailed below which relate to Building and Roofing Stone on the grounds that :

1. The strategies/policies/allocations in the plan fail to represent the most appropriate in all the circumstances having considered the relevant alternatives, and they are not founded on a robust and credible evidence base and
2. The plan is not reasonably flexible to enable it to deal with changing circumstances.

Paragraph 14.12 acknowledges the need to balance the long standing competing factors of the need for building and roofing stone for use in heritage protection, against the requirement to protect the natural environment. It then goes on to state that the Core Strategy seeks to achieve this balance. It is my client's contention that it fails to achieve this aim as the balance has been unreasonably weighted in favour of the natural environment to the detriment of heritage protection. Paragraph 14.17 acknowledges the need for flexibility, but then goes on to propose policies that are highly restrictive and inflexible. Paragraph 14.17 also states that the objective of the authority is to gradually reduce the amount of aggregates and other land-won minerals within the National Park. This fails to make any distinction between the differences in scale, local employment opportunities and potential environmental impacts that exist between a quarry producing high volumes of aggregates for the construction market and a typically low key building stone quarry. These differences are recognised in ODPM report 'Planning for the Supply of Natural Building and Roofing Stone in England and Wales' 2004, which examined the issues affecting the supply and demand of indigenous building stone in the UK. In particular, the report focussed on the problems of sourcing appropriate stone to repair historic buildings and recommended that Mineral Planning Authorities should identify and protect 'heritage quarries'. The report confirms that ninety percent of all active and intermittent building stone quarries are very small, with an output of less than 2,000m³ and often less than 100m³ per year.

Paragraph 14.32 confirms that the National Park Authority's policy on building and roofing stone is informed by competing environmental and economic considerations and that it will only support 'local small scale proposals' under Policy MIN3. The paragraph goes on to confirm that this policy approach is designed to only support sites that meet the specific needs of the National Park. My clients object to this policy on the grounds of its inflexibility and the fact that it ignores (in policy terms) the evidence base which it subsequently sets out in later paragraphs, which confirms the

demand for such materials outside of the Park. Many historic buildings and other settlements beyond the boundaries of the national park were built long before the Park came into being using stone quarried from within the Park. They have a continuing need for stone for restoration purposes in exactly the same way as buildings within the Park. Policy MIN3 attempts to impose an artificial distinction which, in terms of protecting our built heritage, doesn't exist. The policy is also considered to be vague as no guidance is given as to the interpretation of 'small-scale workings' and as drafted the policy could conflict with anti-competition legislation. Whilst it is understandable that the Authority would wish to see most of any outputs going to uses within the Park, it should recognise this historic and long established need and insert some degree of qualification in the policy. Policy MIN3 as drafted does not give sufficient recognition to the need to protect the wider built heritage. English Heritage recognise this need and paragraph 14.44 makes reference to the ongoing national Strategic Stone Study spearheaded by English Heritage in conjunction with BGS, which seeks to identify sources of building and roofing stone. This study was set up in response to the ODPM report of 2004 referred to earlier. The SSS aims to identify sustainable stone resources for building and conservation purposes, and to provide evidence of their importance. This is intended to assist planning authorities in developing policies for safeguarding national, regional and locally significant building stone assets. Local authorities are therefore encouraged to recognise existing and potential quarry sites and include suitable policies within their development plans so that the needs of building conservation can be considered equally alongside other competing uses or designations.

One of the stated aims of the Study is that the information it produces will be available to provide 'valuable support for any case presented, for example, in the form of a planning application or appeal, by concerned parties such as English Heritage, National Trust, quarry companies, stone conservationists, to local and national planning authorities, to necessitate continuity of current and future stone production. Thus helping to safeguard not only England's building stone resources and stone built heritage but also the stone industry and stone craftsmanship on which it relies'. In view of the above Policy Min3 should be amended to: 'A. Proposals will only be permitted for the small-scale working of building and roofing stone where: I. it meets a demonstrable need predominantly within the National Park, which cannot be satisfied from existing permissions inside or outside the National Park; and II. it will be predominantly confined to local use only on buildings and structures within the National Park; and III. the individual and cumulative impacts of working on the environment, amenity and communities can be appropriately mitigated.

Proposed changes: <http://www.english-heritage.org.uk/professional/research/buildings/building-materials/strategic-stone-survey/>

Oral hearing requested? YES.

Details: To ensure that this important issue is given thorough and appropriate consideration and to afford the Inspector the opportunity of asking questions

Representation 12.

From: Mr Alan Yarwood, Derbyshire Gypsy Liaison Group

Work Correspondence Address: Unit 3 Molyneux Business Park, Whitworth Road, Darley Dale Matlock, Derbyshire , DE4 2JH

Home phone: 0 **Work phone:** 1629732744 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** HC4

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

Details: n/a

Proposed changes: The Derbyshire Gypsy Liaison Group welcomes the inclusion of a policy which recognises the need to deal with provision for Gypsy and Traveller site provision. However the policy as drafted is ambiguous, lacks clarity, and effectively precludes any appropriate site provision. In particular the use of the phrase -"where exceptional circumstances show that it is possible to meet a proven need.." is confusing. It will invariably be possible to meet a proven need but it may not always be appropriate to do so in the particular location proposed. Surely, the policy needs to indicate that sites may be permitted where circumstances show that the provision is justified and the location is appropriate, having regard to its impact on amenity and safety.

There is also confusion about the apparent restriction to "limited seasonal occupancy." Whilst this is appropriate for travelling showpeople, it is not appropriate for the wider Gypsy community who will undoubtedly spend time travelling away from the site but

will, nevertheless, often require a permanent base, which may be occupied throughout the year, particularly if there are children in the group who need a settled base during their education. If the intention is to restrict site provision to groups requiring temporary provision whilst passing through the National Park, then that is quite different from "seasonal occupancy" and the policy justification should explain why this is the Authorities approach.

There is no point in "adapting the policy to encompass travelling showpeople" and then limiting the provision to small sites. Whatever interpretation one puts on the word "small," such sites will not be suitable for travelling showpeople who invariably need sites capable of accommodating their large trailers and showground equipment as well as their mobile homes.

The policy as drafted has the presumably unintentional effect of rendering it incapable of satisfying either the needs of the Gypsy community or the needs of travelling show people. The requirement for sites to be small may satisfy Gypsy provision but will exclude provision for travelling show people, whilst the requirement for limited seasonal occupancy may satisfy the needs of travelling show people but will not meet the needs of other Gypsy and traveller groups.

This organisation recommends that the policy be re-drafted as follows;

"Proposals for sites for Gypsies Travellers and travelling show people may be permitted where exceptional circumstances show that there is a proven need, and where the proposed site does not have any adverse impact on visual or residential amenity and will provide a satisfactory environment for the occupants."

Oral hearing requested? NO.

Details:

Representation 13.

From: Mrs Brenda Middleton, Grindlow, Gt Hucklow & Little Hucklow Parish Council

Work Correspondence Address: North View, Gt Hucklow, Buxton, Derbyshire ,
SK17 8RF

Home phone: 01298872554 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - The plan is not reasonably flexible to enable it to deal with changing circumstances.

Details: It excludes anyone who does not reside (or has not resided in) one of the 63 listed settlements or a neighbouring settlement. (To qualify for an affordable home you must live or have lived in the settlement where the home has been built or a parish which shares a boundary with that settlement). It also discriminates against anyone who wants to build their own affordable home for themselves on their own plot either in or outside one of the 63 settlements. Developments in small 'estate type developments' in one of the settlements is more in keeping with an urban lifestyle. Rural communities have always been made up of individual dwellings well spaced out and individually designed. I believe the long term outcome of a more 'urbanised' population will be residents who are not interested in the wider National Park and have no understanding of it either.

Proposed changes: We consider the whole settlement list should be removed from the document and all planning applications from any Parish considered on their own merits so that the Authority is seen to be fair and reasonable in all its dealings with planning matters.

Many young residents are moving out of the Park because they have no choice. If this situation is allowed to continue the average age of residents will increase even further. The National Park will become like Bakewell – the oldest average aged population Park in the country. We must do more to keep our youngsters – they are our future and they already understand the area and respect it.

Oral hearing requested? YES.

Details: To add weight to our point. The PPJPB already know this is a controversial issue but have chosen not to address it

Representation 14.

From: Mrs Brenda Middleton, Grindlow, Gt Hucklow & Little Hucklow Parish Council

Work Correspondence Address: North View, Gt Hucklow, Buxton, Derbyshire ,
SK17 8RF

Home phone: 01298872554 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - The plan is not reasonably flexible to enable it to deal with changing circumstances.

Details: It excludes anyone who does not reside (or has not resided in) one of the 63 listed settlements or a neighbouring settlement. (To qualify for an affordable home you must live or have lived in the settlement where the home has been built or a parish which shares a boundary with that settlement). It also discriminates against anyone who wants to build their own affordable home for themselves on their own plot either in or outside one of the 63 settlements. Developments in small 'estate type developments' in one of the settlements is more in keeping with an urban lifestyle. Rural communities have always been made up of individual dwellings well spaced out and individually designed. I believe the long term outcome of a more 'urbanised' population will be residents who are not interested in the wider National Park and have no understanding of it either.

Proposed changes: I consider the whole settlement list should be removed from the document and all planning applications from any Parish considered on their own merits so that the Authority is seen to be fair and reasonable in all its dealings with planning matters.

Many young residents are moving out of the Park because they have no choice. If this situation is allowed to continue the average age of residents will increase even further. The National Park will become like Bakewell – the oldest average aged population Park in the country. We must do more to keep our youngsters – they are our future and they already understand the area and respect it. For example, my family has lived in Grindlow since at least 1660 but my children's only housing purchase option is a terraced house in Chesterfield or Sheffield. This is ridiculous as they all work locally. There are three family homes close to mine and we have 7 children between us. Of those 7, 4 have already gone to Chesterfield and 1 more is looking. This is an incredibly high percentage in a hamlet with only 14 homes in total.

Can I suggest that those families with land available who wish to help their children with their housing needs be allowed to submit plans which would then be considered properly by the planning authority instead of the usual response to enquiries of 'sorry

you're not in a settlement so you cannot build anything ever no matter what it will look like or what merits it has'.

Oral hearing requested? NO.

Details: To add weight to our point. The PPJPB already know this is a controversial issue but have chosen not to address it

Representation 16.

From: Dr Martin Beer (no organisation)

Personal Correspondence Address: Windmill Cottage, Windmill, Buxton, Derbyshire , SK17 8RE

Home phone: 01298 872809 **Work phone:** 0 (ext. 0) **Mobile:** 07899 988311

Submitted by Representor - Individual

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the Authority and by neighbouring authorities, where cross boundary issues are relevant.

Details: Affordable housing is restricted in the first instance to residents of the parish or adjoining parish. There are a large number of very small parishes in the National Park and many of these are not adjacent to settlements within which affordable housing is most likely to be approved under this policy.

Proposed changes: Change the residential requirement for priority for affordable homes to one which identifies groups of parishes around settlements and identifies inhabitants of these clusters for priority in allocating affordable housing.

Oral hearing requested? NO.

Details:

Representation 17.

From: Dr Martin Beer (no organisation)

Personal Correspondence Address: Windmill Cottage, Windmill, Buxton, Derbyshire , SK17 8RE

Home phone: 01298 872809 **Work phone:** 0 (ext. 0) **Mobile:** 07899 988311

Submitted by Representor - Individual

Representation on **Section:** E2

Legally compliant? Yes

Sound? Unsound - The plan is not reasonably flexible to enable it to deal with changing circumstances.

Details: There are many businesses in the rural areas that are highly dependent on excellent communications to maintain their activities. Many make excellent use of existing buildings etc and bring a younger and economically more active population to the villages. These businesses are increasingly hampered by the lack of rural high speed broadband. Such a service will also reduce the need for the working population to travel and thereby support the other policies within the LDF

Proposed changes: Modify the policy to include support for developments that assist in the provision of high speed broadband in the rural areas and encourage its installation at the earliest available opportunity

Oral hearing requested? YES.

Details:

Representation 18.

From: Mr Christopher Cartledge (no organisation)

Personal Correspondence Address: 4 Dale Crescent, , Hathersage HOPE VALLEY, Derbyshire , S32 1AP

Home phone: 01433 650516 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the

Authority and by neighbouring authorities, where cross boundary issues are relevant.

Details: Recreation and Tourism

There is no need for new facilities at Stanage Edge, which should remain an essentially wild area. Instead focus should be instead on allowing access while minimising damage to the SSSI.

There is a need to make Long Causeway more accessible to walkers, runners horses and cycle riders because the surface is currently much damaged by motorised vehicles.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 19.

From: Mr Peter Rainford, Sheffield City Council

Work Correspondence Address: Development Services, Sheffield City Council, Howden House, 1 Union Street Sheffield, , S1 2SH

Home phone: 0 **Work phone:** 0114 273 5897 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: This is consistent with policy in Sheffield, focussing on provision of affordable housing but with the scope to provide market housing within enhancement schemes where affordable housing would not be viable.

Oral hearing requested? NO.

Details:

Representation 20.

From: Mr Peter Rainford, Sheffield City Council

Work Correspondence Address: Development Services, Sheffield City Council,
Howden House, 1 Union Street Sheffield, , S1 2SH

Home phone: 0 **Work phone:** 0114 273 5897 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** HC2

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: This is consistent with policy in Sheffield.

Oral hearing requested? NO.

Details:

Representation 21.

From: Mr Peter Rainford, Sheffield City Council

Work Correspondence Address: Development Services, Sheffield City Council,
Howden House, 1 Union Street Sheffield, , S1 2SH

Home phone: 0 **Work phone:** 0114 273 5897 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** HC3

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: This is consistent with policy in Sheffield though we note that it may not supply significant numbers of affordable units due to the costs involved and the possibility of more cost effective options.

Oral hearing requested? NO.

Details:

Representation 22.

From: Mr Peter Rainford, Sheffield City Council

Work Correspondence Address: Development Services, Sheffield City Council,
Howden House, 1 Union Street Sheffield, , S1 2SH

Home phone: 0 **Work phone:** 0114 273 5897 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** HC4

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 23.

From: Mr Peter Rainford, Sheffield City Council

Work Correspondence Address: Development Services, Sheffield City Council,
Howden House, 1 Union Street Sheffield, , S1 2SH

Home phone: 0 **Work phone:** 0114 273 5897 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: The policy, coupled with the outcomes for the Dark Peak and Moorland Fringe (Fig 4, p28), identify provision of affordable homes for local need and consolidation of services in settlements, which include High Bradfield and Low Bradfield (the two villages within Sheffield's boundary). The provision of between 35 - 75 homes, mainly affordable housing to meet local needs, is consistent with policy in Sheffield. In particular, it supports objectives in Sheffield's Rural Communities Strategy, which seeks to ensure the long term sustainability of rural settlements by taking opportunities to deliver new housing where possible, and within the context of landscape and character considerations.

Oral hearing requested? NO.

Details:

Representation 24.

From: Mr Peter Rainford, Sheffield City Council

Work Correspondence Address: Development Services, Sheffield City Council, Howden House, 1 Union Street Sheffield, , S1 2SH

Home phone: 0 **Work phone:** 0114 273 5897 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** T5

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: The policy recognises the need for long-term strategic provision to manage the increasing demand for travel between the core cities of Sheffield and Manchester in a sustainable way. Loss of potential rail capacity would put more pressure on strategic roads and make it more difficult to provide the net positive effects on the National Park environment that are sought in paragraph 15.30.

Oral hearing requested? NO.

Details:

Representation 25.

From: Mr Christopher Cartledge (no organisation)

Personal Correspondence Address: 4 Dale Crescent, , Hathersage HOPE VALLEY,
Derebyshire , S32 1AP

Home phone: 01433 650516 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Subsection:** 5.21.

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

Details: Hathersage and Outseats not just Hathersage should be considered together as the settlement. This is important in terms of the "cascade" mechanism for housing need which currently prioritises people in adjacent parishes.

This policy is totally unsuitable for Hathersage and Outseats where the neighbouring civil parishes are as follows:

Hathersage: Grindleford, Highlow, Outseats, Sheffield
Outseats: Hathersage, Offerton, Bamford, Derwent, Bradfield, Sheffield

Taking Hathersage with Outseats as a single settlement for any affordable housing provision would be simple and would probably in practice remove the adjacent parish issue in almost all cases.

However it is not ideal. Abney & Abney Grange do not appear to touch either Hathersage or Outseats. They abutt Eyam (as I think Highlow does). However Abney & Abney Grange, Highlow and Offerton think of themselves as a single community sufficiently to share a single Parish Meeting so should be treated alike.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 26.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Subsection:** 3.7.

Legally compliant? Yes

Sound? Unsound - It is inconsistent with national planning policy.

Details: The Core Strategy's (CS) vision (paragraph 3.7) re-iterates the twin purposes of National Park's as defined in the Environment Act 1995 (conservation and enhancement of the natural beauty, and promotion of public understanding and enjoyment of their special qualities) and the supplementary duty of the National Park Authority's to foster the economic and social well-being of local communities.

Whilst these purposes and duties must form the basis for the CS's vision and policies, FPD believe the vision must also reflect the Government's Circular English National Parks and the Broads (2010). The circular's vision is also based on National Park purposes, however the second of four bullet points within its vision also identifies sustainability and the low carbon society as key issues.

It states that by 2030 National Parks will be places where "Sustainable development can be seen in action. The communities of the Parks take an active part in decisions about their future. They are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy, sustainable agriculture, low carbon transport and travel and healthy, prosperous communities have long been the norm."

The PDNPA's vision is static with no sense of the dynamics and change that will be required for the Park to meet the challenges of the next 20 years. There is no sense that the CS would 'inspire visitors and local communities to live within environmental limits and to tackle climate change.'

The CS should be completely rewritten in the tone of that in the National Park Circular 2010.

Proposed changes: FPD believe that a fifth sentence must be added to the vision to reflect the Government's positive attitude towards sustainable development and a low carbon economy within National Parks. Without reference to these aims within the vision, it does not comply with national guidance.

Oral hearing requested? YES.

Details: FPD believe that the omission of sustainable development within the vision is significant and warrants discussion.

Representation 27.

From: Ken Dorning, Sheffield Area Geology Trust

Work Correspondence Address: SAGT c/o C12i Dainton Building, , Brook Hill
Sheffield, , S3 7HF

Work email: sagt@geodiversity.org

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Organisation

Representation on **Section:** L2

Legally compliant? Yes

Sound? Unsound - It is inconsistent with national planning policy.

Details: The Sheffield Area Geology Trust considers that most of the document is consistent with national policy, but there are aspects of Local Sites as defined in the Defra guidance of 2006 and 2008, particularly regional and local geodiversity sites, that are not considered to be consistent with national policies on geodiversity and therefore not completely effective. PPS12 requires that the LDF takes into consideration and maps the distribution of nationally and locally designated sites. RIGS and Local Geological Sites include sites of national, regional and local importance because geological SSSIs are selected through the GCR - earth heritage habitat SSSI system on a minimalistic basis with one representative site in Great Britain selected for each geological feature. As a consequence, many sites of national importance are designated locally as non statutory Regionally Important Geological Sites, Local Geological Sites or their equivalent. Some of these sites are of regional and local importance, but there is no mechanism at present to determine between national, regional and local importance for geodiversity sites and features. The recognition of significant geological features within L1 Landscape is welcome. The recognition of the importance of archaeological interests of international, national, regional and local importance is welcome.

The text notes this, though the addition of 'Local Geological Sites and equivalents' to the text will clarify this. The core policies do not include reference to regional and local sites in either the section on biodiversity(L2B) or geodiversity in L2D, and these should be added to these sentences within the core policies.

Proposed changes: PDNPA LDF Core strategy consultation October 2010 – response from the Sheffield Area Geology Trust – the geoconservation organisation for the Sheffield and Barnsley Peak Park areas. sagt@geodiversity.org The following is the suggested revised text that includes reference in the policies to regional and local biodiversity and geodiversity sites, as well as including reference to Geodiversity Action Plans. Geodiversity Action Plans have been prepared for parts of the PDNPA area, and are anticipated to be produced for all the LA areas within the Peak Park over the next few years. Local Sites within the Peak Park area include Regionally Important Geological / Geomorphological Sites (RIGS), Local Geological Sites (LGS, 'Local Nature Sites geological' or 'locally important geological sites' of the Sheffield Nature Conservation Strategy 1991 map and their equivalents, mostly listed within the Defra 2006 Local Sites guidance. A separate document, highlighting these changes in colour, will be sent by email to PDNPA forward planning. SAGT is anticipating that these suggested changes will be accepted without the need to participate at the oral examination. If any of these changes are not acceptable to the inspector or to the PDNPA, SAGT will wish to participate at the oral examination, so we have indicated 'Yes' to the question below, in case this is required.

The suggested revised text to L2 follows, together with a copy of L3 to note the comparative treatment of archaeological interests that does include reference to regional and local sites:

9. Landscapes and conservation

L2 Sites of biodiversity or geo-diversity importance

9.22 Sites of biodiversity or geodiversity importance play a vital role within the often unique ecosystems of the National Park and the region. This strong policy principle is important in supporting other areas of the plan. For example restoring 1km² of peat moorland not only protects the eco-system but leads to a carbon saving of 609 to 1128 tonnes of equivalent CO₂/yr. Moorland management also assists water management and reduces the risk of flooding in areas such as the River Derwent as it flows through Derby and other urban areas. This is a vital contribution to the National Park's green infrastructure.

9.23 The 2010 National Parks Circular has a priority outcome for 2010–15 to secure a diverse and healthy natural environment, enhance cultural heritage and inspire lifelong behavioural change. Part of this aim is that biodiversity is valued, safeguarded and enhanced.

9.24 National policy justifies the approach in the National Park. PPS12 and PPS9 requires LDFs to indicate sites of biodiversity and geo-diversity designation; distinguish between national, regional, and local designations; and put in place policies to help restore or create priority habitats in line with national and regional biodiversity action plans. PPS9 requires policies to take into consideration national and local Geodiversity Action Plans. With the 2010 National Parks Circular, policy confirms that every public authority must, in exercising its functions, have regard so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity and should enable the conservation of sites and areas designated for the value of their biodiversity. The following policy is also necessary to aid conservation and enhancement of habitats, species and natural resources and to meet the requirements of PPS942.

9.25 This PPS43 requires local policies that conserve and enhance wildlife species and enhance as well as protect biodiversity and natural habitats. The emerging PPS: Planning for a Natural and Healthy Environment states that planning should conserve and enhance biodiversity and geodiversity and ensure that the natural environment is integrated into the strategic vision of communities. Policies and decisions should ensure that construction, development and regeneration enhances biodiversity wherever possible and that there is no net loss to biodiversity.

9.26 The sites, features and species covered by this policy include:

Sites of Special Scientific Interest (SSSIs);

National Nature Reserves (NNRs);

Species listed under the schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981 or subsequent legislation or reviews;

Local Nature Reserves;

42 ODPM (2005) Planning Policy Statement 9: Biodiversity and Geological

Conservation 43 ODPM (2005) ODPM (2005) Planning Policy Statement 1: Delivering

Local Wildlife Sites or their equivalent;

Regionally Important Geological Sites, Local Geological Sites or their equivalent;

National, regional or local Biodiversity Action Plan priority habitats or species;

National, regional or local Geodiversity Action Plan priorities.

Significant populations of national or local Red Data Book or Notable species;

Sites that provide, or could provide linkages, stepping-stones or corridors between national or local priority habitats, and populations of priority species or other important features.

9.27 The National Park Authority will consider all proposals for development individually and in combination with other proposed and previous developments, to ensure a net positive impact on sites, features or species.

9.28 Proposals likely to affect designated or candidate sites of international importance known collectively as Natura 2000 sites, comprising Special Areas of Conservation (SACs)⁴⁴ and Special Protection Areas (SPAs)⁴⁵, are subject to separate statutory procedures such as the Appropriate Assessment under the Habitats Regulations⁴⁶ designed to provide the highest levels of safeguarding. Specific policies are not included for these sites, but the Authority will consider these internationally important sites under L2 and show them on a subsequent proposals map with associated Development Management Policies.

L2: Sites of biodiversity or geodiversity importance

A. Development must conserve and enhance any sites, features or species of biodiversity importance or their setting.

B. Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any sites, features or species of biodiversity importance or their setting that have statutory designation or are of international, national, regional or local importance for their biodiversity.

C. Development must conserve and enhance any sites or features of geodiversity importance or their setting.

D. Other than in exceptional circumstances, development will not be permitted where it is likely to have an adverse impact on any sites or features of geodiversity importance or their setting that have statutory designation or are of international, national, regional or local importance for their geodiversity.

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

9.29 This policy covers all cultural heritage assets of significance. The 2010 National Parks Circular states that cultural heritage and landscape are fundamental to quality of place, and as they are central to attractiveness, distinctiveness, diversity and quality of place in the Parks, they should be protected and enhanced.

9.30 The Government's vision for the historic environment⁴⁷ is that the value of the historic environment is recognised by all who have the power to shape it; that Government gives

44 A habitat and wildlife protection designation under the European Community Habitats Directive (92/43/EEC) 45 A wild bird protection designation under the European Community Bird Directive (79/409/EEC) 46 HMSO (1994) Statutory Instrument No. 2716 The Conservation (Natural Habitats, &c.) Regulations 47 DCMS (2010) The Government's Statement on the Historic Environment of England Page 55

it proper recognition; and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation. The Government also recognises that, in shaping places, authorities at all levels must give priority to creating high quality environments for those who use them, developing and implementing policies which seek to retain local distinctiveness and giving due weight to the obligation to protect, enhance and promote the historic environment.

9.31 PPS 7 states that nationally designated areas e.g. National Parks have the highest status of protection and that because of National Park purposes the conservation of the natural beauty of the landscape and countryside (including cultural heritage) should be given great weight in planning policies and development control decisions.

9.32 PPS 548 describes 'heritage assets' as those parts of the historic environment that have significance to this and future generations because of their historic,

archaeological, architectural or artistic interest. 'Significance' is described as the value of a heritage asset to this and future generations because of its heritage interest. Some assets possess a level of significance that justifies formal designation, such as World Heritage Site, Scheduled Monument, Listed Building, Registered Park and Garden, or Conservation Area. However, the PPS also covers heritage assets that are not designated, but which are of heritage significance. These are also a material planning consideration.

9.33 The Government accepts these are of equivalent significance and should be considered as if they were designated. In the National Park, around 90% of the assets fall into this category and such assets are therefore significant material considerations in planning decisions. They are a vital part of the landscape and some, such as stone walls, lead rakes and stone barns are highly valued. However they remain susceptible to damage, so they need continued protection through planning policies. As custodians of the National Park, the National Park Authority will provide robust protection for these assets.

9.34 The Government and the Authority also recognise that if people better understand cultural heritage, they are more likely to value it, and if they value it they are more likely to support its conservation and enhancement. The requirement to maintain and provide access to Historic Environment Records now provides additional means for the Authority to:

advance knowledge and understanding of the historic environment;

improve its protection; support its conservation, management and enhancement;

inform policies, plans and development management;

support heritage led regeneration, environmental education and cultural tourism; and

promote involvement in exploration, appreciation and enjoyment of local heritage.

9.35 Therefore, alongside policy protection, the Authority will work to raise people's understanding of cultural heritage. This recognises that peoples' concepts of heritage and 'sense of place' are deeply held, very personal and not easily changed.

9.36 National policy states that planning authorities should designate and review Conservation Areas, and should have special regard for the preservation of listed buildings and scheduled monuments. It also establishes nationally registered parks

and gardens as a material consideration in planning decisions, whilst other areas such as sites of archaeological interest and the wider historic landscape should be important factors in decision-making. Overall, the conservation of cultural heritage plays an integral part in the delivery of sustainable development. 48 DCLG (2010) Planning Policy Statement 5: Planning for the Historic Environment Page 56

9.37 It also states⁴⁹ that local development frameworks should taking into account the variations in type and distribution of heritage asset, as well as the contribution made by the historic environment by its influence on the character of the environment and an area's sense of place; It states that planning authorities should recognize the potential for cultural heritage to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development; and the stimulus it can provide to inspire new development of imaginative and high quality design; the re-use of existing fabric to minimise waste; and its mixed and flexible patterns of land use that are likely to be, and remain sustainable. The level of detail contained in an LDF should reflect the scale of the area covered by the plan and the significance of the heritage assets within it.

9.38 At a local level, plans should consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the local development framework core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place. Plans at a local level are likely to consider investment in and enhancement of historic places, including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats.

9.39 These requirements are covered by Conservation Area designation and Management Plans. They are currently covered by Local Plan policies which will be superseded by the Development Management Policies Development Plan Document.

9.40 Other guidance⁵⁰ states that beyond heritage designations, an understanding of heritage values should be the basis for making sound decisions about the future of cultural heritage assets.

9.41 The Authority welcomes close working and forward planning with all owners and managers of cultural heritage assets. This can be valuable to both landowners and the Authority, particularly when large landholders such as estates and conservation organizations are responsible for significant areas or numbers of cultural heritage

assets. The Authority aims to encourage mutually beneficial and sustainable proposals to conserve and enhance cultural heritage assets for future generations, whilst acknowledging the social and economic challenges faced by today's land owners and managers.

9.42 In all proposals involving cultural heritage assets with statutory designation or registration, or which are otherwise of international, national, regional or local interest, an evaluation of the likely impact must be undertaken to specifications approved by the Authority in accordance with PPS5, and the Authority's Householder Planning Application Guidance Notes and Planning Application Validation Guidance⁵¹. Development that affects the particular merits of Listed Buildings and other buildings, assets and areas of historic or vernacular merit or their settings, must sustain or enhance the assets or their significance to be acceptable. 49 DCLG (2010) Planning Policy Statement 5: Planning for the Historic Environment 50 English Heritage (2008) Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment 51 PDNPA <http://www.peakdistrict.gov.uk/index/living-in/planning/making-a-planning-application.htm> Page 57

L3: Cultural heritage assets of archaeological, architectural, artistic or historic significance

A. Development must conserve and enhance any asset of archaeological, architectural, artistic or historic significance or its setting that has statutory designation or registration or is of other international, national, regional or local significance

B. Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any cultural heritage asset of archaeological, architectural, artistic or historic significance or its setting that has statutory designation or is of other international, national, regional or local significance.

This representation is from the Sheffield Area Geology Trust. Note that there are designated RIGS and LGS areas within each of the LA areas within the PDMPA area.

Oral hearing requested? YES.

Details: This may be necessary should the inspector or the PDNPA officers wish to seek further clarification with regards to the appropriate wording to take into account the geodiversity interests within the PDNPA area. The government White Paper on 'An invitation to shape the Nature of England' is still out for public consultation, and it is

anticipated that there will be many representations regarding the lack of any reference to geology in this document.

Representation 28.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Section:** 2.1

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: At outset I would like to express slight concern that the change of online submission process complicates submissions. My recorded comments on the draft in 2009 were made and stored under the the Limehouse system and I have had to reference and check my position in that format against a new and separate process a year and a half or so later, which is quite awkward and non user-friendly. I ask that my comments are here to be seen in association with my former comments as recorded and referenced against the initial draft CS text and policy options.

In general there is much in this CS document I support, and I am in sympathy with the general vision and intent. I have attempted to express this support. However in my particular field of interest which is Transport I have made my support qualified and in one place I record an Objection. Further down I also record my disappointment at some lost text and options.

Oral hearing requested? YES.

Details:

Representation 29.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire ,

SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.1.

Legally compliant? No

Sound? Unsound - It has not been prepared in accordance with the Authority's Local Development Scheme (LDS).

Details: I am simply querying if the document is sound or legally compliant here because it seems to me the CS as regards an approved Transport Policy should surely precede or be published simultaneously with any associated policy documents, and I wish to safeguard my right to be fully informed to comment.

I feel concern that the STAP* (see below), acknowledged as playing an influential part in creating the Core Strategy document is not currently available or visible as this makes slightly a consultation on things unknown or "unseen". This raises a concern as to a possible lack of the transparency required at this central outset stage, particularly where parts of the texts seem missing or bare as if referring to matters outside of themselves. For this reason I would like to suggest it might be reasonable to ask for this qualification on my comments here on Transport within the Core Strategy and to have access to possible future revision dependent upon the STAP as published. *The text says "Core policies have been developed to help contribute to and complement the new Sustainable Transport Action Plan for the National Park " 138, the reference being to a footnote."

Proposed changes: I am querying the legal compliance and soundness of the consultation on Transport issues within the CS to the best of my knowledge: because I would have thought the CS Policy document should precede any formulation of policy outside itself, or that such publications should at least be simultaneous for this to be a meaningful exercise.

I feel concern that the STAP* (see below), acknowledged as playing an influential part in creating the Core Strategy document is not currently available or visible as this makes slightly a consultation on things unknown or "unseen". This raises a concern as to a possible lack of the transparency required at this central outset stage, particularly where parts of the texts seem missing or bare as if referring outside themselves. For

this reason I would like to suggest it might be reasonable to ask for my comments on Transport to be seen as qualified by this, and ask for permission for them to be subject to possible future revision dependent upon the STAP as published. *The text says "Core policies have been developed to help contribute to and complement the new Sustainable Transport Action Plan for the National Park " 138, the reference being to a footnote."

Oral hearing requested? YES.

Details:

Representation 30.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.8.

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: (see Para 15.14 qualified support/part objection)

A new and positive development that I support as a textual addition is the citation in the new text from the 2010 Park Circular indicating that the Government wishes to discourage trunk road traffic through National Parks, and see its redirection outside such environmentally sensitive areas designated primarily for Conservation purposes. However please see my points at 15.14, that I feel this requires reinforcement with specific action plans, such as existed under initial draft options T2.4 and T2.7 but which have now, somewhat inexplicably in view of the circular, been removed from this final version. I request below consideration of the reinstatement of these options therefore as commensurate with the Circular.

Oral hearing requested? YES.

Details: As I consider my points may require further consideration at the oral examination.

Representation 31.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.14(15.19).

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the Authority and by neighbouring authorities, where cross boundary issues are relevant.

Details: Qualified support/part objection at anomaly/inconsistent text.

This paragraph 15.14 includes against a bullet point "The line of the Bakewell relief road will not be safeguarded".

This position is however implicit within the later paragraph 15.19 (which I "support") where the relevant text states: - "15.19 Therefore land for new road schemes contained within the existing Local Plan is not safeguarded....." so it is hard to understand why it is necessary to explicitly make the "non route protection point at 15.14 as that will be secured at 15.19. However if it is deemed necessary to reinforce the Bakewell clause then should there not be a similar clause for parity for the removal A628 TintwistleBypass route protection? I feel a need to raise the anomaly and request the text is amended for consistency accordingly one way or the other.

The non protection removed clause if required should be stated in both cases, or - if not needed as 15.19 serves this purpose anyway - dropped entirely, but certainly all schemes so covered should be equally treated. (This may also be the case for other roads abandoned within the Plan area of which I am unaware, and again all such cases should presumably be dealt with parity within the text).

Proposed changes: Please see above, under more details,

Oral hearing requested? YES.

Details: Because I think this is an important point, which I do not wish this point to be lost, and I feel it may be necessary for it to to be recalled at oral examination in my presence.

Representation 32.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.14 cf 15.8.

Legally compliant? Yes

Sound? Unsound - The plan is not reasonably flexible to enable it to deal with changing circumstances.

Details: Please note I do offer qualified support for 15.14(cf 15.8)but I feel it needs strengthening to be workable. Please see my comments at subsequent Policy T1 to find my suggested changes therefore to be added to T1 Policy.

I have chosen the closest option from the drop down list available for "unsoundness" but my argument varies slightly to suggest this paragraph and underlying Policy needs strengthening as much as more flexibility to be "workable". The text says: "National Park Policies will seek to ensure "Consistent with routeing long distance traffic around the National Park, traffic management measures that will deter unnecessary journeys across it;"

Whilst supporting these sentiments broadly and specifically as stated and the Government directive/circular they draw support from, I feel the texts should be reinforced by specific proposals that indicate intent and methods of enforcement. Such would be the Draft Options T2.2 and T2.7 (now omitted) and similar, which would strengthen the planning intent of the text in securing the interests of the Peak National Park purposes as indicated.

So I suggest the reinstatement of such policies should follow at the Policy T1 which should be expanded to accommodate them.

Proposed changes: None

Oral hearing requested? YES.

Details: I think this is an important if not critical point of importance for the Core Strategy. I am very well informed on the subject, and feel I may need to be present to reinforce my points, so they receive fair consideration and should they need to be investigated further orally.

Representation 33.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Section:** T1

Legally compliant? Yes

Sound? Unsound - There are no clear mechanisms for implementation and monitoring.

Details: Please see argument/comments at 15.14(cf 15.8)

This is a worthy policy, but I have seen quite a lot of paragraphs of this kind and they can be - to be blunt - a bit bland and toothless. My suggested changes suggest some "teeth" to reinforce the sentiment or ideology. The Policy will need such or similar to be effective, and for the core spatial objectives to have hope of being realised.

T1 needs to be stronger in specifics, and show a capacity to be clearly implemented.

Proposed changes: reinstate the Policy Options (and similar) as dropped from the CS draft stage.

The draft text of Options T2.2 and T2.7 read as follows, Option T2.4 "Investigate the potential benefits and disadvantages of a Park-wide 7.5 tonne weight limit, excluding

all vehicles of more than 7.5 tonne GLW, except those that begin or end their journey within the National Park (ie those with a legitimate purpose).” (cf. My support comment ID CSR092 at draft stage)

Option T2.7 “Research an environmental levy in partnership with key Stakeholders as a means of securing resources for conserving and enhancing the National Park, promoting its understanding and enjoyment as well as constraining the proliferation of traffic. Investigate the potential benefits and disadvantages of a National Park-

Oral hearing requested? YES.

Details: I think this is an important if not critical point of key importance for the Core Strategy and the future of the Park. I believe I am very well informed on the subject, and feel I may need to be present to reinforce my points, so they receive fair consideration and should they need to be investigated further orally. My offer to attend is only made because I am not aware an advocate more skilled than myself to make further representation here. Should any such party arise I would happily relinquish oral participation to someone more qualified than myself. This applies to all my requests to be present and participate at oral examination.

Representation 34.

From: Miss Hannah Fortune, Nathaniel Lichfield and Partners

Work Correspondence Address: 14 Regent's Wharf, , All Saints Street London, , N1 9RL

Home phone: 0 **Work phone:** 020 7837 4477 (ext. 0) **Mobile:** 0

Submitted by Agent on behalf of Litton Properties Ltd

Representation on **Subsection:** Figure 5.

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: We support the provision of up to 890 homes in Alstonefield, Ashford and Bakewell, but consider some of the units can be ‘open market’ dwellings. Please refer to our response to Policy HC1.

We support the safeguarding of employment sites in sustainable locations and the redevelopment of lower quality sites.

We support the guidance towards supporting business start-up and development particularly where it creates high skill- high wage jobs in the places shown on the key diagram.

Oral hearing requested? YES.

Details: We act on behalf of Litton Properties Ltd, a local developer, who is trying to progress the development of the Lumford Mill site in Bakewell.

Representation 35.

From: Miss Hannah Fortune, Nathaniel Lichfield and Partners

Work Correspondence Address: 14 Regent's Wharf, , All Saints Street London, , N1 9RL

Home phone: 0 **Work phone:** 020 7837 4477 (ext. 0) **Mobile:** 0

Submitted by Agent on behalf of Litton Properties Ltd

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: We support the majority of development being directed to Bakewell (including 80-90% of new houses) as this is the largest settlement in the Peak District National Park.

We support the enhancement of under-used employment sites to encourage employment retention in the main settlements.

Oral hearing requested? YES.

Details: We act on behalf of Litton Properties Ltd, a local developer, who is trying to progress the development of the Lumford Mill site in Bakewell.

Representation 36.

From: Miss Hannah Fortune, Nathaniel Lichfield and Partners

Work Correspondence Address: 14 Regent's Wharf, , All Saints Street London, , N1 9RL

Home phone: 0 **Work phone:** 020 7837 4477 (ext. 0) **Mobile:** 0

Submitted by Agent on behalf of Litton Properties Ltd

Representation on **Subsection:** 12.19.

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: We agree that open market housing may be required for financial viability purposes to bring forward conservation and enhancement development on the site or treatment of a underutilised or a despoiled site. This also applies to sites where high infrastructure costs require cross funding.

Oral hearing requested? YES.

Details: We act on behalf of Litton Properties Ltd, a local developer, who is trying to progress the development of the Lumford Mill site in Bakewell.

Representation 37.

From: Miss Hannah Fortune, Nathaniel Lichfield and Partners

Work Correspondence Address: 14 Regent's Wharf, , All Saints Street London, , N1 9RL

Home phone: 0 **Work phone:** 020 7837 4477 (ext. 0) **Mobile:** 0

Submitted by Agent on behalf of Litton Properties Ltd

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - The plan is not reasonably flexible to enable it to deal with changing circumstances.

Details: The policy is not flexible enough to deal with changing circumstances and in particular specific sites which can be treated as exception to normal policy.

Proposed changes: We consider the policy should incorporate an additional criterion which allows for open market housing on limited sites in the main settlements, such as Bakewell, when this can be justified for financial viability purposes to ensure the development is brought forward. Such schemes will normally bring significant benefits to the Park area, such as enhanced employment floorspace. The current Peak Local Plan allows such an exception in Policy LB7 which deals with Lumford Mill. The provision of some open market housing in certain circumstances will help support the Authority to achieve one of its main aims to support sustainable economic development

Oral hearing requested? YES.

Details: We act on behalf of Litton Properties Ltd, a local developer, who is trying to progress the development of the Lumford Mill site in Bakewell. We consider this policy raises complex issues which may need to be addressed.

Representation 38.

From: Miss Hannah Fortune, Nathaniel Lichfield and Partners

Work Correspondence Address: 14 Regent's Wharf, , All Saints Street London, , N1 9RL

Home phone: 0 **Work phone:** 020 7837 4477 (ext. 0) **Mobile:** 0

Submitted by Agent on behalf of Litton Properties Ltd

Representation on **Section:** E1

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: We support the proposals for improvements to existing employment sites so more attractive to business.

We support the redevelopment of business sites for other purposes such as housing where the employment site is under used.

Oral hearing requested? YES.

Details: We act on behalf of Litton Properties Ltd, a local developer, who is trying to progress the development of the Lumford Mill site in Bakewell.

Representation 39.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire ,
SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Section:** T2

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

Details: Generally I accept the text of Policy T2 and specifically support Paragraph C.

However I wish to Object where in Paragraph B it is stated:

- "In exceptional circumstances, transport developments that increase the amount of cross-Park traffic may be accepted where: There is a clear long term net environmental benefit within the National Park; and the public interest may be deemed to exceed any negative impact on the National Park." and reason as follows for deletion of this clause as it stands.

I simply do not believe, nor have I ever seen any convincing argument, that there are any conceivable traffic developments either within or outside the Park that might increase the amount of cross Park traffic but could realistically bring a long term clear net environmental benefit within the National Park. A transfer of benefit to one area at the expense of degradation of another (eg the historical example of the SPITS an ultimately road predicated idea based around expanding use of the A628 towards the North of the Park and the A523 in the South) even in the very short term would degrade the Park to the extent of their being no quantifiable "net benefit" and that is only to consider the outcome in the "short term".

In the long term, which is the requirement of this clause, allowing any kind free rein to car and road freight within the Park by such redirection would ultimately only return the problem to the supposedly relieved more central areas. The Core Strategy document realistically accepts that rural public transport is declining at 4.29 and

notably at 15.22 acknowledges that the trend for car usage is increasing. Within such a context the prospect of any clear net long term benefit by accommodating traffic is inconceivable. It would only destroy the Park and there is no possibility of any "net environmental benefit", or any "long term environmental benefit" and quite certainly no "long term net environmental benefit".

This was shown to be quite conclusively the case with the SPITS *

(*SPITS - the South Pennine Integrated Transport Strategy of 1995)

Proposed changes: Deletion of Paragraph B in Policy T2 unless it can be supported by evidence.

Oral hearing requested? YES.

Details: I think this is an important if not critical point of key importance for the Core Strategy and thus the future of the Park. I believe I am very well informed on the subject, and feel I may need to be present to reinforce my points, ensure they receive fair consideration and justify them in the case of further oral investigation. My offer to attend is only made because I am not aware an advocate more skilled than myself to make further representation here. Should there any such party arise I would happily relinquish oral participation to someone more qualified than myself. This applies to all my requests to be present and participate at oral examination.

Representation 40.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.8.

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

Details: My comments and suggested changes at Policy T2 refer.

Whilst T2 Paragraph B deals with road proposals "within the Park" it also refers back to that part of Paragraph 5.18 that deals with road proposals outside the Park but which could affect Cross park traffic flows. So I would wish to address that scenario as well, and suggest a change to the parallel text.

Proposed changes: The paragraph I refer to and seek to change reads "It follows that transport developments outside the National Park will usually be opposed if they increase traffic on roads inside the National Park or have other adverse impacts on its setting and valued characteristics".

For the reasons given I suggest replacing "usually opposed" with "always opposed" "except in the exceptional circumstances of "national emergency" "with a view to reversion to the status quo when these circumstances are past".

By such definition both road proposals inside or outside the Park that increase cross Park traffic flows are correctly dealt with in a way that would be commensurate with and safeguard the delivery of the desired Spatial Outcome at 15.3.

Oral hearing requested? YES.

Details: I think this is an important if not critical point of key importance for the Core Strategy and thus the future of the Park. I believe I am very well informed on the subject, and feel I may need to be present to reinforce my points, ensure they receive fair consideration and justify them in the case of further oral investigation. My offer to attend is only made because I am not aware an advocate more skilled than myself to make further representation here. Should there any such party arise I would happily relinquish oral participation to someone more qualified than myself.

Representation 41.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Section:** T2/F

Legally compliant? Yes

Sound? Unsound - There are no clear mechanisms for implementation and monitoring.

Details: T2 F support with qualification. - with reference to 4.29/15.4

The Park Authority recognises that rural public transport (notably bus) is declining 4.29, and notably at 15.2 that the trend for car usage is increasing. Recent evidence from the consultation period (Autumn 2010) suggests this is the case as the LTA DCC is indeed seeking to further withdraw subsidy and bus services. This suggests this matter needs particular scrutiny during Core Strategy development and close monitoring.

The Authority acknowledges at 15.4 it does not have transport powers (15.4) but seeks to use its powers in planning development to restrict car use at T2F. I therefore support this clause F in T2. It needs strengthening however, as quite often totally implausible Travel Plans are produced by major developers such as retailers simply to pay lip service and so to get past committee planning constraints. Such plans tend not to be binding and this scenario needs guarding against in the text.

Personally I think this trend of increasing reliance on motorised transport has reached critical proportions and that the Core Strategy and associated transport plans may need an even more robust approach. Otherwise in Transport and Spatial terms the Strategy is still in some danger of becoming a hollow document because I do not see how the Spatial Outcome at 15.3 can be achieved.

Hence my concerns at omissions of specific draft text regarding a Transport Levy proposal is again relevant, as I believe that this matter needs urgent consideration in this critical situation. The Park has to consider that surrounded by ever expansionist and territorial local authorities it has a right to increasingly accordingly define its domain as a sanctuary from traffic increase.

Proposed changes: Following from my argument above I argue there is a need to ensure that Travel Plan strategy description at T2 F contains a description of a binding mechanism for ensuring the certainty of complete travel plan implementation post development.

Oral hearing requested? YES.

Details: I think this is an important point of key importance for the Core Strategy and thus the future of the Park. I believe I am very well informed on the subject, and feel

I may need to be present to reinforce my points, ensure they receive fair consideration and justify them in the case of further oral investigation. My offer to attend is only made because I am not aware an advocate more skilled than myself to make further representation here. Should there any such party arise I would happily relinquish oral participation to someone more qualified than myself.

Representation 43.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 5.20.

Legally compliant? Yes

Sound? Unsound - The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

Details: 5.20 Oppose Development is targeted at settlement areas that appear to have public transport provision, but will alternatively through car ownership levels be able to enable access. The premise is here is one of "realism", but I oppose this as an unacceptable compromise with an unsustainable trend.

The Park has no statutory obligation to provide housing to meet a quota and if the Transport Authority starts to withdraw its transport provision, even if poorly used, a correspondingly reasonable response from the Park is to moderate housing allocation as a result of that other Authority's decision.

Therefore I believe the Park should commit to strict use of housing quotas being dependent upon maintenance and indeed improvement of public transport provision, meanwhile blacklisting for (affordable) housing development areas where there is ongoing current diminishment of public transport services. Clearly the objectives to conserve the Park would struggle otherwise in the future against insidious traffic growth, already seen to represent a serious leakage of Park quality.

A good example of this is Tintwistle in the High Peak, whose 397 bus service into the urban settlements nearby is being withdrawn, and therefore may be misdescribed in the Settlement Matrix in Appendix 2). The potential withdrawal militates against its supposed potential to absorb affordable housing need of its own and neighbouring parishes. (It is not clear incidentally if this capacity is perceived "within or outside the Park part of Tintwistle") and this requires clarity.

Proposed changes: The allocation and provision should be reassessed for Tintwistle, and throughout the Matrix against the current new backdrop of proposed withdrawal of subsidy and services.

Confirm in Matrix text that the affordable housing refers only to areas of the Tintwistle settlement within the Park's supervision.

Oral hearing requested? YES.

Details: I think this is an important point of key importance for the Core Strategy and thus the future of the Park. I believe I am very well informed on the subject, and feel I may need to be present to reinforce my points, ensure they receive fair consideration and justify them in the case of further oral investigation. My offer to attend is only made because I am not aware an advocate more skilled than myself to make further representation here. Should there any such party arise I would happily relinquish oral participation to someone more qualified than myself.

Representation 45.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 11.17.

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: No changes, expression of support for text here.

I agree with this paragraph. I support the line of the Core Strategy in seeking to support “low carbon and renewable energy development” whilst ensuring they “are appropriate to the protected landscape.” I support the view that any such developments must be consistent with the “need to conserve the designation of the landscape.”

Oral hearing requested? NO.

Details:

Representation 46.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 11.32.

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: In accordance with my support expressed at 11.17 I agree with this paragraph, and urge that it remains fully intact.

Oral hearing requested? NO.

Details:

Representation 47.

From: Mr Peter Simon (no organisation)

Personal Correspondence Address: 48, , Post Street Padfield, Derbyshire , SK131EF

Home phone: 01457869953 **Work phone:** 0 (ext. 0) **Mobile:** 0

Submitted by Representor - Individual

Representation on **Subsection:** 15.1.

Legally compliant? No

Sound? Unsound - It has not been prepared in compliance with the statement of community involvement (SCI).

Details: I would like to say that I expressed a concern earlier at this Paragraph, and suggested it could be not unsound, or non legally compliant, to the best of my possible knowledge.

I referred to it however I believe as a Policy and not a paragraph but the reference to the STAP is in fact within a paragraph so please amend my submission there.

Also the reason for it being non legally compliant, if such exists, would presumably need to be found within the statement of community involvement, and I think I did not select that from the drop down menu.

Hopefully my argument was well reasoned and clear as to my point, and its contention will be assessed on its own merits.

As regards the entire submission process, it is okay once you get into the swing of it, but the lack of practice induces errors. I think an example submission page should perhaps have been flagged for the consultee to minimise mistakes that could hamper the submission.

Also it would have been nice to have a pdf of comments submitted as with Limehouse, for possible revision, and as a record.

Thank you very much for considering all my comments.

Proposed changes: None

Oral hearing requested? YES.

Details: I think this is an important if not critical point of key importance for the Core Strategy and thus the future of the Park. I believe I am very well informed on the subject, and feel I may need to be present to reinforce my points, ensure they receive fair consideration and justify them in the case of further oral investigation. My offer to attend is only made because I am not aware an advocate more skilled than myself to make further representation here. Should there any such party arise I would happily relinquish oral participation to someone more qualified than myself.

Representation 50.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley,
Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The consultations should include Parish Meetings, where there is no Parish Council, and take to account Conservation Area constraints.

Proposed changes: The consultations should specifically include Parish Meetings, where there is no Parish Council, and take to account Conservation Area constraints.

Oral hearing requested? NO.

Details:

Representation 51.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley,
Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The negative comments about holiday homes appear unwarranted dogma. Anecdotally, all the holiday accommodation in Foolow is owned by residents of the Park and provide incomes. Furthermore, the maintenance and upkeep of these homes is undertaken largely by local people. There appears no justification to separate these businesses from the other economic activities within the Park.

Proposed changes: Remove negative or implicitly derogatory comments.

Oral hearing requested? NO.

Details:

Representation 52.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley,
Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The document contains ambiguities in respect of conversion of existing buildings. It has been the Park policy to allow conversion of redundant farm buildings to holiday homes but not to residences. If this remains the policy, it needs to be made clear. However, and sensibly, if these properties can now become residences, that should be stated and they should be counted as part of the 'affordable' housing programme. Anecdotally, most farm owners wish to convert redundant buildings as a cheap way to provide accommodation for their adult off-spring.

Proposed changes: Decide policy re building conversion for homes.

Oral hearing requested? NO.

Details:

Representation 53.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley,
Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: No evidence is presented to support the assertion that the Park requires 800 'affordable' houses, if any. As residents of the Park for over 24 years, with two now adult children, neither I, nor my wife, have ever been questioned as to future housing needs. Derbyshire Dales District Council (DDDC) broadly corresponds to the White Peak area. Between 1971 and 2001, the population of DDDC increased by 6.7% while the UK average increased by 5.7%, an 18% greater growth within DDDC than the national average. Even before speculating on the reduced numbers per household due to a rising pensioner population and other increases in single occupancy housing, DDDC has had more than its share of housing development, levels that would not be tolerated in the supposedly less controlled Green-belts.

Proposed changes: Conduct proper surveys of genuine housing need.

Oral hearing requested? NO.

Details:

Representation 54.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley, Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** T3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: By anecdote, the assertions about public transport appear optimistic and wrong. If they are generally as wrong as they are for Foolow, major planning decisions are misguided and a waste of public money. Three centres of economic activity are accessible directly by bus from Foolow, but no service is, in practice, suitable for normal 0900 - 1730 working hours, with the possible exception of within the Chesterfield shopping centre. The earliest bus to Buxton centre arrives there at

0955. The last bus from Sheffield departs at 1730 and the last bus from Chesterfield departs at 1735. Having ridden the Chesterfield bus for more than a dozen times in 2009, I noted 3 regular passengers, a middle-aged woman and a young man who alighted at Carver and a young woman who alighted at Stoney Middleton; all three appeared to be low paid shop workers.

Proposed changes: Undertake realistic and competent surveys.

Oral hearing requested? NO.

Details:

Representation 55.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley, Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** T6

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: There is an implied partnership agreement between the PPJPB and the various Highways Authorities responsible for the rights of way within the Park. However, by performance, it is evident that Derbyshire County Council (DCC) shares no such commitment. It is now eighteen months since two stiles were agreed by the Park an illegal barriers to transit and referred to DCC; no action has been taken to enforce the law. Since then, more stiles have been constructed that patently do not conform to the relevant standards.

Proposed changes: If the Park is unable to maintain transit of the existing rights of way, it is meaningless to postulate a strategy for maintenance, let alone extension. It would however be meaningful to seek legislation to bring all footpaths and bridal-ways under Park authority. It would also be meaningful to remind landowners that stiles are a concession to partially obstruct a right of way for the purpose of enclosing stock, not an entitlement and that they must conform to the legal requirements,

including provision for dogs; the law does consider a dog a 'normal' accompaniment for a human when traversing a right of way.

Oral hearing requested? NO.

Details:

Representation 56.

From: Mr Geoffrey Nancolas (no organisation)

Personal Correspondence Address: South Barn, Foolow, Eyam Hope Valley,
Derbyshire , S32 5QR

Personal email: geoffnancolas@aol.com

Home phone: 01433 631697 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** LDF

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Most of the proposed performance indicators have no measurable targets and are thus meaningless.

Proposed changes: Resolve meaningful targets.

Oral hearing requested? NO.

Details:

Representation 57.

From: Mr Paul Tame, NFU

Work Correspondence Address: Agriculture House, , North Gate Uppingham,
Rutland , LE15 9NX

Work email: Paul.Tame@nfu.org.uk

Home phone: 0 **Work phone:** 01572 824255 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy L1 and Paragraph 9.7 outlines the concept of the Natural Zone. We don't disagree with the concept, but feel that the Zone has been drawn to include farmsteads and land that may need to be developed if agriculture in the Peak Park is to remain viable. We would ask the Authority to ensure the boundaries of the Natural Zone are agreed with those who live and work in the Zone. We do not feel there has been adequate consultation on the boundaries of the Zone. The Natural Zone should not be a prohibited area for wind turbines. This could be the most efficient place to put them.

Proposed changes: Agree the boundaries of the Natural Zone after full consultation with those who will be affected by the Zone's boundaries.

Oral hearing requested? NO.

Details:

Representation 58.

From: Mr Paul Tame, NFU

Work Correspondence Address: Agriculture House, , North Gate Uppingham, Rutland , LE15 9NX

Work email: Paul.Tame@nfu.org.uk

Home phone: 0 **Work phone:** 01572 824255 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 9.15.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Paragraph 9.15 bullet point 17. What are 'environmentally friendly methods of farming and working the land'? Are these defined anywhere. Planning applications for development which increases agricultural production may well be necessary to keep the farm in business, but it seems from statements like bullet point 17 that they may not be allowed, unless they are deemed to be environmental friendly.

Proposed changes: Add "and methods which allow Peak District farmers to continue to farm" to the end of bullet point 17 of paragraph 9.15.

Oral hearing requested? NO.

Details:

Representation 59.

From: Mr Paul Tame, NFU

Work Correspondence Address: Agriculture House, , North Gate Uppingham,
Rutland , LE15 9NX

Work email: Paul.Tame@nfu.org.uk

Home phone: 0 **Work phone:** 01572 824255 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy CC2 and its accompanying text does not refer to biomass and solar panels which Peak District farmers are looking at as renewable energy development. There will also be places in B where medium scale wind turbines should be acceptable. The Peak Park is unnecessarily cautious about renewables and needs to help Peak District farmers play their part in increasing renewable energy levels, which are pitifully low in this country.

Proposed changes: There needs to be an undertaking to include biomass and solar energy in the SPG on renewables in the Peak Park. Also B of CC2 needs to be latered to read, "Large scale wind turbines will not be acceptable but medium scale turbines may be acceptable where they do not affect neighbours or iconic views."

Oral hearing requested? NO.

Details:

Representation 60.

From: Mr Paul Tame, NFU

Work Correspondence Address: Agriculture House, , North Gate Uppingham,
Rutland , LE15 9NX

Work email: Paul.Tame@nfu.org.uk

Home phone: 0 **Work phone:** 01572 824255 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Part A of Policy CC4 requires all on farm AD plants to be fuelled by wastes or crops grown on the unit. We believe that some AD plants will only be possible/viable if they import some of the feedstock from elsewhere.

Proposed changes: In A of CC4, insert "... or renewable energy generation, should mainly use agricultural waste and slurry..."

Oral hearing requested? NO.

Details:

Representation 61.

From: Mr Paul Tame, NFU

Work Correspondence Address: Agriculture House, , North Gate Uppingham, Rutland , LE15 9NX

Work email: Paul.Tame@nfu.org.uk

Home phone: 0 **Work phone:** 01572 824255 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy E2 does not allow for new farm buildings on holdings. Many Peak District farms will only be able to keep going with new investment. Some of this will include new barns, buildings to house livestock etc. If farmers are not allowed to build these, their businesses will fail. There seems to be no provision for new farm buildings anywhere in the LDF yet these must occur if the larger Peak District farms are to remain economic.

Proposed changes: Policy E2A needs to have text allowing for new modern farm buildings to meet the requirements of the farm business or new legislation such as NUZs or animal welfare.

Oral hearing requested? NO.

Details:

Representation 62.

From: Mr Paul Tame, NFU

Work Correspondence Address: Agriculture House, , North Gate Uppingham,
Rutland , LE15 9NX

Work email: Paul.Tame@nfu.org.uk

Home phone: 0 **Work phone:** 01572 824255 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC2

Legally compliant? Yes

Sound? Sound

Details: We support policy HC2 provided housing for key workers will include the housing of family employees of the business. We support the families of Peak District farmers being able to live in re-used traditional buildings, and so should the Peak Park Authority.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 63.

From: Mr Richard Silson, Silson Planning Services

Work Correspondence Address: 4 St James Terrace, , Buxton, Derbyshire , SK17
6HS

Work email: richard@plancoop.co.uk

Home phone: 0 **Work phone:** 01298 77866 (ext. 0) **Mobile:** 07880 547084

Processed by Officer on behalf of representor - organisation on behalf of Rock Mill
Business Park

Representation on **Section:** RT2C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Restricting new hotel accommodation to only one location, Bakewell, is not justified. Elsewhere the strategy states the importance of supporting economic development - particularly tourism and facilities to encourage visitors - as long as there are no harmful impacts on the landscape. { Examples include, Vision, Part 3:

Policy GSP2: para 9.2 and para 10.4} That approach is a sensible balance between the imperative of landscape protection and avoiding economic and social hardship by undue limitations on development. Bakewell is already the major draw of the National park in terms of visitor numbers. Other parts of the Park would benefit from visitors being able to extend their stay beyond a day visit.

Proposed changes: Where beneficial development - visitor accommodation and local jobs - can be achieved without landscape impact it should be welcomed on that basis. The policy should be made more flexible to reflect those stated principles and to allow new visitor accommodation provided there is no impact on the landscape rather than being restricted to one chosen location.

Representation 64.

From: Mr Richard Silson, Silson Planning Services

Work Correspondence Address: 4 St James Terrace, , Buxton, Derbyshire , SK17 6HS

Work email: richard@plancoop.co.uk

Home phone: 0 **Work phone:** 01298 77866 (ext. 0) **Mobile:** 07880 547084

Processed by Officer on behalf of representor - organisation on behalf of Rock Mill Business Park

Representation on **Section:** E1D

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section D of this policy is unduly restrictive by limiting the use of former industrial / commercial sites to housing or community uses only. The Core Strategy recognises the need to balance the protection of the landscape with the social and economic needs of the communities that live in the Park. references include The Vision, Part 3: Policy GSP2: para 9.2 and para 10.4 among many others. That approach is a sensible balance between the imperative of landscape protection and avoiding economic and social hardship by undue limitations on commercial development. The demand for the sort of premises that former employment sites offer is falling steadily. A survey of industrial estates in the area around Stoney Middleton in the summer of 2010 found large numbers of vacant units and on average no more than 50% occupancy. When businesses close it is employment that is lost, and jobs are the life blood of communities. It is essential to the character of the Peak District as well as to the welfare of the communities, that the Park does not lose local

employment and is reduced to the role of a dormitory for the surrounding cities rather than a working rural area. An active local economy is an integral part of sustainable communities.

Proposed changes: Redevelopment of former commercial sites should be allowed for uses that generate employment as well as local needs housing / community use. The policy should be broadened to reflect that approach.

Oral hearing requested? NO.

Details:

Representation 65.

From: Miss Rachael Bust, The Coal Authority

Work Correspondence Address: 200 Lichfield Lane, , Berry Hill Mansfield, Nottinghamshire , NG18 4RG

Work email: planningconsultation@coal.gov.uk

Home phone: 0 **Work phone:** 01623 637119 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Although it is acknowledged that the former East Midlands Regional Plan did set out a clear framework for reducing the supply of minerals from the National Park, which is supported, it must still be recognised that parts of the designated Peak District contain coal resources which are capable of extraction by surface mining operations. These resources occur, in broad terms, on the eastern and western fringes of the Peak District. This previous strategic perspective has now been incorporated into Policy MIN1 since the withdrawal of the former Regional Plan.

Planning Policy for England on Mineral Safeguarding is set out in MPS1 Paragraph 13 and in the MPS1 Companion Guide. Further advice is also provided in the BGS document 'A Guide to Mineral Safeguarding in England'. Unlike planning policy advice in Wales, in England there is no national planning policy which indicates that mineral safeguarding should be carried out differently in National Parks to elsewhere. This has been a long-standing issue of concern to many of the National Parks, and it has sometimes been advocated that mineral safeguarding may not be necessary in

National Parks because there is no risk of sterilisation occurring as development is strongly resisted by national policy. Whilst this argument is understood, it is not in itself considered to be of sufficient strength to not comply with national policy. Our reasoning for this is that there are other areas, for example green belts and the open countryside, where strong policy presumptions against new development equally apply yet mineral safeguarding is still advocated in such areas.

It is acknowledged however that you have set out your rationale for the approach in your Minerals Background Paper which the appointed Inspector can consider. It is recognised that the National Park Core Strategies adopted so far have not addressed mineral safeguarding in general which does appear to potentially indicate a difference in approach being adopted by Inspectors at Examination.

Consequently, the Coal Authority still considers that the surface coal resources that exist within the National Park should be safeguarded in line with the advice in MPS1 and its Companion Guide.

The surface coal resource is potentially economically viable and, whilst proposals for new extraction may not be likely due to other policy considerations, it is vital to protect the energy resources of the UK for the future given the need for energy security and the ever-changing energy market. It may be that in the future the national need for energy minerals may result in other policy considerations being applied such that extraction may become more realistic within the National Park. Mineral safeguarding is a long-term planning tool which is an integral part of the principles of sustainable development, protecting finite resources for generations to come.

The Coal Authority therefore considers that, as the principles of MPS1 apply equally to National Parks, an MSA for coal should be defined through the Core Strategy and incorporated within Policy MIN4. The evidence base for the definition of the MSA should be the Surface Coal Resource Plan, which is available from the Coal Authority as set out above.

The Coal Authority acknowledges that you propose to only safeguard and define MSAs for Fluorspar and Very High Purity Limestone for the reasoning stated. You do not propose to safeguard any other minerals including coal. This indicates an acceptance of the principles of MPS1 in relation to safeguarding, but this does not safeguard all the mineral resources present.

Reason – MPS1 (Planning and Minerals) does not advocate any difference of approach to mineral safeguarding in National Parks. Consequently, the Coal Authority considers that the National Park Authority should apply the principles of MPS1 in a consistent manner across all minerals.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 66.

From: Miss Rachael Bust, The Coal Authority

Work Correspondence Address: 200 Lichfield Lane, , Berry Hill Mansfield, Nottinghamshire , NG18 4RG

Work email: planningconsultation@coal.gov.uk

Home phone: 0 **Work phone:** 01623 637119 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN1

Legally compliant? Yes

Sound? Sound

Details: Support – The Coal Authority supports Policy MIN1 in its overall approach which accords closely to National Planning Policy in MPS1. The policy and its accompanying text in paragraph 14.19 acknowledge the presence of coal and indicate how coal proposals and new coal technology proposals would be dealt with. This is considered to be a sufficient policy approach without unnecessarily duplicating MPS1 or MPG3.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 67.

From: Miss Rachael Bust, The Coal Authority

Work Correspondence Address: 200 Lichfield Lane, , Berry Hill Mansfield, Nottinghamshire , NG18 4RG

Work email: planningconsultation@coal.gov.uk

Home phone: 0 **Work phone:** 01623 637119 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1 & GSP3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Coal Mining Legacy As you will be aware, parts of the Peak District area have been subjected to coal mining which will have left a legacy. Again, the broad areas which are likely to be affected are located on the eastern and western fringes of the Peak Park. Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities. Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area where coal exists near to the surface, including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur. The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million properties of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas needs to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground. Within the Peak District National Park boundary there approximately 1,149 recorded mine entries. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy is as a result of mineral workings it is important that new development delivered through the Local Development Framework, recognises the problems and how they can be positively

addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required. Objection – At the Preferred Options consultation Stage The Coal Authority stated: “For the reasons set out above, and to comply with the guidance in PPG14, the Coal Authority considers that appropriate policy criteria should be incorporated within the Core Strategy to ensure that any new developments within former coal mining areas take account of any associated risks and, if necessary, include suitable mitigation measures to address them. Such criteria could be incorporated within Preferred Policy CC1, Preferred Policy GSP3 or elsewhere within the Core Strategy as the National Park Authority deems appropriate.” The Core Strategy has not responded to this issue at all, and at present the plan does not address the issue of land instability at all. It is acknowledged that Policy LW25 of the adopted Local Plan addresses Unstable Land in great detail (a policy which is supported), and this policy is due to remain ‘saved’ for replacement in due course in the forthcoming Development Management DPD. However PPG14 requires both strategic and detailed policies to be developed on the issue of land instability, the Core Strategy does not set out this strategic framework and as such it fails to conform to PPG14.

Proposed changes: The Coal Authority would suggest the addition of a new bullet point to Policy GSP3 as follows: • “ground conditions including any land instability from former mining, quarrying or industrial uses.” Reason – To ensure compliance with the guidance in PPG14 (Development on Unstable Land) and set out a strategic policy on the issue

Oral hearing requested? NO.

Details:

Representation 68.

From: Miss Ann Plackett, English Heritage

Work Correspondence Address: English Heritage, East Midlands Region, , 44
Derngate Northampton, , NN1 1UH

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Home phone: 0 **Work phone:** 01604 735450 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 3.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: English Heritage is of the opinion that the Core Strategy's policy with respect to applications for the working of building and roofing stone is too restrictive and is not consistent with national policy as set out in Minerals Planning Statement 1 Annex 3. Our detailed case is set out in our representation on Policy MIN3 Local small-scale building and roofing stone. Our main concern is that the policy is too restrictive, as it does not allow, in exceptional circumstances, for the use of stone from the National Park for the repair of important historic buildings or monuments outside of the Park, where an existing or historic quarry is the source of the stone, or where the stone is technically compatible and there are no viable alternatives (MPS 1 Annex 3, paragraph 3.3). Minor changes to the wording of the Minerals Spatial Objectives (Figure 3) are required to bring them in line with the proposed changes to Policy MIN3.

Proposed changes: The following amendments to the Minerals policies Spatial Objectives are recommended to bring them into line with the recommended changes to Policy MIN3, so that they better reflect MPS 1: 'Allow the development of small-scale building and roofing stone quarries where the material cannot be sourced from elsewhere and is essential for the conservation of buildings in the National Park and to protect local character and, in exceptional circumstances, for the conservation of important historic buildings or monuments outside the National Park.'

Oral hearing requested? NO.

Details:

Representation 69.

From: Miss Ann Plackett, English Heritage

Work Correspondence Address: English Heritage, East Midlands Region, , 44
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Processed by Officer on behalf of representor - organisation

Representation on **Section:** L3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: English Heritage welcomes the inclusion of a policy on the historic environment. However, we are aware of the guidance in PPS 12 paragraph 4.3, not to repeat national policy guidance.

Notwithstanding, we consider that Policy L3 sets out the priorities for the conservation of the area's heritage assets based on the policy guidance in PPS 5 Planning for the Historic Environment. However, we wish to suggest some changes to the policy so that it better reflects the language of PPS 5.

In addition, we consider that the policy could be made more locally specific if there were an additional point that includes some of the priorities for the management of the historic environment in the National Park set out in paragraphs 9.35 – 9.41 and also makes specific reference to the Peak District Cultural Strategy, which provides a strategic framework for the conservation of the area's heritage assets.

Proposed changes: Recommendations

In order to better reflect the language of PPS 5 and to make the policy more locally specific (PPS 5, paragraph HE3.4 local planning approaches), the following changes and additions to the policy are proposed, which include local priorities set out in paragraphs 9.35 – 9.41 of the Core Strategy:

- A. Development should seek to enhance or better reveal the significance of archaeological, architectural, artistic or historic assets or their setting, including statutory designations or other heritage assets of international, national, regional or local importance or special interest;
- B. Other than in exceptional circumstances, development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset of archaeological, architectural, artistic or historic significance or its setting;
- C. Development should seek to meet the objectives of and, where appropriate, contribute to the implementation the Cultural Heritage Strategy, including maintaining local distinctiveness, investment in and enhancement of historic places and conserving 'at risk' heritage assets.

Oral hearing requested? NO.

Details:

Representation 70.

From: Miss Ann Plackett, English Heritage

Work Correspondence Address: English Heritage, East Midlands Region, , 44
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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: While English Heritage welcomes the support this policy gives for small scale proposals for the working of building and roofing stone, we consider that the policy is too restrictive and would not be sound in terms of conformity with national guidance. We therefore wish to reiterate comments that we made at the Preferred Approaches stage.

We understand that, in order to achieve the statutory purposes underpinning the National Park designation and other international and national natural and heritage designations, there needs to be a protectionist policy approach consistent with paragraph 14 of Minerals Policy Statement 1 (MPS1). While the Core Strategy policy recognises the need for local supplies of building and roofing stone, which is consistent with the uses set out in paragraph 2.1 of Annex 3 of MPS 1, the policy could frustrate the successful repair of important historic buildings and structures outside the National Park boundary; the MPS promotes a more flexible approach that ensures the supply of original or technically compatible sources of stone for conservation purposes (paragraph 3.3, Annex 3), which nevertheless takes into account the need to protect wildlife and geological sites.

We recognise that this has to be tempered with reference to paragraph 14 of MPS 1, which does not permit new major mineral developments in the National Parks, but states that 'Proposals in these areas which are not considered to be major mineral development should be carefully assessed, with great weight being given in decisions to the conservation of wildlife and the cultural heritage and the need to avoid adverse impacts on recreational opportunities.

While any proposals should seek to avoid harm to environmental, including heritage, assets, the repair of historic buildings and structures and the maintenance of local distinctiveness within and adjacent to the National Park depends upon a continuing supply of suitable building and roofing stone. The continuation of this industry also helps to maintain the necessary craft skills.

The policy as written is too restrictive as it allows for the use of stone only within the National Park area. However, paragraph 4.28 of the Submission Version of the Core Strategy recognises that the minerals industry in the Peak Park 'provides jobs and building materials that are valuable locally and nationally'. Planning for the Supply of Natural Building and Roofing Stone in England and Wales, by the Symonds Group, published by the ODPM in March 2004, was commissioned in order to inform the preparation of the current MPS 1 (Annex 3). The Strategic Stone Study was set up to inform the implementation of the recommendations of the Symonds Group report and the MPS. Its objective is not only to identify and safeguard the supply of materials for local use but to identify key buildings and monuments that utilise stone from the area, in line with paragraph 3.3 of Annex 3 of MPS 1. Building and roofing stone from the Peak District has been used in nationally designated buildings elsewhere in the UK and the policy as written would mean that appropriate materials would not be available for their restoration, repair and maintenance. It should be borne in mind that the economic viability of a small quarry may depend upon the export of some of the stone for appropriate use outside the National Park. As indicated in paragraph 14.45 of the Core Strategy, the Peak Park National Park Authority appear committed to undertaking its own Strategic Stone Study that is compatible with the work that has already been undertaken for the rest of Derbyshire; this is welcome.

In recognition of the policy framework set out in paragraph 14 of MPS 1, we are recommending that a more flexible approach to the supply of stone outside the National Park should apply, in exceptional circumstances, to allow for the repair of important historic buildings outside the National Park, where stone that meets specific technical or aesthetic properties is only available from within the National Park. We would expect that any new planning application, whether for the reopening of an existing quarry or for a new quarry, should meet the criteria set out in paragraph 3.3 of Annex 3. The policy now provides for the negotiation of legal agreements, which we welcome as we had highlighted the need for end-use controls.

Proposed changes: Recommendations The following changes are recommended to ensure that the policy is consistent with MPS 1, Annex 3 but still respects the need to protect the special qualities of the National Park as set out in paragraph 14 of MPS 1:

'Proposals will only be permitted for the small-scale working of building and roofing stone where:

I it meets a demonstrable need within the National Park, which cannot be satisfied from existing permissions inside or outside the National Park; or,

II in exceptional circumstances, it can be demonstrated that the proposed working is the original source of stone or has the technical or aesthetic qualities not available elsewhere, required for the restoration, repair or maintenance of a building or monument of international or national importance outside the National Park; and

III subject to the exception above, it will be confined to local use only on buildings and structures within the National Park;

Oral hearing requested? NO.

Details:

Representation 71.

From: Miss Ann Plackett, English Heritage

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** Sustainability Appraisal

Legally compliant? Yes

Sound? Sound

Details: Because of the strategic level of this assessment, English Heritage does not consider that the comments that we wish to make on the Sustainability Appraisal affect the soundness of the plan. The purposes of the National Park, as set out in statute, are reflected in the strategy and thus, the conservation of the cultural heritage of the Peak District is clearly an overall priority. However, we wish to make the following comments suggesting changes/updates to the Sustainability Appraisal that should be corrected before the plan is adopted.

Paragraph 6.18

Firstly, with regard to the monitoring of impacts on the historic environment, it was indicated in our letter of 27 June 2008 that the 'Heritage at Risk' (HAR) register would shortly replace the Buildings at Risk register, extending the coverage of assets being monitored. This register has been in place since 2008 and should be used as the basis for monitoring the plan, together with local 'at risk' data, e.g. for Grade II heritage assets.

Appendix 2 – Objective 3

'The Historic Environment: a Force for Our Future' 2001 was replaced by 'The Government's Statement on the Historic Environment for England 2010'; however, the status of this document is uncertain as a result of the change in Government.

More importantly, Planning Policy Guidance 15 and 16 have been replaced by Planning Policy Statement 5 Planning for the Historic Environment, which uses the concept of 'significance' to assess the impact on heritage assets, including setting, whether the assets are designated or not, as well as providing policy guidance on climate change and the historic environment.

Proposed changes: Recommendations

That the amendments/ corrections identified above and below should be made before the plan is adopted.

Oral hearing requested? NO.

Details:

Representation 72.

From: Mrs Janet Cuff (no organisation)

Personal Correspondence Address: 33 Tatton Road North, , Stockport, , SK4 4QX

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Home phone: 0 **Work phone:** 0161 431 7654 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.18.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Paragraph 15.18 states: "Additional capacity will only be accepted as a last

resort. Therefore, other than in exceptional circumstances, the National Park Authority will oppose transport developments that increase the amount of cross-Park road traffic." We think this is in conflict with the document English National Parks and the Broads - UK Government Vision and Circular 2010 (Defra March 2010) particularly with the following: - Vision for the NPs and Broads - By 2030 English NPs and the Broads will be places where sustainable development can be seen in action ... (The communities of the Parks) ... are known for having been pivotal in the transformation to a low carbon society and sustainable living. Renewable energy ... low carbon transport ... have long been the norm (page 12). - Promote sustainable transport, including navigation Paragraph 85 - "Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks." Comment: Any additional road capacity will increase cross-Park road traffic. This cannot be seen as sustainable or low carbon development as increased traffic will mean more carbon emissions. Routes for long distance traffic should be directed to routes that avoid the Park (as in para 85).

Proposed changes: Paragraph 15.18 should read: -"Additional road capacity will not be accepted" (Delete "will only be accepted as a last resort") -The next sentence should read: "The National Park Authority will oppose transport developments that increase the amount of cross-Park traffic" (Delete "Therefore, other than in exceptional circumstances") - Delete from "exceptional circumstances" to "in the public interest". - Delete "usually" from the last sentence in this paragraph. This change will make the policy compliant with low carbon and sustainable development.

Oral hearing requested? NO.

Details:

Representation 73.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 3.7.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: *See Appendix for detail on all representations. Taddington and Priestcliffe Parish Council is not able to comment upon the legality of the consultation process but it can say with some certainty that the preparation of the Core Strategy has by-passed much of the National Park population. This is because there has been little actual dialogue with local people (perhaps as opposed to other stakeholders) in the setting of the vision and the policies that flow from that.

The success of the strategy is, or should be, dependent upon local people and the extent to which they "own" it. The lack of recognition of this is apparent in some of the policies, particularly those on housing and communities. Without a clear public understanding of issues such as:

- what is meant by a sustainable village;
- what the provision of affordable housing as envisaged is intended to achieve;
- the meaning of local "need";
- the onerous requirements in future placed upon a prospective applicant for new dwellings'

there is likely to be confusion and/or a lack of confidence and/or opposition to policies as they are implemented.

Government policy emphasises the role of the community in achieving sustainability.

Proposed changes: The vision should contain a form of words that clearly conveys that the National Park Authority wants to see ownership of the strategy by local people as being central to its thinking and to the successful outcome of the strategy.

Oral hearing requested? YES.

Details: Mainly because it reflects on other objections such as housing and sustainability policy.

Representation 74.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton,

Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: See Appendix One of the two main problems with trying to assess the likely success of the strategy in meeting the vision of "vibrant" villages is that it is unclear as to where and how many new affordable homes to meet local needs could reasonably be expected in different communities and how many market homes.

However DS1, read in conjunction with Appendix 2 will produce very little younger population to counter the existing aging population or any other development that will add to the vibrancy and resilience of the majority of the listed communities and such a policy is unsustainable

Proposed changes: Policy DS1 should when read in conjunction with the housing policies provide a realistic opportunity for sustainable communities.

Oral hearing requested? YES.

Details: Only because it reflects on Housing Policies.

Representation 75.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The Policy reads well but what does it actually mean? The policy is intended,

presumably, to guide decisions about development and this policy as drafted seems to be open to many interpretations particularly if tied in to Policy GSP4 (below)..

Proposed changes: Clarify what the policy is intended to do.

Oral hearing requested? NO.

Details:

Representation 76.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy GSP2 starts by being concerned only with "enhancement". It is not clear why the proposals for "enhancement" have more stringent tests than those for "conservation". The latter is however mentioned in E even though the rest of the policy and the preamble relates only to enhancement

It is not entirely clear what the first sentence of B is intended to convey. "Will need to demonstrate" may throw the onus on the developer to prove the benefits listed or they may just be the criteria that will be considered by the National Park Authority in considering a planning application. Taddington and Priestcliffe Parish Council hope the latter, as there are already considerable extra burdens on a planning applicant within the National Park.

The second sentence is also unclear. If a proposal "enhances " the National Park, there should be a strong presumption in its favour. The second sentence seems to go against the Sandford Principal with other policies taking precedence.

Proposed changes: Retain the existing Structure Plan Policy C3 which retains a strong and uncomplicated assumption in favour of development that conserves or enhances. but in any event clarify the wording of the policy.

Oral hearing requested? YES.

Details: Only because it reflects on housing/conservation policies.

Representation 77.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: "impact on living conditions of communities" is unclear. Three parish councillors have all interpreted it differently.

Proposed changes: Consideration needs to be given to local people's health, privacy and amenity. The policy would benefit from plain English

Oral hearing requested? NO.

Details:

Representation 78.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP4

Legally compliant? No

Sound? Unsound - Not Specified

Details: The point is made under Policy HC1.C.V.(below) that a policy requiring a

financial contribution for affordable housing when there is no local need is probably illegal and is certainly unreasonable.

In the light of that policy, the meaning of GSP4A is unclear. It appears to imply that the benefits listed will be sought whether or not the nature of development itself gives rise to the need for them.

It imposes no limitations as to when an agreement will be sought or what kind of benefits will be sought or whether such benefits will only be sought when the development itself demands it.

Proposed changes: The wording and legality of the Policy should be clarified.

Oral hearing requested? YES.

Details: The Parish Council is concerned about the number of burdens being placed upon potential developers. This may be another one.

Representation 79.

From: Mr Patrick Brady (no organisation)

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Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy RT2 does not seem to acknowledge the possibility of Non- traditional etc buildings being used for hotels, B & B etc. and it does not explain this. Such accommodation is important to the local economy and there is no obvious reason why it should be limited to the buildings mentioned.

Proposed changes: The policy should apply to the change of use of all buildings not just those listed.

Oral hearing requested? NO.

Details:

Representation 80.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: See Appendix

The first sentence - "Provision will not be made etc - is unclear as to its purpose. There is no "provision" made for affordable housing either. Given the tenor of HC1 the sentence is probably unnecessary. Because it is there, it appears to have a purpose that is not readily apparent.

Policy HC1.C. clearly envisages some open market housing, as do the figures listed in Paragraph 12.17 (see also 12.19). Either there is "provision" for both or for neither

Proposed changes: Clarify the meaning of the first sentence of HC1

Oral hearing requested? YES.

Details: The housing policies together, as set out in Policy HC1.do not in the Parish Council's opinion amount to a coherent response to the need for sustainable communities. Appendix 1 outlines the Parish Council's concerns which it considers need a full discussion.

Representation 81.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC1A

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: See Appendix .

Without a clear definition of what is meant by “local need” and without a more detailed breakdown of where affordable housing is likely to go (see comments on DS1) it is impossible to assess what the impact of this policy will be on sustainable communities

This Core Strategy attempts to control the local housing market to an extent never before seen in the National Park. A definition of local need is therefore crucial to an understanding of the strategy and of an ability to monitor it. Some assumptions of “need” must have been made when the figures in Para.12.17 were calculated. Those assumptions should be used to explain the policy and enable its implication to be properly assessed.

Proposed changes: The Policy should define local need so that the Core Strategy’s robustness and contribution to sustainable communities can be examined.

The present definition of local need contained in the local plan should be widened to accommodate, for example, expanding local households, local people living in the village who work locally and elderly people wishing to downsize.

Oral hearing requested? YES.

Details: The housing policies together, as set out in Policy HC1, do not in the Parish Council’s opinion amount to a coherent response to the need for sustainable communities. Appendix 1 outlines the Parish Council’s concerns which it considers need a full discussion.

Representation 82.

From: Mr Patrick Brady (no organisation)

Personal Correspondence Address: Alban House, Main Street, Taddington Buxton, Derbyshire , SK17 9TY

Personal email: brady985@btinternet.com

Home phone: 01298 85798 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC1C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: See Appendix

It is not entirely clear whether the inset paragraph starting "Such development" applies to I and II or just to II. It is assumed from the words "a building" that it refers to the former.

Taddington and Priestcliffe Parish Council fully supports the aim of conserving and enhancing the National Park through the sensitive conversion of existing buildings and redeveloping derelict and unsightly sites or relocating non-conforming uses. It is a policy that has had some success under the existing structure plan and local plan policies.

The Parish Council also recognises that open market housing can make an important contribution to sustaining local communities. It considers that meeting the demand for such housing is in accordance with Government guidelines on new housing provision. The Core Strategy relies upon some market housing but does not explain how that is to be met.

Allocating land specifically for such housing may normally be inappropriate in the National Park but that does not mean that the opportunities that open market housing offers to communities should not be taken when they meet other National Park purposes.

The Parish Council considers that the policies now proposed, with their emphasis on affordable local housing, will work against National Park purposes because:

- a) they ignore the effects of existing land use values;
- b) they create too many hurdles for the potential developer, given the need to prove/disprove the local housing need, viability etc;
- c) they take no account of some of the realities of the housing market;
- d) they are more likely to result in building conversions to larger single dwellings rather than smaller more affordable open market dwellings;

e) there is insufficient evidence that they have been tried and tested;

f) there is no evidence that any of the agencies are prepared to put their resources into releasing such sites as against a green field site.

Consequently the polices will remove the incentives to deal with unused buildings and unsightly/nuisance sites, leaving them untouched for years to come.

Proposed changes: III, IV and V should be deleted and existing Structure Plan policies retained.

If there is a case for affordable housing in such cases, it should be limited to developments exceeding, say, three dwellings.

Alternatively, the policy should recognise that the environmental needs of some communities override the normal assumptions underlying the policy.

Oral hearing requested? YES.

Details: The housing policies together, as set out in Policy HC1.do not in the Parish Council's opinion amount to a coherent response to the needs of sustainable communities. Appendix 1 outlines the Parish Council's concerns which it considers need a full discussion.

Representation 83.

From: Mr Thomas Redfern, The Tissington Estate

Work Correspondence Address: 36 Pennine Way, , Ashby de la Zouch,
Leicestershire , LE65 1EW

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Home phone: 0 **Work phone:** 01530 415127 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of The Tissington Estate

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: This policy covers all types of development and essentially sets the scene for the development in the Peak. As such, it is necessary to establish a context for the core strategy's proposals and has been distilled by a thorough examination of factual

evidence, wide opinion and comparison with alternatives through a lengthy and rigorous consultation process.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 84.

From: Mr Thomas Redfern, The Tissington Estate

Work Correspondence Address: 36 Pennine Way, , Ashby de la Zouch,
Leicestershire , LE65 1EW

Work email: tom.redfern1@talktalk.net

Home phone: 0 **Work phone:** 01530 415127 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of The Tissington Estate

Representation on **Section:** RT2

Legally compliant? Yes

Sound? Sound

Details: The Estate recognises that the core strategy sets no estimates or targets for recreation and tourism development, but rather acts an “enabler” to development. This is reasonable as no shortfalls have been identified and it is incumbent on the community at large to come forward with proposals. The policy is by definition, flexible and there is every indication that the agencies and key stakeholders identified in the delivery plan will be effective in delivery and monitoring. The National Park Management Plan also deals with recreation and tourism issues and has itself successfully enabled the coordination of partners for promotion purposes.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 85.

From: Mr Thomas Redfern, The Tissington Estate

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Representation on **Section:** HC1

Legally compliant? Yes

Sound? Sound

Details: Development pressure on the Peak is certainly considerable but the core strategy does not impose upper or lower limits on housing but provides a basis for monitoring and review. This is a workable and flexible approach which enables local conditions to be recognised within the framework established by the policy. Although the core strategy is oriented towards affordable housing, the Tissington Estate is pleased to note the positive reference made to the contribution of open market housing to achieving conservation and enhancement. Without such flexibility, many rural settlements will not be sustained.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 86.

From: Mr Thomas Redfern, The Tissington Estate

Work Correspondence Address: 36 Pennine Way, , Ashby de la Zouch,
Leicestershire , LE65 1EW

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Home phone: 0 **Work phone:** 01530 415127 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of The Tissington Estate

Representation on **Section:** E1

Legally compliant? Yes

Sound? Sound

Details: This is also an "enabling" policy which relies on the wider community coming forward with proposals. As such, flexibility is built into the policies. "Enabling" should also extend to "encouraging" for the sake of enterprise in towns and villages in the present economic climate which itself may extend well into the life of the core strategy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 87.

From: Mr Thomas Redfern, The Tissington Estate

Work Correspondence Address: 36 Pennine Way, , Ashby de la Zouch,
Leicestershire , LE65 1EW

Work email: tom.redfern1@talktalk.net

Home phone: 0 **Work phone:** 01530 415127 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of The Tissington Estate

Representation on **Section:** E2C

Legally compliant? No

Sound? Unsound - Not Specified

Details: Whilst the Tissington Estate is pleased to note that businesses are encouraged to use traditional buildings of historic or vernacular merit, we are concerned that the specific policy E2C refers to business use in an isolated existing or new building in the open countryside, not being permitted.

This could be interpreted to refer to all buildings outside settlements which is not in the Estate's interests or in compliance with policies EC6.2c and EC6.2f of PPS 4 : 'Planning for Sustainable Economic Growth' 2009. We can appreciate the need to prohibit such uses in very remote situations well away from any settlement and basic infrastructure. However, the wording of the policy appears to militate against business use in all buildings outside settlements. Even those buildings which are appropriate for business conversion and located close to settlements may still be regarded as being in "open countryside". This seems to contradict the intentions of the policy when read against other core strategy policies to promote rural employment and farm diversification and protect vernacular buildings as well as contradicting the explanatory text accompanying policy E2 itself.

This apparent inconsistency with other policies could compromise the intentions of the core strategy to secure effective conservation and enhancement of the Peak's heritage.

Proposed changes: It is suggested that the policy is re-worded along the following lines: -

Business uses in isolated existing or new buildings in remote areas of the countryside and located well away from settlements will not be permitted.

This should enable the policy to be legally compliant, sound and effective, being in accordance with national policy expressed in PPS 4 as well as the corresponding explanatory text of policy E2 and the other policies in the core strategy aimed at supporting rural employment, building heritage and conservation.

Oral hearing requested? NO.

Details:

Representation 88.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

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Processed by Officer on behalf of representor - individual

Representation on **Section:** T2C **Subsection:** 15.14.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: I oppose policy T2C in respect of its proposal to abandon the safeguarding of the Bakewell relief road and urge that a traffic management scheme be undertaken

15.26 accepts that there will be increases in freight traffic and the need for active control and management.

T7A accepts that, 'within environmentally sensitive locations additional traffic management schemes will be undertaken where there is a demonstrable need' (to minimise the adverse effects of motor vehicles).

However, T2C proposes that 'no new road schemes will be permitted unless .. there are exceptional circumstances'.

And 15.14 says that the Bakewell relief road will not be safeguarded because road schemes 'fuel demand for improvements and additions to the road network'. That would not occur in this case of the Bakewell relief road.

The completion of the Bakewell relief road between the Agricultural Centre and Baslow Road offers the only hope of seriously minimising the adverse impact of motor vehicles in the town centre, which 15.26 accepts will increase. Many towns now enjoy fairly traffic free centres and I do not see why this should be denied to Bakewell.

I accept that the relief road could not be built to normal standards of width and alignment, partly because its route has already been partly compromised. In many historic towns traffic is diverted from the town centre on narrow streets not designed for the purpose. The narrow section of road between Rutland Mews and Felicini's is no narrower than part of the A6 Buxton road. I also accept that the relief road would have adverse effects on residential property. The conversion of Rutland Works and other properties to residential use was made with the full knowledge of the proposal for a relief road and I am concerned that, if the safeguarding is abandoned, people buying those properties in future without such a warning would have a very real complaint if the relief road proposal was resuscitated.

I consider that those drawbacks would be more than outweighed by the advantages to the town centre of reduced traffic flow. Most of the through freight traffic from the south would be diverted up Baslow Road to Hassop roundabout for destinations to the east and on to Ashford to rejoin the A6. The relief road would particularly benefit pedestrians using the historic Bakewell bridge, Bridge Street and Buxton Road.

An alternative with more modest potential to reduce the adverse effects of traffic on the town centre and Bakewell bridge is a one -way relief road leading from Baslow Road to the Agricultural Centre and island car parks and on to Meaden Bridge.

I appreciate that the relief road would cut across pedestrian movement from the Agricultural Centre and car parks. In many small towns pedestrians are successfully channelled across relief roads from car parks. Pedestrians would be gathered to cross it at one or both of the bridges over the mill stream. A pedestrian route parallel to the relief road could go on the river side of Rutland Works apartments and Felicini's.

I accept that the relief road is unlikely to be built in the foreseeable future but note that the core strategy includes for safeguarding the route of the Buxton to Matlock railway which is also very unlikely to be realized. With changes to local government it

is conceivable that a different local authority might finance the relief road. A small community in Scotland built a railway to Loch Tay!

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 90.

From: Mr James Lidgett, Environment Agency

Work Correspondence Address: Trent Side North, , West Bridgford Nottingham, , NG2 5FA

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3

Legally compliant? Yes

Sound? Sound

Details: The Environment Agency consider the above documents to be sound. We wish to suggest the following minor amendment in order to provide greater clarity to developers.

Proposed changes: We wish to suggest the following minor amendment in order to provide greater clarity to developers. CS 3 - Waste management - domestic, industrial and commercial waste. We support the existing wording of policy CS3. However, we would recommend that wording is inserted within the supporting text informing developers of the possibility that a Site Waste Management Plan is required for their site, as per the Site Waste Management Plan Regulations (April 2008). This will help to ensure the safe, legal and sustainable management of construction and demolition waste. We would suggest the following wording is included as a separate paragraph in the supporting text of policy CS3, pages 71 and 72. "Anyone who intends to carry out a construction project on one site with an estimated cost of £300,000 or more must prepare a Site Waste Management Plan (SWMP) before work begins, in accordance with the Site Waste Management Plan Regulations (April 2008). More information can be found at <http://www.netregs-swmp.co.uk>"

Oral hearing requested? NO.

Details:

Representation 91.

From: Shaun Denny, CEMEX UK Materials Ltd

Work Correspondence Address: Cemex UK Operations Ltd, Wolverhampton Road, Oldbury Warley, West Midlands , B69 4RJ

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The Company is concerned that the above policy is unsound as both it and the supporting text to the policy fail to define the extent of the provision of aggregates the Park will make during the Plan period. Whilst reference is made within paragraphs 14.21 and 14.22 to the Park's belief that the current apportionment derived from the Revised National and Regional Guidelines for Aggregates Provision in England via the East Midlands Regional Aggregates Working Party is too high, no evidence is provided in support of this. Moreover, it is conceded within paragraph 14.22 that its aim of reducing its apportionment of aggregates has not been agreed through the East Midlands Regional Aggregates Working Party. In the Company's view basing policy on an aim which has yet to be agreed by the relevant Aggregates Working Party and where no evidence has been presented that supports the Park's aim of further reducing its apportionment is not a robust approach to policy formulation.

Proposed changes: The Company suggests that Policy MIN1A be revised as follows to render it both sound and robust: - "The National Park Authority will make provision for 4.18 Mt per annum of limestone and an appropriate proportion of 0.136 Mt per annum of sandstone until 2020 and seek the progressive reduction in the proportion and amount of aggregates and other land-won minerals from the National Park in accordance with the technical advice of the East Midlands RAWP. To achieve this pProposals for new mineral extraction or extensions to existing mineral operations (other than fluorspar proposals and local small-scale building and roofing stone which are covered by MIN2 and MIN3 respectively) will not be permitted other than in

exceptional circumstances in accordance with the criteria set out in National Planning Policy in MPS1."

Oral hearing requested? NO.

Details:

Representation 92.

From: Shaun Denny, CEMEX UK Materials Ltd

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: No evidence has been included within the Strategy for Policy MIN4A not according with national policy regards minerals safeguarding and as such the Company believe it to be unsound. It is a long held tenet of mineral safeguarding policy that all minerals of economic importance be safeguarded, irrespective of the likelihood of those minerals being worked at any given time. This approach is reiterated by the BGS's A Guide to Mineral Safeguarding in England, a document which is material to the formulation of the Strategy, which states that..."Mineral safeguarding should not be curtailed by other planning designations...and environmental designations without sound justification." In the Company's view the Strategy contains no "sound justification" for its failure to safeguard via Policy MIN4A construction aggregate, a mineral of self-evident "economic importance".

Proposed changes: As such the following revision to Policy MIN4A is sought to render the policy sound: - "The following minerals will be safeguarded from sterilisation by non-mineral surface development through the definition of Mineral Safeguarding Areas covering: I The limestone aggregate resource including limestone used for industrial purposes containing at least 98% calcium carbonate; II The mineralised vein structures relating to Milldam Mine and Watersaw Mine, for fluorspar."

Oral hearing requested? NO.

Details:

Representation 95.

From: Mr Martin Robeson, Martin Robeson Planning Practice

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1 **Subsection:** 5.1-5.28.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The representation needs to be read in conjunction with the representations to policies HC6 and E1. It also relies upon our support for Policy T1 and T2.

The policy fails to effectively plan for the difference in hierarchy between Bakewell as a "significant service centre" (paragraph 5.11) and the other "named settlements". In accordance with Government Guidance there needs to be a clear hierarchy set out in terms of the locations where the main focus of growth will be accommodated.

Alternatively, the policy is fundamentally deficient because it positively chooses not to establish a hierarchy thus allowing growth and the creation of more sustainable communities to be effectively addressed between Bakewell and all of the remaining "named settlements".

There is therefore uncertainty as to what the development strategy is seeking to achieve. There should, in any event, have been a clear review of both options in the Sustainability Appraisal, supporting the DPD. There is therefore a failure of legal compliance.

The strategy merely provides that "the majority of new development will be directed into bakewell and named settlements...". There is no attempt to quantify the distribution of development between bakewell and those named settlements notwithstanding that the policy provides that "about 80-90% of new homes" will be directed into Bakewell and the named settlements rather than in other settlements and the countryside.

It is incumbent upon the Development Strategy to provide a clear and effective core policy that seeks to direct the location and relative quanta for growth.

The policy explains that there is scope for new build development including housing, community facilities, retailing and business premises in the area but does not distinguish, no plan for their provision, in any way, between the defined or named settlements.

Whilst the text to the policy, eg 5.11 and 5.12 explains the distinct role of Bakewell within the National Park in terms of its status as a market town and significant service centre, Policy DF1 does not distinguish between the scale of facilities that can be accommodated in Bakewell compared with the other "named settlements". The DPD fails to provide any guidance on how much of the "between 550 and 890" homes proposed across the White Peak and Derwent Valley, should be provided within Bakewell rather than other smaller settlements. Other policies in the DPD do not assist. Indeed, as a further example, "small-scale retail" is seen as acceptable in all of the named settlements (and Bakewell) yet the term is not defined. Clearly the scale of retail development that can be accommodated in the Area's "significant service centre" will be radically different from that which might be accommodated in one of the larger number of "named settlements". In this context, PPS4 requires local authorities in planning for retail and business premises, to develop a "hierarchy" of centres in order "to meet the needs of their catchments" (Policy EC31b).

The policy also incorporates wholly unacceptable uncertainty in that it recognises that there can be pressure for development in both Bakewell and "named settlements" but that the National Park Authority is uncertain about the capacity for it. This uncertainty directly arises from the deficiency of the Plan in not developing an adequate evidence base (notwithstanding Appendix 2) that considers relevant needs across the area and then identifies a settlement structure best able to accommodate it, having assessed matters through a Sustainability Appraisal.

Even in respect of the Area's Significant Service Centre, ie. Bakewell, where development pressures are likely to be focused, this proposed analysis, including an assessment of site alternatives, is expected to apply (see final paragraph).

The specific aims of the Development Strategy insofar as it applies to Bakewell, are inappropriately cast. The strategy should be to seek to "focus retail and related services in the town", ie. in preference to their accommodation elsewhere, unless in exceptional circumstances. This provides a strategy that addresses sustainable growth.

Merely seeking to "protect the range and integrity of the shopping area", does not achieve this although it may be an important assessment criteria to apply to individual proposals.

Likewise, the safeguarding of employment sites, fails to have regard to the evidence base in terms of supply and take up and thus should seek to distinguish between better quality employment premises and the encouragement towards re-use of poorer quality sites and buildings for other appropriate economic growth or for housing, as appropriate (see, for instance, the finding at paragraph 10.45 of the Employment Land Review, evidence base).

Finally, paragraph 5.15 should be more specific in terms of explaining what the DPD suggests are the forms of development (ie. "the majority of new development" that is "naturally" better accommodated in the larger towns and outside the National Park).

Proposed changes: The Development Strategy (DS1) should, after appropriate sustainability assessment, define a hierarchy of settlements with Bakewell distinct from the other "named settlements".

The Strategy should inform the general, if not specific, distribution of development that is seen to be appropriate in Bakewell bearing in mind its role as a "significant service centre" and a need to build a more sustainable community here and reduce the need to travel across the National Park and out of it to other towns which the Plan currently suggests can be "naturally better places for the majority of new development" (paragraph 5.15). The Plan then needs to set out the specific role and function of Bakewell in accommodating growth and helping to build a more sustainable community structure bearing in mind the needs of its community and the desirability of reducing reliance on the car and of travel across the Area to those other "naturally better places".

Oral hearing requested? YES.

Details: This representation raises a series of substantial issues concerning the lack of soundness of the Core Strategy and its failure to recognise and effectively plan for justified and identifiable needs. Examination of the evidence base is required and this is effective through oral evidence.

Representation 96.

From: Mr Martin Robeson, Martin Robeson Planning Practice

Work Correspondence Address: 21 Buckingham Street, , London, , WC2N 6EF

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Home phone: 0 **Work phone:** 020 7930 0007 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC6 **Subsection:** 12.1-12.17 & 12.44-12.47 .

Legally compliant? No

Sound? Unsound - Not Specified

Details: This representation needs to be read in conjunction with the representations to Policies DS1 and E1. It also relies upon our support for Policy T1 and T2.

The Plan is unsound because it is not founded on a robust and credible evidence base relating, in particular, to retail provision. There are fundamental deficiencies within the evidence base relating to retail matters. For instance, with regard to convenience (or food) retailing, whilst the study identifies that 51% of main food shopping trips "leak" out of the area and that the existing Coop store in Bakewell very substantially overtrades, these clear quantitative and qualitative justifications for the need for further retail floorspace are ignored (see paragraphs 11.2, 11.3 and 11.5 of the Retail and Town Centre Study, evidence base).

In addition, there appears to have been no Sustainability Appraisal of the alternative (if it had been recognised from the Study) of seeking to provide for that alternative. Such a failure to assess a realistic and appropriate alternative, makes the Plan, fail with regard to legal compliance.

Instead, the evidence base looks only at future growth in a retail situation presumed, erroneously, to be in equilibrium. Indeed, the substantial leakage of main food shopping trips out of the area must, in part, arise from the substantial levels of overtrading found in the existing larger supermarket.

A substantial capacity for new food or convenience goods retail development can therefore be identified. The same may no doubt be true for other forms of retail provision. Indeed, on comparison goods, the evidence base fails to review the prospect of and opportunity for increasing the existing market share of only 25.8%, dismissing it simply in terms of "there is no realistic prospect" (see paragraphs 11.14 and 11.19 of the Study).

PPS4 makes it clear that local planning authorities should "identify deficiencies in the network of higher level centres where a need for growth has been established" (Policy EC1.2c) and "at the local level, the evidence base should ... assess the detailed need for land or floorspace for economic development including for all main town centre uses..." as well as identifying "any deficiencies in the provision of local convenience shopping and other facilities which people's day-to-day needs" (Policy EC1.3). PPS4 also makes it clear through Policy EC1.4 that local authorities should "take account of both the quantitative and qualitative need for additional floorspace for different types of retail and leisure developments" and "when assessing qualitative need for retail and leisure uses assess whether there is provision in distribution of shopping, leisure and local services, which will allow genuine choice to meet the needs of the whole community..." and which "takes into account the degree to which shops may be overtrading and whether there is a need to improve competition and retail mix" (Policy EC1.4).

There is no evidence that these important planks of Government policy regarding the creation of plan making policies have been either taken into account by the Authority or properly used in the development of the Core Strategy.

The policy also needs to define an effective hierarchy that will deal with retail provision. At present, it fails to do this. PPS4's Policy EC3.1b explains that local authorities should "define a network (the pattern of provision of centres) and hierarchy (the role and relationship of centres in the network) of centres which are resilient to anticipated future economic changes, to meet the needs of their catchment...". This is required in order to help make choices about accommodating "any identified need for growth in town centre uses..." (see Policy EC3.1). Such choices should therefore inform the Plan's Sustainability Assessment.

Bakewell is identified by the Plan as the areas only "significant service centre" and thus should provide for the regular shopping needs of its catchment. The evidence (see above) demonstrates that it fails to do this with the result that it is deficient in terms of relevant sustainability criteria, including causing significant travel to take place across the National Park in order to use facilities elsewhere. Policies T1 and T2 exist to deter such unnecessary travel.

The first part of the policy requiring that shops and related activity "must" be located within the Bakewell Central Shopping Area, or within settlements listed in Policy DS1 is unreasonably inflexible and inconsistent with the evidence base and Government policy. Indeed, if such activities can be located generally within the "named

settlements", subject to sequential testing and impact assessment, then the same provisions should be able to apply (in accordance with Government policy) to bakewell. In this regard, provision B is wholly inappropriate in terms of the prospect of meeting identified needs, apparent from the evidence base, and in terms of how not only Government policy but other policies in the Core Strategy should be applied in order to accommodate growth in sustainable locations and make Bakewell a more sustainable community and improve accessibility to services and reduce travel across the National Park.

Sustainability Appraisal of a more rational alternative advocated by Government guidance, ie. the use of tools such as the sequential assessment and impact considerations, would, in our view if submitted, demonstrate that appropriate retail and economic growth can be accommodated within the Area's Significant Service Centre and that this would be a more sustainable option than not accommodating identified needs.

Proposed changes: Whilst the policy could be re-written to identify the use of sequential assessment and impact tools to determine the appropriateness of accommodating identified needs, such mechanisms already exist in central Government policy (PPs4) and would perhaps in any event not be appropriate for a Core Strategy.

However, HC6 could provide that the majority of necessary retail and related provision in order to address both existing deficiencies and growth, should be located to serve Bakewell where it will serve to build a more sustainable community. The policy could then provide that smaller scale retail and related activities could, subject to assessment criteria, be accommodated in the "named settlements".

Oral hearing requested? YES.

Details: This representation raises a series of substantial issues concerning the lack of soundness of the Core Strategy and its failure to recognise and effectively plan for justified and identifiable needs. Examination of the evidence base is required and this is effective through oral evidence.

Representation 97.

From: Mr Martin Robeson, Martin Robeson Planning Practice

Work Correspondence Address: 21 Buckingham Street, , London, , WC2N 6EF

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Home phone: 0 **Work phone:** 020 7930 0007 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E1 **Subsection:** 13.1-13.14.

Legally compliant? No

Sound? Unsound - Not Specified

Details: This representation needs to be read in conjunction with the representationsto Policies DS1 and HC6. It also relies upon our support for Policy T1 and T2.

This policy through provision D, seeks a blanket safeguarding of all existing business land and buildings. The evidence base does not support this. It identifies a significant supply of premises and land and that there is limited take up. It is therefore inappropriate for the Plan to merely maintain the existing situation when other needs, eg. for retail and related services and for housing, could effectively use that scarce brownfield land. The Plan has failed to have regard to the evidence base in this regard and fails to test alternative approaches in terms of sustainability appraisal.

Provision D also appears to be uncertain since notwithstanding the indication that existing business land and buildings will be safeguarded, there is a proviso that if premises are no longer "appropriate" then either "enhancements will be sought" and this "may include redevelopment". The Core Strategy needs to be more effective in defining which land and sites it is suggesting may be appropriate for re-use and redevelopment bearing in mind also the quantitative issues referred to above.

Provision D also fails to have regard to the identified retail requirements in terms of surplus business land or buildings suitable for such a use (subject to other policies) in addition to housing and community uses. Indeed, retail development can both be a source of employment itself and a facilitator of other employment facilities as part of mixed use development. This opportunity, to help build growth and meet the challenge to build more sustainable communities, has not been addressed in this policy.

Finally, Provision A is uncertain in terms of relating the scale of a development proposal with the "needs of the local population". The Plan must be more certain than this if it is to provide appropriate and sensible guidance for inward investment and development.

Proposed changes: More appropriate wording should be used in Provision A relating to the scale that is seen to be consistent with the population of different settlements.

With regard to Provision D, the Plan needs to provide greater certainty in terms of better defining the types of land or premises that is likely to be surplus to future business requirements and recognising that a balance needs to be struck between the needs of business and other uses including housing and where retail needs have been identified. This is important in terms of Government policy making it clear that retail development is an important economic and employment generator. Reference to the role of mixed use development needs to be made in both its sustainability and enabling roles.

Oral hearing requested? YES.

Details: This representation raises a series of substantial issues concerning the lack of soundness of the Core Strategy and its failure to recognise and effectively plan for justified and identifiable needs. Examination of the evidence base is required and this is effective through oral evidence.

Representation 100.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** Spatial Objectives and Outcomes

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The vision for the Core Strategy is to be welcomed, however whilst it is considered that the vision's sentiment is to be advocated, the policies that seek to achieve the vision need to be equally positive in terms of facilitating development considered necessary within the National Park. In order for the Core Strategy to be considered justified and effective the plan must be capable of delivering the spatial vision, outcomes and objectives. The spatial objectives for the National Park and those parts that fall within the Derbyshire Dales, if achieved could provide positive benefits to the social and economic well being of our communities.

Work to explore the potential to deliver more affordable housing to meet wider community needs and challenges is supported as an overarching objective. However, it is questionable whether the mechanisms by which this objective may be delivered effectively are achievable, given the uncertainty relating to settlement capacity, site availability and public and private funding for either new built affordable housing or for buying existing dwellings as part of the effective use of current housing stock.

Proposed changes: In order to ensure that the Core Strategy is sound greater consideration of the resources available to deliver the stated spatial outcome of a 'reduced unmet level of affordable housing need' should be made. The policies inherent in the plan and particularly Policy DS1 include uncertainties regarding the ability of affordable housing to be developed within the capacity of named settlements to accommodate identified housing needs. The delivery of the Spatial Objectives and Outcomes is dependent upon a flexible set of planning policies that will ensure that appropriate development is facilitated for the social and economic benefit of residents whilst at the same time conserving and enhancing the National Park's special qualities.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 101.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1- Development Strategy

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Despite the positive elements of the development strategy policy DS1 states that there is uncertainty in some of the named settlements as to their capacity to accommodate larger scale development and that in such instances an assessment of

site alternatives and impacts upon the settlement character and landscape would be required. In terms of assessing settlement capacity to accommodate development it is noted that a number of settlement wide assessments have been undertaken but a number remain to be completed including those for Ashford, Grindleford, Litton, Monyash, Stanton in Peak, Stoney Middleton and Tideswell. This approach arguable lacks clarity as to when and where development capacity issues may arise with implications for the justification and effectiveness of the policy and delivery of objectives.

Whilst the need to ensure that the character and appearance of the settlements in the National Park is protected by restricting inappropriate development there appears to be a degree of inconsistency between the spatial outcomes and the development strategy. There remains a significant risk that if development is restricted in settlements where capacity issues have been identified development will be unable to meet the need for local affordable housing, with associated implications for the ability of the plan to meet the wider social and economic needs of the National Park and deliver its stated visions and objectives.

For example Parish Housing Needs Surveys in Hathersage have shown a need for 33 affordable units, Calver 18 units and Chelmorton 6 units. However, in the settlement wide assessments contained within Appendix 2 of the Core Strategy all three villages are identified to have limited potential to develop without harm to the valued characteristics of the settlement and landscape setting, concluding in the case of Hathersage and Calver there is "little potential other than very limited affordable housing for parish and adjoining parishes" and in the case of Calver there is "limited potential to address the affordable housing needs as evidenced by a site search on the back of a Parish Housing Needs Survey in 2009."

In light of the above considerations the ability and effectiveness of the plan and particularly policy DS1 to deliver affordable housing in locations and at the rates necessary to meet all identified local housing needs is disputed. A more flexible approach to development that is less restrictive is necessary to ensure the wider policy aspirations of reducing the level of unmet affordable housing need can be delivered.

Proposed changes: The Development Strategy and approach to the development of affordable housing requires amendment. The approach to development capacity of settlements lacks clarity and will restrict development in locations where there is an identified affordable housing need. The policy should recognise that whilst

inappropriate development should be resisted and that the character and appearance of settlements is a key consideration, there needs to be flexibility in the development strategy to allow development of affordable housing to occur where there is an identified local need.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 102.

From: Mr Mike Hase, Derbyshire Dales District Council

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Home phone: 0 **Work phone:** 01629 761251 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L1 Landscape Character

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is recognised that the landscape of the National Park is its primary asset and that the landscape and conservation policies will contribute towards the achievement of spatial outcomes for landscape and conservation, which state that the valued characteristics and natural beauty of the National Park will be conserved and enhanced. However, the National Park should be advised that there should be a degree of flexibility in the overarching policy approach where the need for development may be considered to outweigh the need to protect and conserve landscape. This is pertinent to ensure that the Spatial Outcomes for 'Homes, Shops and Community Facilities' and 'Supporting Economic Development' are to be effectively delivered and the vision for "a living, modern and innovative Peak District, that contributes positively to vibrant communities for both residents and people in neighbouring areas" is to be achieved.

Proposed changes: The policy should be amended to ensure that where the need and justification for development outweighs the need to protect and conserve the landscape development should be permitted. A flexible approach is considered

necessary in order to ensure that the spatial vision, outcomes and objectives can be achieved.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 103.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

Work email: mike.hase@derbyshiredales.gov.uk

Home phone: 0 **Work phone:** 01629 761251 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1 Climate Change

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is considered that the technical wording of CC1 (g) should be simplified and an alternative approach to using percentage target reduction rates should be considered. The policy will not be effective and should be amended to take account of advice published by BRE outlining 'Guidance for Local Planning Authorities incorporating BREEAM and the Code for Sustainable Homes within planning policy'. This document advises that rather than using targets for emission reductions planning policy should be based upon achieving levels of the Code for Sustainable Homes or BREEAM. It is suggested that non residential development should be required to achieve the highest level of CSH as viably possible.

Proposed changes: The policy should be amended to ensure that the development is required to reach levels of BREEAM and The Code for Sustainable Homes rather than include prescriptive percentage reduction targets. Such revisions would ensure that the policy effectively delivers the stated aims of reducing carbon emissions and promoting sustainable development.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National

Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 104.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

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Home phone: 0 **Work phone:** 01629 761251 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC5 Flood Risk

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The essence of the policy on food risk and water conservation is supported, however the policy wording in CC5 appears to duplicate and reiterate guidance contained within Planning Policy Statement 25. The effectiveness and justification for including a policy on flood risk in the Core Strategy that replicates national guidance and is not location specific to the National Park is questioned.

Proposed changes: The policy is not locationally specific and repeats National Planning Policy guidance, accordingly the need for the policy is not justified and should be omitted.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 105.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

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Home phone: 0 **Work phone:** 01629 761251 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC3 Buying existing homes

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The aspiration to provide more affordable housing is supported, however the development strategy presents a restrictive framework for the provision of affordable homes, where local needs may surpass the deemed capacity limit of settlements. The ability of the policies to therefore effectively deliver the plans spatial outcome of “reducing unmet level of affordable housing need” is disputed. The accompanying Delivery Plan acknowledges uncertainty regarding site availability and grant aid for affordable housing and acknowledges that there are significant variables that illustrate the dependence of delivery on both the availability of resources for publicly subsidised affordable housing programmes and sites.

There is great concern about the feasibility, effectiveness and deliverability of proposals that would involve the purchase of existing properties for use as affordable housing. The grant rates required to achieve a purchase would be so significant as to make the policy aims impossible to deliver. Furthermore, the use of commuted sums to buy existing stock would not represent value for money. It is suggested that such monies could be used far more effectively by subsidising HCA investment on new build schemes. It should be noted that the HCA are looking for a net increase in the number of homes and not simply switching homes from one tenure to another.

Furthermore, it may not be assumed that the turnover of private houses will be sufficient to meet affordable housing needs. There is evidence to indicate that turnover in some areas is historically low and accordingly, properties may not be available in areas of greatest need, or in terms of the house type or tenures required at that time. It is considered that the policy approach of ‘buying back’ existing housing stock is not justified nor will it effectively deliver affordable housing across the Peak Park to address local needs and meet the Plans vision, spatial outcomes and objectives.

Additionally the housing policies should make reference to the role of the Rural Housing Enabler and the importance of the role in developing housing needs information. The provision of affordable housing should continue to reflect the findings of the District Housing Needs Survey which shows a requirement for a tenure split of 80% rent and 20% shared ownership, although more local housing needs surveys may vary on the exact percentage split.

Proposed changes: The policy approach advocated in policy HC3 is not supported nor justified by sound infrastructure planning and accordingly should be omitted. The policy will not effectively deliver affordable housing and therefore will not contribute towards the spatial vision, outcomes and objectives of the Core Strategy.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 106.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

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Home phone: 0 **Work phone:** 01629 761251 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is recognised that mineral extraction has a significant impact upon the character and appearance of the National Park. However, concerns regarding the implication and justification for policy MIN3 that states building and roofing stone is to only be produced to meet the needs of the National Park should to be considered. Restricting building stone and roofing materials to use within the National Park will have implications for the character and appearance of settlements outside the Park that rely on such materials for new build and restoration projects to ensure development proposals are in keeping with Peak District Character and retain local vernacular. The implications of achieving wider economic heritage considerations within the Peak Sub Region needs to be balanced against the need to protect the Peak Park from inappropriate development.

Proposed changes: The policy should be amended to consider the wider economic heritage implications of restricting building stone and roofing materials to use within the National Park. Revisions to the policy are required to ensure the wider need for such minerals is considered, to ensure the Peak District character of the wider Peak

Sub Region is retained. A flexible approach to the use of such materials in exceptional and justified circumstances outside the National Park should be considered.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 107.

From: Mr Mike Hase, Derbyshire Dales District Council

Work Correspondence Address: Town Hall, , Bank Road Matlock, Derbyshire , DE4 3NN

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Home phone: 0 **Work phone:** 01629 761251 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T2 Reducing & Directing Traffic

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Whilst it is appropriate for the Core Strategy to support the aim of reducing the need to travel and encouraging the use of more sustainable modes of transport, the practicalities of achieving this will require partnership working with other agencies such as Derbyshire County Council. However, no definitive sources of funding are identified to support the delivering of these transport aims within the accompanying Delivery Plan. If the resources are not available it is questioned whether this objective can be effectively delivered in any significant measure.

Proposed changes: Further consideration and identification of infrastructure planning and funding for the delivery and implementation of transport proposals and measures to reduce traffic and travel within the National Park is necessary to ensure the plan is sound and the spatial outcomes and objectives are to be delivered.

Oral hearing requested? YES.

Details: Derbyshire Dales is the largest constituent local authority within the National Park and accounts for the majority of the National Parks residents, it is accordingly imperative that the issues raised are fully considered as part of the Examination.

Representation 108.

From: Mr Malcolm Ratcliff, Mineral Products Association

Work Correspondence Address: Gillingham House, , 38-44 Gillingham Street
London, , SW1V 1HU

Work email: malcolm.ratcliff@mineralproducts.org

Home phone: 0 **Work phone:** 07960 410838 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN1 **Subsection:** 14.21 14.25.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We believe the PDNPA has erred in not rolling forward the agreed sub regional apportionment to the end of the plan period. Irrespective of the Authority's intentions to seek reductions in the apportionment, which it admits must take place in the context of an agreed approach by the East Midlands RAWP (para 14.22) the Authority must not plan on the basis of an inadequate provision because its commitment to a particular figure falls short of the plan period. In our view, the strategy is UNSOUND because in order for the Core Strategy to be fully EFFECTIVE by reason of being flexible, the apportionment to 2020 should be rolled forward to the end of the plan period to 2026, until such time as it is reviewed and changed by the RAWP.

Proposed changes: The policy MIN1 needs to be amended to reflect the need to refer to the sub regional apportionment. (Additions in bold; deletions in strikethrough)
"A The National Park Authority will make provision for 4.18 Mt per annum of limestone and an appropriate proportion of 0.136 Mt per annum of sandstone until 2026 and seek the progressive reduction in the proportion and amount of aggregates and other land-won minerals from the National Park in accordance with the technical advice of the East Midlands RAWP. To achieve this proposals for new mineral extraction or extensions to existing mineral operations (other than fluorspar proposals and local small-scale building and roofing stone which are covered by MIN2 and MIN3 respectively) will not be permitted other than in exceptional circumstances in accordance with the criteria set out in National Planning Policy in MPS1. "

Oral hearing requested? YES.

Details: The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and

ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar.

Representation 109.

From: Mr Malcolm Ratcliff, Mineral Products Association

Work Correspondence Address: Gillingham House, , 38-44 Gillingham Street
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Home phone: 0 **Work phone:** 07960 410838 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.26-14.29.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We submit that the position with respect to Cement Works is UNSOUND by reason of being contrary to national policy, particularly, MPG10.

In paragraph 14.8 the text states that the concentration of cement manufacture into fewer plants located within or close to the National Park is "...the opposite of the long term outcome envisaged by planning policy". We refute this statement since it is clear from MPG 10 paragraph 32 that the rationalisation of production within the industry was foreseen, viz "...high capital cost of investment in the cement industry means that, in the short run at least, investment in new capacity is most likely to take the form of the up rating of existing plant or the creation of additional capacity at existing plant, rather than the building of new plant on greenfield sites. The rationalisation of production capacity into larger more economic units may lead to the closure of some small plants."

We can find no statement either in MPS1 or MPG10 that indicates that it is national policy to move cement production away from National Parks. Paragraph 39 of MPG 10 contains national policy on National Parks in respect of cement manufacture, and this is substantially the same as in MPS 1 paragraph 14.

The concentration of cement production into fewer, larger plants has made the remaining plants even more nationally important than they were when MPG10 was first published. It is still government policy to discourage the import of cement into this country and to support indigenous production (paragraphs 3 & 30). It also

remains national policy that authorities and operators co-operate in identifying resources relatively near existing plants (paragraph 34). National policy also includes basing landbanks on individual sites (para 57) and providing for a minimum of 15 years reserves, or 25 years in the case of significant new investment (para 58).

The Association recognises that major mineral applications in National Parks must be subject to the most rigorous examination, and will only be approved in exceptional circumstances. However, the authority's declared intention (Core Strategy para 14.26) to rundown cement production in the Park without examining the case for a national need argument balanced against the local employment effects and environmental impacts, is premature.

Moreover, Core Strategy paragraph 14.29 includes an analysis of Hope Cement Works which clearly indicates that it is likely that there will be a need to examine the minimum reserve position within the plan period in order to maintain 15 years or 25 years supply as the case may be, in accordance with MPG 10 para 58.

We conclude this representation on cement by drawing the authority's attention to paragraph 63 of MPG 10, "The Government takes the view that it is in the national interest to maintain and increase cement production, and to increase the scope for competition. Sufficient reserves of minerals should be permitted for this. More permitted reserves are particularly needed where the size of the landbank is below the levels recommended in para 58 above. The cement makers and the mineral planning authorities should examine the feasibility of bringing forward planning proposals for new raw material reserves at the best balance of economic, environmental and social cost. In undertaking this the planning authorities may wish to have regard to the forecast at Annex B of the long term future demand for cement minerals."

Proposed changes: We believe the supporting text should be modified to allow the flexibility to examine future proposals for cement on their merits and not prejudge the situation. We therefore suggest that paragraphs 14.26 – 14.29 are deleted and replaced with a single paragraph as follows,

New 14.26

The decision on the future of Hope Cement works will be based around a consideration of many factors including need for cement, economic impact, National Park purposes and relevant planning policies. It will be necessary to address the long-

term future of the Hope Cement works beyond its current lifespan in relation to other alternatives outside of the National Park. Hope Cement Works currently has permitted reserves of about 44mt of limestone and 13.6mt of shale. These reserves of limestone are estimated by Lafarge as sufficient to sustain output at recent rates of about 1.4mtpa until around 2038, and shale reserves are sufficient to sustain output at recent rates until between 2018 and 2058 depending on quality of reserve. There is therefore a prima facie case to supplement the reserve position at this site in accordance with paragraph 58 of MPG 10 to maintain a minimum landbank for this site. However, it should be noted that all proposals for mineral extraction must fulfil the requirements in MPS1 relating to exceptional circumstances. Any proposals for future cement manufacture will be treated on their merits.

Oral hearing requested? YES.

Details: The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar.

Representation 110.

From: Mr Malcolm Ratcliff, Mineral Products Association

Work Correspondence Address: Gillingham House, , 38-44 Gillingham Street
London, , SW1V 1HU

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Home phone: 0 **Work phone:** 07960 410838 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN4 **Subsection:** 14.47-14.53.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We find the logic of the authority's argument in seeking to safeguard some minerals but not others to be bizarre. We therefore find the policy UNSOUND by reason of not being justified and not in accordance with national policy.

The BGS document A Guide to Mineral Safeguarding in England states that, "Effective safeguarding of mineral resources for the long term requires their definition be based principally upon the best available geological information. Mineral safeguarding should

not be curtailed by other planning designations, such as urban areas and environmental designations without sound justification. Defining MSAs alongside environmental and cultural designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning considerations." (page 15) This approach starts with the assumption that all minerals of economic importance should be safeguarded against development and identified so that mineral issues can be taken into account in the development process. In other words, safeguarding should be resource driven rather than constraint driven.

The plan assumes that there is a weak case for the safeguarding of certain minerals for which there appears a remote chance of future working in the national park. However, the BGS guidance requires all minerals of economic importance to be safeguarded "for generations to come..." (page 6), not just the ones that the authority wants to safeguard. This particularly applies to aggregate minerals. Please also remember that safeguarding does not imply that the mineral will be worked. Moreover, it is illogical to safeguard the railheads that carry aggregates and not the aggregates themselves (para 14.49).

Your argument that planning policies in the Park will indirectly safeguard minerals by resisting surface development proves too much. If that is so, and is a reason for not safeguarding aggregate minerals, then it is also a reason for not safeguarding any minerals.

The aim of safeguarding is to protect minerals for the long term. Who knows what will be required in 100 years time? Even though aggregate minerals may not seem as though they need to be safeguarded in the national park because of restrictive planning policies and the remote possibility of future working, we believe the minerals are of sufficient economic importance to need to be safeguarded.

Neither is there in MPS1 and its Practice Guide or the BGS Guidance any get out clause for national parks to avoid their responsibilities to safeguard minerals of economic importance because the possibility of development is remote.

Proposed changes: We therefore seek the following changes to policy MIN 4, (Additions in bold; deletions in strikethrough)

A. The following minerals will be safeguarded from sterilisation by non-mineral surface development through the definition of Mineral Safeguarding Areas covering:

I The limestone resource containing at least 98% calcium carbonate;

II The mineralised vein structures relating to Milldam Mine and Watersaw Mine, for fluorspar.

Oral hearing requested? YES.

Details: The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar

Representation 111.

From: Mr Andrew Leyssens, United Utilities

Work Correspondence Address: First Floor, Grasmere House, Lingley Mere Business Park, Lingley Green Avenue Great Sankey, Warrington, , WA5 3LP

Work email: andrew.leyssens

Home phone: 0 **Work phone:** 01925 731 285 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: For consistency with Planning Policy Statement 3 and Planning Policy Statement 12, policy HC1 should be amended to ensure greater flexibility to the delivery of affordable housing. As currently worded, the principal means of delivering new build affordable housing is on sites comprising 100% affordable housing.

The delivery of 100% affordable housing sites in the National Park is dependent on the availability of funding. Following recent announcements on spending cuts, it is possible that such funds will be reduced or not available during the plan period. As such, the Core Strategy should include flexibility to allow for alternative delivery options.

Proposed changes: The policy should be amended to include flexibility so that there is an alternative delivery option for the provision of affordable housing. If monitoring indicates affordable housing is not being delivered in accordance with the stated requirements, applications comprising housing proposals including a predominance of

affordable housing i.e. at least 50% will be considered favourably. These proposals will need to demonstrate they are in locations which are well related to sustainable settlements with minimal impact on the landscape qualities of the National Park.

Oral hearing requested? YES.

Details: United Utilities requests the opportunity to participate as the delivery of affordable housing is an important national issue.

Representation 112.

From: Mr Andrew Leyssens, United Utilities

Work Correspondence Address: First Floor, Grasmere House, Lingley Mere Business Park, Lingley Green Avenue Great Sankey, Warrington, , WA5 3LP

Work email: andrew.leyssens

Home phone: 0 **Work phone:** 01925 731 285 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: In order to more fully comply with Policy EC12 of Planning Policy Statement 4: Planning for Sustainable Economic Growth, the fifth bullet point of Policy DS1: Development Strategy should be amended. This bullet point currently states:

'In all settlements and in the countryside outside the Natural Zone the following forms of development will be acceptable in principle:

- conversion or change of use of traditional buildings for housing, community facilities and business uses including visitor accommodation.'

For consistency with other policies of the plan and to more fully reflect national planning policy, this bullet point should be amended. In addition to traditional buildings, those buildings which are of historic or vernacular merit should also be identified as suitable for conversion outside the Natural Zone.

Proposed changes: The bullet point should be amended to state:

'conversion or change of use of traditional buildings and buildings of historic or vernacular merit for housing, community facilities and business uses including visitor accommodation.'

Oral hearing requested? NO.

Details:

Representation 113.

From: Mr Andrew Leyssens, United Utilities

Work Correspondence Address: First Floor, Grasmere House, Lingley Mere Business Park, Lingley Green Avenue Great Sankey, Warrington, , WA5 3LP

Work email: andrew.leyssens

Home phone: 0 **Work phone:** 01925 731 285 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy DS1: Development Strategy states:

'In all settlements and in the countryside outside the Natural Zone the following forms of development will be acceptable in principle: Conversion of change of use of traditional buildings for housing, community facilities and business uses including visitor accommodation.'

This policy should be amended to reflect Planning Policy Statement 4 which covers the re-use of buildings in rural areas. Policy DS1 should recognise that not all buildings in the Natural Zone will be inappropriately located.

In addition, in some circumstances in the Natural Zone there may be existing buildings of historic or vernacular merit which are worthy of re-use.

Proposed changes: The policy should be amended to allow for the conversion of buildings of historic or vernacular merit in the Natural Zone where it is demonstrated that:

1) the building is worthy of re-use; and

2) the proposal has no material impact on the landscape.

Oral hearing requested? YES.

Details: United Utilities requests the opportunity to participate as a blanket approach to the re-use of buildings in the Natural Zone is not consistent with national planning policy.

Representation 114.

From: Ms Marion Andrews, Natural England

Work Correspondence Address: Endcliffe, Deepdale Business Park, Ashford Road
Bakewell, Derbyshire , DE45 1GT

Work email: marion.andrews@naturalengland.org.uk

Home phone: 0 **Work phone:** 0300 060 1755 (ext. 0) **Mobile:** 07786 277824

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T6

Legally compliant? Yes

Sound? Sound

Details: Natural England supports this policy as this will encourage access for all and greater enjoyment of the countryside. Enabling people to exercise and find alternative modes of transport other than cars will greatly increase the health and well-being of both residents and visitors to the park. This policy will also have significant benefits on traffic reduction which, by reducing carbon emissions, will make a positive impact on climate change.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 115.

From: Ms Marion Andrews, Natural England

Work Correspondence Address: Endcliffe, Deepdale Business Park, Ashford Road
Bakewell, Derbyshire , DE45 1GT

Work email: marion.andrews@naturalengland.org.uk

Home phone: 0 **Work phone:** 0300 060 1755 (ext. 0) **Mobile:** 07786 277824

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Sound

Details: Natural England supports the principle of sustainable energy generation and believes that such developments, if appropriately sited can make an important contribution to the low carbon economy that is needed to tackle climate change. However as well as the climate change mitigation benefits of renewable energy schemes, there can also be significant adverse effects on landscapes, nature conservation and people's enjoyment of the countryside and landscape. We will therefore consider renewable energy proposals on the basis of the extent to which they conserve and enhance the existing natural environment. We therefore welcome the approach taken in CC2 to renewable energy that includes a provision for protecting the National Parks' landscape character and will limit the development of wind turbines to small schemes only.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 116.

From: Ms Marion Andrews, Natural England

Work Correspondence Address: Endcliffe, Deepdale Business Park, Ashford Road
Bakewell, Derbyshire , DE45 1GT

Work email: marion.andrews@naturalengland.org.uk

Home phone: 0 **Work phone:** 0300 060 1755 (ext. 0) **Mobile:** 07786 277824

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP1

Legally compliant? Yes

Sound? Sound

Details: Natural England strongly supports this policy and recognises that the principles that it sets out underpinning the whole approach of the Core Strategy. It will serve as a good basis for protecting and enhancing the distinctive landscape of the national park and its biodiversity resources by controlling inappropriate development.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 117.

From: Ms Marion Andrews, Natural England

Work Correspondence Address: Endcliffe, Deepdale Business Park, Ashford Road
Bakewell, Derbyshire , DE45 1GT

Work email: marion.andrews@naturalengland.org.uk

Home phone: 0 **Work phone:** 0300 060 1755 (ext. 0) **Mobile:** 07786 277824

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP2

Legally compliant? Yes

Sound? Sound

Details: Natural England supports this policy as it offers benefits to the natural beauty, wildlife and cultural heritage of the area. We particularly support the provision where development should seek landscaping and planting schemes consistent with local landscape character and will help to achieve an increase in biodiversity. This is in line with our encouragement of "Biodiversity with Design" which is the concept of incorporating ecologically sensitive design and features for biodiversity early on within a development scheme. Significant improvements for biodiversity can be achieved in this way, along with easier integration with wider environmental, design and planning aspects.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 118.

From: Ms Marion Andrews, Natural England

Work Correspondence Address: Endcliffe, Deepdale Business Park, Ashford Road
Bakewell, Derbyshire , DE45 1GT

Work email: marion.andrews@naturalengland.org.uk

Home phone: 0 **Work phone:** 0300 060 1755 (ext. 0) **Mobile:** 07786 277824

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L1

Legally compliant? Yes

Sound? Sound

Details: Natural England strongly supports this policy and the accompanying text as it establishes an approach to landscape protection and enhancement which is in line with our own objectives. We particularly welcome the inclusion of summary points from the National Park's Landscape Strategy and Action Plan as it integrates the aims and objectives of the Landscape Strategy into the planning framework so that it underpins all decisions on future development. We also welcome the use of the Natural Zone as a planning tool to create a stronger presumption against development and greater protection of the Natura 2000 sites.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 119.

From: Ms Marion Andrews, Natural England

Work Correspondence Address: Endcliffe, Deepdale Business Park, Ashford Road
Bakewell, Derbyshire , DE45 1GT

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** L2

Legally compliant? Yes

Sound? Sound

Details: Natural England strongly supports this policy as it will protect and enhance the biodiversity and geodiversity resource throughout the whole of the National Park. We are particularly glad to note that as well as the designated sites that are protected, that this policy also protects linkages, stepping stones or corridors between important natural habitats which will have beneficial effects in terms of climate change adaptation as well as enhancing biodiversity and protecting local landscapes.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 120.

From: Steven Broomhead, Northwest Regional Development Agency

Work Correspondence Address: Renaissance House, , Centre Park Warrington, ,
WA1 1QN

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN2 **Subsection:** 14.37.

Legally compliant? Yes

Sound? Sound

Details: We have previously drawn attention to the importance of the mineral fluorspar in sustaining the UK fluorochemical industry which is centred on Runcorn. In the context of an overall approach which aims to gradually reduce the impact of mineral extraction within the National Park, we are pleased to note that the draft Core Strategy proposes an exception with regard to fluorspar.

The supporting text (paragraph 14.37) notes that most of the remaining high grade fluorspar that is capable of being worked by opencast methods has the benefit of extant consents or resolutions to grant consent pending legal agreements. Draft Policy MIN2 thus aims to secure an appropriate supply of fluorspar by promoting a transition from opencast to underground mining. Whilst the draft policy would not permit new proposals for opencast mining of fluorspar ore, it encourages and supports its continued extraction by underground mining. This is in recognition of its scarcity within the UK and the need to source mineral supplies indigenously to avoid exporting environmental damage.

The Agency therefore has no concerns regarding the soundness of the draft Strategy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 121.

From: Mr Greg Potter, Alsop Rivendale Ltd

Work Correspondence Address: Buxton Road, , Alsop en le Dale, Derbyshire , DE6 1QU

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Processed by Officer on behalf of representor - individual

Representation on **Section:** RT3 B&C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The proposal for Recreation for Tourism RT3 part B does not support the stated objectives of the PDNP core strategy, government policy for National Parks or the Peak District Sustainable Tourism Strategy.

RT3 part B states: - "Static caravans, chalets or lodges will not be permitted."

Policy 10 for recreation & tourism goes on to state that "Small touring camping and caravan sites and backpack camping sites will be permitted," This policy maintains an existing policy, originally formulated following the "Joint Study" in 1979 which we (along with other sites) have consistently opposed.

The Joint Study concluded that static caravans and chalets should be resisted in the Peak District, because: - 1. The holiday homes were underused if privately owned. 2. The permanence of them was likely to create an adverse visual impact.

The maintenance of this policy prevents holiday parks from having their own accommodation - static caravans, lodges or mountain huts and thus restricts tourists visiting holiday parks in the Peak District to people who own a caravan or tent (and a car to transport them with).

The NPA may argue that self-catering accommodation is available in cottages within the PDNP - but these do not cater for the same market or offer the combination of facilities on site and variety of accommodation in one location. As an example, much of this accommodation is not suitable for wheelchair or other disabled users because permissions have been restricted to the conversion of existing buildings which are generally on 2 floors and have narrow doorways, steps and so on.

In details this policy does not support the following national and PDNPA goals because of the reasons described below: - Core Policy - Vision & Core Strategy RT3 B states Para 3.7 "Our vision is for: A welcoming Peak District, where people from all parts of our diverse society have the opportunity to visit, appreciate, understand and enjoy the National Park's special qualities" To which should be added - as long as they own a car with which to tow the caravan or transport their bulky frame tent AND they own a caravan or tent AND have a place to store their caravan at home AND the owner must be physically capable of setting up a touring caravan weighing several tonnes or a tent.

Who does this preclude? > Everybody who does not own a car - poor people, people who live in inner cities and do not need a car, people who cannot drive. > Everybody who does not own a caravan or tent - or does not have a place to store one (many properties have covenants preventing them from keeping caravans on their premises). > Everybody physically incapable of setting up or using a tent or caravan - wheel chair users, older people, disabled or infirm persons.

This contrasts starkly with the possibilities offered by Pine Lodges, Static Caravans and Camping Pods.

The Together Trust charity operates a pine-clad holiday caravan at Rivendale offering specially adapted accommodation for wheel chair and other disabled users with wide doorways, access ramps, special bathrooms, kitchens with low worktops etc. It is gas central-heated, double glazed and insulated to a higher standard than all but the newest houses.

The Together Trust mission is to provide rural holidays for disabled children of all types from inner cities with carers. To do this, they also needed space to operate bed and bath hoists within bedrooms, 800 mm wide doorways and the possibility of sleeping up to 8 people. These facilities are not possible in touring caravans or tents, which, in contrast to static caravans or lodges do not have the space for wheel chairs or carers and are not available in an adapted accessible form.

The other point to note is that, in contrast to the findings of the Joint Study which stated holiday statics would have low occupancy, this pitch will be the most used on our site because of the number of clients the Together Trust has, and because the very high quality and cost of the accommodation will put pressure on them to maximise its use. We cannot think of a service more in tune with what the PDNPA should be doing & national policy.

At the other end of the spectrum Camping Pods offer a camping style experience in a warmer, sustainable format without the need to transport a heavy tent - so clients may (and frequently do) arrive by bike up the Tissington or High Peak trails or by bus or even on foot. They were originally conceived by the manufacturer with the aim of developing a network in the Lake District approximately a days walk apart - to provide a more comfortable, environmentally-friendly alternative to back-packing.

Para 10.17 States:-

"One of the Authority's main aims is to increase awareness of what the National Park has to offer people who currently do not know about it and find it hard to visit. Developments which provide opportunities for understanding and enjoying the National Park will be welcomed in locations close to its boundary or with easy access by sustainable means, taking into account the landscape character and setting of the National Park." The PDNPA needs to understand that self-catering cottages and bed and breakfast rooms are not a substitute for holiday park accommodation. Bed & breakfast and hotels are a lot more expensive than self-catering accommodation per head. In both B & B & holiday cottages on farms there is also a far greater intimacy with the proprietors than is the case in lodge accommodation on a holiday park. This is why we have a significant number of gay couples staying in our accommodation - a place where there is no requirement for them to confront a conservative, perhaps judgemental owner over breakfast or opposite his front door.

Many clients with younger children want to be in a location where they will meet other families with children of the same age. We also have retired clients and families who own caravans who want to meet family and friends who do not have caravans - they can do this only in a location which offers a variety of accommodation including the sites own accommodation. Clients also look for locations with facilities they need - restaurants able to satisfy special dietary requirements that are wheel-chair accessible (like ours), swimming pools and spas in the case of families with children - or older people with arthritis. Self-catering cottages do not meet these requirements.

The statute which first established the National Parks made accessibility to all sections of the community a central plank of the legislation. The NPA has been criticised for the lack of visitors from (for example) inner city ethnic minorities - the people who are least likely to own a car and caravan. Obviously, restricting access to holiday parks within the Peak District to car and caravan owners will not improve this.

Policy 15 - Accessibility, travel & traffic States:-

"15.2 As the population of the UK becomes increasingly mobile, greater accessibility and travel generally brings economic and social benefits. It also creates traffic-related problems such as increases in harmful greenhouse gas, other polluting emissions and congestion. Other concerns include the decreasing viability of rural public transport as car ownership increases; increased exclusion for those without access to a car when local services are lost, more visitor traffic congestion and the negative impacts of traffic on road safety and health. Recent predictions indicate that UK road traffic will continue to grow in the near future. The National Park Authority is keen to promote a more sustainable approach to transport because continuous growth will harm its valued characteristics." [our bold typeface]

How does this fit with Policy RT3 B which is a policy that only permits caravans and tents and therefore will require visitors to holiday parks and campsites

in the PD National Park to arrive by car towing a caravan or transporting a frame tent. The maximum towed weight of a caravan is recommended to be about 85% of the towing vehicle. It follows that a large touring caravan (which might weigh several tonnes) MUST be towed by a heavy vehicle - usually a large 4x4. The total weight of vehicle & caravan is likely to be of the order of 4 tonnes - with a likely average fuel consumption of around 10 mpg - not to mention the pollution caused by the queue of traffic following it.

By contrast, guests staying in Camping Pods or Pine Lodges in the White Peak may arrive by bike or foot along the Tissington or High Peak Trails, perhaps having caught the train to Matlock, Cromford or Buxton stations. Or by bus from Ashbourne or Buxton - or even a holiday parks own courtesy minibus picking up groups of clients from the stations. One thing is sure - it is at least not compulsory to arrive in a private car when staying in some form of accommodation provided by the campsite.

It follows that RT3 (B) is a contradiction of National policies - as recorded by paras 15.7, 15.8, 15.9, 15.10 and PDNPA policy T1 which states"A modal shift to more accessible, sustainable transport with improved connectivity will be sought..."and RT1 A which states "...Opportunities for access by sustainable means will be encouraged.

Policy 11 Climate Change and Sustainable Building.

Para 11.4 states:- "The delivery of spatial policies will be assisted by schemes which encourage sustainable and low carbon development, including the Authority's Sustainable Development Fund & the Environmental Quality Mark".

11.5 states "National Policy seeks to minimize energy use through the use of the energy hierarchy and consequently PPS1 Supplement expects policies to secure the highest viable resource efficiency and reduction in emissions". Paras 11.14-11.18 continue this theme as do policies CC1 & CC2. There is a very obvious contradiction between RT3 (B) which requires visitors to holiday parks in the PDNPA to arrive by car so they can tow their caravan or transport their tent and the stated goal of minimizing carbon emissions, pollution, congestion and so forth. However, the advantages offered by Camping Pods and Pine Lodges goes far beyond transport to and from site.

Touring caravans are constructed largely from steel and plastics with a fiberglass or aluminium exterior. All these products are oil based apart from aluminium and steel, the production of which is energy intensive. Pine Lodges and Camping Pods, by contrast are constructed mainly from timber - all from sustainable FCS sources - so in themselves they are more environmentally friendly, requiring far less energy and oil in their production.

Furthermore, Pine Lodges, Camping Pods etc are far better insulated, may be equipped with solar heating panels, Combined Heat and Power systems, photovoltaic panels and so forth that would be too heavy or vulnerable for a road-going vehicle like a touring caravan or a motorhome. In fact, many Pine Lodges are offered with the option of being insulated to the same standard as a brand new residential property, making them far superior from the carbon emissions point of view than virtually every barn conversion, B & B and hotel in the Peak District, given that (for planning reasons) these will almost all be older buildings with grossly inferior insulation.

In summary of this point, RT3 B is contradicted by CC1 A,B, D & E and is a contradiction of the Sanford Principle.

Economic Policy

Para 13.6 "The Environment Act 1995 gives National Park Authorities a duty to foster the economic and social well-being of local communities in carrying out National Park purposes

Para 13.9 "The spatial outcome for the economy is that by 2026 the rural economy will be stronger and more sustainable, with more businesses contributing positively to conservation and enhancement of the valued characteristics of the National Park whilst providing high quality jobs for local people...."

Tourism has been criticized for offering low-skilled, poorly paid, seasonal jobs with little security. This stems, in large part, from the seasonal nature and relatively low added value per employee offered by tent and caravan pitch hire. The problem is that accommodation in tents is only attractive for about 4 months of the year - particularly if you are a holiday park like Rivendale, Newhaven or Longnor Wood well over 1000 feet above sea level.

Most touring caravans tend to be put into storage at the end of September - and for those who did not do this last year, the roads north of Tissington were largely snowbound from November 2009 to March 2010 - a daunting prospect for anyone hoping to tow a large caravan. In any event, the occupancy rate of a caravan touring pitch in the White Peak is less than 40% over 12 months. This contrasts with the occupancy rate of Pine Lodges which is typically over 75% and Camping Pods at around 65% over the same period.

If reasonable occupancy is achieved in the winter months, jobs can be full time even if there is some seasonal variation in hours worked. The greater retention of staff in turn makes for greater staff commitment and opportunities for staff training - which in turn leads to better skills, enhanced customer service and client satisfaction - and thence higher occupancy rates and more revenue with which to pay better wages. In summary, the key to achieving stated national & PDNPA objectives is to make tourism in the Peak District less seasonal and add more value. That is, instead of offering a grass pitch for a tent occupied for four months of the year at £11 per night creating employment for one groundsman, invest in a well-insulated, centrally heated Pine Lodge (built in Bakewell), transport it to site, pay local tradesman to assemble it and build a timber verandah, employ cleaners, decorators, window cleaners and other trades to maintain it - and charge £150 per night for twice the occupancy period - creating many times the number of permanent employees both directly & indirectly.

It follows that the policy proposed by the core strategy - to permit tents and caravans, and oppose statics, pine lodges and other forms of sited accommodation provided on site will GUARANTEE that this industry will remain highly seasonal -with low-skilled, poorly-paid seasonal workers. The prejudice against "Holiday Parks" is similarly mis-placed. The reason "Oasis" and "Center-Park" type development is so successful is that they offer entertainment even when the weather is poor. These facilities also generate additional employment in their construction, operation and maintenance.

Swimming pools require life guards and maintenance, restaurants require chefs and waitresses - and food supplies - such as the excellent meat our restaurant sources from our local butcher 3 miles away in Tissington and the wonderful dairy products from Gibsons - a farmer about 1.5 miles away.

However, It is a mistake to think that a park such as Rivendale (which already has a bar and restaurant and an existing consent for a swimming pool) or Ashbourne Heights (which is similar) are some sort of ghetto which clients never leave during their holiday. Firstly, none of the existing parks in the PDNPA are remotely large enough to accommodate sufficient facilities such that clients would never want to go off site. Secondly, clients want to try out the local pubs and restaurants - they walk along the Tissington Trail from Rivendale to the Waterloo Inn at Biggin, they walk from Rivendale down Eaton Dale to the Sycamore Inn in Parwich, they catch the bus at the bottom of our park to Ashbourne - and in so doing help make the local Bowers 42 service viable. They visit local attractions, patronise shops and use local services - which we actively encourage with the hope that our clients will better enjoy their stay and choose to return to the Peak District.

A variety of accommodation on site - static caravans for rent, B & B rooms, yurts etc opens up new markets - for example corporate team building - which we can serve in the low season by networking with local outdoor activity companies to provide say, a day abseiling, a night in our accommodation followed by a conference day. This benefits other local businesses and enables all of us to reduce the seasonal nature of our businesses - and thus increase the proportion of permanent staff.

We can also use the local environment as an attraction. For example, we have agreed in principle to provide Atkins (the consulting engineers) with accommodation and a room in which to train their ecologists about bats and crested newts - with the advantage that they can actually observe them in their natural habitat on our site a few hundred metres from their accommodation.

The NPA should also be aware that Campsites and Caravan Parks in the Peak District have to compete with other venues in the UK and overseas where elaborate swimming pools, restaurants, bars and indoor entertainment are provided - in the case of France and Spain even where they already have the advantage of a more favourable climate. This is not to deny that the landscape, culture and attractions within & surrounding the PDNP are the main draw - but to give clients some hope, given the awful summers we have experienced that they can book a holiday in the Peak District that can be enjoyed even if the weather is a wash-out.

The Foot and Mouth Disease crisis brought home the huge dependency of the Peak District Area on tourism. Even people running shops, petrol stations and so on (who did not consider themselves to be involved in tourism) saw their sales fall off a cliff and their jobs and businesses under threat when the National park was effectively closed to tourism.

The PDNPA themselves state that caravan and campsites are the leading bed provider in the Peak District. Rivendale, for example currently hosts around 800 people when full. If we add in our 3 nearest neighbouring sites - at Newhaven, Fenny Bentley and Longnor - we are talking about 3200 people. If they (conservatively) spend just £20 per head per day off site on fuel, lunch, coffee, souvenirs etc - that is £64,000 per day into the local economy per day. It is very important at a time when many large local employers (such as Dairy Crest at Hartington) are closing that our industry is not hamstrung by an over-prescriptive planning policy that prevents holiday parks and campsites in the Peak District from being competitive. There will be a huge knock-on effect on the remaining local pubs, shops and other businesses if the camping, caravanning and holiday parks business in the Peak District falters.

Visual Impact of sited Accommodation

The principle objection to static holiday caravans has been that (Para 10.26): -
"Similarly, static caravans, chalets or lodges would often be too prominent within National Park landscapes." We enclose some photographs of a 401 green, timber-clad holiday home and a fifth wheel trailer (about 28 feet long) on an adjoining pitch which demonstrates that sited accommodation can be far less intrusive. Having control over colour, landscape design and siting - which the park owner and the PDNPA retain in the case of accommodation provided by the site - is more important than whether the accommodation can roll down the highway on its own wheels (touring caravan) or needs to do so on the back of a lorry (static caravan).

In this respect we have little control of the colour and size of tents, caravans or motorhomes clients arrive in or with, whereas the PDNPA can exercise considerable control over the colour, landscaping etc of static caravans, lodges, Camping Pods and other forms of sited accommodation. Some frame tents are now 9 metres long and up to 9 metres wide in all sorts of garish colours - see the photos - which demonstrate that the largest Camping Pod available is smaller and less obtrusive than many tents - unless they are backpacking tents.

The Lake District National Park have evidently come to that conclusion because they have allowed Camping Pods to be used in sensitive locations where they have expressly not permitted caravans because they can better control the size, colour, landscaping and visual impact of the Camping Pod development - see a copy of LDNPA grant of planning for Camping Pods Ref 7/2009/5777 dated 6th May 2010. This states: - "3. None of the camping pods hereby permitted shall be replaced by any other structure(s) or caravan(s) differing from the approved details

REASON: Permission has been granted on the basis that the proposed camping pods would have a limited landscape impact. Their replacements with caravans or other more intrusive structures could have a more significant impact and would be contrary to the aims of Policy T9"

Summary of Reasons for Approval & Relevant Development Plan Policies

"The camping pods proposed would provide a relatively inexpensive basic accommodation for visitors to the National Park who might not have the equipment or appetite for conventional camping. The pods would contribute to the range and availability of low-cost accommodation within the National Park...The existing and proposed pods are to be well sited and would have a limited impact either within the site or beyond..." Quite.

Whilst it is true that on sites such as Newhaven, the static caravans are far more visible after leaf-fall there are other sites - such as Rivendale and perhaps the Caravan Club site at Grin Low the - which are located in old quarries where the topography results in NO visual impact outside the site itself.

There is no reason why the benefits to the environment, economy and local employment offered by static caravans & lodges should be prohibited in these locations just because the majority of locations within the PDNP are not suitable. Rather, these locations should be accommodating clients who do not have (or cannot use) touring caravans and tents, extending the tourism season within the PDNPA, creating full time employment and bringing in more low season business to the benefit of other retail outlets and services in the area.

On sites where there would be adverse visual impact after leaf fall it will be equally as bad with large tents, motorhomes or touring caravans as it would be if the site accommodated statics or lodges. The logic here is to ensure that such sites accommodate only caravans and tents, and close after leaf fall so that there is no

harm to the landscape. In any event, the PDNPA should accept that some sited accommodation (e.g. camping pods) may have less impact than touring caravans or tents and be ready to consider them in appropriate locations on a case by case basis - determined by their likely visual impact after leaf fall. There is no possibility, based on the current and projected economics of holiday parks, that camping pod type structures will be substituted for static holiday caravans by park owners. They should instead be regarded (as they are by the LDNPA) as an alternative to conventional camping, youth hostels or camping barns, providing basic accommodation at an affordable price.

Policy RT3 C states:- "Provision of improved facilities on existing caravan and camping sites, including shops and recreation opportunities, must be of a scale appropriate to the site itself." This continues an existing NPA policy which has been interpreted such that only clients staying overnight at campsites or holiday parks may use the facilities on them.

Local facilities It is intuitively strange that at a time local pubs are being encouraged to double as a post office and local shop to provide services to local residents - facilities on caravan parks are to be inaccessible to locals. So, for example at Rivendale, the PDNPA theory is that the occupants of the cottages at Alsop Moor and the local farms will, having been barred from the (environmentally friendly) option of walking 300 metres to our shop to collect the Sunday paper they have ordered, be forced instead to drive 4 miles to the nearest existing "local" shop in Hartington - thus supporting it's long-term viability.

This is very unlikely. A far more credible scenario is that, faced with a car journey to Hartington they will instead choose to drive 3 miles extra to Ashbourne and do a more comprehensive weekly shop, taking advantage of all the choice offered by Waitrose, The Co-op, Sainsburys or Marks and Spencer. Unlike Rivendale, supermarket meat does not come from the local butcher in Tissington (neither by the way does the produce in the shop in Hartington), nor has their milk, cream and other dairy products been supplied by the dairy farmer 2 miles away.

Thus RT3C effectively has the opposite effect to that intended by coercing residents at Alsop Moor and Alsop-en-le-Dale to drive 7 miles to Ashbourne to purchase everyday essentials from a supermarket - such as meat products most likely imported from New Zealand. How does this possibly support PDNPA & national policies with regard to transport, carbon emissions, food miles and the promotion of the local economy?

Then there is the issue of local services for local people. How about local residents that do not own a car or cannot drive - is it reasonable to deny them the chance of walking to what could be their local shop?

Equally, the well-used Tissington Trail is 100 metres from our site entrance. The nearest cafes on the trail are about 4 miles away at Tissington & Parsley Hay and are closed mid-week in the winter. Our cafe is equidistant between them and open 9-5 p.m 7 days a week for 11 months of the year, much of the produce within it is locally produced. So obvious are the benefits for walkers and cyclists using the trail that the NPA show the location of Rivendale on their map of local cycle trails.

Indeed, Rivendale was part of the National Park's BESST project to promote small businesses operating in an environmentally sustainable way - one part of which was the establishment of the "Trails Triangle "cycle route and the identification of businesses that could serve clients who were using the new trail. Our facilities have also been used for a wide variety of other purposes for the benefit of local people, including the use of the buildings by Derby University to run computer training as part of their out-reach programme, which was set up to bring education and training to rural folk who could not access college courses for reasons of transportation, parental /farm responsibilities.

Officers of the PDNPA used our rooms to hold meetings with the steering committee of the BESST project on several occasions. We also provided a 3 course meal plus conference facilities for over 30 BESST delegates - some from Norway & Sweden.

There have been no local losers resulting from our provision of any of these services, because no other local businesses could have offered the facilities that we have on our site. There have only been local winners - who have picked up custom in their B & B rooms, filling stations, shops, pubs and cafes, or benefited from a facility on their doorstep that they would not otherwise have accessed.

The financial contribution to our business from local residents is miniscule to the point of being of no importance - it is more a question of their benefiting from the facilities we offer and our reaping the benefits of being a more integrated part of the community as a result. These include engaging with local services and suppliers and finding additional staff.

Our business would, however be improved if we could offer "ancillary services" such as spa treatments (in the spa for which we already have a planning consent) to day

visitors. We do not anticipate a rush of clientele from the local farmers. The objective would be to attract new business from surrounding conurbations such as Derby and Stoke-on-Trent into the Peak District - clients that would not otherwise be here. This would improve the viability of employing additional staff to operate the spa service for residents on site, does not threaten a local spa business (there isn't one), and might provide a local pub or restaurant with some much-needed business mid-week when our own restaurant is shut.

Proposed changes: It is concluded that RT3B should be rewritten to read: "Static caravans, chalets or lodges will only be permitted where there is no adverse visual impact on the surrounding landscape."

Para 10.26 - final part should be redrafted to read: "However, there may be some locations where, through the use of effective design and landscaping, small, simple timber structure may be acceptable either as a farm diversification or an addition to existing campsites, providing there are existing facilities or existing buildings that may be converted to provide the necessary facilities and there will be no visual impact after leaf fall.

RT3C – Provision of improved facilities on existing caravan and camping sites, including shops and recreation opportunities, must be of a scale appropriate to the site itself.

- Should remain unchanged as there is no suggestion that a holiday parks business should be able to effectively become a new business by disproportionately expanding its shop etc

Para 10.27 should be shortened to read: -

The National Park Authority understands that site operators may wish to improve quality to remain competitive. Upgraded toilet and shower facilities, tree planting or hardstandings will generally be acceptable. Proposals for a shop, recreation or other facilities must only provide for the needs of the site itself, without putting other community facilities at risk.

There is no reason why a park facility should not be able to serve local people, or improve the economics of providing an existing service on the site by serving non-residents.

Oral hearing requested? YES.

Details: I feel it necessary to be involved in the oral examination because, despite being an original member of the Peak District Sustainable Tourism Forum, despite writing several letters to my MP, the Chief Executive of the PDNPA & Mr Taylor on behalf of the holiday parks business in the Peak District I find the same old policies originally established in 1979 are maintained. Recently, I emailed asking who had written supporting RT3 - which is still unanswered. I conclude our industry is facing institutionalised prejudice within the PDNPA - which has no council members or other officers with a background in our industry. Secondly, some of these issues are complex and inter-related - it would take many more pages to explain all of these issues.

Representation 123.

From: Mr Hugh Wright (no organisation)

Personal Correspondence Address: Gild Low, , , , DE45 1UA

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Subsection:** 10.14.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The use of the term 'positively manage' is not consistent with the use of the term 'control' used elsewhere in the document. The Rights of way Act 1990 for poughed fields (Schedule A) and the potential to use Traffic Regulation Orders are examples of control mechanisms open to the National Park Authority and justify the use of the term.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 124.

From: Mr Hugh Wright (no organisation)

Personal Correspondence Address: Gild Low, , , , DE45 1UA

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Subsection:** 10.12.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: the term control should replace manage in respect of the issue of off road vehicles. This is justified by the Rights of way Act 2000 and the ability to use TROs to control illegal activity

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 125.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 3.18.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is important that there is a clear explanation of the three principal purposes and duties of National Parks giving a degree of equality between them. This was set out in the National Park and Access to the Countryside Act 1949 and strengthened in the NERC Act 2006.

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks; and

- Promoting opportunities for understanding and enjoyment of the special quality of the Parks by the public; and

- Fostering the economic and social well being of the local communities in the National Park (Section 62 of the Natural England and Rural Communities Act 2006 enabled significant expenditure to be spent in carrying out this duty, thus significantly raising the importance and profile of this duty).

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation form was generated. The answer is therefore an officer assumption based on the reasoning that unless someone expressly makes a request to participate at the oral examination, it is reasonable to assume that they don't.

Representation 126.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.16.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This paragraph implies that the affordable housing problem within the Peak District National Park is a result of national planning policy. In reality it is not national policy contained within PPS3 that is the problem but the policy within the Peak District National Park to prevent, wherever possible, the building of market priced housing. This, we understand, is based on historical evidence that the provision of market priced housing would lead to an influx of people from the surrounding urban areas who would commute into work on a daily basis, or that those houses would be bought as second homes. The National Park policy does not recognise the role of permitting open market housing of co-funding affordable housing provision in that locality.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 127.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.17.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The buying up of open market housing and selling it on subject to an affordable housing occupancy condition would not be the most appropriate solution for the Peak District National Park. Whilst this would lead to an increase in the number of affordable houses, it would also restrict the availability of houses on the market at open market value which could, in a small area, exacerbate the already high house prices within the Park. In addition, the dependence on a policy that involves the conversion of redundant buildings does not always recognise that often the conversion costs of redundant buildings are far greater than the construction of new buildings. This paragraph therefore fails to represent the most appropriate strategy in all circumstances and does not represent reasonable flexibility to enable the framework to deal with changing circumstances.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was

generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 128.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.25.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The CLA objects to this paragraph, as this paragraph is not coherent and consistent. The reference to 'the level of farm payments' is an inadequate description. It is assumed what is meant is the 'profitability of farming in the Peak District' but that is not what is written. It could be construed that either farm businesses are not sufficiently profitable, or that payments made to farmers under the Single Payment Scheme or agri-environmental scheme are inadequate. It is unclear which interpretation is desired as the solution could be radically different in each case.

It is also unclear as to whether the 'business growth in unsuitable buildings and countryside locations' refers to businesses developed without planning consent and therefore unlawful, or whether this refers to businesses which have already been granted planning consent by the Peak District National Park Authority.

It appears to suggest that countryside locations are not appropriate, which is clearly not the case. This is contrary to guidance given within PPS 4 and 7.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the

reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 129.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The first bullet point of this policy states that development will be permitted for 'agriculture, forestry and other rural enterprises requiring a rural location'.

However, this policy fails to recognise the many businesses that take place in the countryside, not because they require a rural location but because there are buildings and employment potential within that same countryside. It would be wrong and not supported by PPS 4 or 7 to limit such development just to businesses that have to be located in the rural area. There is no justification for this restriction.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 130.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy does not seek to establish when charging may be appropriate. There are good reasons why charging should not take place for certain types of development e.g. agriculture or rural diversification. Both of these businesses would be marginal operations and therefore the levying of any charge on this type of development would be detrimental. It would be inappropriate to leave decisions of this nature until the Infrastructure and Charging Schedules are drawn up, when these two could be exempted at the current time within this policy. This policy should refer to any condition, legal agreement or financial charge not impacting on the overall viability of an individual business.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 131.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section A of this policy says development must 'conserve and enhance valued landscape character'. This goes beyond planning policy guidance which seeks

to protect the landscape rather than put a condition that any development would enhance the landscape. In some cases, it may be extremely difficult to prove that stand alone development enhances the landscape. This policy goes beyond what is necessary and beyond national guidance.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation form was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 132.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy tries to wrap up all the statutory and non statutory designations in one policy but does not afford a different degree of protection to each of them. There must be a way of apportioning the impact between the most important sites which will be European or UK statutory designations and other more local by diversity designations which may not have the same degree of importance. It should be necessary for a decision to be taken as to whether the site biodiversity or geodiversity is significantly important to be preserved or whether some mitigation works can take place which would be sufficient to allow the development to take place

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the

body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 133.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: A - says 'opportunities for access by sustainable means will be encouraged'. This would lead one to believe that development which needed to be accessed by car would be unlikely to get planning consent. In a mainly rural area with a decreasing amount of public transport (as evidenced in this document), there is insufficient flexibility within this policy for it to remain in the plan in its current form. It is also contrary to PPG13 paragraphs 40-43 which deal with the rural area.

B – 'in the open countryside clear demonstration of need for such a location will be necessary'. It is unclear within this policy whether there is a need to demonstrate that that particular use has to happen in that location (which goes beyond, we believe, policy set out in PPS 4 and 7) or whether the existence of, for example, redundant buildings that could accommodate such a use would be a sufficient reason for the development to take place in that location (which in our view would be in line with government policy). Again, further clarification is needed.

C – this section requires that development must use existing traditional buildings of historical or vernacular merit. There is nothing within PPS7 or PPS4 that requires the buildings to be of particular construction, design, age or merit. PPS4 Policy EC6.2c refers to appropriate located and suitably constructed buildings, PPS4 Policy EC12.1 encourages the reuse of buildings in the countryside for economic development purposes and PPS7, paragraph 31 (i) encourages the reuse or replacement of existing

buildings. Restricting change of use only to traditional, historical or vernacular buildings is not considered in line with government policy nor justified within this document. There may be cases where modern agricultural buildings are suitably located and finished to a high specification, and capable of housing alternative use without any detriment to the landscape or the wider environment but provide considerable employment possibilities.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 134.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section B says that static caravans, chalets or lodges are not permitted. Static caravans, by and large, have a similar form, but chalets and lodges come in a wide variety of different materials, construction and forms. It would be inappropriate to prevent these from being sited within the National Park particularly when they can be designed and positioned where there is little or no impact on the landscape. This policy appears to be incompatible with the tourism sections of PPS4 to prevent this type of development without sufficient justification.

In addition there may be some landowners who wish to site yurts or tepees on a site for the whole of the summer season and this type of temporary accommodation, for a

number of consecutive months, is not dealt with within this policy and, in order to retain flexibility throughout the planned period, this should be considered not only because there would not be any permanent landscape impact, but they could contribute to a low carbon green holiday provision especially where there is a link to public transport.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 135.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section F sets the standard at a high level and it is considered that this might not be possible to achieve particularly within converted buildings. There must be reasonable flexibility where there is good reason that such high standards cannot be met.

It is also unclear in Section G as to why the building omission rate should be 10% less than the target omission rate.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the

body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 136.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: There is no definition of what is considered to be of 'small scale' within Section B. It is unclear as to whether this would be measured by turbine output, turbine dimensions or what proportion of electricity is for "home consumption". Just describing a wind generation unit as 'small scale' will offer little flexibility when it is economically less viability to develop.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 137.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy is too narrow to operate on an economic scale. It must be possible for someone to establish an on-farm anaerobic digestion facility which primarily uses agricultural manure and slurry arising on the farms involved, but there should also be the ability to import other green materials or appropriate wastes to feed that digester so that the use is viable. The inflexibility of this policy is likely to prevent the establishment of economically viable on-farm anaerobic digestion units purely because of the constraints which it places on a new but growing industry in which there is a considerable amount of enthusiasm

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 138.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 12.18.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This paragraph states that 'new housing in the National Park is not required to meet open market demand'. This statement suggests that there is no open market demand when in reality it is likely that there would be a considerable amount of open

market demand evidenced by the high price of property within the Peak District National Park. The reality is that the Peak District Planning Policy prevents suitable sites being brought forward for open market housing development. It is considered that such an outright prohibition on open market housing further exacerbates the housing problem within the Peak District National Park and prevents cross fertilisation of financial resources between the open market sector and the affordable housing sector.

PPS3, paragraph 38, states 'the need to provide housing in rural areas, not only in market towns and local service centres, but also in villages in order to enhance or maintain their sustainability'. This should include, particularly in small rural settlements, considering the relationship between the settlements so as to ensure that growth is distributed in a way that supports informal social support networks, assist people to live near where they work and benefit from key services, minimise environmental impact and where possible encourage environmental benefits'.

It is considered that in this instance there is no need for a complete ban on open market housing and that it is against national policy (no such prohibition exists in PPS3 – not even for National Parks). There may be good local reasons as to why there is insufficient space for new housing provision but this should not lead to an outright ban.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 139.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This paragraph states that 'new housing in the National Park is not required to meet open market demand'. This statement suggests that there is no open market demand when in reality it is likely that there would be a considerable amount of open market demand evidenced by the high price of property within the Peak District National Park. The reality is that the Peak District Planning Policy prevents suitable sites being brought forward for open market housing development. It is considered that such an outright prohibition on open market housing further exacerbates the housing problem within the Peak District National Park and prevents cross fertilisation of financial resources between the open market sector and the affordable housing sector.

PPS3, paragraph 38, states 'the need to provide housing in rural areas, not only in market towns and local service centres, but also in villages in order to enhance or maintain their sustainability'. This should include, particularly in small rural settlements, considering the relationship between the settlements so as to ensure that growth is distributed in a way that supports informal social support networks, assist people to live near where they work and benefit from key services, minimise environmental impact and where possible encourage environmental benefits'.

It is considered that in this instance there is no need for a complete ban on open market housing and that it is against national policy (no such prohibition exists in PPS3 – not even for National Parks). There may be good local reasons as to why there is insufficient space for new housing provision but this should not lead to an outright ban.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 140.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Buying existing homes to add them to the affordable housing stock is only a very short term solution. Whilst it will increase the amount of affordable housing, it will also increase demand for the existing housing stock by removing smaller and therefore, by their nature, less expensive market priced housing and removing that from the open market. Arguably it is this type of housing that is in short supply in the National Park and offers the potential for people to get onto the housing ladder in the first place. This policy seems to be very inflexible and does not address the unique position that the Peak District National Park has in continuing to sustain high property prices mainly sustained by those working outside the National Park itself.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 141.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section A makes a distinction between buildings of vernacular merit and other buildings. Such a distinction is not provided for in PPS7 and should only be made on a site by site basis when a proposal comes forward. It should also be recognised that very few buildings are removed unless there is a commercial reason for doing so. Significant improvement could be made to a building by allowing an alternative use

Section B goes further than national guidance detailed in PPS4 and PPS7. There is no requirement within national planning guidance and no justification put forward in this development document that justifies new development being tied into the agricultural or other primary business responsible for estate or land management. There may be instances where buildings could be utilised for alternative use but that the ownership is different from the area of land within management. The impact of that development will be similar whether the land is in the same management or in different management and therefore there is no reason for a distinction within this policy which shows a lack of flexibility.

In Section C there is no reason for there to be a prohibition on the alternative use of isolated buildings. This is not provided for within either PPS4 or PPS7 and each such application should be considered on its merits depending on the impact on the landscape, the road network and services within the area.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 142.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market

Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section A of this policy aims for a progressive reduction in proportion and the amount of aggregates and other land won minerals from the National Park. It does however give no consideration for the environmental impact of transporting this kind of stone from one side of the National Park to the other. Nor is there any consideration given to the impact that this reduction will have on employment within the National Park and the local development framework does not seek to address any employment lost from mineral extraction.

The character of the National Park is largely framed from the agriculture that is carried on in the Park, and also the mineral extraction that has historically taken place. It would be difficult to envisage a National Park which has stopped all mineral extraction which has given it the cultural heritage and landscape importance for which the area has become so well known. The insufficient flexibility when deciding on mineral extraction consents.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 143.

From: Andrew Shirley, Country Land & Business Association

Work Correspondence Address: The Hayloft, Sutton Lodge, Sutton Bassett Market
Harborough, , LE16 8HL

Work email: andrew.shirley@cla.org.uk

Home phone: 0 **Work phone:** 01335 347739 (ext. 0) **Mobile:** 07801 526320

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy does not allow there to be consideration between the extraction of minerals from within the Park and their use locally, and the adverse environmental impact of hauling stone from one side of the National Park to another to fulfil a requirement elsewhere.

There may be good reasons as to why stone should be quarried in the National Park for use outside the National Park and if there are good environmental arguments this should be reflected within this policy.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 144.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 3.7.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Paragraph 3.7 of the draft Core Strategy, The Vision, adopted from the National Park Management Plan, is welcome

Proposed changes: needs updating to respond to later national policy development. It fails to record the overriding responsibility of National Parks to respond to climate change, as set out in PPS1CC and in the 2010 National Parks Vision and Circular (NPVC) paragraphs 45 and 46. NPVC requires National Parks to work with communities to be an exemplar in the encouragement of renewable energy by appropriate means

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate in the examination if it is felt necessary.

Representation 145.

From: John Youatt (no organisation)

Personal Correspondence Address: 17, New Road, , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.12.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Climate Change section Paras 4.12 to 4.16 of the Core Strategy fails to report the key messages on RE in PPS1CC nor rises to the challenge in the National Vision – " The Parks should be exemplars in renewable energy. Authorities need to work with local communities to reach a position where renewable energy is the norm in all Parks whilst not compromising their overriding duty under the 1949 Act." NPVC Para 46

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 146.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.13.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Climate Change section Paras 4.12 to 4.16 of the Core Strategy fails to report the key messages on RE in PPS1CC nor rises to the challenge in the National Vision – “ The Parks should be exemplars in renewable energy. Authorities need to work with local communities to reach a position where renewable energy is the norm in all Parks whilst not compromising their overriding duty under the 1949 Act.” NPVC Para 46

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 147.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.14.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Climate Change section Paras 4.12 to 4.16 of the Core Strategy fails to

report the key messages on RE in PPS1CC nor rises to the challenge in the National Vision – “ The Parks should be exemplars in renewable energy. Authorities need to work with local communities to reach a position where renewable energy is the norm in all Parks whilst not compromising their overriding duty under the 1949 Act.” NPVC Para 46

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 148.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.15.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: Climate Change section Paras 4.12 to 4.16 of the Core Strategy fails to report the key messages on RE in PPS1CC nor rises to the challenge in the National Vision – “ The Parks should be exemplars in renewable energy. Authorities need to work with local communities to reach a position where renewable energy is the norm in all Parks whilst not compromising their overriding duty under the 1949 Act.” NPVC Para 46

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 149.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.16.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Climate Change section Paras 4.12 to 4.16 of the Core Strategy fails to report the key messages on RE in PPS1CC nor rises to the challenge in the National Vision – " The Parks should be exemplars in renewable energy. Authorities need to work with local communities to reach a position where renewable energy is the norm in all Parks whilst not compromising their overriding duty under the 1949 Act." NPVC Para 46

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 151.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The requirement to take account of an energy hierarchy in clause B is appropriate in this policy - however later mention in policy CC2 is not appropriate. It

is therefore clear that the policy development here has not been carried out with a full understanding of the energy hierarchy and how it should be applied.

SY considers that there should not be an exemption for affordable and social housing under clause F. It is those that are in greatest need that will be the most vulnerable to the impacts of climate change and rising fuel costs. More highly efficient housing can be more expensive to build: but this should be balanced in favour of long term lower running costs.

SY can see no valid grounds for exception of 3 units or less. Bids for funding of social housing that meet the highest levels of sustainability would be strengthened by having a supporting policy base consistent with DECC's policies.

Clause G is an unnecessary policy and the logic is not explained. All development should adhere to Clause D. The logic of having an exception to Clause D is contradictory and waters down the effectiveness of D. An LDF might well be a 10 to 15 year document. It should be guided by but not limit itself to current targets. There should not be exemptions for non residential either on scale or use. It is the commercial sector that contributes the highest proportion of emissions.

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 152.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The opening clause to this policy is flawed. One cannot consider renewable

energy applications in the context of the energy hierarchy. Most applicants for renewable energy development will not be in control of the energy hierarchy. The current wording therefore creates a significant barrier to renewable energy development and is therefore contrary to PPS1CC paragraph 19. For those that are in control of the energy hierarchy this policy is equally restrictive. For example, the application of this clause to the hydro project at Alport Mill would have resulted in refusal, because the applicant had not addressed the lower levels of the hierarchy.

In clause A the use of the absolute phrase "without harm" needs qualification. Any development has the potential to affect the landscape and as it stands this policy is a major barrier to renewable energy development and contrary to PPS1CC paragraph 19. We suggest that the phrase "without exceptional harm" should be used in line with PPS1CC (paragraph 20).

Clause B. is unnecessary as it is adequately covered by clause A

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 153.

From: John Youatt (no organisation)

Personal Correspondence Address: 17,New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The policy does not take into account the fact that waste can be a valuable resource for powering renewable energy developments. For example, anaerobic digestion can be powered by organic waste, which otherwise might be simply composted and not be subjected to energy recovery processes.

Clause C is an unnecessary barrier to introduction of AD within the National Park; the word 'small' is a barrier, see above. Reference to another agency's document is wrong in principle in this LDF policy, in that it hands power to a separate process outside the PDNPA's control.

Proposed changes: Clause C should be deleted.

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 154.

From: John Youatt (no organisation)

Personal Correspondence Address: 17, New Road, , , , DE45 1WP

Home phone: 01629 636241 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy in combination with CC3 is an effective barrier to the majority of the potential applications of AD for energy generation within the National Park. The policy is flawed in that it does not reflect the technical realities of AD. The AD process cannot function efficiently without a co-digestate and energy recovery from slurry alone dismissed the huge potential for energy production from other organic waste. This policy as written therefore precludes AD.

This policy does not allow for and precludes the management of waste that will already be moved around the area, for example much of green waste from Derbyshire Dales is transported through the Park to Ashbourne.

Clause C is an unjustified restriction. Any facility has to comply with CC1 and all primary duties and policies, at whatever scale. This is a contrary to PPS1CC para 19 as it seeks to restrict renewable energy. The test, within a policy that must be an overall presumption in favour, should be 'appropriateness' not size.

SY believes that a policy that is specific to AD is unnecessary as this would be covered by the previous policies. Given the anticipated life of the Core Strategy (10?15 years) we do think it is appropriate to focus on specific technologies.

Proposed changes: None

Oral hearing requested? YES.

Details: Sustainable Youlgrave wish to participate at the oral examination if it is felt necessary

Representation 155.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 3.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Recreation and Tourism

The management of unsurfaced routes by motorised vehicles must be a park wide objective. This only appears an objective in the South West Peak (Figure 6) yet is a park wide problem.

Climate Change

FPD note the CS's support for development that takes account of the energy hierarchy to reduce the need for energy and to use energy more efficiently (bullet 3) and the support for sensitively sited small-scale low carbon and renewable energy development. This support is not however reflected in Policy CC2.

Minerals

Second bullet point should be re-written. "other than in exceptional circumstances" should be removed as it confuses the objective

Proposed changes: Recreation and Tourism

Add bullet point which will read "prevent motorised vehicle access on unsurfaced routes where damage and disturbance is contrary to National Park purposes."

Minerals

Second bullet should read "allow the development of small-scale building and roofing stone quarries provided the material cannot be sourced from elsewhere and is essential to effect the conservation of building in the National Parks."

Oral hearing requested? YES.

Details:

Representation 156.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 5.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Recreation and Tourism

Bullet point 2 repeats the 8th bullet under transport within Figure 3 (National Park Objectives). Maintenance and filling of gaps in rights of way network is a Park wide objective and not just restricted to the White Peak.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 157.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 4.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Homes, Shops and Communities

As the provision of new homes is dependent on the landscape capacities of settlements to absorb new development and funding from public sources (which have been significantly reduced), it would seem inappropriate to identify how many homes (35 – 75) will be delivered in the sub area.

Especially as the Proposals Map is not identifying affordable housing sites.

Proposed changes: Homes, Shops and Community Facilities

Bullet number 2 should be removed

Oral hearing requested? YES.

Details:

Representation 158.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy GSP4: Securing planning benefits

In addition to delivering National Park purposes and its duty, policy GSP4 should also ensure that conditions and legal agreements ensure developments are, where required, sustainable, either through design and/or renewable energy technologies. This would assist in delivering the vision within the Government's National Park Circular (2010), and the amended vision (see comments) and policy GSP1 of the CS (see comments). Without reference to securing sustainable benefits through conditions and legal agreements, policy GSP4 will be less effective in securing sustainable development.

Proposed changes: Include "and to the achievement of sustainable development" at the end of part A.

Oral hearing requested? YES.

Details:

Representation 159.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Exceptional Circumstances

GSP1 D refers to the major test of development in National Parks, which is spelt out in CS 8.10. GSP1 E should be deleted as it is part of the process to apply that test.

Repeatedly only one part of the major test of development in a National Park (exceptional circumstances) is quoted when dealing with new transport links (see CS 8.9, 14.5, 15.18, 15.14 4th open bullet under whole National Park policies, 15.30). That test also requires that the development is in the public interest and this should be added every time the test is quoted as in CS 8.10 or the words 'test of major development' should be used when referring to new major developments such as new roads and railways.

There is also confusion between the 'exceptional circumstances' required to permit major development and the PDNPA's own use of exceptional circumstances under which development would be allowed e.g. development for gypsies in HC4 which would not invoke the test of major development.

Proposed changes: FPD believe policy GSP1 parts D and E should be re-written. The removal of Part E will eliminate repetition and make it more effective in applying the exceptional circumstances test (as set out in PPS7) when determining major developments in the National Park.

Oral hearing requested? YES.

Details:

Representation 160.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Environmental Limits

The National Park Circular 2010 (vision and para 28) expounds the importance of living within environmental limits. The Park should 'inspire visitors and local communities to live within environmental limits' and it should 'be an exemplar of sustainable development'. Instead of environmental limits being an overarching principle for the whole strategy they appear twice, buried in the chapters on homes, shops and community facilities (CS 12.9) and on minerals (CS 14.2). The Authority's primary responsibility is to deliver its statutory purposes but in so doing, it should ensure it is an exemplar in achieving sustainable development (National Park Circular, 2010, para 28). This pioneering spirit does not appear in the strategy; instead the Park would 'contribute to' (CS 3.21), 'facilitate and promote' (CS 7.2) sustainable development.

We suggest that living within environmental limits and how that complements achieving the statutory purposes is explained in the introductory text of Chapter 8 and that living within environmental limits is added to GSP1. Its absence from policy GSP1 is inconsistent with national policy and therefore unsound.

Proposed changes: The principle of living within environmental limits must be incorporated into GSP1 and its preceding supporting text (Paragraphs 8.1 - 8.21

Oral hearing requested? YES.

Details:

Representation 161.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Whilst the opportunities to develop community Anaerobic Digestion (AD) are supported by FPD the restrictions within policy CC4, which prevent the use of non-farm waste on farm based AD plants, causes concern. If communities are permitted to

develop small scale AD using their own waste (policy CC3 part C) it would be more effective if they were permitted to work with farmers so that there was more than one waste stream (farm waste and domestic waste). Farm based AD should be permitted to use locally generated residential waste, this will increase the viability and opportunities to develop AD schemes.

As a source of renewable energy AD could form an important element of the National Park's sustainable energy mix. If sited sensitively small scale AD plants would not have a significant adverse impact upon the landscape and natural environments. Given the opportunities to utilise the waste resources provided by both agriculture and local communities, FPD believe policy CC4 is not the most effective or appropriate means of contributing to Government targets, nor is it compliant with National Policies within PPS1 and its supplement.

Proposed changes: FPD suggest that Policy CC4 is removed and applications for AD determined according to CC2 (as amended) and CC3

Oral hearing requested? YES.

Details:

Representation 162.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3

Legally compliant? Yes

Sound? Sound

Details: Policy CC3 part C states that 'Small scale waste facilities may be permitted to serve local communities where they are in accordance with the relevant Municipal Waste Management Strategy. Such schemes should meet only the need of the local community and must not involve importation of waste from outside that community.'

According to the Waste Management Background Paper (July 2010), this allows for small scale anaerobic digestion (para 25) provided the waste comes from within the parish or its neighbouring parish. This approach is supported by FPD.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 163.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy CC2, as hinted by the analysis above, is clearly unsound for a number of reasons. First of all 'proposals' will be 'considered' – language that is both at odds with the phrasing 'support' in CS para.11.18 and also with national guidance (see PPS: Planning and Climate Change, paras 19 and 20). The use of the energy hierarchy as part of that 'consideration' is also flawed. The phrasing of principle A is also inconsistent with national policy (PPS22, para.12) as the term (and key qualifier) 'significant' is absent – the all encompassing term 'harm' is used. This also runs contrary to PPS: Climate Change and Planning, para.20, bullet 2 and is also inconsistent with the CS's own restatement of guidance in CS para.11.9. Finally there is no consideration, as stated in PPS22, para.11, that harm must be weighed against environmental, social and economic benefits (see also paras 4.10-4.11 PPS22 Companion Guide).

It is clear, from development control decisions on various forms of RE installations already made by the PDNPA, ranging from 'domestic' scale wind turbines (less than 20m height, e.g. at Stanedge Lodge on the Dark Peak moors and Middleton-by-Youlgreave in the White Peak) and micro hydro power plants (e.g. Alport Mill and

Manor Farm, Quarnford) that harm of some kind is inherent (e.g. visual impact, effects on riverine ecology) but can usually be mitigated sufficiently and/or is outweighed by a number of environmental, social and economic benefits. The policy CC2, if accepted, is – on its face – more restrictive which is at odds with the direction of national policy which requires increased promotion of such technologies, subject to suitable safeguards.

Proposed changes: We therefore contend that alternative text, along the following lines, will be more effective in promoting appropriate renewable energy generation schemes and also be more consistent with national policy (the square bracketed text [...] represent substitutable options):

‘Proposals for low carbon and renewable energy development will be supported provided they can be accommodated without [significant harm][significant detriment][unacceptable adverse effects], either individually or cumulatively, to landscape character, cultural heritage assets, other valued characteristics, or to other established uses of the area which are not outweighed by local and wider environmental, economic, and social benefits of the development.’

This alternative policy text has several benefits: it is more consistent with national policy guidance (need to support; weighing of benefits) and also applies the cumulative effect test to other low carbon and RE technologies rather than just wind turbines. It also does not apply arbitrary, exclusionary tests as to what represents ‘small’ scale and allows a simpler test of ‘fit’ with landscape character and assessment of harm on other valued qualities or uses of the Park.

Oral hearing requested? YES.

Details:

Representation 164.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS policy CC1 pre-amble is stated to apply to 'all development' and then applies tests A and B to ensure resource and energy efficiency. We believe there is a danger that the term 'all development' is too sweeping and could be read (or even is intended?) to apply also to stand alone renewable energy generation. If so, we believe that this is inconsistent with national policy which applies no such test, e.g. the energy hierarchy. Indeed PPS: Climate Change and Planning states that 'planning authorities should: ... – ensure any approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances' (para.20, point 2). The fact that separate policies exist for 'all development' (CC1) and then Low carbon and renewable energy development (CC2) is suggestive that CC1 is intended to be applied to all other forms of development save stand-alone RE developments, but this point needs addressing for the purposes of clarity.

CS Policy CC1 part F requires all new homes and replacement dwellings (except affordable developments of less than 3 dwellings) to achieve the same sustainability standard as those required for affordable homes built by Registered Social Landlords. If applied today it would require all new homes in the National Park to achieve Code 4. Code 4 sets the target of a 44% reduction in carbon emissions. This is a 19% reduction above current Building Regulations (which now require a 25% reduction).

Due to uncertainties regarding the future of the Code for Sustainable Homes, FPD understand that a flexible approach is required to avoid being tied to a policy which is obsolete. It is however dependent on Government retaining a policy of increasing sustainability standards for affordable housing.

CS policy CC1 part F will not be effective at reducing carbon emissions from non-residential developments. It should set a lower threshold so that such developments in the National Park deliver this target. Given the limited number of non-residential developments of 1000sqm or more, how often will this policy be applied to a development? In order to be deliver sufficient carbon reductions within the Park this threshold should be reduced.

The Lake District National Park's Core Strategy has recently undergone examination and the Inspector's Report was published in August 2010. Policy CS16 within the submitted Core Strategy requires all non-residential developments of 200sqm or more to deliver a 10% reduction of carbon emissions. Whilst National Parks are distinctly

different, they are guided by the same purposes which limit the scale of development. The Inspector, whilst noting the challenging target (para 2.51) believed it could be achieved and that it was justified and feasible (para 2.52). FPD believe this is also the case in Peak District National Park and the lower threshold should be applied.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't

Representation 165.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.40.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS 15.40 is unclear. It sounds as though it intends to restrict operational and non-residential car use, but car parking 'need only follow national standards'. It then requires parking provision to be fit for purpose without clarifying exactly what is meant by this or what the needs of rural vehicles (excluding service vehicles and coaches) or future requirements might be. The final sentence requires adequate service and parking provision at transport interchanges to attract potential users. Is there not already enough for residents and are not visitors to be encouraged to use sustainable modes to access the National Park rather than driving in to a transport interchange to park?

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 166.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.19.

Legally compliant? Yes

Sound? Sound

Details: We support the principle of not safeguarding land for new road schemes (CS 15.19).

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 167.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.18.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS para 15.18 incorrectly quotes PPS 7, Sustainable Development in Rural

Areas, as the source for Government policy to route long distance road traffic around the National Park. The policy was in the East Midlands Regional Plan, 2008, which is now immaterial, but it also appears in the National Park Circular, 2010, para 85 with respect to trunk road investment.

Proposed changes: The adverb 'usually' should be removed from the final sentence of CS 15.18 i.e. 'Transport developments will be opposed if they increase traffic on roads inside the Park'.

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't

Representation 168.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T7

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy T7: One of the major challenges identified 'is to encourage Highway Authorities to tackle road safety in ways that conserve the valued characteristics of the landscapes through which routes pass' (CS 4.33). Yet nowhere is this challenge addressed.

Although the PDNPA has no powers to implement slower speeds the same aspirational approach as that adopted towards weight restrictions should be taken. Slower speeds would reduce vehicle collisions and personal injury, injury to stock and wildlife, intimidation of vulnerable road users and noise, thereby increasing enjoyment of the Park and improving road safety. Both the New Forest and Dartmoor National Parks

have substantial lengths of road with 40 mph speed limits that are signed with roundels on the tarmac and enforced by temporary signs and random police checks. Such an approach is recommended by the National Park Circular, para 88.

Proposed changes: Policy T7 should include speed management in order to reduce the impact of motor traffic with an addition such as 'Innovative speed management schemes that are in keeping with the requirements of a protected landscape will be sought'.

Oral hearing requested? YES.

Details:

Representation 169.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T4

Legally compliant? Yes

Sound? Sound

Details: Policy T4 - Managing the demand for freight transport refers to weight restriction orders being sought. We support this aspiration

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 170.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy T3, Design of transport infrastructure, should state that alternatives to signs, such as engineering, landscaping, planting schemes and road markings that could create less impact on the special characteristics of the Park, should be considered first. This policy should include an audit of road signs and furniture with the removal of all that are unnecessary. The proposed monitoring of this policy (CS 9.8) as presented in the Landscape Strategy Action Plan 2009, Action 6.3, is unsatisfactory. The two measures are outputs which say nothing about outcomes on the ground. 'Road Signage Agreements established to uphold National Park purposes' and 'Annual review with Highways Authorities of problem areas and priorities for action' should be replaced by 'numbers of road signs removed', 'length of roads with 40 mph speed limits' and 'number of villages with 20 mph speed limits', all with appropriate targets.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 171.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy T2A should have 'including demand management and low carbon initiatives' added after 'schemes' in first sentence. This would accord with the National Park Circular, para 87.

Policy T2B quotes the test of major development in a National Park incompletely and T2C permits schemes that provide access to new business or housing development. Both should be replaced by a single policy stating that all major transport developments will be subject to the major development test. A new road scheme to a business or housing development could be a major development and should undergo the same test as any other major development.

Proposed changes: The road hierarchy should be shown on the Key Diagram Fig 8.

Oral hearing requested? YES.

Details:

Representation 172.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy L1 states that "other than in exceptional circumstances, proposals for development in the Natural Zone will not be permitted."

The supporting text does not explain how the test of exceptional circumstances will be determined. FPD presume the test is the same for major development in the National Park, as set out in paragraph 8.10.

If so, this will be very restrictive as it prevents development unless it is required to meet an overriding national need. There will be developments, such as the approved antenna required by the emergency services on the Snake summit, which meet a local need and which can be accommodated in the Natural Zone, without significant adverse environmental impacts or harm to National Park purposes.

Proposed changes: FPD suggest that the test required to meet the test of exceptional circumstances should be explained within the supporting text for policy L1. If the test mirrors that for major development in the national park (paragraph 8.10, bullet point 1), it should not restrict development which is not of overriding national need.

Oral hearing requested? YES.

Details:

Representation 173.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy T1 repeats the condition ('subject to safety considerations') imposed on the primary criterion (environmental quality) as noted in CS paragraph 15.8. The criterion has no qualification as presented in the National Park Circular (para 84), which recognises separately that speeding traffic is a key issue (para 88).

Proposed changes: This condition should be deleted and safety on Park roads should be dealt with separately

Oral hearing requested? YES.

Details:

Representation 174.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Similarly to developments in the Natural Zone and the requirement to meet the test of exceptional circumstances (see comments on L1), the CS should explain what these circumstances are. If they are the same as those for major development (paragraph 8.10), it would seem impossible to meet this test as the local need for caravan pitches would not be an overriding national one.

Proposed changes: Paragraph 12.26 should explain the exceptional circumstances required to comply with policy HC4. Or policy HC4 should set a criteria which applications should comply with and the test of exceptional circumstances should be removed.

Oral hearing requested? NO.

Details:

Representation 175.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T5

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy T5 Part B should state that all proposals will be subject to the test of major development

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 176.

From: Ruth Chambers, Campaign for National Parks

Work Correspondence Address: 6-7 Barnard Mews, , London, , SW11 1QU

Work email: ruth@cnp.org.uk

Home phone: 0 **Work phone:** 020 7924 4077 (ext. 222) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 3.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: The word 'the' needs to be inserted between the words 'in' and the word 'exceptional' in the second line of the second bullet point

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't

Representation 177.

From: Ruth Chambers, Campaign for National Parks

Work Correspondence Address: 6-7 Barnard Mews, , London, , SW11 1QU

Work email: ruth@cnp.org.uk

Home phone: 0 **Work phone:** 020 7924 4077 (ext. 222) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 8.1.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This states that 'Policy GSP1 sets out the Sandford principle: that any development proposal in the National Park must satisfy the statutory purposes of National Park designation'. However, this is not the Sandford principle. The principle is correctly stated in GSP1 itself and relates to an irreconcilable conflict between the purposes, not to a requirement for development proposals in the National Park to satisfy National Park purposes (although we agree that this requirement is laudable and should be included within the Core Strategy).

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't

Representation 178.

From: Ruth Chambers, Campaign for National Parks

Work Correspondence Address: 6-7 Barnard Mews, , London, , SW11 1QU

Work email: ruth@cnp.org.uk

Home phone: 0 **Work phone:** 020 7924 4077 (ext. 222) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 8.10.

Legally compliant? Yes

Sound? Sound

Details: We are surprised that this paragraph is included as supporting text and that it does not have the status of a policy. Instead, the policy on major developments is encapsulated in an abbreviated form within D of GSP1.

Proposed changes: Given the strategic importance of the major development policy, CNP considers that paragraph 8.10 should be elevated to the status of a policy and that there should be a separate policy on major developments, rather than the current abbreviated encapsulation in GSP1.

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't

Representation 179.

From: Ruth Chambers, Campaign for National Parks

Work Correspondence Address: 6-7 Barnard Mews, , London, , SW11 1QU

Work email: ruth@cnp.org.uk

Home phone: 0 **Work phone:** 020 7924 4077 (ext. 222) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 8.10.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Paragraph 8.19 misquotes the Sandford principle as it states that 'Where there are conflicting desired outcomes, greater priority must be given to the conservation of the natural beauty, wildlife and cultural heritage of the area, even at the cost of some socio-economic benefits'. The principle only relates to conflicts between the two purposes and does not apply to conflicts between the first purpose and the socio-economic duty, as the current wording of this paragraph implies.

Proposed changes: The words 'even at the cost of some socio-economic benefits' should therefore be deleted.

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the

reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't

Representation 180.

From: Ruth Chambers, Campaign for National Parks

Work Correspondence Address: 6-7 Barnard Mews, , London, , SW11 1QU

Work email: ruth@cnp.org.uk

Home phone: 0 **Work phone:** 020 7924 4077 (ext. 222) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.6.

Legally compliant? Yes

Sound? Sound

Details: CNP strongly supports the thrust of the proposed policies to reduce the proportion and amount of aggregates and other land-won minerals from the National Park.

Proposed changes: In order to reflect the correct status of regional policy, we suggest that the words in bold are added to paragraph 14.6.

14.6 There remains no case for granting major planning permissions for aggregates working in the National Park. Existing permissions will allow significant output for many years in any event. As sites are worked out or become time-expired, there is likely to be a gradual rundown in output in line with the former regional policy, whilst retaining sufficient permitted reserves to meet the aggregates apportionment figure set out for the National Park at a regional level.

Oral hearing requested? NO.

Details:

Representation 181.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.28.

Legally compliant? Yes

Sound? Sound

Details: It is not enough in our view to refer simply to 'appropriate site restoration' of quarry sites which become time expired. These represent significant land resource and, in a crowded National Park, real opportunity for imaginative post industrial development - with potential spin off for the local economy. Moreover, when moulding of land form, or treatment of exposed rock faces is concerned, this can be achieved in the final stages of occupancy at no cost to the Authority and no additional cost to the site operators either, with a little forward planning. These sites do pose certain problems but these are capable of resolution, and with a resolution comes a coherence with the broad thrust of the rest of the strategy in respect of landscape character, conservation, local amenity and a range of recreational activity - activity which may otherwise be difficult to accommodate in the natural landscape.

Proposed changes: Say 'planned appropriate site restoration and after-use' or better still 'consultation with local communities and recreational partnership organisations on planning for appropriate site restoration and after use'

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 182.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 3.7.

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: say 'valued and enjoyed' rather than just plain 'valued'

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 183.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.9.

Legally compliant? Yes

Sound? Sound

Details: It is arguable whether you need to draw attention to the words of the regulations and it is worth re-considering the implications of doing so

Proposed changes: re-word the sentence ' Traffic regulation orders can be used to prevent problems from happening, not just stop damage once it has already occurred' with 'traffic regulations can be used to conserve or protect valued characteristics'

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 184.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.34.

Legally compliant? Yes

Sound? Sound

Details: The essence of traffic management should be that heavy goods and long distance traffic should go round the National Park and not through it. You could strengthen policy here to consider conventional approaches like congestion charging or similar for certain groups of vehicle.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 185.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 5.3.

Legally compliant? Yes

Sound? Sound

Details: The term 'network of high quality sustainable sites' makes us a little queasy. The attraction certainly for the recreational community is natural/semi-natural landscapes with good open access and freedom from man made intrusion. Strategy for these should be the antithesis of any development, signage, fencing and so on. They do not need infrastructure development, and would actually be destroyed by it. But perhaps by infrastructure you refer to facilities in key village communities (with public transport links). That much is fine. Links between such centres, and from them into the local countryside, are also important.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 186.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.3.

Legally compliant? Yes

Sound? Sound

Details: We are glad to see the [recreation] zoning policy has gone and fully support its removal.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 187.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.7.

Legally compliant? Yes

Sound? Sound

Details: might you refer to the least restrictive option?

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 188.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.13.

Legally compliant? Yes

Sound? Sound

Details: agree with this paragraph

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 189.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.14.

Legally compliant? Yes

Sound? Sound

Details: this paragraph is a non sequitor to 10.13

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 190.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.37.

Legally compliant? Yes

Sound? Sound

Details: As a principle we have no objection to fluorspar being extracted from underground sites, and every objection to it being open casted (if that what the aragraph is saying

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 191.

From: Henry Folkard (no organisation)

Personal Correspondence Address: The Bungalow, Grindlow, Great Hucklow
Buxton, Derbyshire , SK17 8RJ

Personal email: henry.folkard@bmcvolunteers.org.uk

Home phone: 01298 871849 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.4.

Legally compliant? Yes

Sound? Sound

Details: The sense expressed in 14.37 is not as clear in this paragraph and the paragraph also lacks reference to restoration and after-use

Proposed changes: None

Oral hearing requested? NO.

Details: No request to be heard at examination but offer made to discuss further if felt necessary

Representation 192.

From: Mr. Robert Fletcher, Ian Baseley Associates

Work Correspondence Address: The Studios, Church Farm, Mansfield Road
Edwinstowe, Nottinghamshire , NG219NJ

Personal email: ask@ibaplanning.co.uk

Home phone: 01623 822006 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Although the policy permits new build development in or on the edge of the named settlements, in the case of housing this is restricted to affordable housing. This is not consistent with paragraph 8.3 which aims to recognise the diverse needs of the area which includes the need for some new market housing in order to retain the viability of communities by producing a choice of housing that can also have the beneficial effect of releasing other existing properties to the local market. This is allowed within the existing policy framework and should continue to be as to resist any market housing in settlements would be contrary to PPS3: Housing, which advocates that provision should be made for the housing needs of all sectors of the community, with no exclusion in operation for National Park residents or potential residents.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 193.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** L2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The lack of focus on the statutory purpose of the National Park to conserve and enhance wildlife and cultural heritage compromises the Plan's soundness. Policy L2 lacks reference to ecological networks, climate change and a strategic approach to biodiversity habitat enhancement and creation.

Ecology

S.4.0 The Spatial Portrait lacks description of the biodiversity of the National Park, the landscapes and conservation section containing landscape description only. Revision of this section is recommended, to include a brief description of the key biodiversity elements of the three character areas.

S.3.18 states that "The 1995 Environment Act establishes the statutory purposes of National Park designation, as: (i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks". s.5.1 and s.5.3 fail, however, to refer to the conservation of wildlife and cultural heritage as part of the focus of the plan and its spatial outcomes.

The sections on achieving spatial objectives for the character areas lack reference to conservation of biodiversity. For the Dark Peak and Moorland Fringe and White Peak and Derwent areas policy wording refers only to seeking opportunities for management or enhancement but with no policy focus, identification of objectives or priorities or reference to the Biodiversity Action Plan. South West Peak lacks reference to biodiversity.

In terms of Policy L2, PPS9 advises that LDFs should "identify any areas or sites for the restoration or creation of new priority habitats" s.12 also advises that "Local authorities should aim to maintain networks by avoiding or repairing the

fragmentation and isolation of natural habitats through policies in plans". Planning Policy Statement Planning and Climate Change supplement to PPS1 Delivering Sustainable Development –paragraph 9 states: "To deliver sustainable development, and in doing so a full and appropriate response on climate change, regional planning bodies and all planning authorities should prepare, and manage the delivery of, spatial strategies that: conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change;" There is a lack of reference to ecological networks, to the effects of climate change on habitats and species or to areas/locations for focus of habitat enhancement/creation to address the potential impacts of climate change. In the West Midlands, Biodiversity Opportunity Mapping, incorporating climate change considerations, has been carried out to identify priorities for the creation and enhancement of habitats that contribute to and strengthen ecological networks and species' adaptability. This approach may be useful in order to give biodiversity policy more strategic focus and clearer outcomes and to allow more effective monitoring of policy outcomes.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 194.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 9.15.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section 9.15 of the core strategy lists archaeology, historic buildings and registered parks and gardens as 'valued characteristics' within the landscape. While reference is made in the footnotes to the role of the Peak District Historic Landscape Characterisation as underpinning the 'Landscape Strategy and Action Plan' the list of characteristics should also reference the historic landscape character. Much of the historic landscape is undesignated but does make a positive contribution to a sense of

place of the Peak District. This concept is supported by the European Landscape Convention and PPS 5 Policy HE3.1.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 195.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT1

Legally compliant? Yes

Sound? Sound

Details: The emphasis placed upon the re-use of traditional historic or vernacular buildings, acknowledging the part it can play in regeneration and influencing the 'sense of place' of an area is welcomed. This is supported in PPS5: Planning for the Historic Environment, Policy HE3 which states that: '...local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account...its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development...the re-use of existing fabric, minimising waste...

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 196.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT2

Legally compliant? Yes

Sound? Sound

Details: The emphasis placed upon the re-use of traditional historic or vernacular buildings, acknowledging the part it can play in regeneration and influencing the 'sense of place' of an area is welcomed. This is supported in PPS5: Planning for the Historic Environment, Policy HE3 which states that: '...local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account...its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development...the re-use of existing fabric, minimising waste...

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 197.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E1

Legally compliant? Yes

Sound? Sound

Details: The emphasis placed upon the re-use of traditional historic or vernacular buildings, acknowledging the part it can play in regeneration and influencing the 'sense of place' of an area is welcomed. This is supported in PPS5: Planning for the Historic Environment, Policy HE3 which states that: '...local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account...its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development...the re-use of existing fabric, minimising waste...

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 198.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2

Legally compliant? Yes

Sound? Sound

Details: The emphasis placed upon the re-use of traditional historic or vernacular buildings, acknowledging the part it can play in regeneration and influencing the 'sense of place' of an area is welcomed. This is supported in PPS5: Planning for the Historic Environment, Policy HE3 which states that: '...local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account...its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development...the re-use of existing fabric, minimising waste...

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 199.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN3

Legally compliant? Yes

Sound? Sound

Details: The policy concerning local small-scale building and roofing stone, will also help maintain the historic character and local distinctiveness of buildings, particularly. The joint English Heritage/Derbyshire County Council Strategic Stone Survey has been developed to identify suitable sources of stone and the control of its usage. Para 14.42 states 'A shortage has been identified in the availability of sandstone roofing slates and to a lesser extent certain types of local building stone. It is important to ensure a long term supply of these materials from suitable sources to sustain the vernacular built environment heritage of the National Park...the use of local materials and building methods gives each place its special vernacular characteristics, and this distinctiveness will be sustained as long as repair, maintenance, extensions and new buildings continue to use sympathetic stone building materials...'. The PPS5 supporting Practice Guide suggests in the 'Quality of Place' section that: '...Recognising how the design, materials and pattern of land use of the built environment provide character and definition to a locality can enable local planning authorities to better understand the appropriateness of proposed development.'

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 200.

From: Mr Tony Lovett, Staffordshire County Council

Work Correspondence Address: Riverway, , Stafford, Staffordshire , ST163TJ

Work email: tony.lovett@staffordshire.gov.uk

Home phone: 0 **Work phone:** 01785 277363 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 9.15.

Legally compliant? Yes

Sound? Sound

Details: The expected strong emphasis throughout the document on conservation and enhancement of landscape character is welcomed as it is addressed through all the development policies, with landscape character assessment and the European Landscape Convention as the guiding principles. Particularly valuable is the recognition, in para. 9:15 of the "flow of landscape character across and beyond the National Park boundary, providing a continuity of landscape and valued setting for the National Park"

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 201.

From: Alethea Faulkner, GMGU (Urban Vision Partnership Limited)

Work Correspondence Address: GMGU (Urban Vision Partnership Ltd, Environment

- 2nd Floor Emerson House, Albert Street Eccles, Salford, , M300TE

Work email: alethea.faulkner@urbanvision.org.uk

Home phone: 0 **Work phone:** 0161 7796182 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.6.

Legally compliant? Yes

Sound? Sound

Details: Greater Manchester imports crushed rock from Derbyshire and the Peak District and is keen that there should remain a sufficient supply. This concern is alleviated by Paragraph 14.6, which states that as reserves are run down in the Peak District they will be replaced by reserves from Derbyshire and that this is supported by Derbyshire County Council and the RAWP apportionment for 2005 – 2020. We are keen to see this continue in light of any uncertainties over the future of RAWPs.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 202.

From: Alethea Faulkner, GMGU (Urban Vision Partnership Limited)

Work Correspondence Address: GMGU (Urban Vision Partnership Ltd, Environment
- 2nd Floor Emerson House, Albert Street Eccles, Salford, , M300TE

Work email: alethea.faulkner@urbanvision.org.uk

Home phone: 0 **Work phone:** 0161 7796182 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.16.

Legally compliant? Yes

Sound? Sound

Details: The second bullet point is unclear

Proposed changes: It could benefit from the word 'not' inserted at the beginning of the sentence.

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 203.

From: Anne Ashe (no organisation)

Personal Correspondence Address: 12 , , Southbourne Rd Sheffield, , S10 2QN

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** L1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Lack of flexibility in respect of demarcation of Natural Zone. Also possible inconsistency with national planning policy PPS7 paragraphs 24 and 25.

Throughout the Core Strategy the Natural Zone is cited as significant for the acceptability or otherwise of development. Yet the Natural Zone as defined in this chapter does not appear to be defined in a way that will provide the flexibility that might be required in the future. It appears to be more of a local designation that in the words of PPS7 (paragraph 24) '...might unduly restrict acceptable sustainable development...'. It is not clear, or evidenced, whether paragraph 9.18 of the Core Strategy complies with paragraph 25 of PPS7 which states that '...Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and

robust assessment of the qualities of the landscape concerned.' It is not clear what requires extra protection and why, nor is it clear why the criteria outlined in the Core Strategy paragraph 9.17 would not suffice along with additional criteria to cover for instance areas that are seen to be at risk because of the impact of climate change.

The need for flexibility is especially crucial bearing in mind the likely impacts of climate change shown in the outputs from UKCIP. These impacts might not come into being during the 15 year time horizon of the Core Strategy, but the Planning Advisory Service advises that Core Strategies should look beyond this especially with regard to climate change issues, so that the lifetime of developments is taken into account, and not just the lifetime of this Core Strategy. The lead time for change on climate change issues is lengthy, and the adaptation process is slow, so to-day's policies need to start to plan for future change and future impacts. A criteria based policy would avoid the need for the inflexible demarcation of the Natural Zone and allow the possibility of protection being extended in future years to areas that might not, in 2010, meet the criteria and so not qualify to be in it. There must be scope within the core strategy to cope with and manage this, increasing protection where necessary or adapting to changing pressures. A dynamic view of sensitive locations is needed rather than the more static NZ concept, especially with the landscape risks inherent in climate change. These risks stem from the changing climate itself (for example, erosion, or species and habitat shifts) as well as from society's potential response to the changing climate (for example risks associated with changing patterns of tourism). Criteria drawn from the landscape characterisation and strategy could provide a basis for firm decisions, and aligning this policy with the landscape strategy would increase the likelihood of delivering the sustainable management of different landscapes within the NP. (See also comment on policy CC2 / para 11.52.) This comment applies to all the policies that are reliant on the Natural Zone.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 204.

From: Anne Ashe (no organisation)

Personal Correspondence Address: 12 , , Southbourne Rd Sheffield, , S10 2QN

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Subsection:** 11.52.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: A blanket ban on wind turbines in Natural Zone is not supported by evidence: the Core Strategy's Climate Change study showed that small wind turbines up to 15m in height to blade tips are more likely to be acceptable and single turbines are more appropriate than clusters. Moreover the blanket ban would seem not to be consistent with the thrust of national policy evidenced in the 2010 National Parks' circular, the 2010 draft PPS1 and the draft national policy on permitted development for micro-generation. This condition in the Core Strategy is effectively pre-judging that all applications for turbines in the Natural Zone would run counter to the reasons for which the Peak District was designated a National Park, even in situations where there is already a building or other development. That might be justifiable in respect of large wind farms, but there is no evidence that, for instance, a single domestic sized turbine would prejudice the whole concept of designation. It might even be the case, where there is already a development within the Natural Zone, or where a future development is being permitted, that a small turbine combined with a battery store would be the least intrusive means of providing electricity. Principle A of Policy CC2 would appear to give adequate protection for areas located in the Natural Zone. Underlying this concern, it would be better for this policy to use criteria, based on the landscape characterisation, rather than have recourse to the rigid local designation of the Natural Zone.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 205.

From: Anne Ashe (no organisation)

Personal Correspondence Address: 12 , , Southbourne Rd Sheffield, , S10 2QN

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Subsection:** 3.7.

Legally compliant? Yes

Sound? Sound

Details: This rightly reflects the existing National Park Management Plan (NPMP), but needs also to reflect the changing emphases stressed in the Foreword and emerging from the current (autumn 2010) consultations for the refreshed NPMP, especially in respect of climate change. It would be appropriate to include additional wording, either in the boxed text or immediately after it, that showed the Authority's commitment to contributing towards a sustainable future for lifetime of developments and beyond not just the lifetime of this core strategy; and towards tackling climate change.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 206.

From: Anne Ashe (no organisation)

Personal Correspondence Address: 12 , , Southbourne Rd Sheffield, , S10 2QN

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Subsection:** 11.5.

Legally compliant? Yes

Sound? Sound

Details: it would be appropriate for a spatial plan to include relevant policies that are not specifically planning policies. It includes some EU and Defra policies so for this Chapter could include Climate Change Act 2008, and the Government's low carbon transition plan 2009 and renewable energy strategy 2009.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 207.

From: Philip Thompson (no organisation)

Personal Correspondence Address: 2 Hogshaw Drive, , Buxton, Derbyshire , SK17 7AX

Work email: pppfsec@yahoo.co.uk

Home phone: 01298 26632 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: The issue surrounding settlements now appear to offer a pragmatic approach

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the

reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 208.

From: Philip Thompson (no organisation)

Personal Correspondence Address: 2 Hogshaw Drive, , Buxton, Derbyshire , SK17 7AX

Work email: pppfsec@yahoo.co.uk

Home phone: 01298 26632 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: In our view it is too strict (see para 4 of response last December) It is acknowledged that the proposals may be acceptable for the current farming economy, but if the world/European markets take a turn for the worse, it is beleived that these policies would not offer enough flexibility to diversify for farmers caught up in a particulalry harsh downturn. This caanot be ruled out over the 15 - 20 year span of the new Framework, and flexibility to react to such a scenario is vital if the farmer community in particular, and the wider community in general is not to suffer.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 209.

From: Philip Thompson (no organisation)

Personal Correspondence Address: 2 Hogshaw Drive, , Buxton, Derbyshire , SK17 7AX

Work email: pppfsec@yahoo.co.uk

Home phone: 01298 26632 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Climate Change Chapter.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is regretted that proposals have been watered down, and aspirations for a tougher planning regime set aside (see our original response on CC3 for example)

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 210.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.27.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Although we do not dispute the value of the work being carried out by the Moors for the Future project in stabilising degraded peatlands and preventing further carbon loss from soils, it is not appropriate to count it as a 'major contribution to the region's carbon reduction targets'. Such remedial work has never been included within regional studies of CO2 emissions or savings or accorded a role in regional or sub-regional strategies for addressing climate change. It should therefore be treated as irrelevant for the purposes of policy making and not seen as a reason to limit the PDNPA's ambition for pursuing other forms of climate change mitigation. The last

sentence of 11.27 also states that the evidence base of the Climate Change study shows many opportunities for low impact, low carbon and renewable energy technologies yet no monitorable targets have been derived from this work or presented in the CS.

Proposed changes: None

Oral hearing requested? YES.

Details: FPD would like to participate at the EiP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments (see others on chapter11) are accepted, require significant alterations.

Representation 211.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.25.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS para.11.25 is factually problematic in that it describes the renewed focus on achieving NP purposes and leading on climate change mitigation as one key outcome whereas they are two separate key outcomes specified in the 2010 National Parks Vision and Circular.

Proposed changes: We suggest omission of the first key outcome (renewed focus) as it is not pertinent to the policies in this particular chapter of the CS.

Oral hearing requested? YES.

Details: FPD would like to participate at the EiP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments (see others on chapter11) are accepted, require significant alterations

Representation 212.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.14 - 11.18.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Section 4.

CS para.11.14 states a number of laudable, yet vague aspirations to have responded and adapted to climate change through reduced energy consumption, reduced CO2 emissions, increased proportion of energy being from renewable sources and resource conservation. However, as no targets for any of these outcomes have been set nor indicators outlined, they cannot be shown to be deliverable or able to be monitored and thus are ineffective and unsound as spatial outcomes. PPS: Planning and Climate Change (2007) makes clear (see paras 34-37) that effective monitoring and review is essential in securing responsive action to tackle climate change. The CS submission draft neither appears to address deliverability nor flexibility issues (see PPS12, paras 4.45-4.46) which are also key to effectiveness and thus soundness.

The point is further reinforced in CS para.11.17 where it is stated that the NPA is seeking ways of contributing to various targets – including local targets – but again these are not described. Again this appears to be at odds with the tests of soundness as outlined in PPS12.

CS para.11.17 also states that 'it aims to support proposals to reduce GHG emissions where they are consistent with the need to conserve the designated landscape'. The implicit thrust of this statement appears to link back to the statutory purpose of conserving and enhancing, but it can also be argued that any proposals to reduce GHG will de facto conserve the landscape as they will reduce (however infinitesimally) climate change impacts. However, we are concerned that this suggested text is intended to be read narrowly as a test of whether particular renewable energy

developments are acceptable, based on their impact on the valued characteristics of the national park.

Yet, as the 2010 National Parks Vision and Circular makes clear (see para.42), the dynamic nature of climate change means adaptation will be required 'as the special qualities of the Parks change... Assumptions about the traditional appearance of the countryside may have to be challenged as the needs which shape its future may be different from those that shaped its past'. In this sense, a narrow test of a renewable energy development's fit with a status quo ('conserved at all costs') landscape is not only unhelpful in terms of mitigating climate change impacts on the designated landscape itself and the biodiversity within it (as it could hinder deliver of the rich renewable energy opportunities identified in the 2010 National Parks Vision and Circular) but is also doomed to failure as and when the qualities of the Park change.

The Spatial Outcomes listed in CS para.11.18 may also be problematic. The first (open) bullet could be read (based on the above argument) that measures (presumably arising through some form of development schemes) will usually both conserve the landscape (in the strict sense) whilst mitigating the impacts of climate change. However, if this is meant in a broader way (i.e. that all measures to reduce GHG will implicitly conserve valued features of the Park as such measures mitigate climate change), then this may be more acceptable. This text needs clarification. Bullet 2 raises the seemingly omitted issue of respecting built and landscape character outside of settlements. The third bullet is problematic in that it appears to apply the energy hierarchy to all development, possibly including stand-alone renewable energy generation (this point is taken further in CC2 and our comments on it, see later), which is inappropriate, unreasonable and inconsistent with national policy. Nonetheless, the stated intention that policies will 'support' measures, design, energy reduction and low carbon/ renewable energy development is correctly phrased and consistent with national guidance. We return to this point later in relation to policy CC2 where the term 'support' is strangely absent.

In terms of the Spatial Outcomes broken down by the main three character areas in the Park (Dark Peak/Moorland fringe; White Peak; Southwest Peak), these are ineffective in being too generic. The point on floodplains occurs in all three areas; open skylines and long views are hardly specific to the Dark Peak and the peatland protection point also covers wide areas in many parts of the Peak. We do not understand how these statements add much to the effectiveness of the CS. In particular, the lone 'protect' aim should be omitted and instead covered by an

appropriate reference to 'without significant harm' (or similar phrase) to the Park's valued characteristics in policy CC2.

Overall we would suggest the removal of CS para.11.18 as being unsound: it is not properly justified as its aims are sweepingly and unhelpfully generic compared to the case by case locational approach (based on landscape character and impacts on other special qualities) that will occur in any case. Previous decisions by the NPA have illustrated that, for example, small wind turbines can indeed be accommodated in open moorland areas of the Dark Peak, if sensitively sited (e.g. Stanedge Lodge). A more appropriate alternative is to have a more general version of policy CC2 which has appropriate safeguards in relation to unacceptable impacts on key qualities of the NP. We propose this later.

Proposed changes: None

Oral hearing requested? YES.

Details: FPD would like to participate at the EiP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments (see others on chapter11) are accepted require significant alterations.

Representation 213.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.9.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS para.11.9 is concerning in its selective quotation of PPS22 text in respect of '...planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation will not be compromised by the development' (para.11, PPS22). However, this only quotes the first half of the original sentence which then goes on '...and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the

environmental, social and economic benefits.' This is a crucial omission in two respects: i) the use of the linking 'and' means that it is a dual policy test and it cannot be read or used selectively; ii) it underscores the common planning test of weighing adverse effects against other potential benefits (also material considerations) which is nationally applicable, even in nationally designated areas, as the original paragraph 11 of PPS22 makes perfectly clear. The mis-reading of this principle has implications for the consequent CS policy CC2 (see our comments on this policy).

Again, the theme is continued in the later part of CS para.11.9 where the quotation from the 2010 National Parks Vision and Circular focuses solely (and repetitiously) on highest status of protection (which is already in statute) and does not take the opportunity to expound on the crucial role assigned to renewable energy in the Vision itself and the key outcome sought of adapting to and mitigating climate change.

Proposed changes: None

Oral hearing requested? YES.

Details: FPD would like to participate at the EiP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments (see others on chapter11) are accepted require significant alterations.

Representation 214.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.5.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We are concerned that the submission version of the Core Strategy takes a selective and partial approach to the principles and guidance set out nationally, principally by PPS22 (2004) and Planning Policy Statement: Planning and Climate Change (Supplement to PPS1, 2007) and to a lesser degree in the recent UK Government Vision and Circular 2010: English National Parks and the Broads. These

documents set out a framework to be adhered to by local planning authorities and national park authorities in their approach to planning for renewable energy. In our view, the submission version does not fully comply with these guidance documents and for that reason is unsound. We elucidate below.

Paragraph 11.5 of the Core Strategy gives some hint of the selective quotation of national policy which, in part, acts as a skewed starting point for what we judge to be an overly-restrictive policy approach by the PDNPA to the encouragement of appropriately scaled renewable energy generation. Although we understand that government policy cannot and should not be quoted at length in LDF documents, the elements of national guidance highlighted in CS paragraphs 11.5-11.9 are suggestive of an unreasonably partial approach to policy making.

In para.11.5, the first sentence gives the impression that national policy is predicated mainly on energy minimisation and energy efficiency, particularly using the energy hierarchy. Yet even a glancing perusal of PPS22 (e.g. Key Principles in para.1, p.7) shows that national policy is firmly aimed at the promotion of renewable energy developments as well as reducing energy use. This is underscored in the statement of the Government's objectives in the second paragraph on page 6 of PPS22: 'The development of renewable energy, alongside improvements in energy efficiency and the development of combined heat and power, will make a vital contribution to these aims.' In addition, the reliance placed on the energy hierarchy also appears out of kilter with national policy guidance (which does not refer to it), especially in relation to its use when considering the supply of stand-alone renewable energy development (see policy CC1 and CC2). Similarly, although one of the overall key outcomes ('leading the way in adapting to, and mitigating climate change', para.12, bullet 2) of the 2010 National Parks Vision and Circular is quoted in CS para.11.5, energy efficiency is again quoted at the expense of the statement (see para.47 of the Vision and Circular) that 'The Parks offer important opportunities for renewable energy generation which must not be overlooked...'.

Proposed changes: None

Oral hearing requested? YES.

Details: FPD would like to participate at the EiP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments are accepted require significant alterations.

Representation 215.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.12.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: Bullet point 4 under 'Across all parts of the National Park' should be re-written. Notwithstanding the obvious lack of planning powers when dealing with off-roading, there is a clear conflict between the legitimacy of off-roading on unsurfaced routes and the damage that it causes to the environment. There may be a right to use these routes but is it appropriate given the sensitivity of these routes and the protection they should be afforded?

As with the White Peak, support work to maintain and fill gaps in the right of way network should also occur within the Dark Peak and South West Peak. There are opportunities to expand the bridleway network within these areas, this will deliver health objectives and promote sustainable forms of transport. Improvements should be park wide.

Oral hearing requested? NO.

Details:

Representation 216.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 5.3.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: • The Landscape and Conservation outcome does not refer to wildlife, culture or geo-morphology (CS 5.3). It merely identifies landscapes. All should be added. The alternative is to refer to nature in all its remit. Improvements to biodiversity is a key objective of the Management Plan, conserving and enhancing wildlife is also a purpose of National Parks.

- The spatial outcome for accessibility travel and traffic as presented in CS 5.3 and CS 15.13 is restrictive. It is based on transport modes rather than people accessing their needs. People can access their needs without travelling e.g. through broadband.

Proposed changes: • An additional outcome bullet should be added. Titled Biodiversity, it should state that biodiversity within all the National Park's varied habitats will have increased.

- The accessibility outcome should be rewritten as 'By 2026 residents, visitors and businesses access their needs in ways that conserve and enhance the valued characteristics of the Park'.

Oral hearing requested? YES.

Details:

Representation 218.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 8.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The road hierarchy should be shown on the Key Diagram Fig 8. Cross park

traffic is a significant problem which requires cross boundary solutions. Its exclusion reduces the Core Strategies effectiveness in delivering its transport objectives.

Proposed changes: None

Oral hearing requested? YES.

Details: FPD would like to attend the EiP and discuss this issue. If more appropriate discussions on a road hierarchy and Figure 8 could occur within the examination of Chapter 15.

Representation 219.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 6.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Recreation and Tourism

Bullet point 1 should be removed as it should be dealt with across the National Park (see representation on Figure 3). It is not a problem which is restricted to the South West Peak.

Proposed changes: Remove 1st bullet point under Recreation and Tourism in Figure 6

Oral hearing requested? NO.

Details:

Representation 220.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,

South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.16.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS 15.16 should refer to light pollution from both traffic and transport infrastructure

Proposed changes: response asked us to see section 4 but nothing was included for section 4

Oral hearing requested? YES.

Details: The discussion of transport issues within Chapter 15 at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions.

Representation 221.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.14.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Whole NP 1st Bullet delete 'more'; opportunities are either equal or not, they cannot be more equal; this bullet also repeats the 10th bullet about the impact of transport. The 10th bullet should be the 1st bullet and 'whilst minimising the negative impacts of transport' can be deleted from this bullet; 2nd bullet should clearly state

that 'long distance traffic will be routed around the Park and traffic management measures will deter unnecessary journeys across the Park';

9th bullet delete the word 'better'; Add a new bullet 'increased understanding of the need to travel sustainably and acceptance that the use of a private car is not required for travelling around the Park'.

Dark, White and South West Peak The 3rd bullet in the Dark Peak policies, the 1st bullet in the White Peak policies and the 2nd bullet in the South West Peak policies all of which start with 'development will be focused in settlements...', could all be deleted as they are the same and generic, and should be moved into policies for the whole of the National Park.

The 2nd bullet of both Dark Peak and of White Peak policies should be moved into whole National Park policies as all villages should have reduced adverse impacts of traffic; reference could be made particularly to those (villages) alongside the A628, A616 (Langsett sits alongside it), A515 and A619/623.

Proposed changes: Whole NP 1st Bullet delete 'more'; opportunities are either equal or not, they cannot be more equal; this bullet also repeats the 10th bullet about the impact of transport. The 10th bullet should be the 1st bullet and 'whilst minimising the negative impacts of transport' can be deleted from this bullet; 2nd bullet should clearly state that 'long distance traffic will be routed around the Park and traffic management measures will deter unnecessary journeys across the Park';

9th bullet delete the word 'better'; Add a new bullet 'increased understanding of the need to travel sustainably and acceptance that the use of a private car is not required for travelling around the Park'.

Dark, White and South West Peak The 3rd bullet in the Dark Peak policies, the 1st bullet in the White Peak policies and the 2nd bullet in the South West Peak policies all of which start with 'development will be focused in settlements...', could all be deleted as they are the same and generic, and should be moved into policies for the whole of the National Park.

The 2nd bullet of both Dark Peak and of White Peak policies should be moved into whole National Park policies as all villages should have reduced adverse impacts of traffic; reference could be made particularly to those (villages) alongside the A628, A616 (Langsett sits alongside it), A515 and A619/623.

Oral hearing requested? YES.

Details: The discussion of transport issues within Chapter 15 at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions.

Representation 222.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.13.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The spatial outcome as presented in CS 15.13 is restrictive. It is based on transport modes rather than people accessing their needs. People can access their needs without travelling e.g. through broadband

Proposed changes: Paragraph 15.13 should be rewritten as 'By 2026 residents, visitors and businesses access their needs in ways that conserve and enhance the valued characteristics of the Park and maximise community safety and cohesion'.

Oral hearing requested? YES.

Details: The discussion of transport issues within Chapter 15 at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions.

Representation 223.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.10.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The suggestion that roads through settlements should be more than transport corridors (with its connotations of speeding traffic) should be deleted (CS 15.10) and replaced with the idea that roads should be a space for people to share with other road users all of whom are travelling no more than 20 mph (as in CS 15.24).

Proposed changes: None

Oral hearing requested? YES.

Details: The discussion of transport issues within Chapter 15 at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions.

Representation 224.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.8.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: There is no mention of low carbon transport, nor of the need to meet the requirements of vehicles powered by alternatives to fossil fuels. The word 'strong' should be inserted in front of 'presumption' in the second sentence of CS 15.8 to reflect the wording in the National Park Circular, 2010. The condition ('subject to safety considerations') imposed on the primary criterion (environmental quality) in planning and managing transport is unsound (CS 15.8). The criterion has no qualification as presented in the National Park Circular (para 84), which recognises

separately that speeding traffic is a key issue (para 88). This condition should be deleted and safety on Park roads should be dealt with separately (see below).

Proposed changes: None

Oral hearing requested? YES.

Details: The discussion of transport issues at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions.

Representation 225.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.3.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: How does the PDNPA intend to measure the outcomes for the NPMP, particularly reduction of adverse impacts of travel on the valued characteristics of the Park? (CS 15.3) PPS 12, 4.1, requires clear arrangements for managing and monitoring the delivery of the strategy. The monitoring of the accessibility travel and traffic policies appears fraught by lack of information. According to the PDNP LDF Annual Monitoring Report 2008-09 Table 18 no targets were set or achieved. The inability to monitor the CS means the policies will be ineffective.

Proposed changes: None

Oral hearing requested? YES.

Details: The discussion of transport issues within Chapter 15 at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions.

Representation 226.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.1 -15.6.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The potential to inform and educate visitors and residents about the Park and therefore to meet the second statutory purpose imposed on the PDNPA is missing from the text introducing the transport policies. The Authority must make the most of visitors they receive to increase understanding of the natural environment, promote healthy outdoor recreation and inspire lifestyle choices that support a diverse and healthy natural environment (National Park Circular 2010 para. 61).

Proposed changes: None

Oral hearing requested? YES.

Details: The discussion of transport issues at the EiP will involve complex evidence. As the National Park Society, FPD believe we should be involved in these discussions

Representation 227.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield,
South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.29.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS para.11.29 appears to be suggesting (and this is made explicit in policy

CC2) that the energy hierarchy can be applied (potentially as some form of policy filter?) when judging the acceptability of proposals for stand-alone renewable energy generation. Irrespective of how this is meant to operate in practice (and the CS is unhelpfully vague on this), this 'consideration' (as it is termed in CC2 pre-amble) is clearly inconsistent with national guidance (PPS: Planning and Climate Change, para.20) which states that 'In particular, planning authorities should... not require applicants for energy development to demonstrate the overall need for renewable energy and its distribution, nor question the energy justification for why a proposal for such development must be sited in a particular location'.

We also suggest that CS para.11.31 is omitted as the information is unhelpful. Large turbines – which would form 'major development' are extremely unlikely to be permitted within the PDNP and this is consistent with all national policies. Thus this information is extraneous. In addition, the dividing line between 'medium' (15m and above) and 'small' (up to 15m) is highly arbitrary, even if the distinction was used in a consultant's report which is being used as part of the CS evidence base. The NPA has, in sites where landscape capacity exists, already permitted individual turbines greater than 15m, proving that judgments are always made on a site-by-site basis, related to discrete locational factors. In addition, additional conditional text in 11.32 (('are more likely') and CC2 ('are unlikely to be') shows that using an arbitrary height rule is unhelpful and likely to be ineffective. This is a further reason to amend CC2 as suggested. More detailed guidance such as this, once amended, would be more appropriately dealt with in a SPD.

Proposed changes: Paragraph 11.31 should be removed from the CS.

Oral hearing requested? YES.

Details: FPD would like to participate at the EIP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments (see others on chapter11) are accepted, require significant alterations.

Representation 228.

From: Mr John King, Friends of the Peak District

Work Correspondence Address: The Stables, , 22a Endcliffe Crescent Sheffield, South Yorkshire , S10 3EF

Home phone: 0 **Work phone:** 0114 2665822 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.31.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: CS para.11.29 appears to be suggesting (and this is made explicit in policy CC2) that the energy hierarchy can be applied (potentially as some form of policy filter?) when judging the acceptability of proposals for stand-alone renewable energy generation. Irrespective of how this is meant to operate in practice (and the CS is unhelpfully vague on this), this 'consideration' (as it is termed in CC2 pre-amble) is clearly inconsistent with national guidance (PPS: Planning and Climate Change, para.20) which states that 'In particular, planning authorities should... not require applicants for energy development to demonstrate the overall need for renewable energy and its distribution, nor question the energy justification for why a proposal for such development must be sited in a particular location'.

We also suggest that CS para.11.31 is omitted as the information is unhelpful. Large turbines – which would form 'major development' are extremely unlikely to be permitted within the PDNP and this is consistent with all national policies. Thus this information is extraneous. In addition, the dividing line between 'medium' (15m and above) and 'small' (up to 15m) is highly arbitrary, even if the distinction was used in a consultant's report which is being used as part of the CS evidence base. The NPA has, in sites where landscape capacity exists, already permitted individual turbines greater than 15m, proving that judgments are always made on a site-by-site basis, related to discrete locational factors. In addition, additional conditional text in 11.32 (('are more likely') and CC2 ('are unlikely to be') shows that using an arbitrary height rule is unhelpful and likely to be ineffective. This is a further reason to amend CC2 as suggested. More detailed guidance such as this, once amended, would be more appropriately dealt with in a SPD.

Proposed changes: Paragraph 11.31 should be removed from the CS.

Oral hearing requested? YES.

Details: FPD would like to participate at the EiP in order to discuss the CS's non-compliance with national renewable energy/low carbon policy. It will, if our comments (see others on chapter11) are accepted, require significant alterations.

Representation 229.

From: Andrew Astin, Indigo Planning Limited

Work Correspondence Address: Indigo Planning Limited, , 36 Park Row Leeds, , LS15JL

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** DS1.

Legally compliant? Yes

Sound? Sound

Details: Focussing new development in Bakewell represents the most sustainable means of accommodating new development, helping to ensure that homes, jobs and services continue to be directed towards the largest town in the National Park, to maximise accessibility and to preserve more rural areas within the area. This is consistent with PPS3 and PPS4 Indigo supports new development in Bakewell as it is already an established centre, and is accessible to the rest of the Peak District.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 230.

From: Andrew Astin, Indigo Planning Limited

Work Correspondence Address: Indigo Planning Limited, , 36 Park Row Leeds, , LS15JL

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 8.9.

Legally compliant? Yes

Sound? Sound

Details: Requires further clarification. Both PPS7 and the 2010 National Parks Circular

refer to "major" developments but neither establish what they consider to constitute major.

Proposed changes: Indigo considers that the Core Strategy must be more precise and provide a clearer definition of what constitutes major developments.

Oral hearing requested? NO.

Details:

Representation 231.

From: Andrew Astin, Indigo Planning Limited

Work Correspondence Address: Indigo Planning Limited, , 36 Park Row Leeds, , LS15JL

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** HC6.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Indigo Planning objects to parts A and B of this policy as they are unsound as they are not compliant with the policies contained in PPS4.

Firstly an objection is made in relation to point A) of the policy given that it is not sound, and is not consistent with PPS4. It only refers to shops within the Core Shopping Area; it is therefore not compliant with the sequential approach as it makes no recognition that where there are no sites available, suitable and viable in the town centre, edge of centre sites are the next preference, followed by out of centre sites. In relation to point B), again this is also contrary to PPS4 as it is unduly negative. Where retail development passes the relevant tests of PPS4 it is deemed to be acceptable.

Proposed changes: Indigo recommend the policy be reworded as follows: "In Towns and Villages A. shops, professional services and related activities must i) Be located within the Bakewell Central Shopping Area or within settlements listed in policy DS1. Where no town centre sites exists, development should take place on edge of centre sites, followed by out of centre sites. ii) Be of an appropriate scale to serve the needs of the local community and the settlement's visitor capacity, in accordance with an

update to date evidence base. B) Significant out of centre retail development will not be permitted where it is demonstrated that the development would cause a significant adverse impact on existing centres".

Oral hearing requested? NO.

Details:

Representation 232.

From: Andrew Astin, Indigo Planning Limited

Work Correspondence Address: Indigo Planning Limited, , 36 Park Row Leeds, , LS15JL

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 12.13 -12.14.

Legally compliant? Yes

Sound? Sound

Details: Indigo seeks recognition within the Core Strategy of the findings of the GVA Grimley Sub Peak Region Retail Assessment in respect of (i) the limited consumer choice currently available in Bakewell, and (ii) existing overtrading of the Coop, and (iii) significant expenditure leakage outside of the Peak District to other stores.

The Peak Sub Region Retail Study (the Retail Assessment) prepared by GVA Grimley provides the evidence base for the Core Strategy. A household survey was undertaken as part of the Retail Assessment which identified that there was only 51% convenience trade retention within Bakewell's catchment with a significant level of convenience leakage to stores outside of the Peak District to Chesterfield, Matlock and Buxton. The main food store is a medium sized Co-op, and a small Spar (within the Post Office). The Coop is found to be overtrading retaining 98.1% of convenience expenditure in the town and dominating the food retail market (over trading by £5.4m). This demonstrates that currently Bakewell lacks consumer choice (advocated by PPS4) and qualitative deficiencies exist. This coupled with expenditure growth projected to 2026, identifies sufficient need to support an increased level of convenience retail floorspace in the town of 1,690sqm sq m up to 2026. However, the Core Strategy is prescriptively negative in that development should be small in scale

and consolidated within the town centre. It notes at paragraph 12.45 that "Proposals for edge or out of centre developments would be unlikely to satisfy the impact tests". However, it is for the applicant to demonstrate the tests of PPS4 and any impact judged using a balanced approach.

Indigo supports the need to improve the retail offer and reduce expenditure leakage to food stores falling outside the Bakewell catchment area as recognised by the Sub Peak Region Retail Assessment. The Core Strategy fails to acknowledge that Bakewell is currently failing to adequately serve residents resulting in a compelling need to address qualitative deficiencies and improve the retail offer of the town.

Proposed changes: the Core Strategy should allow appropriate flexibility to support development proposals within sustainable locations for moderate food store development where they are compliant with the sequential approach and where there would be no significant adverse impact upon existing centres

Oral hearing requested? NO.

Details:

Representation 233.

From: Robin Edwards, Ministry of Defence

Work Correspondence Address: DE Operations North, Building 28 Copthorne Barracks, Copthorne Road Shrewsbury, , SY37LT

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 07710746979

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** whole plan.

Legally compliant? Yes

Sound? Sound

Details: General comment on MOD policy and management plan relating to Leek (Upper Hulme) Training Area.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 234.

From: Bethany Tucker, National Grid

Work Correspondence Address: National Grid, National Grid House, Warwickshire Technology Park, Gallows Hill Warwick, , CV346DA

Home phone: 0 **Work phone:** 01926 654165 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 8.20.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: refers to the need to find solutions which conserve and enhance the National Park for future generations, including “undergrounding electricity cables”. Whilst National Grid will seek to avoid new infrastructure in National Parks, there may be cases where such infrastructure is necessary in order to carry out the duties under Section 9 (2) of the Electricity Act 1989. There are a number of severe disadvantages associated with high voltage underground cables. As underground conductors tend to be hotter than overhead ones, this results in the need for a larger conductor underground than would be necessary overhead. This results in a much greater scale of construction activity, 30 times more excavation than is associated with an overhead line and greater impact in terms of disturbance to flora and fauna. There are also significant cost differences between a length of 400kV underground cable compared to the same length of 400kV overhead line. Under National Grid’s undergrounding policy, the Peak District National Park is classified as an “exceptionally constrained area”, where consideration of underground cables is warranted. However, in such areas, judgement on the merits of each case will be required to justify the use of underground cables. National Grid will always seek to consult fully on any new overhead line proposals and involve the relevant LPA fully in the process. As part of this, National Grid is keen to ensure that the full implications of undergrounding high voltage lines and other issues are fully understood. This information can then be used by LPAs in the development of policies and/or supporting text, which will then be used by LPAs to inform their responses as statutory consultees to consent applications. We feel that based on the implications outlined above, the reference to undergrounding electricity cables in paragraph 8.20 of the Core Strategy Submission document contradicts with the objective of finding solutions that conserve and enhance the National Park.

Proposed changes: We therefore request that paragraph 8.20 of the document is amended to remove the words "undergrounding electricity cables"

Oral hearing requested? NO.

Details:

Representation 235.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figure 3.

Legally compliant? No

Sound? Unsound - Not Specified

Details: regarding the text Resist further proposals for aggregates; limestone and shale for cement manufacture; large scale building and roofing stone; and limestone for industrial and chemical products.

Proposed changes: This is the essence of LCUK's objection to this LDF Core Strategy. This strategy by the Peak District National Park Authority [PDNPA] seeks to eliminate cement manufacture at Hope Cement Works and Quarries. Hope Works has the highest cement production capacity of all plants, of all producers, in the UK, and is of National importance. Mining and processing of minerals has been part of the history and cultural heritage of the peak District for hundreds of years. Hope Cement Works has been in existence since 1929 and pre-dates the National Park by some 22 years. LCUK has no intention of scaling down its operations here over the next 20-30 years as is proposed in this core strategy and argues that this strategy and associated policy is inconsistent with National Planning Policy for mineral extraction in MPS1, and in MPG 10 for the provision of raw materials for the cement industry.

Oral hearing requested? YES.

Details: The Peak District National Park Authority has misinterpreted/ignored National Planning Policy, has inappropriately singled out Lafarge Cement UK's [LCUK's] largest Cement Works located at Hope and seeks to eliminate cement manufacture there at

the earliest opportunity. LCUK would welcome an opportunity to put an opposing case for retention of Hope Works in the long term and for core strategy policy to enable the provision of additional raw material reserves when required.

Representation 236.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.1.

Legally compliant? No

Sound? Unsound - Not Specified

Details: The 1995 Environment Act describes the purposes of National Parks as conserving and enhancing their natural beauty, wildlife and cultural heritage and promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public. Mineral extraction IS part of the cultural heritage of the Peak District and does not necessarily conflict with the purposes of a National Park.

Proposed changes: None

Oral hearing requested? YES.

Details: The Peak District National Park Authority has misinterpreted/ignored National Planning Policy, has inappropriately singled out Lafarge Cement UK's [LCUK's] largest Cement Works located at Hope and seeks to eliminate cement manufacture there at the earliest opportunity. LCUK would welcome an opportunity to put an opposing case for retention of Hope Works in the long term and for core strategy policy to enable the provision of additional raw material reserves when required.

Representation 237.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.2, 14.3,14.4.

Legally compliant? No

Sound? Unsound - Not Specified

Details: The reference to National Planning Policy MPS1 and PPS 7 in paragraph 14.2 is correct to say that government policy is not to allow major mineral development in National Parks "except in exceptional circumstances". National Planning Policy in MPS 1 does not preclude new mineral development in National Parks therefore, but states that: "Major mineral development proposals should be demonstrated to be in the public interest before being allowed to proceed. Consideration of such applications should therefore include an assessment of: i the need for the development, including in terms of national considerations of mineral supply and the impact of permitting it, or refusing it, upon the local economy; ii the cost of, and scope for making available an alternative supply from outside the designated area, or meeting the need for it in some other way; iii any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.

Planning authorities should ensure that for any planning permission granted for major mineral development in these designated areas, the development and all restoration should be carried out to high environmental standards, through the application of appropriate conditions where necessary, and be in character with the local landscape and its natural features." Similarly PPS 7 in paragraph 22 does not preclude mineral development in National Parks, but states: 22. Major developments should not take place in these designated areas, except in exceptional circumstances. This policy includes major development proposals that raise issues of national significance. Because of the serious impact that major developments may have on these areas of natural beauty, and taking account of the recreational opportunities that they provide, applications for all such developments should be subject to the most rigorous examination. Major development proposals should be demonstrated to be in the public interest before being allowed to proceed. Consideration of such applications should therefore include an assessment of: (i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; (ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and (iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. Paragraph 14.2 also refers to former regional policy, which did seek to progressively reduce [but NOT eliminate]

mineral extraction in the Peak District. However such regional policy has now been excised from the planning process and the LDF Core Strategy can no longer rely on this for support in seeking to eliminate mineral extraction for cement manufacture from the National Park. The policy in the former East Midlands Regional Plan was also a repetition of historic regional policy and did not reflect the new National Planning Policy in MPS1 even though it was adopted after MPS1 was published. MPS 1 does NOT require the progressive reduction of mineral extraction in National Parks. The LDF Core Strategy should now interpret this National Planning Policy correctly.

Proposed changes: None

Oral hearing requested? YES.

Details: The Peak District National Park Authority has misinterpreted/ignored National Planning Policy, has inappropriately singled out Lafarge Cement UK's [LCUK's] largest Cement Works located at Hope and seeks to eliminate cement manufacture there at the earliest opportunity. LCUK would welcome an opportunity to put an opposing case for retention of Hope Works in the long term and for core strategy policy to enable the provision of additional raw material reserves when required.

Representation 238.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.7.

Legally compliant? No

Sound? Unsound - Not Specified

Details: The status of MPG 10 was reinforced by the government in MPS 1, November 2006 "Minerals Policy Statement 1: Planning and Minerals Introduction 2 Minerals Policy Statements (MPSs) set out the Government's national planning policies for minerals planning in England. These complement, but do not replace or overrule, other national planning policies, and should be read in conjunction with other relevant statements of national planning policy. MPS1 sets out the Government's key overarching policies and principles which apply to all minerals. 3.A range of

minerals other than those dealt with in the annexes are worked in England. Many of these are economically important. Appropriate provision for the supply of these is important even though specific guidance is not provided. 4. The table at the end of this statement, sets out the current status of individual MPGs. Until replaced, all extant MPGs, which have equivalent status to MPSs, should be read in the context of MPS1 and MPS2.

MPG 10: Provision of Raw Material for the Cement Industry. Remains in force." MPG 10 states that the cement industry is of major importance to the national economy as it supplies an essential product to the construction and civil engineering industries. It is therefore necessary to have an adequate and continuous supply of raw material to maintain production. With regard to National Parks MPG 10 refers to former National Planning Policy in MPG1, now replaced by almost identical policy in MPS1.

Fundamentally the extraction of raw material reserves in National Parks was not and is not embargoed where it can be demonstrated to conform to the specified criteria.

"39 The Government's policy on the treatment of applications for mineral extraction in the National Parks is set out in MPG1. Applications must be considered on their merits, but because of the serious impact which mineral working may have on the natural beauty of the Parks, minerals applications in these areas "must be subject to the most rigorous examination". Extraction should be demonstrated to be in the public interest, and consideration of such applications should therefore normally include an assessment of: i. the need for the development, including the extraction of the mineral in terms of national considerations and the impact of permitting or refusing it upon the local economy; ii. the availability and cost of alternative sources of supply; iii. any detrimental effect on the environment and the landscape and the extent to which that could and should be moderated; iv. whether in the light of this assessment the proposed development would be public interest." MPG 10 goes on to say: "58 The size of the cement industry's landbank should be directly linked to the scale of capital investment envisaged at a site, for an important feature of the industry is the high cost of investment and the long amortisation periods this entails. Mineral planning authorities should normally aim to maintain cement plant with a stock of permitted reserves of at least 15 years. Where significant new investment (such as a new kiln) is agreed with the mineral planning authority, the plant should be provided with a stock of permitted reserves to provide for at least 25 years. New plant on a greenfield site should be provided with a stock of permitted reserves lasting more than 25 years. 59 Development plans should normally allocate sufficient land for mineral extraction for cement manufacture to provide for the maintenance of landbanks. Structure plans should set out the general principle of maintaining a landbank for cement plant, and

mineral local plans should seek to identify areas where minerals will be worked. Sufficient land should be allocated to maintain this landbank throughout, and at the end of, the plan period." The PDNPA LDF Core Strategy plan period is to 2026 and so in accordance with MPG 10 at that date there should remain a landbank of AT LEAST 15 years [i.e. to 2041]. The role of the core strategy in lieu of former structure plan strategy should be to set out the general principle of maintaining a landbank of raw material reserves for cement production at Hope Works until at least 2041. Current permitted reserves of limestone for cement production at Hope at 01.01.09 are less than 28 years at anticipated production capacity [i.e. to 2038]. Shale reserves are currently less than 8 years supply [i.e. to 2018].

Hence this LDF core strategy does not comply with MPG 10 and should be making provision for the medium term shale reserves and longer-term limestone reserves for Hope Cement Works.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 239.

From: Mr John Heron, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.heron@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.8.

Legally compliant? No

Sound? Unsound - Not Specified

Details: Paragraph 14.8 states that the concentration of cement manufacture into fewer plants located within or close to the National Park is "...the opposite of the long term outcome envisaged by planning policy". With respect to MPG 10 this statement is not true since it is clear from paragraph 32 of MPG 10 that the rationalisation of production within the industry was foreseen: "32 The high capital cost of investment in the cement industry means that, in the short run at least, investment in new

capacity is most likely to take the form of the up rating of existing plant or the creation of additional capacity at existing plant, rather than the building of new plant on greenfield sites. The rationalisation of production capacity into larger more economic units may lead to the closure of some small plants. In the longer term, the possibility of greenfield sites cannot be ruled out." The current national and international economic crisis has severely distorted the UK cement market and substantial reductions in demand for cement, which has further exaggerated this rationalisation of production capacity. A fifth LCUK mainland plant in Wiltshire was finally closed in 2010, having been previously "mothballed". At this stage in the economic downturn no other LCUK operational site is producing cement at full capacity. The fact that Hope works is currently supplying a higher proportion of LCUK's wider national market than historically is a function of this market distortion and necessary capital restrictions on investment in existing or new plant. The apparent concentration of extraction of raw materials for cement in the Peak District is also unashamedly a function of the premise that you can only extract minerals where they occur, which is more often than not within cherished landscapes including National Parks. LCUK does not accept that this is contrary to any long-term outcome envisaged by planning policy, other than PDNPA's own interpretation that this should involve the progressive reduction of mineral extraction. The issue of cement manufacture occurring both within and around the Peak District is not specifically contrary to any policy, and PDNPA should not seek to influence land use planning matters outside the Park unless they have a direct and measurable prejudicial impact [i.e. not just out of prejudice].

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 240.

From: Mr John Herson, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.herson@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.26.

Legally compliant? No

Sound? Unsound - Not Specified

Details: This is an expression of PDNPA's prejudicial stance, which pre-judges any objective consideration. LCUK accepts that any future planning permission for extended or new mineral reserves at Hope Works will need to comply with the criteria for mineral development in National Parks as set out in MPS 1. The exceptional circumstances would include the national importance of cement production recognised in MPG 10. It is anticipated that an evaluation of alternative locations for cement production will also be required. As stated at the outset in this submission LCUK has no intention to scale down its operations here over the next 20-30 years as is proposed in this core strategy and argues that this strategy and associated policy is inconsistent with National Planning Policy for mineral extraction in MPS1, and in MPG 10 for the provision of raw materials for the cement industry. This strategy also takes no account of the potential impact of the loss of Hope Works on the local economy. A finite end date for cement production will also affect the investment that can be justified in maintaining and improving the works in line with ever more rigorous environmental demands. LCUK has recently made considerable investment in new rail infrastructure, which enables the sustainable distribution of most of Hope's cement products offroad. Such further investment could not be justified if the works has a limited life. It is not disputed by PDNPA that Hope Works and Quarries are operated to high environmental standards. Such standards are only achievable through continual investment. The statement that Hope Cement Works is a major emitter of carbon dioxide is not qualified in any way. Industrial gas emissions are controlled under Environment Agency permitting procedures and carbon dioxide emissions are also in LCUK's case subject to the European Union Emissions Trading Scheme, which seeks to control greenhouse gas emissions on a pan European macro scale. This is a far more appropriate mechanism than through a Local Development Framework, which should not seek to duplicate other permitting mechanisms. Separate planning permissions for the limestone and shale reserves will expire in 2042, although that is not to say that new permissions at that time [or earlier when existing reserves are exhausted] could not be obtained. Planning permission for the cement works itself does not expire in 2042. LCUK accepts that in recent years this has become a bone of contention between the company and PDNPA, although the company's position has been supported by leading Counsel [legal opinion available as required]. In theory this suggests that the cement works could continue production in isolation of the existing raw material reserves in adjoining quarries by importing alternative raw materials.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 241.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent ,
ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.27.

Legally compliant? No

Sound? Unsound - Not Specified

Details: The opening sentence provides a much more rational and objective position regarding policy considerations for the "decision" on the future of Hope Cement Works than the pre-judgemental stance in paragraph 14.26 commented upon earlier. As already stated in any future proposal for new mineral extraction to support the Cement Works LCUK expects to support any application with an evaluation of alternative locations for cement production and mineral extraction outside the National Park. Deferring consideration of the future of Hope Works to subsequent LDF reviews is contrary to National Planning Policy in MPG10 to maintain appropriate landbanks for raw materials for cement production during and at the end of the plan period.

Proposed changes: None

Oral hearing requested? NO.

Details: The opening sentence above provides a much more rational and objective position regarding policy considerations for the "decision" on the future of Hope Cement Works than the pre-judgemental stance in paragraph 14.26 commented upon earlier. As already stated in any future proposal for new mineral extraction to support the Cement Works LCUK expects to support any application with an evaluation of alternative locations for cement production and mineral extraction outside the National Park. Deferring consideration of the future of Hope Works to subsequent LDF reviews is contrary to National Planning Policy in MPG 10 to maintain appropriate

landbanks for raw materials for cement production during and at the end of the plan period.

Representation 242.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.28.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: LCUK does not accept that PDNPA has made an adequate case for eliminating cement manufacture and raw material supply from the National Park. Furthermore the implication here seems to be that PNPA expects to exert influence over consideration of any planning applications for future development at Caudon Cement Works. For the avoidance of doubt this plant and its associated quarries are entirely outside the National Park and the relevant Mineral Planning Authority and Planning Authority responsible for the cement works is Staffordshire County Council. PDNPA will no doubt continue to be an important consultee regarding any future planning applications at Caudon, but Staffordshire C.C. is not bound by any such consultation response.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 243.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 14.29.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The current configuration Hope limestone quarry was permitted in 2006 with 47mt of reserves estimated to last until about 2038. LCUK does not consider it helpful to quote a figure for currently remaining reserves [e.g. about 42mt at end 2009], as this is a constantly changing figure. With regard to shale reserves LCUK does estimate that these could last until 2018, although this reserve life may be enhanced marginally by the partial replacement of shale with alternative raw materials such as PFA. The remaining discourse in the text regarding shale with high sulphur content and planning permission for a PFA silo is unnecessary.

Proposed changes: LCUK proposes that paragraphs 14.26 – 14.29 are deleted and replaced with a single paragraph as follows, 14.26 The decision on the future of Hope Cement works will be based around a consideration of many factors including need for cement, economic impact, National Park purposes and relevant planning policies. It will be necessary to address the long-term future of the Hope Cement works beyond its current lifespan in relation to other alternatives outside of the National Park. Hope Cement Works currently has permitted reserves of limestone sufficient to sustain output at recent rates of about 1.4mtpa until around 2038 and shale reserves sufficient to sustain output at recent rates until 2018. There is therefore a case to supplement the reserves at this site in accordance with paragraph 58 of MPG 10 to maintain a minimum landbank for this site. However, it should be noted that all proposals for mineral extraction must fulfil the requirements in MPS1 relating to exceptional circumstances. Any future proposal for additional reserves to maintain a limestone or shale landbank for this site will therefore be considered on its merits at the appropriate time.

Oral hearing requested? YES.

Details:

Representation 244.

From: Mr John Hernon, Lafarge Cement UK

Work Correspondence Address: The Cedars, , Holborough Road Snodland, Kent , ME6 5PW

Work email: john.hernon@uk.lafarge.com

Home phone: 0 **Work phone:** 07703 546754 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN1

Legally compliant? No

Sound? Unsound - Not Specified

Details: As previously stated LCUK considers that the core strategy policy for progressive reduction of mineral extraction in policy MIN1 A is not supported by National Planning Policy. Nevertheless the caveat that proposals for new mineral extraction or extensions to existing mineral operations will not be permitted other than in exceptional circumstances in accordance with MPS1 is acceptable to the company. However this is not consistent with the aggressive and pre-judgemental pre-amble in this core strategy document in respect of a PDNPA prejudicial determination to eliminate Hope Cement Works from the National Park at the earliest opportunity.

Proposed changes: LCUK proposes therefore that Policy MIN1 A is deleted, and replaced with the following: MIN1: Minerals Development A. The National Park Authority will not permit proposals for mineral extraction or extensions to existing mineral operations (other than fluorspar proposals and local small scale building and roofing stone which are covered by MIN2 and MIN3 respectively) other than in exceptional circumstances in accordance with National Planning Policy in MPS1

Oral hearing requested? YES.

Details:

Representation 245.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire , DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:** 07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.8.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: PPS1 Supplement has not been taken properly into account. PPS1 requires that policies contribute to reduction on carbon emissions, and that developments that make this contribution are allowed except under exceptional circumstances. (including therefore low carbon & renewable sources of energy) The National Park does have sites which are exceptional – eg in the Natural Zone, but also has areas where suitable development of renewable energy sources would not significantly change the appreciation of the landscape character.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 246.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire , DE4 4EY

Personal email: haskerjd51@hotmail.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:** 07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.9.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: PPS 22 Wording is 'appropriate' not 'small scale', as NPA currently uses in the climate change Action Plan. Small is not easily defined and is relative to scale.

Proposed changes: None

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the

reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 250.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Sound

Details: n/a

Proposed changes: We request a qualification of the word harm, (Used in part A) as this may not be shared by different stakeholders. We consider that all applications should be considered individually. Now there is no mention of Zones – therefore there is no longer a presumption per se against development in the moorlands ('Natural Zone').

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 251.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: What is small in one context may be too large in another, and each application should be judged on its merit.

Proposed changes: the stipulation (in part B) that wind turbines should be 'small – scale in height' should be replaced with 'at an appropriate scale'.

Oral hearing requested? NO.

Details: No request to participate at the oral examination was received either in the body of the e mail or the attachment from which this representation forms was generated. The answer to this question is therefore officer assumption based on the reasoning that unless someone expressly makes a request to appear at the oral examination it is reasonable to assume that they don't.

Representation 252.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire , DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:** 07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Sound

Details: CC2. C. ok

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 255.

From: Martin Clayton, Geoplan Limited

Work Correspondence Address: Unit 7, Heritage Business Centre, , Belper Road
Derby, , DE56 1SW

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of pp Marshalls Natural Zone

Representation on **Subsection:** 14.12.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The strategies/policies/allocations in the plan is not justified because it fails to represent the most appropriate in all the circumstances having considered the relevant alternatives, and they are not founded on a robust and credible evidence base . In addition, the plan is not reasonably flexible to enable it to deal with changing circumstances.

It is my client's contention that despite the words of 14.12, the strategy fails to achieve the correct balance and is unreasonably weighted in favour of the natural environment to the detriment of heritage protection.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 256.

From: Martin Clayton, Geoplan Limited

Work Correspondence Address: Unit 7, Heritage Business Centre, , Belper Road
Derby, , DE56 1SW

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of pp Marshalls Natural Stone

Representation on **Subsection:** 14.17.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: 1. The strategies/policies/allocations in the plan fail to represent the most appropriate in all the circumstances having considered the relevant alternatives, and they are not founded on a robust and credible evidence base and

2. The plan is not reasonably flexible to enable it to deal with changing circumstances.

14.17 acknowledges the need for flexibility, but then goes on to propose policies that are highly restrictive and inflexible. Paragraph 14.17 also states that the objective of the authority is to gradually reduce the amount of aggregates and other land-won minerals within the National Park. This fails to make any distinction between the differences in scale, local employment opportunities and potential environmental impacts that exist between a quarry producing high volumes of aggregates for the construction market and a typically low key building stone quarry. These differences are recognised in ODPM report 'Planning for the Supply of Natural Building and Roofing Stone in England and Wales' 2004, which examined the issues affecting the supply and demand of indigenous building stone in the UK. In particular, the report focussed on the problems of sourcing appropriate stone to repair historic buildings and recommended that Mineral Planning Authorities should identify and protect 'heritage quarries'. The report confirms that ninety percent of all active and intermittent building stone quarries are very small, with an output of less than 2,000m³ and often less than 100m³per year.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 257.

From: Martin Clayton, Geoplan Limited

Work Correspondence Address: Unit 7, Heritage Business Centre, , Belper Road
Derby, , DE56 1SW

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of pp Marshalls Natural Stone

Representation on **Subsection:** 14.32.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: 1. The strategies/policies/allocations in the plan fail to represent the most appropriate in all the circumstances having considered the relevant alternatives, and they are not founded on a robust and credible evidence base and

2. The plan is not reasonably flexible to enable it to deal with changing circumstances.

14.32 confirms that the National Park Authority's policy on building and roofing stone is informed by competing environmental and economic considerations and that it will only support 'local small scale proposals' under Policy MIN3. The paragraph goes on to confirm that this policy approach is designed to only support sites that meet the specific needs of the National Park. My clients object to this policy on the grounds of its inflexibility and the fact that it ignores (in policy terms) the evidence base which it subsequently sets out in later paragraphs, which confirms the demand for such materials outside of the Park. Many historic buildings and other settlements beyond the boundaries of the national park were built long before the Park came into being using stone quarried from within the Park. They have a continuing need for stone for restoration purposes in exactly the same way as buildings within the Park.

Proposed changes: None

Oral hearing requested? YES.

Details:

Representation 258.

From: Martin Clayton, Geoplan Limited

Work Correspondence Address: Unit 7, Heritage Business Centre, , Belper Road
Derby, , DE56 1SW

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of pp Marshalls Natural Stone

Representation on **Section:** MIN3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The strategies/policies/allocations in the plan fail to represent the most

appropriate in all the circumstances having considered the relevant alternatives, and they are not founded on a robust and credible evidence base and 2. The plan is not reasonably flexible to enable it to deal with changing circumstances.

MIN3 attempts to impose an artificial distinction which, in terms of protecting our built heritage, doesn't exist. The policy is also considered to be vague as no guidance is given as to the interpretation of 'small-scale workings' and as drafted the policy could conflict with anti-competition legislation. Whilst it is understandable that the Authority would wish to see most of any outputs going to uses within the Park, it should recognise this historic and long established need and insert some degree of qualification in the policy. Policy MIN3 as drafted does not give sufficient recognition to the need to protect the wider built heritage. English Heritage recognise this need and paragraph 14.44 makes reference to the ongoing national Strategic Stone Study spearheaded by English Heritage in conjunction with BGS, which seeks to identify sources of building and roofing stone. This study was set up in response to the ODPM report of 2004 referred to earlier. The SSS aims to identify sustainable stone resources for building and conservation purposes, and to provide evidence of their importance. This is intended to assist planning authorities in developing policies for safeguarding national, regional and locally significant building stone assets. Local authorities are therefore encouraged to recognise existing and potential quarry sites and include suitable policies within their development plans so that the needs of building conservation can be considered equally alongside other competing uses or designations. One of the stated aims of the Study is that the information it produces will be available to provide 'valuable support for any case presented, for example, in the form of a planning application or appeal, by concerned parties such as English Heritage, National Trust, quarry companies, stone conservationists, to local and national planning authorities, to necessitate continuity of current and future stone production. Thus helping to safeguard not only England's building stone resources and stone built heritage but also the stone industry and stone craftsmanship on which it relies'. In view of the above Policy Min3 should be amended to: 'A. Proposals will only be permitted for the small-scale working of building and roofing stone where: I. it meets a demonstrable need predominantly within the National Park, which cannot be satisfied from existing permissions inside or outside the National Park; and II. it will be predominantly confined to local use only on buildings and structures within the National Park; and III. the individual and cumulative impacts of working on the environment, amenity and communities can be appropriately mitigated.

Proposed changes: Proposed changes: <http://www.english-heritage.org.uk/professional/research/buildings/building-materials/strategic-stone-survey/>

Oral hearing requested? YES.

Details:

Representation 259.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 4.8.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Chatsworth House and garden date back to the 16th Century and have been open to visitors commercially for over 50 years. However, the tradition of welcoming visitors goes back much further; in the 1850s, more than 80,000 visitors were welcomed each summer. Chatsworth is considered as being of outstanding scenic, historic, artistic and scientific interest. Chatsworth is one of the largest employers within the National Park with the house, park, farmyard and garden providing over 175 (FTE) jobs and the wider Estate providing full and part-time work for over 550 people. This is of particular importance given the loss of larger employers within the National Park which is recognised within paragraph 4.23 of the Core Strategy.

As a result, the long-term economic and financial survival and sustainability of Chatsworth are fundamentally important to the local economy. The house, garden and farmyard receive approximately 600,000 visitors per year, and the park and outdoor events many more, bringing a significant amount of expenditure to the locality and contributing substantially to the enjoyment, understanding and appreciation of the National Park. Chatsworth has changed and evolved constantly over time which is an essential part of its history and continued appeal.

As a result of Chatsworth's local, regional and national importance, it is important that the PDNPA Core Strategy is brought forward in a way that allows the Estate's continued, sustainable existence as one of the UK's most important cultural and historic facilities and tourist destinations. Supporting the improvement of facilities at Chatsworth would be beneficial to the National Park as it is one of the few major employers and tourist facilities outside larger settlements that is served by public transport.

Although Chatsworth's dependence on tourists is recognised in paragraph 4.8 of the Core Strategy, this should be developed further to fully reflect the importance of the Estate to both the economy of the National Park through directly and indirectly supporting a large number of jobs and through its contribution to facilitating the enjoyment and understanding of the National Park for hundreds of thousands of visitors each year. Chatsworth is of significant cultural, historic, ecological and economic importance to the National Park and it is appropriate that this is specifically recognised in the Core Strategy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 260.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 4.10.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Paragraph 4.10 of the Core Strategy recognises the challenge of supporting development of appropriate visitor facilities in recognised visitor locations whilst protecting the natural landscape and encouraging alternatives to car travel.

Proposed changes: Given Chatsworth's clear status as a recognised visitor location and accessibility by means other than the car (principally bus and coach), the relevant sentence of paragraph 4.10 should be adjusted to read as follows: "The challenge here is to support the development and improvement of appropriate facilities in recognised visitor locations such as Bakewell, Castleton, the Hope Valley, Chatsworth and Dovedale..."

Oral hearing requested? NO.

Details:

Representation 261.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** figure 3.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Chatsworth support the National Park wide Spatial Objectives in respect of the recreation and tourism policies of the Core Strategy in that they seek to enable the development and improvement of sites and facilities indicated on the Key Diagram along with existing recognised visitor locations.

Proposed changes: Given Chatsworth's significance as an existing visitor location, it should be specifically identified on the Key Diagram to ensure this status is fully recognised and supported by the Spatial Objectives of the National Park. This will also allow easy recognition of the spatial area within which Chatsworth is located given its proximity to the Natural Zone.

Oral hearing requested? NO.

Details:

Representation 262.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsowth House Trust

Representation on **Subsection:** figure 5.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: Spatially specific White Peak and Derwent Valley Recreation and Tourism Spatial Objective to support the development of appropriate facilities in recognised visitor locations such Bakewell, Castleton, the Hope Valley should be adjusted to include specific reference to Chatsworth by vurtue of the Estate's position as a significant tourist attraction and one which is accessible by means other than the private car.

Chatsworth also support the Spatial Objective to safeguard the route for the Buxton to Matlock railway although believe that this reinstatement should be actively supported by the National Park Authority. This additional rail route will allow cross-park traffic to be taken off the roads and enable a greater number of existing settlements and visitor facilities within the Park to be accessed by public transport.

Oral hearing requested? NO.

Details:

Representation 263.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: Policy DS1: Development Strategy sets out the overriding principles to achieve sustainable development over the plan period. Based on the Core Strategy's Key Diagram, Chatsworth House, garden and farmyard are excluded from the Natural Zone (although are in close proximity) and thus Policy DS1 supports the principle of extensions to existing buildings and recreation and tourism at the Estate. Chatsworth support the location of the Estate outside the Natural Zone and strongly support the general presumption in favour of recreation and tourism development outside of the Natural Zone.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 264.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Section:** L3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy L3: Cultural heritage assets of archaeological, architectural, artistic or historic significance stipulates that development must "conserve and enhance" any asset of archaeological, architectural, artistic or historic significance. The conservation of heritage assets and provision of a cultural heritage facility of benefit to the nation is the fundamental purpose of Chatsworth House Trust and therefore the principle of Policy L3 is supported. However, the Policy is too prescriptive in essentially requiring all development that affects the setting of a cultural heritage asset to enhance its setting. It is possible for minor development to occur that affects the setting of a cultural heritage asset that conserves this setting but does not actively or materially enhance it.

Proposed changes: Policy LE should therefore be edjusted to read:

"Development must conserve or enhance any asset of architectural, artistic or historic significance or its setting..."

This approach would be consistent with PPS5: Planning for the historic environment which while seeking to encourage developments that enhance the setting of heritage assets, does not specifically require that they do so.

Oral hearing requested? NO.

Details:

Representation 265.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 9.41.

Legally compliant? Yes

Sound? Sound

Details: The supporting text to Policy L3 (paragraph 9.41) notes that the PDNPA welcome close working and forward planning with the owners and managers of cultural heritage assets and that this process is particularly valuable where the landholders are responsible for large numbers of cultural heritage assets. Chatsworth strongly support this approach and trust that the comments contained within these representations will be taken into account as part of this close working approach. This should, as the Core Strategy suggests, encourage the conservation of cultural heritage assets for future generations.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 266.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 10.1.

Legally compliant? Yes

Sound? Sound

Details: In relation to the recreation and tourism supporting text (from paragraph 10.1) Chatsworth support the recognition of the importance of these activities to the economy of the National Park.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 267.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 10.12.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Chatsworth also support the provisions of Paragraph 10.12 which provides support (on a National Park-wide basis) for:

- development at appropriate sites and facilities in settlements shown on the Key Diagram; and

- for the low-key development or improvement of facilities in recognised visitor locations where they enhance recreation opportunities and understanding of the National Park.

The first of the above points is supported although as suggested further above, given Chatsworth's significance as an existing visitor location, it should be specifically identified on the Key Diagram to ensure its nationally significant status as a visitor attraction and cultural heritage asset is fully recognised and supported by the Core Strategy.

In addition to this, a caveat should be added to second point to provide an indication of the nature of the phrase 'low-key'.

Proposed changes: The text should therefore be adjusted to read:

"Support low-key development or improvement of facilities in recognised visitor locations where they enhance recreation opportunities and understanding of the National Park. The appropriate scale of development and improvement will be dependent on the nature of existing facilities and their accessibility by means other than private car."

This will ensure that existing tourist and recreational facilities are able to be improved in a manner that facilitates the improved understanding and enjoyment of the National Park whilst minimising the impact on the natural environment and existing residents.

Paragraph 10.12 also provides support for the development of appropriate facilities in recognised visitor locations such as Bakewell, Castleton, the Hope Valley and Dovedale within the White Peak and Derwent Valley spatial area. As noted above, the Estate consider that Chatsworth should be added to the list to recognise its status as a significant existing visitor attraction and cultural heritage asset and to capitalise on the facility's accessibility by public transport.

Oral hearing requested? NO.

Details:

Representation 268.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street

Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 12.44.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The Chatsworth farmyard and farm shop are important facilities to the Estate and the local area providing a number of jobs and selling a range of locally produced goods. The facility serves both visitors to Chatsworth and the wider National Park and residents of the Peak District. The production of these goods locally assist in increasing resilience to climate change through the reduction of food mileage. Most people who use the farm shop either live locally or are tourists who are likely to have not visited the National Park with the principal reason of visiting the farm shop (including those visiting the House and garden). Despite the importance of the farm shop, it is essentially ancillary to the operation of the farm itself and the wider estate, providing an enhancement of the overall visitor experience and an opportunity to obtain a reminder of the visit to the National Park in a similar manner to how the gift shop operates.

The role of the farm shop is therefore supported by Paragraph 12.44 of the Core Strategy which allows retail provision which is ancillary to a business or related directly to recreation or tourism activity and Paragraph 12.46 which states that proposals for farm shops may be acceptable if the majority of goods for sale are produced on that farm. Although the principle of Paragraph 12.46 is supported, it goes further than advice contained within PPS4: Planning for Sustainable Economic Growth which states that local planning authorities should respond positively to planning applications for farm shops which meet a demand for local produce in a sustainable way and contribute to the rural economy, as long as they do not adversely affect easily accessible convenience shopping. This does not contain a requirement that the majority of goods sold from a farm shop be produced locally and although the encouragement of the sale of locally produced goods is strongly supported by Chatsworth, the requirement in the PDNPA Core Strategy for the majority of goods sold within a farm shop to be produced on that particular farm is arguably ultra vires.

Proposed changes: This requirement should therefore be removed from Paragraph 12.46.

Oral hearing requested? NO.

Details:

Representation 269.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Subsection:** 15.14.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Paragraph 15.14 sets out the key spatial outcomes that the transport Policies of the Core Strategy will achieve. Relevant to Chatsworth and across the White Peak and Derwent Valley these spatial outcomes include:

- Development will be focused on settlements that support and retain existing public transport routes; and
- The Matlock - Buxton route will be safeguarded but without accepting the principle of a new or reinstated railway.

Chatsworth support the desire to direct necessary development to locations accessible by public transport. However, the first point above does not recognise that existing facilities in locations outside of settlements may also be accessible by public transport and as such appropriate in this respect for improvement and development. As a result the text of the first point should be adjusted to read as follows:

"Development will be focused on settlements and adjacent to existing facilities that support and retain existing public transport routes."

In relation to the second point, Chatsworth support the safeguarding of the Matlock to Buxton railway route but as mentioned further above, consider that the PDNPA should actively support the reinstatement of this railway to reduce cross-park vehicular traffic and enable a greater number of existing settlements and visitor facilities within the Park to be accessed by public transport. This will also assist the modal shift to more

sustainable transport outlined in Policy T1: Reducing the general need to travel and encouraging sustainable transport of the Core Strategy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 270.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Section:** T5

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Chatsworth support the safeguarding of the Matlock to Buxton railway route but as mentioned above, consider that the PDNPA should actively support the reinstatement of this railway to reduce cross-park vehicular traffic and enable a greater number of existing settlements and visitor facilities within the Park to be accessed by public transport. This will also assist the modal shift to more sustainable transport outlined in Policy T1: Reducing the general need to travel and encouraging sustainable transport of the Core Strategy.

Proposed changes: Adjust Policy T5: Managing the demand for rail, and reuse of former railway routes to provide more pro-active support for the re-use of former railway lines to be consistent with the National Park's other strategies to increase sustainable modes of transport and reduce cross-park vehicular traffic.

Oral hearing requested? NO.

Details:

Representation 271.

From: Graham Stock, Chatsworth House Trust

Work Correspondence Address: Drivers Jonas Deloitte, , 5 New York Street
Manchester, , M1 4JB

Work email: gstock@djdeloitte.co.uk

Home phone: 0 **Work phone:** 0161 455 6579 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of Agent on behalf of Chatsworth House Trust

Representation on **Section:** T7

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Policy T7: Minimising the adverse impact of motor vehicles and managing the demand on car and coach parks sets out that modal shift to coaches from cars is desirable as is the encouragement of park and ride schemes to support main visitor areas. The main approach of this Policy is supported as is its accompanying text (Paragraph 15.41). However, the Policy, through its requirement for the review of existing traffic management schemes, does not recognise the effect that traffic management measures, including the restriction of non-residential car-parking can have on the ability of visitors to enjoy and understand the National Park and on the economy of the National Park and therefore the well-being of its residents.

Proposed changes: Point A of Policy T7 should therefore be adjusted to add the following text:

"Traffic management schemes will need to take account of the following criteria:

- The potential impact of any traffic management measures upon the ability of the public to understand and enjoy the National Park; and
- The potential impact of any traffic management measures upon the economy of the National Park and the economic well-being of its residents."

Oral hearing requested? NO.

Details:

Representation 272.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire ,
DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.5, 9.22-26.

Legally compliant? Yes

Sound? Sound

Details: Changes to the limestone dales due to colonisation by scrub, trees and coarse grass are as much a threat to landscape beauty, diversity and the ability to see geodiversity as are the changes affecting the moorlands. I have many 'then and now' photographs taken over a century which demonstrate that progress to dense cover is accelerating in some dales (with the notable exception of those including The Winnats, Cave Dale, the upper part of Cressbrook Dale, Wolfscote Dale and Thorpe Cloud where there has been continuous sheep grazing). The efforts of conservation organisations to control it are mostly restricted to only the highest quality sites. They consist of removing scrub and providing suitable grazing but they often seem not to be effective and require re-treatment.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 273.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.20 & 10.21-23.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: 4.20 and 10.21-23 deal with second and holiday homes. There is a perception that applicants are more likely to get planning permission for converting worthwhile buildings to holiday use than to affordable housing. Whilst recognising that

holiday use can result in less change to the external appearance and surroundings of traditional buildings whose character it is important to conserve, and may require fewer services, we urge that affordable housing should be the first use considered.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 274.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.26.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: 10.26 suggests that chalets might be allowed as replacements for existing static caravans. We oppose this as chalets have a more permanent appearance and would occur where houses would not be permitted.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 275.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 9.37.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: 9.37 hopes that new developments of imaginative design will be inspired. We feel that the Design Guide and 'playing safe' on behalf of architects and planners, often conspire against imaginative design.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 276.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 11

Legally compliant? Yes

Sound? Sound

Details: We support chapter 11 on climate change and sustainable building and hope that it will result in a less restrictive attitude to the installation of renewable energy schemes. We recognise that wind turbines are difficult to accept in the landscape.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 277.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 12.44.

Legally compliant? Yes

Sound? Sound

Details: We support 12.44 in retaining shops in the central area of Bakewell. Too many business premises in the centre of Bakewell have been lost to residential use. However, we query whether the policy of restricting retail use anywhere but the town centre (12.45) means that the strategy is opposed to the types of retail use which seem quite appropriate at Lumford and the station yard.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 278.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire , DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: E2C restricts business use in isolated areas. We think that some small businesses might be allowed to provide new uses for field barns, providing their character is conserved and minimal services are required. We have in mind as an example the wood sculpture studio above Barber Booth.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 279.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire ,
DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: MIN3 restricts small quarries supplying roofing slates to those needed to supply building work in the national park. This seems unduly restrictive. We have in mind the excellent work of repairing field barns in Bonsall parish, some of which are outside the National Park.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 280.

From: Mr George Challenger (no organisation)

Personal Correspondence Address: 37 Wyedale Crescent, , Bakewell, Derbyshire ,
DE45 1BE

Personal email: george.challenger@virgin.net

Home phone: 01629 812784 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T5

Legally compliant? Yes

Sound? Sound

Details: We are pleased that T5 safeguards the Matlock / Buxton rail route but doubt

whether, if rail is restored to it, it will be possible to replace the Monsal Trail with an equally commodious pedestrian, cycling and horse riding route.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 281.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 12

Legally compliant? Yes

Sound? Sound

Details: The County Council made detailed comments on the housing policies proposed in the Core Strategy Preferred Policy Approaches document. The policy approaches which were supported by the County Council relating to the scale and distribution of housing, methods for providing affordable housing, the provision of housing for different groups and the means for identifying suitable sites for housing, have virtually all been included in the Submission version, which is welcomed. The major challenge in the PDNP is to assist the delivery of affordable homes because it is an urgent priority for communities and housing authorities. Development sites are scarce but the PDNPA believes that providing homes for local people can be achieved in alternative ways, such as buying houses as they become available on the open market, and permitting conversion of existing buildings to affordable rather than open market homes. Its housing policy stance is supported.

The PDNPA highlights the challenges of providing social care for an increasing elderly population and providing other services to a relatively small and widely scattered population. There is a culture of good quality voluntary service provision, including community transport, which is valued in this area. The PDNPA's recognition of the need to encourage development in places that will make it easier for service providers rather than harder is welcomed.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 282.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 13

Legally compliant? Yes

Sound? Sound

Details: The Submission Version has identified that self employment and home working levels are relatively high across the PDNP. The PDNPA considers that future improvements in broadband connectivity and reduced cost of internet access, and changes in peoples' work patterns, could make home working more realistic for more people, and further reduce residents' need to commute to work.

Whilst the Submission version of the Core Strategy supports small businesses and home working (section 13.14 page 93), because of its designation as a National Park there is understandable reluctance in allowing the installation of more communication masts, which would impede the installation of extensive communications services. In this regard, it would be helpful for supplementary planning guidance to provide more detailed guidance, specifically relating to the requirement in any new development to put fibre optic cables into the site, alongside other services such as electricity, gas and water.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 283.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 9

Legally compliant? Yes

Sound? Sound

Details: The Submission version is exemplar in demonstrating how landscape character areas can be used as a framework for spatial planning considerations.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 284.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 14

Legally compliant? Yes

Sound? Sound

Details: The Foreword reaffirms the PDNPA's commitment to seeking a progressive reduction in the extraction of minerals within the National Park whilst balancing the relevant economic, social, community and environmental considerations that apply. Derbyshire County Council has worked closely with the PDNPA and will continue to do so in developing policies and proposals which have cross boundary implications. The preparation of a Statement of Intent is being considered that would set out the two authorities' approach to collaborative working.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 285.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 15

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The Foreword of the Submission version states that "The policy for creating new roads is more demanding than before, and our resolve to resist the pressures to accommodate new car parks is undiminished. On the other hand, our policies encourage sustainable modes of travel." The inclusion of the reference to encouraging sustainable modes of travel, as requested, is welcomed.

The Peak Park has 5 of the 10 most dangerous roads in the country running into it, according to the European Road assessment Programme, principally due to the proportionally larger representation of motor cycle casualties. A significant number of motorcyclists ride through the PDNP because of the character of the roads and are unlikely to be diverted away. The problems associated with this essentially leisure activity should be recognised more strongly in the Submission version and a commitment given to seek to work with partners to reduce the dangers.

In addition, the PDNPA remains concerned about the damage caused to walls and buildings by excessive vehicle use and degradation of air quality from vehicle emissions and accompanying loss of tranquility. The PDNPA sees the challenge as being to discourage traffic that has no essential need to be in the PDNP and find ways to maximise the quality of the road and rail network for residents, visitors and PDNP based businesses.

In addressing this issue, Policy T1 (page 115) therefore states that "Unnecessary traffic will be deterred". Whilst this might be a laudable aim, it is not practical. Paragraph 15.16 refers to traffic "beyond which is necessary for the needs of local

residents, businesses and visitors." How will this traffic be identified, and what methods will be used to deter this traffic? If these questions cannot be answered, and there has been no consultation with the Highway Authority on this, then the statement should be removed.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 286.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 15

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is requested that the County Council's Rights of Way Improvement Plan and West Derbyshire and High Peak Greenway Strategies, which form part of it, are referred to in the Submission Version because they cut across the document's closely related themes on leisure and recreation, access, sustainable travel, healthy lifestyles, social inclusion, conservation, regeneration and development of green infrastructure.

Although several trails are mentioned, the Submission Version does not identify the strategic network of routes for walking, cycling and horse riding that cross the PDNP. Neither does it recognise many of the aims/proposed actions set out in the Rights of Way Improvement Plan to deliver/contribute towards a sustainable transport system for both visitors and local residents alike, whether for leisure or access to employment, schools and other essential services. It is not just about linking gaps in the rights of way network but also developing new Greenways, which can also be achieved through planning gain.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 287.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 15

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: In relation to minerals, it is requested that "appropriate site restoration" is expanded to refer to the opportunity to improve access and recreation facilities, eg provide new multi-user routes or upgrade existing ones to cater for horse riders and cyclists.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 288.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 4.29.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: In paragraph 4.29, cycling should be mentioned as a means of accessing work/essential services.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 289.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Appendix 3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is suggested that Appendix 3 Glossary and Abbreviations includes the definition of a Greenway. There is one reference to green way in paragraph 15.15. The definition of Highway Authority needs to be expanded to include the responsibility for maintaining public rights of way and keeping them free from obstruction.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 290.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** figure 3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: Page 28 - Transport policies will seek to ensure: the 8th bullet point should be amended to read "Gaps in the rights of way network will be filled."

Oral hearing requested? NO.

Details:

Representation 291.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.14.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The points made in this paragraph relate to developments and off road motorised recreation. These are not connected and would be better made separately.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 292.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.4.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: n/a

Proposed changes: Footnote 64, Planning Policy Statement 13: Transport, should read Planning Policy Guidance 13: Transport.

Oral hearing requested? NO.

Details:

Representation 293.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 15.20.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: With regard to paragraph 15.20 (page 115), the PDNPA might wish to develop its own hierarchy of roads, but without any discussion with the Highways Authority, such a list would have no weight, and may conflict with the County Council's hierarchy.

Proposed changes: This statement should reflect the need for prior consultation with the Highway Authority in drawing up the hierarchy.

Oral hearing requested? NO.

Details:

Representation 294.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T2C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The PDNPA is not the Highway Authority, and therefore cannot refuse a new road scheme.

Proposed changes: The word "permitted" should be replaced with "supported".

Oral hearing requested? NO.

Details:

Representation 295.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T3A

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Again, the PDNPA is not the Highway Authority, and should not say that any transport infrastructure will be carefully designed.

Proposed changes: PDNPA can say that it should be carefully designed, and that this would be done in consultation with the relevant Highway Authority.

Oral hearing requested? NO.

Details:

Representation 296.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T7C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The phrase "environmental capacity" is used in relation to car and coach parking. This could mean different things to different people, depending on their background, knowledge and experience.

Proposed changes: There should either be a clear definition in the glossary, or a different expression should be used.

Oral hearing requested? NO.

Details:

Representation 297.

From: Steve Buffery, Derbyshire County Council

Work Correspondence Address: County Hall, , Matlock, Derbyshire , DE4 3AG

Work email: Steve.Buffery@derbyshire.gov.uk

Home phone: 0 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Delivery Plan

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Delivery Plan, Policies T1 and T2 (pages 59 - 60) refer to an estimated delivery for average annual daily traffic flows (AADT) of "No >2% increase pa." This is not a figure that the Highway Authority is aware of, and not one to which it would want to be committed.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 298.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Core Strategy

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: You might like to reflect on the length of the Strategy which now extends to nearly 150 pages. It is noteworthy that the new Government has continued to emphasise brevity and conciseness in plan preparation and you might like to reflect on how this plan might be edited so that the main policy emphasis is retained but that some of the supporting text is reduced in length. A case in point is the oft quoted 'Sandford principle' which is mentioned throughout the plan but could be subject to more cross referencing. We therefore remain of the view that there is an excessive amount of detail which goes well beyond what is required in a Core Strategy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 299.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 10

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We welcome the acknowledgement of the role of tourism in supporting the economy (in paragraph 4.8 and elsewhere). However, while we would accept that tourism may bring disbenefits at some locations as well as benefits, it is nevertheless important to recognise that it brings benefits even in those locations which may also experience problems. Castleton is a notable example as it is a commercial centre which is also the centre of an area that is rich in tourist attractions which means that the key challenge is to manage the resource in a sustainable way.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 300.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 10.2.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: In response to the statement in paragraph 10.2 we would restate our previously expressed view that the protection of the special qualities of the Park can still be part of a broader more integrated approach that recognises the importance of sustainable development. We would contend that sustainable economic development can be part of this approach.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 301.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 12

Legally compliant? Yes

Sound? Sound

Details: We welcome the explicit recognition given to the importance of addressing affordable housing needs and we support the intention to focus development on the needs of local communities. This is also in tune with the new Government's emphasis on localism. Underpinning this statement is a need to ensure that local communities are fully engaged in helping to shape planning policy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 302.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 13

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We welcome the greater recognition of the importance of economic development and the recasting of the former 'Economy' chapter. Local communities require employment opportunities and the economy can only be sustained by supporting existing as well as providing new opportunities for business to establish and grow. The statement in paragraph 4.24 does not sufficiently acknowledge the benefits of business development. The nature of the planning system is to seek to manage development and it is likely to be the case that there will be appropriate locations where new businesses could be established with no harm to the attractive characteristics of the Peak Park but with significant benefits to the local economy and for sustaining communities. We would therefore advocate a more sensitive approach which recognises the benefits of employment creation as a means of diversifying the economy as a suitable response to "the persistent problem of lower than average wages and an overdependence on seasonal work".

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 303.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 13.6.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The reference in paragraph 13.6 restates the earlier comment in 4.24 that new jobs created will not necessarily be taken up by people who live locally. While this is true, it also needs to be considered that if no additional jobs are available then local people will continue to face long journeys to work which will add to commuting pressures and diminish community life.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 304.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E1

Legally compliant? Yes

Sound? Sound

Details: Policy E1 'Business development in towns and villages' is a helpful new policy which we would support. Some minor changes to wording may however be required,

for example to elaborate the policy on home working. Home working (particularly if served by high quality ICT) may provide economic and sustainability benefits without impacting on the landscape or necessarily requiring any change to the external appearance of buildings.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 305.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We also welcome some aspects of new policy E2 'Business in the Countryside' which is framed more appropriately than the former policy which we commented on in the Preferred Options. However, we would seriously question the appropriateness of some of the negative statements particularly that "Beyond this policy and policies RT1, RT2 and RT3 there is no scope for setting up new businesses in the countryside". Furthermore scale, location and type of employment development are key criteria in considering any application and should be reflected in this policy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 306.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 11

Legally compliant? Yes

Sound? Sound

Details: The drafting changes to the chapter on Climate Change and Renewables have strengthened the policy guidance, for example the redrafted policy on Low carbon and Renewable Energy Development is a significant improvement on the previous policy in the Preferred Options which was overly focussed on wind turbines. The new policy also provides more scope for the development of community renewables.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 307.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 15

Legally compliant? Yes

Sound? Sound

Details: Maintaining adequate public transport services to provide reasonable levels of accessibility to employment and services is likely to be increasingly challenging as a result of pressure on local authority spending. We therefore welcome the acknowledgement that home working can help to reduce commuting, but this may require a stronger policy in the Core Strategy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 308.

From: Geoffrey Brown, emda

Work Correspondence Address: Apex Court, , City Link Nottingham, , NG2 4LA

Work email: geoffreybrown@emd.org.uk

Home phone: 0 **Work phone:** 0115 9888433 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 14

Legally compliant? Yes

Sound? Sound

Details: In our previous comments we drew attention to what we considered to an overly prescriptive and negative wording concerning fluorspar extraction. We questioned whether the desired 'transition' from opencast to underground mining for all fluorspar extraction was deliverable in commercial or technical terms, and called on the PDNPA to revisit the proposed approach with input from the private sector, as well as the British Geological Survey who we understand updated their advice note in fluorspar more recently than 2004. We now note that reference is made to discussions with the main fluorspar operator as well as updated information from the British Geological Survey. In view of the national significance of this resource, securing an appropriate supply of fluorspar is likely to remain a key issue and it will therefore be important to continue a dialogue with private sector interests to ensure that emerging policy is evidence based and has regards to commercial considerations and the strategic importance of this resource.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 309.

From: Hannah Morrison, Kirklees Council

Work Correspondence Address: Strategic Investment Service, PO Box B93, Civic Centre III Huddersfield, , HD1 2JR

Work email: hannah.morrison@kirklees.gov.uk

Home phone: 0 **Work phone:** 01484 223208 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: An overall development Strategy is set out for the Peak Park (policy DS1). The majority (80 to 90%) of new housing will be directed into named settlements. Holme is a named settlement where new build development will be acceptable for affordable housing, community facilities and small scale retail and business premises.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 310.

From: Hannah Morrison, Kirklees Council

Work Correspondence Address: Strategic Investment Service, PO Box B93, Civic Centre III Huddersfield, , HD1 2JR

Work email: hannah.morrison@kirklees.gov.uk

Home phone: 0 **Work phone:** 01484 223208 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 8

Legally compliant? Yes

Sound? Sound

Details: The Settlement Strategy has been omitted from this document. The Preferred Options defined Holme village as a 'B' Settlement, where small scale development of no more than 1 or 2 dwellings and appropriate infrastructure would be permitted. The approach towards new housing development is now set out in the Homes, Shops and Community Facilities chapter, as described below.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 311.

From: Hannah Morrison, Kirklees Council

Work Correspondence Address: Strategic Investment Service, PO Box B93, Civic Centre III Huddersfield, , HD1 2JR

Work email: hannah.morrison@kirklees.gov.uk

Home phone: 0 **Work phone:** 01484 223208 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 9

Legally compliant? Yes

Sound? Sound

Details: The area of Peak Park within Kirklees is still defined as Dark Peak and Moorland Fringe and sets out an overall strategy for the Dark Peak, which is unchanged. Most of Kirklees also lies within the Natural Zone where other than in exceptional circumstances proposals for development will not be permitted. The Natural Zone is strategically defined and the boundary is open to interpretation. We previously supported this approach to development and landscape character, it will help to ensure that where development is permitted it can be achieved with proper consideration of the landscape, ensuring that characteristics we value will be conserved and enhanced.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 312.

From: Hannah Morrison, Kirklees Council

Work Correspondence Address: Strategic Investment Service, PO Box B93, Civic Centre III Huddersfield, , HD1 2JR

Work email: hannah.morrison@kirklees.gov.uk

Home phone: 0 **Work phone:** 01484 223208 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Sound

Details: On the matter of low carbon and renewable energy development (Policy CC2) a range of forms is supported in the right locations. Policy CC2 now states that wind turbines OTHER THAN SMALL SCALE in height are unlikely to be acceptable. Small scale is defined as up to 15m in height to blade tip and having an energy output of 6kW to 50kW. As most of Kirklees lie within the Natural Zone, wind turbine development within this zone, of any number or size will not be permitted. We previously required clarity on this policy; it is now clear that within the areas of Kirklees allocated as Natural Zone wind turbines will not be permitted. In other Dark Peak areas small scale turbines may be acceptable.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 313.

From: Hannah Morrison, Kirklees Council

Work Correspondence Address: Strategic Investment Service, PO Box B93, Civic Centre III Huddersfield, , HD1 2JR

Work email: hannah.morrison@kirklees.gov.uk

Home phone: 0 **Work phone:** 01484 223208 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 12

Legally compliant? Yes

Sound? Sound

Details: Provision for new homes will be accepted only where it addresses local needs or for agricultural workers. Affordable housing will have to be justified by evidence of local need, including provision for key workers, and secured by occupancy restrictions applied through legal agreements or arrangements with housing associations. This approach applied to Holme village will help provide housing directed at households with a requirement to stay or live in the village and priced at a level which is affordable.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 314.

From: Hannah Morrison, Kirklees Council

Work Correspondence Address: Strategic Investment Service, PO Box B93, Civic Centre III Huddersfield, , HD1 2JR

Work email: hannah.morrison@kirklees.gov.uk

Home phone: 0 **Work phone:** 01484 223208 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** T6

Legally compliant? Yes

Sound? Sound

Details: Policy T6 now identifies that Huddersfield Narrow Canal will be protected as an inland waterway, to be used as a recreational route. This is consistent with the Kirklees approach in the Unitary Development Plan.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 315.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire , DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:** 07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Ref paragraph 11.8. PPS1 has not been properly taken into account in the PDNP LDF. PPS1 requires that policies contribute to reduction on carbon emissions, and that developments that make this contribution are allowed except under exceptional circumstances. (including therefore low carbon and renewable sources of energy) The National Park does have sites which are exceptional - eg in the Natural Zone, but also has areas where suitable development of renewable energy sources would not significantly change the appreciation of the landscape character.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 316.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire , DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:** 07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.9.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Wording should be 'appropriate' not 'small scale' as currently used in the PDNP words in the climate change Action Plan. Small is not easily defined and is relative to scale.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 318.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmail.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1D

Legally compliant? Yes

Sound? Sound

Details: CC1 Clause D supported.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 319.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmail.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1G

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Clause G is superfluous. 10,000 square feet is too big. It waters the policy down, making the policy too timid, standards could be set a long way from highest possible. As a precedent: the Lake District National Park Authority lowered the threshold to 20,000 square feet (2 houses approx).

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 320.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Comment In addition there is virtually no mitigation - real mitigation comes with renewables, not just insulation. We see a need for a parent phrase in CC1 to enable CC2 and beyond.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 324.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy does not take into account the fact that 'waste' can be a valuable resource for powering renewable energy developments. For example, anaerobic digestion can be powered by organic waste, which otherwise may be simply composted and not subjected to energy recovery processes. We feel that it is not appropriate to say that there should be no new waste disposal in the Park - this forces transportation of waste out of the park which might be dealt with better in the Park.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 325.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3B

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: We would like to replace B with a positive statement on bio waste as a source of energy and soil conditioner.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 326.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3C

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Subset 3 - should allow clusters of communities to develop waste management/energy production (e.g. Anaerobic Digestion).

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 327.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmail.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4A

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: 'On farm' is inappropriate - needs to refer to 'on farm and wider community'
- includes managing all waste in a coherent area/valley including sewage sludge, food waste and farm waste. AD is inefficient when limited to manure and slurry.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 328.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

Home phone: 01298 74241 **Work phone:** 01629 821924 (ext. 0) **Mobile:**
07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4B

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This clause should be rewritten far more helpfully - to allow and encourage the local recycling of 'waste' into energy and compost by partnerships of local farms and communities. These partnerships are critical to the viability of AD and should be encouraged.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 329.

From: Mr Joe Dugdale, PDSEG / Rural Action Derbyshire

Work Correspondence Address: RAD, /DRCC, Church St Wirksworth, Derbyshire ,
DE4 4EY

Personal email: haskerjd51@hotmailo.com

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07743850127

Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC4

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: This policy in combination with CC3 is an effective barrier to the majority of the potential application of AD for energy generation within the National Park.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 330.

From: Mr Andy Hall, Forestry Commission

Work Correspondence Address: Forestry Enterprise, East Midlands Region,
Edwinstowe Mansfield, Nottinghamshire , NG21 9JL

Work email: andy.hall@forestry.gsi.gov.uk

Home phone: 0 **Work phone:** 01623 821436 (ext. 0) **Mobile:** 07771 833080

Processed by Officer on behalf of representor - organisation

Representation on **Section:** Chapter 11

Legally compliant? Yes

Sound? Sound

Details: Peatlands are the single largest carbon reserve in the UK. With around 3 billion tonnes of carbon more carbon is stored in UK peat than in the forest of Britain and France combined. The entire UK woodland estate contains only around 150 million tonnes of carbon in comparison. Between 40-50% of UK soil carbon is stored in 8% of its land area. This is equivalent to 20 years of UK CO₂ output. The Peak District moorlands store between and 20 million tonnes of carbon. Peat bogs can actively sequester carbon. Scientists from Durham estimate that all of the peat lands in England and Wales could absorb around 400,000 tonnes of carbon a year if in pristine condition. The Peak District moorlands have the potential to sequester up to 13,000 tonnes of carbon per year (Peak District Moorland Carbon Flux – Moors for the Future Research Note 12 , 2007).

And given this statement (made in the refined options document as opposed to this document) I'd like you to consider the following;

That the peatland vs. forest comparison (Britain and France) does not include forest soils. Also, the 3 billion tonnes carbon in peat is about 11 billion tonnes CO₂ (unit incompatibility). It is estimated that there could be as much as 4 billion tonnes CO₂ in forest soils but this may be an overestimate (have seen other figures ~2 billion tCO₂). It could also be argued that peak district peats will never return to pristine condition, particularly in the light of climate change; that said reducing emissions from peat

would be a great outcome, but returning to GHG sinks (including CH4 emissions) achieving the figures quoted would seem unlikely?

So would like to suggest that it might be pertinent to await publication of the forest carbon review (likely within the next couple of months).

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 331.

From: Ken Fawcett (no organisation)

Personal Correspondence Address: 14 Edge View Drive, Great Longstone, Bakewell, Derbyshire , DE451PB

Personal email: ken.fawcett147@btinternet.com

Home phone: 01629 640424 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: Demand- This should take into account the ability of the "local" area to provide / sustain employment, where new property is being sought by those in employment. The recent government statements regarding economic mobility linked to subsidised housing is relevant. Clearly, meeting the demand for affordable housing to be built in the Peak Park, and then having residents working "away" produces a dormitory effect and carries negative travel & wider environmental and community implications.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 332.

From: Ken Fawcett (no organisation)

Personal Correspondence Address: 14 Edge View Drive, Great Longstone,
Bakewell, Derbyshire , DE451PB

Personal email: ken.fawcett147@btinternet.com

Home phone: 01629 640424 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: Suitable Site- The definition / application of "on the edge of a LP Settlement", should be reviewed, with a much more rigorous top priority being given to land, especially brown, within the limits / confines of a settlement. Indeed, such potential areas of land "approved" for consideration for more affordable housing should / must be known in advance. Any local search would then show this up accordingly and property owners / prospective purchasers would have a clear advance knowledge of such zoning. The temptation to look at the cheapest / easiest sites to develop for affordable housing, must be safeguarded against, and only considered when all the other possible locations have been assessed on planning grounds and local considerations. A clearer definition would be "within" or "outside".

Defined Housing Zones- Where it is considered necessary to look at land "outside" the existing zones for development or beyond / outside the settlement, especially with areas having clearly defined and long established boundaries, full regard must be given to the impact on local properties and crucially the requirements of the affected owners, who with no prior knowledge of an effective planning rezoning / change of status can find themselves facing developments, which they had every reason to believe would not be possible and indeed fully safeguarded by PDNPA. This would eliminate the situation we are now facing locally, with a long established(40yrs) and clearly defined boundary (stone walls & trees), and a site outside the limit of the settlement on which NO private development whatsoever will be approved(confirmed by PDNPA) is now being considered for an affordable housing development. The existing position & timescale which allows a one off application for affordable housing to break existing zones, with no advance early warning / consultation with affected owners or a full public consultation on the basic change of status does not reflect the best of democracy or inclusiveness. I am sure you will appreciate that the potential negative amenity, privacy and effect on property values with such a change of land status are a real concern.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation 333.

From: Ken Fawcett (no organisation)

Personal Correspondence Address: 14 Edge View Drive, Great Longstone,
Bakewell, Derbyshire , DE451PB

Personal email: ken.fawcett147@btinternet.com

Home phone: 01629 640424 **Work phone:** 0 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - individual

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Sound

Details: Design- The very nature of more affordable housing, will produce a relatively / very high density developments. Such design and location should / must fully reflect the immediately adjoining property design / density / layout so as to be completely complementary. Although SPP C2.3,14 are available, the specific addition of complementary housing density, design, and a rigorous implementation is required to ensure that a fully complementary and non harmful design in all respects is achieved.

Proposed changes: None

Oral hearing requested? NO.

Details:

Details:

Representation CS336.

From: Mr. Alan Hubbard, National Trust

Work Correspondence Address: National Trust, Midlands Office (East), Clumber
Park Stableyard Worksop, Nottinghamshire , S80 3BE

Work email: alan.hubbard@nationaltrust.org.uk

Home phone: 0161 761 5834 **Work phone:** 0161 925 4330 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 3,7.

Legally compliant? Yes

Sound? Sound

Details: The Vision has been the subject of detailed review and various iterations over a number of years as part of the Peak District Management Plan. It is agreed that it is helpful to have communal Vision, as, for example, has been found to be the case in the Lake District National Park. Furthermore it is agreed that the established Vision is appropriate to the particular characteristics and challenges within the Peak District. National Trust is pleased to support the Vision.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS337.

From: Mr. Alan Hubbard, National Trust

Work Correspondence Address: National Trust, Midlands Office (East), Clumber Park Stableyard Worksop, Nottinghamshire , S80 3BE

Work email: alan.hubbard@nationaltrust.org.uk

Home phone: 0161 761 5834 **Work phone:** 0161 925 4330 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 5.3.

Legally compliant? Yes

Sound? Sound

Details: These are appropriate and well focussed having regard to the Park Authority's Statutory Purposes and the planning issues that it needs to address.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS338.

From: Mr. Alan Hubbard, National Trust

Work Correspondence Address: National Trust, Midlands Office (East), Clumber Park Stableyard Worksop, Nottinghamshire , S80 3BE

Work email: alan.hubbard@nationaltrust.org.uk

Home phone: 0161 761 5834 **Work phone:** 0161 925 4330 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Figures 3, 4, 5 and 6.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: not justified and not effective as well as not consistent with national policy.

Figure 3 – This is a new Figure; its introduction is helpful and welcomed. The error in the second bullet point under “Minerals” is noted – the Suggested Change Ref 100.3 is necessary, agreed and supported.

Figure 4 – The nature of this Figure (and Figs. 5 and 6) has changed in the Submission version of the Core Strategy. This is not objected to per se, indeed it attempts to tie back the key characteristics of the sub-areas to the Spatial Outcomes. However, it is considered that a) the educational/improving understanding dimension has largely been lost, and b) the introduction of some key locations into the text needs review/justification. Specifically: ? The role of Moors for the Future Project partnership is now in its eighth year and is a key project across much of the Dark Peak and Moorland Fringe, with its aims including conservation through moorland restoration and improved education and understanding through its learning programme – in particular at the Moors for the Future base at Longshaw which, for example, has played key role in raising awareness about the Moors, especially for the thousands of school children who have had studied there (<http://www.moorsforthefuture.org.uk/>). ? Allied to the above point is the importance of Longshaw more widely as a key visitor centre within an upland location in the National Park. It is an important facility, based around a large complex that was formerly a Shooting Lodge, providing a range of visitor facilities including a year round events programme, which despite its ‘wild’ location is readily accessible by a range of modes of transport.

Figure 5 – Generally agreed, although it is arguable that Ilam should be identified as a recognised visitor location given the range of facilities and attractions to be found there.

Figure 6 – Fails to identify the important role of Lyme Park to this part of Peak District. Its location on the western edge of the National Park close to the south eastern fringe of Greater Manchester, and well served by public transport, means that it acts as a key destination and takes pressure off the more remote and less well serviced parts of the Park. Currently in excess of 400,000 visitors a year enjoy a range of activities, including ready access to open moorland.

Proposed changes: Figure 4 – “Landscape Conservation Policies” first bullet point should read: ? Protect the remoteness, wildness, open character and tranquillity of the Dark Peak landscapes, including through the continued promotion of the Moors for the Future project.

“Recreation and Tourism Policies” first bullet point should read: ? Enable development of appropriate sites and facilities at key locations such as the Hope Valley, Stanage Edge, the Upper Derwent, Langsett and Longshaw.

Figure 6 - “Recreation and Tourism Policies” add a new bullet point to read: ? Enable development of appropriate facilities at key visitor locations such as Lyme Park.

(Related, complementary, changes are also needed at Para 10.12 – pages 60-61.)

Oral hearing requested? YES.

Details: National Trust is a key partner across large parts of the Peak District National Park and is renowned for its extensive conservation work, including innovative projects such as those associated with Moors for the Future. Furthermore it looks after and promotes a number of key visitor destinations, including the Longshaw Estate and Lyme Park which have played, and will continue to play, a very important part in visitor enjoyment, learning and understanding about the valued characteristics of the Peak District. The requested changes directly relate to these interests.

Representation CS339.

From: Mr. Alan Hubbard, National Trust

Work Correspondence Address: National Trust, Midlands Office (East), Clumber Park Stableyard Worksop, Nottinghamshire , S80 3BE

Work email: alan.hubbard@nationaltrust.org.uk

Home phone: 0161 761 5834 **Work phone:** 0161 925 4330 (ext. 0) **Mobile:** 0

Processed by Officer on behalf of representor - organisation

Representation on **Section:** DS1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: The National Trust stated that the policy is not justified, and not effective as well as being inconsistent with national policy. Earlier inputs to the Core Strategy by the Trust have emphasised: ? The need for a robust approach to be taken to the limits to be set for new development – in particular if individual settlement boundaries are not going to be defined (apart from the Bakewell exception). ? Support for the categorisation of settlements and general intent, but the need for more work to add some precision to what might be achievable in individual settlements whether in terms of residential, commercial or mixed use development. The Trust considered that pending such detailed work it was premature to rule out the establishment of settlement boundaries for other settlements. It was noted that a previous option (S1.4) was discarded on the basis that it did not provide sufficient guidance on what development could happen and where (a view shared by the Trust in its response); however, it is not clear that the present approach is sufficiently detailed and robust either. ? The Trust was also concerned that detailed studies of housing need would be undertaken as part of a specific planning application – i.e. not be a plan-led approach and one with inherent dangers. ? The preceding points were reinforced by the contrasts between the settlements within the main Categories; for example, the scope for new development (albeit still limited) is clearly much greater in a settlement the size of Hathersage than in Little Hayfield or Wetton.

Current Concerns The Trust is concerned about the location of this key policy, that sets the overall spatial context, in the document; in particular as it is outwith the Core Policies and, for example, the approach to ‘sensitively managed change in the National Park’ as set out at paras 7.1 to 7.4, and its Valued Characteristics (Policy L1 and para 9.15); and outwith the discussion of the Sandford principle and the National Planning Context in paragraphs 8.1 to 8.21, including Policy GSP1. In a National Park environment these are fundamental considerations if the statutory purposes are to be fulfilled. It is therefore considered that it is appropriate that they should follow on after the Vision and Objectives, and precede the Development Strategy. For example, para 7.1 commences “The policies in this Core Strategy...” and clearly is intended to set the scene for all Policies in the document, including Policy DS1. Furthermore it appears to National Trust that Policy DS1 is a “General Spatial Policy” and accordingly should be subsumed within Section 8 of the Core Strategy.

Having regard to the above point the text in the first paragraph of Policy DS1, last sentence, should use capitals for Core Policies. The word ‘specific’ which precedes Core Policies appears to be redundant.

Third paragraph: this appears to contain superfluous wording and could more clearly be worded as: "In all settlements and in the countryside Outside the Natural Zone..."

In the fourth paragraph the wording does not reflect the justification as set out in the preceding text at 5.18 to 5.28. In particular it does not place any "character test" on new development where the National Park Authority considers that capacity exists, including in the case of large scale development (e.g. three or more new homes [an important definition that arguably should be set out in the Policy rather than solely in the supporting text]).

(Continue on a separate sheet /expand box if necessary) 7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

First paragraph, second sentence, amend to read: "These principles must be considered in relation to the specific Core Policies in this plan and the subsequent Development Management Policies DPD."

Third paragraph, amend to read: "In all settlements and in the countryside Outside the Natural Zone..."

Amend the fourth paragraph, second sentence to read: "In or on the edge of these settlements new development will be acceptable for small scale (i.e. up to two new homes) affordable housing, community facilities and small scale retail and business premises.

Amend the fifth paragraph to read: "Any proposals for additional development beyond that set out above in a named settlement, will require an assessment of site alternatives will be required to demonstrate the extent of development which can be permitted.

(Continue on a separate sheet /expand box if necessary)

Accordingly the strategic approach to the location and scale of new development is of particular interest to the Trust and the well-being of the property that it owns and manages on behalf of the nation.

Proposed changes: Policy DS1 which is a key policy which sets out the spatial development approach across the National Park. National Trust has wide-ranging property interests across the National Park, including in and/or around 15 of the named settlements, i.e. Alstonefield, Biggin, Castleton, Curbar, Earl Sterndale, Edale, Grindleford, Grindon, Hathersage, Hayfield, Little Hayfield, Monyash, Thorpe, Wetton and Winster. Its interests are not limited to land, they also include a range of buildings, amongst them tenanted farmsteads, dwellings and commercial premises.

Accordingly the strategic approach to the location and scale of new development is of particular interest to the Trust and the well-being of the property that it owns and manages on behalf of the nation

Oral hearing requested? YES.

Details:

Representation CS340.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 7.2.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Not justified and not effective. As worded the final sentence can be interpreted as saying that large scale development (i.e. in residential terms three or more homes) does not need to address sustainable development and climate change issues. It is assumed that this was not the intention when this was drafted. An alternative form of wording is suggested below.

Proposed changes: Amend the last part of the final sentence of para 7.2 to read:

"....National Parks, it also needs to show how small-scale sensitive development can sensitively address these other national and global drivers."

Oral hearing requested? NO.

Details:

Representation CS341.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP1

Legally compliant? Yes

Sound? Sound

Details: Although extensively re-worded from the previous iteration, mainly as a result of amalgamation with other Policies, the proposed Policy GSP1 is entirely apt in the context of the Peak District National Park, its statutory purposes and national planning policy guidance – in particular as set out in PPS1. Accordingly the Policy is supported.

Although there are multiple references to “valued characteristics” earlier in the document this is the first place where the phrase appears in a Policy. It also then appears in Policy GSP2 (A), (D) and (E), and GSP3. At present the phrase is not defined until para 9.15 on page 51. It would assist legibility of the document if in Policy GSP1 (or one the first occurrence at para 3.5) if there was cross-reference or footnote with the words “as defined at paragraph 9.15) so that it was apparent that this phrase has particular meaning. Whilst those familiar with the previous Structure Plan will be aware of the detailed definition of the phrase it will not be apparent to those researching the Peak District Development Plan for the first time.

Proposed changes: Add a footnote to “valued characteristics” in Section E of the Policy, with the following related text:

“The “valued characteristics” of the Peak District National Park are set out at paragraph 9.15.”

Oral hearing requested? NO.

Details:

Representation CS342.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** GSP2

Legally compliant? Yes

Sound? Sound

Details: It is important that steps are taken to secure enhancement within the National Park, in particular where there are degraded landscapes and/or vernacular buildings that are either unused or have been poorly converted in the past. National Trust is supportive of the approach adopted in this Policy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS343.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** L1

Legally compliant? Yes

Sound? Sound

Details: An overall approach based on landscape character is fundamental to the proper planning of a National Park. The identification of a 'Natural Zone' has been a key element of previous Development Plans and overall, as an owner and manager of

a significant part of this Zone the National Trust remains supportive of this approach, including the 'exceptional circumstances' test.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS344.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** L2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: It is not effective. As worded Section A of the Policy suggests that there is a choice of conserving and enhancing either a site, or its setting...whereas it is assumed that the intention is to require both. The 'or' should be replaced with 'and'.

Furthermore as the plural is used in the first part of the sentence the final word should be settings.

A similar consideration applies to Section C of the Policy (but not to Sections B or D as these are worded in the negative – 'will not be permitted').

Proposed changes: Amend 'A' to read:

"Development must conserve and enhance any sites, features or species of biodiversity importance and their settings." Amend 'C' to read:

"Development must conserve and enhance any sites or features of geodiversity importance and their settings."

Oral hearing requested? NO.

Details:

Representation CS345.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** L3

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: not effective The simplification and amalgamation of the Policies on cultural heritage has removed several detailed concerns about the document at Preferred Options stage. However, in doing so the Policy is arguably now at its barest essentials and adds little to current national policy. (It is noted that current national policy for the historic environment was only recently up-dated but nonetheless is due to be reviewed and potentially slimmed down in the foreseeable future – i.e. there is still merit in the Policy as advanced here.) Overall the Policy would be improved by direct reference to some of the key matters that need to be addressed from a Peak District perspective to safeguard its distinctive qualities, including encouragement for the re-use of buildings that make a positive contribution to its landscapes and the utilisation of local building techniques.

The distinctive cultural heritage features of the Peak District do raise several issues that need to be addressed, e.g. the range of functionally obsolete vernacular agricultural buildings, including field barns, the challenges facing the major Estates in finding ways of maintaining exceptional and distinctive designed parks/gardens and their associated buildings and structures, and the loss of drystone walls in the White Peak. Some of these aspects can be tied back to Actions 5.1, 5.2 and 5.3 of the Landscape Strategy and Action Plan 2009.

There is also a similar issue with the treatment of 'settings' in Policy L3 as in L2. In addition in this case the form of wording is such that it suggests that the settings themselves are also, or need to be, formal designated, whereas in practice this is not the case (except for World Heritage Sites and in Wales). An alternative form of words is suggested below.

Proposed changes: Amend L3 to read: A. Development must conserve and enhance any asset of archaeological, architectural, artistic or historic significance or its setting that has statutory designation or registration or is of other international, national, regional or local significance, including their wider settings. B. Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any cultural heritage asset of archaeological, architectural, artistic or historic significance or its setting that has statutory designation or is of other international, national, regional or local significance, including their wider settings.

Supplement the Policy wording to include encouragement for the reuse of buildings of archaeological and historic importance that make a positive contribution to the landscape character or historic environment of the Peak District National Park, and require works to heritage assets to employ, where appropriate, local crafts, skills and traditions including traditional building techniques and materials

Oral hearing requested? YES.

Details:

Representation CS347.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT1

Legally compliant? Yes

Sound? Sound

Details: The Policy, including its detailed wording is supported by National Trust. In particular it has successfully addressed issues raised by the Trust at Preferred Options stage.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS348.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** RT2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Not justified. The final sentence of Section A is worded as an absolute prohibition, i.e. "will not be permitted". However the relevant supporting text at para 10.21 is less absolute, stating that conversion of entire farmsteads "will not generally be acceptable where it adversely affects the function or character of the main group of farm buildings". This suggests that if it can shown that there would be no adverse effects, or indeed some enhancement, that it would be appropriate/reasonable to grant permission. The use of the word 'generally' also indicates that there might be exceptions. An appropriate change to the Policy is suggested below.

Proposed changes: Last sentence of Section A, amend to read: "The change of entire farmsteads to holiday accommodation will not normally be permitted."

Oral hearing requested? NO.

Details:

Representation CS349.

From: Mr. Alan Hubbard, National Trust

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Representation on **Section:** RT3

Legally compliant? Yes

Sound? Sound

Details: National Trust continues to support the (generally unamended) approach to Caravans and Camping in Policy RT3.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS350.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC1

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: not justified National Trust continues to support the Park Authority's pro-active approach to addressing climate change issues. Overall it supports Policy CC1.

However, in respect of Section C it is considered that a slightly more subtle approach is needed to flood risk – in particular in the context of the re-use of buildings, especially those of vernacular importance. Whilst the approach is an appropriate one for new build development it does need to recognise that in some situations the balance of advantage will lie in allowing the re-use of a building, especially for a low intensity use and in one of the areas of lesser flood risk, where it is important that the building in question remains and has a viable use.

Proposed changes: Add to the end of Section C: "Subject to detailed assessment of the likely flood risks, exceptions may be made for the conversion of existing vernacular buildings."

Oral hearing requested? NO.

Details:

Representation CS351.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** 11.32.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: not justified. The reference to small scale wind turbines and the Natural Zone (penultimate sentence) is not consistent with Policy L1. Specifically the Policy allows for the possibility that it may be possible to demonstrate 'exceptional circumstances'. This could equally be the case in respect of renewable energy developments, including small scale wind turbines.

Proposed changes: Amend the penultimate sentence of para 11.32 to read: "Due to its particular landscape sensitivity, wind turbine development of any number or size will not be permitted within the Natural Zone other than in exceptional circumstances."

Oral hearing requested? NO.

Details:

Representation CS352.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC2

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: not justified. As previously argued there are adverse impacts upon the valued characteristics of the National Park as a result of existing fossil fuel use – not least through transmission or transportation, but also where on site storage is needed (e.g. oil tanks) or there are associated noise or odour impacts. Consideration should be given to the net overall environmental impact, including any benefits associated with the removal of 'conventional' energy supplies. Policy CC2 should consider net impacts upon the Park's valued characteristics.

The Trust does not agree with the NPA's suggestion that such an approach would be contrary to National Park purposes, if a net benefit to the valued characteristics can be demonstrated then the Park's purposes would be being fulfilled.

Proposed changes: Amend Section A of Policy CC2 to read: "Development will be encouraged provided that it can be accommodated without net harm to the landscape character, cultural heritage assets, other valued characteristics, or to other established uses of the area"

Oral hearing requested? NO.

Details:

Representation CS353.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC3

Legally compliant? Yes

Sound? Sound

Details: National Trust continues to support the proposed approach to "Waste management – domestic, industrial and commercial waste".

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS354.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** CC5

Legally compliant? Yes

Sound? Sound

Details: The Policy proposes a suitable response to the issues of flood risk and water conservation, it is supported.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS355.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC1

Legally compliant? Yes

Sound? Sound

Details: National Trust remains content with the overall approach towards housing development within the National Park.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS356.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC2

Legally compliant? Yes

Sound? Sound

Details: National Trust supports the approach to key workers – this is an important consideration for the Trust given the number of rural workers that it directly employs to work within the National Park, many of whom cannot afford to buy market housing there; and also its interests in agriculture and forestry within the Park – including a significant number of tenanted farms.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS357.

From: Mr. Alan Hubbard, National Trust

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Representation on **Section:** HC5

Legally compliant? Yes

Sound? Sound

Details: Ensuring wherever possible the provision and retention of community services and facilities is a key role of the Core Strategy having regard to the social and economic imperatives for the National Park.

The proposed Policy remains suitable in this respect and is supported

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS358.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** HC6

Legally compliant? Yes

Sound? Sound

Details: Among other aspects this Policy recognises the importance of permitting some modest out of centre retail activity where it is associated with, and indeed ancillary to, tourism/leisure use – for example, at stately homes within the National Park. In a similar vein the role of local food is increasingly important, including the potential for farmers as producers to benefit from value added by the processing and sale of food on or close to the farm.

The Policy is appropriate, necessary, suitably worded and supported.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS359.

From: Mr. Alan Hubbard, National Trust

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Representation on **Section:** E1

Legally compliant? Yes

Sound? Sound

Details: This is an important Policy for the economic well being of the Park and its residents. National Trust has no objections to the changes since preferred options stage and supports the Policy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS360.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** E2

Legally compliant? Yes

Sound? Sound

Details: This is an important Policy for the economic well being of the Park and its residents. National Trust has no objections to the changes since preferred options stage and supports the Policy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS361.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN1

Legally compliant? Yes

Sound? Sound

Details: The revised and more detailed approach set out in the Submission Core Strategy is supported (including the exception to be made for local small scale building and roofing stone which is essential to enable the upkeep and restoration of vernacular buildings).

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS362.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN 2

Legally compliant? Yes

Sound? Sound

Details: Fluorspar extraction has long been an issue within certain parts of the

National Park and has resulted in significant damage to the landscape, especially where it has been extracted by opencast mining methods. National Trust continues to support the proposed approach to such development as detailed in this Policy.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS363.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** MIN 3

Legally compliant? Yes

Sound? Sound

Details: In practical terms the Policy is unchanged from the Preferred Options stage and it is considered it is important to ensure that essential building materials are available for conservation work, extensions to vernacular buildings and the like, whilst ensuring that local amenities are adequately protected.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS364.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** T1

Legally compliant? Yes

Sound? Sound

Details: National Trust continues to support the overall approach to travel within and across the Peak District National Park.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS365.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** T2

Legally compliant? Yes

Sound? Sound

Details: The approach to reducing traffic and to Travel Plans as set out in this Policy is supported.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS366.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Section:** T6

Legally compliant? Yes

Sound? Sound

Details: This is a key Policy in the context of the role of the National Park, in particular for outdoor recreation. The Policy is supported both in principle and in detail.

Proposed changes: None

Oral hearing requested? NO.

Details:

Representation CS369.

From: Mr. Alan Hubbard, National Trust

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Processed by Officer on behalf of representor - organisation

Representation on **Subsection:** Chapter 11.

Legally compliant? Yes

Sound? Unsound - Not Specified

Details: Not justified or effective. It is unclear why the Preferred Options Policy CC5 has not been taken forward into the Submission document. Indeed, subject to conditions, it appears that the Policy was supported by all those who commented upon it at the Preferred Options stage. A small addition is proposed at the end (in italics) in accordance with the Trust's earlier submission.

It is considered especially important that the Core Strategy for a National Park includes the approach to be taken at a landscape scale level to land management with particular regard to the water environment and enabling flora and fauna to adapt to the impacts of climate change. There is a major task, already being tackled, to ensure the appropriate management of carbon storage in the Dark Peak

Proposed changes: Reinstate Policy CC5 as CC3, i.e.:

CC3: Impact of climate change on land management, biodiversity and air quality The Core Strategy will foster the sustainable management of all land and water within the National Park, in relation to securing functional natural processes, maintaining and enhancing biodiversity, improving air, water and soil quality, and the continuation of land management practices which have historically created the special and distinctive landscapes of the National Park where these remain appropriate to current and future circumstances.

Proposals for development will not be permitted where they would have a net harmful impact upon the robust functioning of natural process or features of the landscape which deliver essential ecosystem goods and services, such as sustainable drainage, carbon sequestration, clean air and water supply, uncontaminated soils and sustainable and sensitive food production potential.

Where harm cannot be mitigated, and there is a clear need for the proposed development, it will only be permitted where a net gain in ecosystem benefits can be secured by compensatory measures on or off site, which are within the scope of planning control or can be otherwise secured through legal agreement and partnership working.

Operations which will facilitate measures which can help sensitive and sustainable adaptation to the effects of climate change facing the National Park, or will help mitigate the causes of it, will be considered favourably. In particular, the role of the Dark Peak peat moors as a carbon sink will be strictly protected, and where possible enhanced. Similarly, the 'permeability' of landscapes to species movement as climatic conditions change will be maintained and enhanced through appropriate design, landscape treatment and control of new development proposals.

Oral hearing requested? NO.

Details: