

**PEAK DISTRICT NATIONAL
PARK AUTHORITY CORE
STRATEGY
Preferred Approaches
Sustainability Appraisal Report**

**Prepared for the Peak District
National Park Authority
by
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Appendix C – Baseline Information
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I. INTRODUCTION

BACKGROUND

- I.1. This Sustainability Appraisal Report has been prepared by Land Use Consultants (LUC) as part of the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Peak District National Park Core Strategy, working with and on behalf of the Peak District National Park Authority (PDNPA).
- I.2. The Sustainability Appraisal process is concerned with assessment and consideration of social, economic and environmental factors that can be influenced by the Core Strategy. This report forms the Sustainability Appraisal of the Peak District National Park Core Strategy Preferred Approaches and should accompany and be read in conjunction with the Peak District National Park Core Strategy Preferred Approaches Paper.
- I.3. A Habitat Regulations Assessment of the Core Strategy is being undertaken alongside this SA and the results from that assessment are being taken into consideration throughout the SA process.

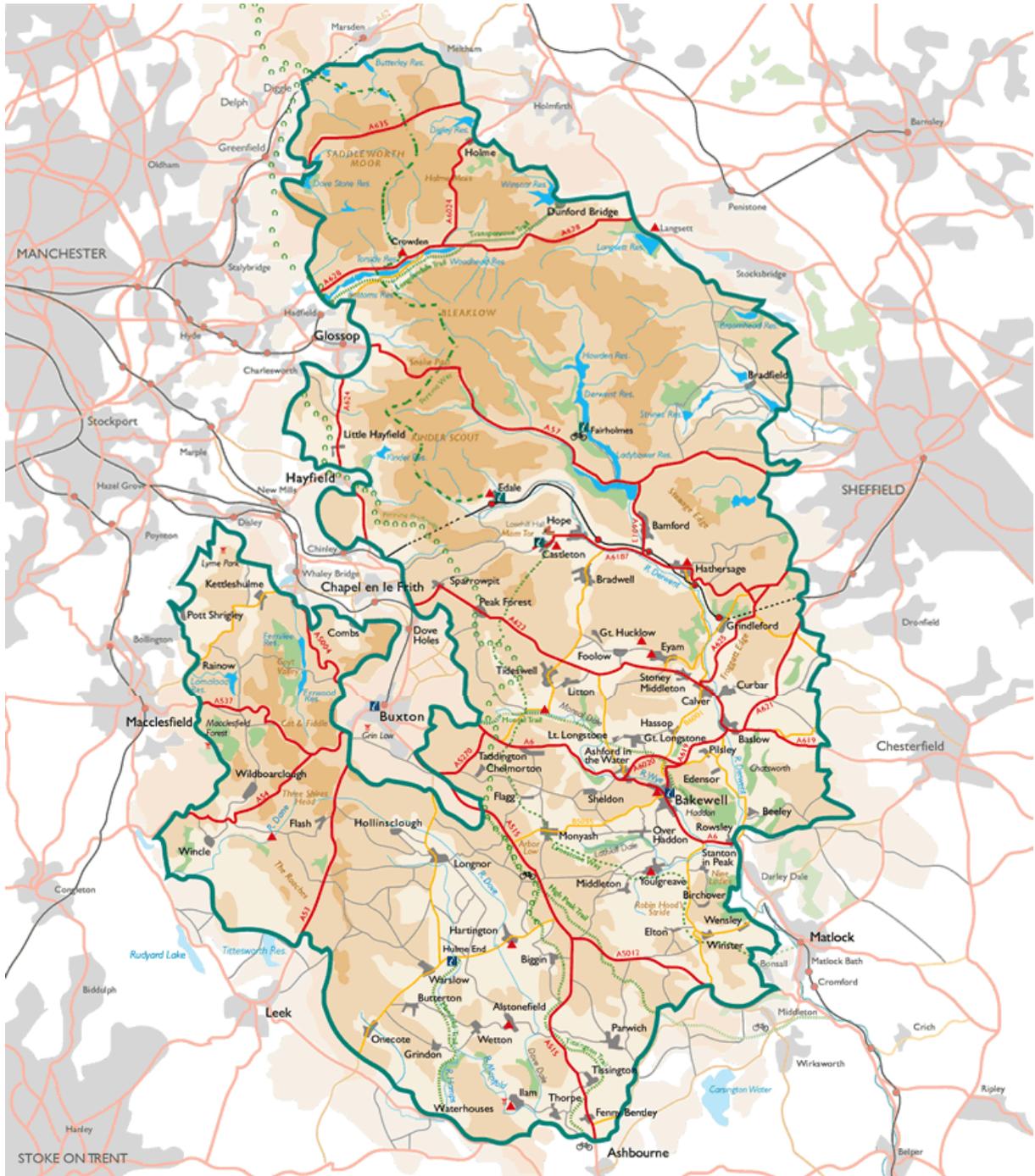
PEAK DISTRICT NATIONAL PARK

- I.4. The Peak District is an upland area located in central and northern England. In 1951 the Peak District¹ was the first National Park to be designated in Britain. It sits at the southern end of the Pennine Chain² sandwiched between Sheffield and Manchester and covers 1438 km². Gritstone edges, wild heather moorlands, and gentle limestone dales shaped by humans over thousands of years, attract between 18 – 22 million day visitors per day, and 2.5 million visitors who stay overnight from all over the country and worldwide to visit the National Park.¹
- I.5. The National Park is home to 38,000 people making up 20,000 households. 60% of the population are working age with 25% being self-employed, twice the English average. Tourism and catering make up 24% of all jobs within the National Park and Quarrying and Agriculture both create 12 % of the jobs in the National Park respectively.²

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

² The Peak District National Park Authority – Living in. Accessed 11/08/09 (<http://www.peakdistrict.org/index/living-in.htm>)

Figure 1.1: Peak District National Park Area.



- | | | | | | | | | | |
|--|------------------------|--|---------------------|--|-------------------|--|--------------------|--|------------|
| | National Park Boundary | | Railway and Station | | Pennine Bridleway | | Information Centre | | Settlement |
| | Land over 400 metres | | Railway Tunnel | | Pennine Way | | Cycle Hire | | Reservoir |
| | Land over 300 metres | | A Road | | Trail | | Youth Hostel | | Woodland |
| | Land over 200 metres | | B Road | | Limestone Way | | Country Park | | |
| | | | Minor Road | | | | | | |

Peak District National Park Authority © 2008

Figure 1.2: Peak District local authority and regional boundaries (Peak District National Park Management Plan 2006 – 2011)



PEAK DISTRICT CORE STRATEGY

- I.6. The Core Strategy sets out the long term spatial vision and objectives for the National Park, and the strategic policies and development principles required to deliver that vision over a 20 year period to 2029. It seeks to implement the spatial and transport policies of the Regional Spatial Strategy (the East Midlands Regional Spatial Plan) as well as incorporating its housing requirement. It sets out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development.
- I.7. It is anticipated that a small number of Development Control policies are to be included within the Core Strategy to help with the day to day implementation of the vision and objectives.
- I.8. In the National Park it is also essential to make sure that all policy development (including the use of tools such as SA/SEA appraisal) focus on and prioritise the purposes and duty of National Parks set out in the Environment Act 1995. The **purposes** are to:
- ‘Conserve and enhance natural beauty, wildlife and cultural heritage’, and
 - ‘Promote opportunities for the understanding and enjoyment (of the Parks) by the public’
- I.9. In pursuing these purposes the Authority has a **duty** to ‘seek to foster the social and economic well-being of local communities’.
- I.10. Since the National Park Authority is bound by the purposes and duty set out in the Environment Act, this document seeks to embed the SA/SEA process firmly within them. It is the purposes and duty that guide strategic policy in the National Park Management Plan and the Local Development Framework. This approach has been supported consistently by Government Planning Policy Statements and by Inspectors presiding over development plan policy.
- I.11. Where there is a conflict between the purposes themselves (perhaps from proposals for recreational development that would harm valued characteristics of the National Park), the “Sandford Principle” has established to Government’s satisfaction that the conservation purpose should prevail. Existing plan policies take this understanding about National Park purposes into account.

SUSTAINABILITY APPRAISAL (SA) AND STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

- I.12. Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the Development Plan Document (DPD) preparation process improves the contribution that the Plan makes to the achievement of sustainable development and to the minimisation of environmental impacts. The SA process appraises the social, environmental and economic effects of the strategies and policies in a DPD from the outset.

- I.13. Strategic Environmental Assessment (SEA) is a statutory assessment process under the SEA Regulations (Statutory Instrument 2004, No 1633). The Regulations require formal strategic environmental assessment of plans and programmes which are likely to have significant effects on the environment and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA) under EU Directives 85/337/EEC and 97/11/EC concerning EIA. The objective of Strategic Environmental Assessment, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'*.
- I.14. SEA is a separate process to SA but has similar characteristics in terms of aims and objectives. Simply put, Sustainability Appraisal includes a wider range of considerations, extending to social and economic impacts of plans, whereas SEA is more focussed on environmental impacts. The 2005 Office of the Deputy Prime Minister (ODPM) guidance on sustainability appraisal³ clearly shows how it is possible to satisfy both requirements through a single appraisal process undertaking a joint SA/SEA⁴, and it is possible to present an SA report that includes the requirements of the SEA Regulations. This document has been prepared in the spirit of this integrated approach and the requirements of the SEA Directive are clearly signposted through this report.

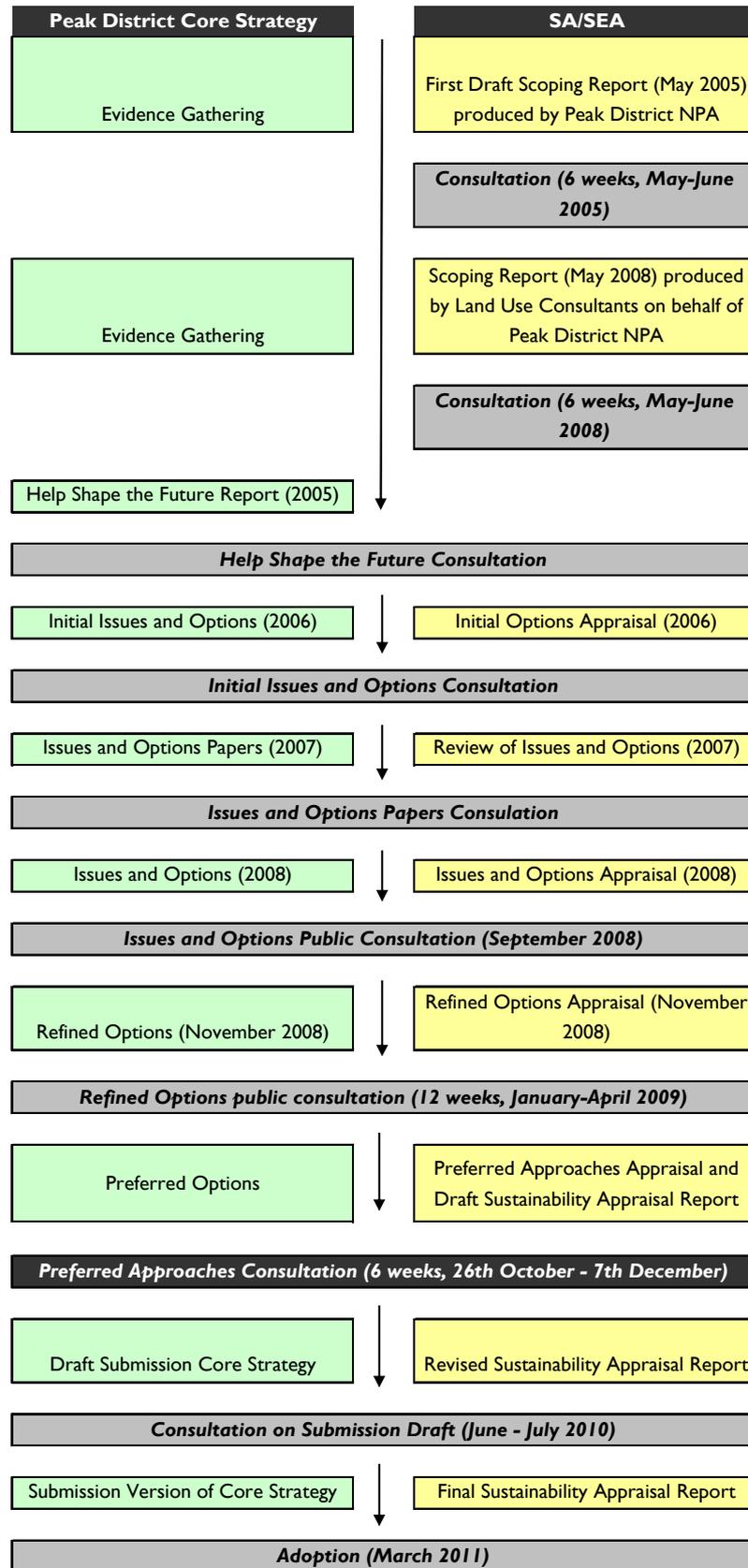
³ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Framework: Guidance for Regional Planning Bodies and Local Planning Authorities*. Office of the Deputy Prime Minister, November 2005.

⁴ From this point on, references to the Sustainability Appraisal (SA) shall be taken as meaning the SA incorporating SEA.

2. METHODOLOGY

- 2.1. The approach for carrying out the SA of the PDNPA Core Strategy is based on current best practice and the following guidance:
- *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, Office of the Deputy Prime Minister (November 2005); and
 - *Practical Guide to the SEA Directive*, Office of the Deputy Prime Minister (September 2005)
- 2.2. The methodology below expands on the approach described in the Second Draft Scoping Report (May 2008) which documents the work that has been undertaken to date and provides information on the subsequent stages of the SA process. Figure 2.1 below illustrates the key milestones in the SA and shows how the process interacts with the production of the Core Strategy:

Figure 2.1: Core Strategy Production and the SA Process



SCOPING

- 2.3. The Sustainability Appraisal process started in 2005 with the PDNPA producing the first draft of the Scoping Report which covered both the LDF and Management Plan. The Scoping Report was issued in June 2005 for consultation to various stakeholders and the following statutory consultees; English Nature, Countryside Agency, The Environment Agency and the Historic Buildings and Monuments Commission for England (English Heritage).
- 2.4. The Scoping Report was also posted on the National Park website www.peakdistrict.gov.uk to enable the public to contribute. The Sustainability Objectives in the June 2005 Scoping Report were considerably refined since its publication.
- 2.5. Following the preparation of a first draft scoping report a stakeholder presentation was held in October 2005 to present the findings of early appraisals of options and feedback from the scoping work.
- 2.6. LUC was commissioned in 2007 by the PDNPA to undertake a review and verification exercise of the joint scoping report produced in 2005. Some key gaps in the baseline data and problems with the definition of key issues were identified as a result of this process.
- 2.7. LUC was then commissioned to revise the scoping report concentrating solely on the Core Strategy and to then carry out the remainder of the SA process for the Core Strategy.
- 2.8. A second draft of the scoping report was then produced and issued for consultation to the Statutory Consultees, Natural England, English Heritage and the Environment Agency, in May 2008. Comments received from the consultees were analysed and any necessary changes were made to the scoping report in July 2008. Appendix A lists the comments made and the response to these comments.
- 2.9. The scoping stage and accompanying report encompassed the following procedures and outputs:
 - **Policies, plans and programmes (PPP)** that are relevant to the Core Strategy were identified and relationships understood enabling potential synergies to be exploited and any inconsistencies and constraints addressed. (See Appendix B)
 - **Baseline** information was collected in line with SEA guidance on the following SEA topics: Biodiversity, fauna and flora; Population and human health; Water; Soil; Air; Climate Factors; Material Assets; Cultural Heritage and Landscape. In addition information on Social and Economic factors has been taken in to consideration. This baseline provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. (See Appendix C)
 - Drawing on the PPP and Baseline the key **Sustainability Issues** were highlighted (including environmental problems as required by the SEA Directive). Opportunities were also highlighted.

- The **Sustainability Appraisal Framework** sets out the Sustainability Objectives. Where appropriate, targets along with indicators are used to enable these objectives to be measured.
- **Consulting** on the Scoping Report: Public and stakeholder participation is an important element of the SA/SEA and plan-making process. Consultation helps to ensure that the SA Report will be robust and have due regard to the appropriate information that will support the plan in its contribution to sustainable development. The Scoping Report was published for a six week consultation period (complying with the requirement for a five week consultation in the SEA Regulations) and focused on the Statutory Consultees (Environment Agency, Natural England and English Heritage) In line with best practice and PDNPA's desire to be as inclusive as possible, a wide range of stakeholders were consulted. All consultation responses are presented in Appendix A.

ASSESSMENT OF ALTERNATIVES & REFINED OPTIONS

- 2.10. The SA process is iterative, ongoing and cyclic, rather than sequential, and in the spirit of this approach as PDNPA has been developing and refining the issues that need to be addressed by the Core Strategy, and the alternative ways that these issues could be addressed, a series of SA assessments have been undertaken on the emerging options. These iterations have been made available to consultees to help inform their comments on the Issues and Options papers at various points and have also helped to inform the plan making team as they refine and develop the Options. These various iterations are explained below in more detail. All of the SA assessments described below are available from PDNPA on request.
- 2.11. In 2005 PDNPA produced a consultation document entitled '*Help Shape the Future*' which started to explore issues faced the National Park and the potential options for addressing these issues. Following public consultation on this document PDNPA went on in October 2006 to produce an initial Issues and Options paper. This paper underwent a high level SA review to help inform the development of these options.
- 2.12. In the Spring of 2007 PDNPA published and consulted on 12 Issues and Options paper covering a wide range of themes that the Core Strategy may need to address. A SA accompanied these papers to help inform their development and for consultation.
- 2.13. In 2008, a final Issues and Options paper for the Core Strategy was produced and a full SA assessment was undertaken using the SA Objectives that were developed as part of the scoping phase to accompany these refined options. The SA assessment was published on the PDNPA website alongside the Issues and Options paper and a workshop was held with key stakeholders in September 2008 to present the work being done on the SA and discuss the initial sustainability findings on the Issues and Options.
- 2.14. In November 2008 the Refined Options for the Core Strategy were produced and a full SA assessment was undertaken to accompany them (see Appendix D). The Refined Options and accompanying SA underwent a 12 week public consultation between January and April 2009.

- 2.15. The findings of each SA, at every stage of the process, was fed back into the plan making process in order to inform the next iteration of the Options.

PREFERRED APPROACHES

- 2.16. Following on from the assessment of the Refined Options, the findings of the SA were fed into the development of the Preferred Approaches. The development of the Preferred Approaches has also been undertaken in an iterative manner with the SA process. Draft versions of the Preferred Approaches were assessed and results fed back to the PDNPA plan-making team. This SA Report presents the findings of the Preferred Approaches assessment (see chapter 6 & Appendix E) including temporal, geographical and cumulative effects (see chapter 6).

SUSTAINABILITY APPRAISAL REPORT PREPARATION AND CONSULTATION.

- 2.17. The comments received during the consultation on the scoping reports have been taken into consideration and, where relevant, taken on board in this SA Report. Appendix A details the responses to scoping consultation comments. The SA Report presents the findings of the Preferred Approaches assessment (see chapter 6 & Appendix E) and also includes details of possible mitigation and a monitoring schedule. A non technical summary is also included at the front of this report, to not only comply with the SEA Directive requirements but also to enhance its accessibility to a range of users.
- 2.18. The Sustainability Appraisal Report will be published with the Preferred Options for the Core Strategy. These two documents will then undergo a six week formal public consultation, and will be published on PDNPA's website.

PREPARATION AND CONSULTATION ON THE DRAFT SUBMISSION SUSTAINABILITY APPRAISAL

- 2.19. Comments from the SA Report Consultation will be taken into consideration and PDNPA will, from this, develop the draft Core Strategy for Submission to the Secretary of State. This may simply be a refinement of the Preferred Approaches to provide greater clarity about how it will be delivered, in which case a further SA Report would not be needed, but an annex to the SA would probably be adequate to explain the position. However, if the Core Strategy contains issues and options which have not been included in the Preferred Approaches and there are significant impacts that have not been appraised, the SA Report may need more extensive supplementation or may even need to be rewritten.
- 2.20. The draft Core Strategy for Submission to the Secretary of State will then go out to consultation on its soundness.

PREPARATION OF THE SUSTAINABILITY APPRAISAL FOR SUBMISSION

- 2.21. Following the consultation on its soundness the Submission version of the Core Strategy will be prepared by PDNPA and the SA Report will be updated to reflect any significant changes.

EXAMINATION

- 2.22. The Examination will consider matters of procedure, conformity and consistency with regard to the Core Strategy. A Planning Inspector will be appointed to ensure that legal requirements have been met (of which the Core Strategy being subject to Sustainability Appraisal is one) and to determine whether the Core Strategy is sound i.e. is justified, effective and consistent with National Policy. (See PPS12.)
- 2.23. Once adopted a Post Adoption Statement will be produced summarising how environmental and sustainability considerations have been integrated into the Core Strategy, including the reasons for choosing the plan as adopted, in light of other reasonable alternatives dealt with, and also the measures decided concerning monitoring. This will ensure compliance with Article 9 (1) of the SEA Directive.

MONITORING AND IMPLEMENTATION OF THE STRATEGY

- 2.24. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken under circumstances where predicted effects prove to change. Monitoring recommendations are presented in Chapter 6 of this report and PDNPA will be responsible for monitoring effects over the lifetime of the Core Strategy.

3. CHARACTERISATION

REVIEW OF POLICIES, PLANS, AND PROGRAMMES

- 3.1. The Core Strategy is not prepared in isolation. The Core Strategy is greatly influenced by other policies, plans and programmes and sustainability objectives. Most importantly, it needs to be consistent with international and national guidance and strategic planning policies. It also needs to contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture or heritage. It must also conform to environmental protection legislation and sustainability objectives established at an international, European and national level.
- 3.2. A review has been undertaken of other plans, programmes and objectives relevant to the Core Strategy at an international, national, regional and local level. This review includes information from an initial study undertaken as part of the first draft scoping report, June 2005 and some supplementary work that was undertaken as part of the second draft scoping report in May 2008. Conclusions drawn from this section alongside a review of baseline data, trends and issues have informed the development of the SA Objectives. The full review can be seen in Appendix B. There are a number of key strategies of particular importance that should inform the development of the Core Strategy and these are discussed below.
- 3.3. At the national level **Natural Environment and Rural Communities (NERC) Act (2006)** contains a range of measures for the future of the countryside and the people who live and work there. The Act also reaffirms the position of National Parks as protected areas and does not advocate the removal of areas of significant human influence from existing or future National Park areas. It also gives powers to National Park Authorities to make traffic regulation orders to close routes, or to introduce speed restrictions, where unacceptable damage is being done by vehicular pressures.
- 3.4. At the regional level there are a number of strategies which influence the Core Strategy, the most important strategy is the **East Midlands Regional Spatial Plan** published in March 2009. It is a requirement of the Planning and Compulsory Purchase Act 2004, that DPDs are “in general conformity” with the RSS.
- 3.5. Policy 8 on the Spatial Priorities in and around the Peak Sub-area states that: “*The preparation of policies and programmes in and around the Sub-area should:*
 - *Help to secure the conservation and enhancement of the Peak District National Park, respecting the statutory purposes of its designation;*
 - *Address the social and economic needs of the Park’s communities, for example, by the provision of appropriate business premises and affordable housing and;*
 - *Protect and enhance natural and cultural heritage of the Sub-area, in particular the Special Areas of Conservation covering the South Penning Moors, Peak District Dales, the Bee’s Nest and Green Clay Pits, Gang Mine and the Peak District Moors and the Peak District Moors Special Protection Areas.*

- *Wherever practicable, routes for long distance traffic should be developed to avoid the National Park. However, access to the National Park and across it by public transport and other non-car modes should be improved.”*

- 3.6. Policy 10 Managing tourism and visitors in the Peak Sub-area states that: “*Local Authorities and other responsible organisations should seek to manage tourism and visitor pressures in accordance with the principles of sustainable development, giving particular attention to improved public transport, walking and cycling links and respecting National Park purposes and priorities.*

Local Authorities and other relevant public bodies in areas adjacent to the National Park should encourage and promote tourism opportunities that could ease pressures on the Park itself, providing this would not increase pressure on areas of biodiversity interest. Coordinated approaches and inter-regional efforts may be needed to support required habitat and access management measures in the South Pennine Moors and Peak District Dales designated nature conservation sites of international importance.”

- 3.7. The **Peak District National Park Management Plan 2006 – 2011**, indicates the National Park purposes and associated duty will be delivered through sustainable development and sets the framework for all activity pursued in the National Park by stakeholders.

- 3.8. **Derbyshire Dales and High Peak Sustainable Communities Strategy 2009 – 2014**, sets the goals and aims for the area and provides the policy priorities for the Local Development Frameworks (LDFs) being produced by the District / Borough councils and National Park Authority to guide future development in the area. The Strategy sets out the following vision:

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

- *people of all ages who are healthy and safe;*
- *high-wage, high-skill jobs;*
- *affordable, decent homes for local people;*
- *towns and villages that offer a high quality of life.’*

- 3.9. The LDF including the Core Strategy should be the spatial representation of the goals and aims set out in the Sustainable Communities Strategy.

BASELINE

- 3.10. Baseline data provides the context for the assessment of sustainability and the basis for identifying trends, predicting effects and monitoring outcomes. The requirements for baseline data will vary widely, but it must be relevant to the environmental, social and economic issues, be sensitive to change and ideally have sufficient records to identify trends.
- 3.11. Annex 1(f) of the SEA Directive requires data to be gathered on the following topics: biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors,

material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. Additionally 'sustainability' topics have been included on housing, access to services, crime and safety, education and engagement, tourism and recreation, rights of way and open access, employment characteristics, transport and access, market towns and villages and rural deprivation.

3.12. Most of the baseline data has been drawn from the State of the Park Report, the recent scoping report on the Design Guide and emerging evidence reports:

- Strategic Housing Needs Survey
- Population projections
- Landscape Character Assessment
- Strategic Flood Risk Assessment
- Gypsy and Traveller Study
- Employment Land review
- Transport Study
- Open Space Study
- Climate Change Study
- Housing Market Assessment
- Strategic Housing Land Availability Assessment
- Retail Study.

3.13. Information has been supported by discussions with the Peak District National Park Authority Staff.

3.14. The baseline is included in Appendix C and a summary of key issues for the Peak District National Park identified by the baseline is given below.

KEY ISSUES

Environment

Landscape Character:

3.15. Private ownership of land can restrict landscape and biodiversity improvements.

3.16. Over-grazing and inappropriate moorland burning can lead to loss of habitat and negatively affect the landscape.

Biodiversity

3.17. Additional species to those identified will continue decline, or become extinct.

3.18. Permanent alternations to the weather will also contribute to changes to the landscape, rare habitats and species. Those on the edge of their range within the Park may decline, degrade or disappear (such as peat bogs and Jacob's Ladder) and be replaced by others.

- 3.19. Moorland condition affecting biodiversity will continue to decline due to over-grazing, inappropriate moorland burning and air pollution. Improved grassland (where fertilisers and herbicides are used) will also affect biodiversity.
- 3.20. Disturbance by recreational use and human activity is also a concern for some species and habitats.
- 3.21. The loss of surface remains referred to under the historic environment is also having a negative impact on ecological communities.

Geology

- 3.22. Extant permissions for mineral operations could be a threat.

Historic Environment

- 3.23. The conservation of the landscape can be threatened by the trend towards larger fields, post and wire fences. It is also reliant on Environmental Stewardship agreements with farmers to protect the historic environment.
- 3.24. A survey of lead mine surface remains has shown a dramatic loss of leadmine waste hillocks and associated features (since World War II) due to removal through agricultural and industrial purposes.
- 3.25. A further issue identified by the PDNPA is the need to achieve a balance between enabling settlements to develop, and maintaining their local character, reflecting in particular the historic environment, for instance recognition needs to be given to the key differences between settlements on the limestone plateau and gritstone.
- 3.26. Over grazing of moorland discussed above also has an impact on archaeology.

Climate change

- 3.27. Increased temperatures and changes in the weather will affect the economy of the National Park, particularly farming and tourism.
- 3.28. Permanent alterations to the weather will cause changes to the landscape, rare habitats and species of the Peak District.
- 3.29. There will be more frequent moorland fires due to drier summers and flooding, from higher rainfall in winter.

Air quality

- 3.30. The quality of air within the National Park is largely determined by the conditions from the surrounding areas outside, and by traffic. Certain weather conditions mean that cross-boundary and trans-country pollution occurs.
- 3.31. Recent developments, including incinerators and industrialised tyre burning, are considered to require monitoring.

Noise and light pollution

- 3.32. Noise is associated with transport movements and mineral extraction operations as well as quarry industry vehicle movements, cross park transport movements and motor sports.

Social

Population

- 3.33. Rural isolation, market conditions and small populations may result in the loss of vital services that keep village communities alive.
- 3.34. A declining and ageing population will also affect the demographic make up of communities in certain areas. Findings show that a doubling of the building rate (e.g. to around 95 dwellings per year, might stabilise the population level but would also increase the overall numbers of elderly.) Furthermore, there is no evidence to suggest that this level of development can stabilise local service provision, such as supporting shops, post offices and schools which are more affected by local political, and commercial drivers. In constrained rural areas therefore the conclusion is that it is not possible to 'build your way' out of the problem: this would result in so much development that it would be incompatible with the statutory National Park purposes.
- 3.35. Policy will need to consider how best to tackle these issues in the context of National Park constraints.

Housing

- 3.36. High house prices are one reason for young people moving to other areas, which is also affected by the gap between wages and house prices.
- 3.37. A large number of open market housing completions resulted from the change of use of large disused mills. There are now fewer in existence, so completion rates will fall.
- 3.38. If present trends and forecasts continue there will be less affordable housing completed than anticipated in the Structure Plan, but all other housing types will be well above.
- 3.39. The annual housing report shows that over the last 5 years there are 130 commitments for local needs housing, whereas in the previous 5 years there were only 32. While the overall number of units may fall as larger brown-field opportunities dry up, the proportion of commitments that are for local needs housing is expected to rise.

Access to services

- 3.40. Smaller settlements will continue to find it difficult to sustain services required, and coupled with a falling (and increasingly elderly) population this will affect the labour supply and rural businesses, as well as affecting the costs of maintaining public services.

- 3.41. It should be noted that the statistics about local supermarkets increasing in number. Policy will need to take into account the ability to access services, whether they are actually in the settlement or brought to it via mobile services, or by transport options taking people to the services.

Health

- 3.42. The effects of prolonged exposure to radon from underlying rock strata could increase the risks of lung cancer in the population.

Crime and Safety

- 3.43. Maintaining low levels of crime.

Education and Engagement

- 3.44. Encouraging and actively engaging with new audiences and children to participate in learning and outdoor activities.

Tourism and recreation

- 3.45. To retain ease of access to the Park from surrounding areas for short day visits by encouraging sustainable forms of transport, as well as benefiting the local economy and tourism sector.
- 3.46. Some activities threaten the 'wild' and more tranquil areas of the National Park which are valued for quiet enjoyment.
- 3.47. Some of the most popular honeypot areas attract large numbers of visitors resulting in overcrowded car parks, blocked roads, and overstretched local facilities - particularly on summer Sundays.

Rights of Way and Open Access

- 3.48. Many thousands of tourists hike over the moors, wearing away the sparse vegetation and exposing the bare soil (inc. peat) which is then subject to erosion.

Leisure and culture

- 3.49. Young people in particular find it difficult living in isolated villages where there are fewer services and cultural activities available.

Economy

Employment characteristics

- 3.50. Increase in seasonal and part-time jobs as a proportion of National Park employment, combined with loss of jobs in the traditional employment activities of farming, quarrying and manufacturing.

Transport and access

- 3.51. It will be necessary to encourage environmentally sustainable modes of transport and to locate new development in places that minimise the need for additional journeys by private car. The retention of public transport services for people living within the Park and visitors is essential.
- 3.52. Residents within the National Park want to see less traffic and signage within villages.

Market towns and villages and rural deprivation

- 3.53. The purpose of the Rural Action Zone (RAZ) is to stimulate economic development and regeneration activity within the wider Peak District in order to create a 'high skills – high wage economy.
- 3.54. There is a shortage of modern office accommodation and few appropriate development sites, combined with poor access to services, and poor road and rail connections.

Prudent Use of Resources

Agriculture and soils

- 3.55. Many National Park farms are dependent on subsidies, therefore reviews of CAP and agri-environment schemes will also have significant effects. Biodiversity interests may be affected by a decline in hay meadow, pasture and rough grazing conservation.
- 3.56. Policies on agricultural buildings are considered likely to have an effect on stock numbers and out-wintering of stock, and this may have adverse implications for hay meadow, pasture and rough grazing conservation.
- 3.57. Private ownership of land can restrict landscape and biodiversity improvements.

Woodlands

- 3.58. Maintaining favourable conditions for key woodland habitats through appropriate management regimes by working with private landowners and farmers.

Renewable energy

- 3.59. There is a need to encourage the use of renewable energy, and the conservation of energy in homes and businesses.

Minerals and Quarrying

- 3.60. Mineral extraction is traditional and important to the local economy but leaves scars on the landscape, and causes pollution and traffic congestion.
- 3.61. The supply of local building and roofing stone to the repair of historic buildings and structures and for new buildings is an issue in the National Park and is being considered in the context of the Minerals Development Framework.

Waste Planning

- 3.62. Levels of recycling will increase as councils are required to hit 'targets' for domestic recycling.
- 3.63. There may be increased demand for locally sited recycling sites within villages.

Water and Flood Risk

- 3.64. Threats to water quality are from farming practices that release chemicals harmful to wildlife into the water, and from flooding.

4. SA FRAMEWORK

AN OBJECTIVES-LED APPROACH

- 4.1. The development of SA Objectives is a recognised way in which environmental and other sustainability effects can be described, analysed and compared. Although not a requirement of the SEA Directive, objectives are a recognised way of considering the environmental and sustainability credentials of a plan and comparing the impacts of various alternatives. The SA Objectives are used in conjunction with the baseline to predict sustainability effects.
- 4.2. The formulation of SA Objectives is based on the environmental topics identified in Annex I(f) of the SEA Directive to ensure that all the issues detailed were considered: “*biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors*”. Additional social and economic topics were also covered by the SA Objectives. Environmental protection, social and economic objectives identified in other plans, policies and programmes (see Chapter 3) and results from the baseline data collection and identification of key issues also fed into the identification of SA Objectives.
- 4.3. ODPM’s SA Guidance recommends that the SA Objectives are developed in consultation with key stakeholders which took place during the two iterations of the Scoping Report. The first SA Framework was presented in the first draft of the Scoping Report, June 2005. The SA objectives were informed by *the State of the Park Report*, Annual Monitoring Reports, and consultations with representatives of other National Parks and constituent authorities. They were also informed by both national and regional guidance. It was considered that the SA Objectives fulfilled the statutory purposes of the National Park.
- 4.4. The SA Framework was then refined following a review of the first scoping report in June 2007, a review of the SA Objectives in the Peak District Design Guide prepared in November 2006, and further consultations with statutory environmental consultees. The draft SA Objectives were also subject to further comments by statutory environmental consultees on issue of the Scoping Reports. The SA Objectives are set out according to the National Park’s purposes and duty.
- 4.5. **Table 4.1** shows the resulting framework for the SA of the Core Strategy.

Objective	Criteria
I. To protect, maintain and enhance the landscape and townscape of the National Park	
Ia To conserve and enhance landscapes including moorland, edge, valley, woodland, grassland and their history.	Will it protect areas of highest landscape quality?
	Will it protect key landscape features?
	Will it promote/maintain an attractive and diverse landscape?
Ib To protect, enhance and manage the character and appearance of the townscape, maintaining and strengthening local distinctiveness and sense of place.	Will it achieve a high quality of design and construction?
	Will it promote/maintain an attractive and distinctive townscape?

Objective	Criteria
1c To protect open spaces within settlements.	Will it retain valuable open space within settlements?
2. To protect, enhance and improve biodiversity, flora and fauna and geological interests	
2a To conserve and enhance designated nature conservation sites and vulnerable habitats and species.	Will it protect sites and habitats of nature conservation value, including NATURA 2000 sites, Ramsar Sites, SSSIs and other national and local designations?
	Will it protect BAP priority species?
	Will it protect nature conservation interests outside designated areas?
	Will it generate opportunities for enhancement of habitats and biodiversity?
2b To protect geology and geomorphology.	Will it conserve and enhance geological interests, including RIGGS?
3. To preserve, protect and enhance the National Park's historic and cultural environment	
3a To preserve and enhance sites, features, areas and settings of archaeological, historical and cultural heritage importance.	Will it preserve and protect scheduled and unscheduled archaeological sites and other designated and undesignated historic assets?
	Will it preserve and enhance the setting of key areas, features and sites of importance?
	Will it avoid damaging or eroding the character of conservation areas?
	Will it preserve and enhance buildings and settlements, which contribute to the historical and architectural character of the National Park?
	Will it result in the loss/deterioration of registered parks and gardens?
	Will it respect the Park's cultural heritage? (e.g. history, traditions, customs and literary associations).
4. To protect and improve air, water and soil quality and minimise noise and light pollution	
4a To reduce air pollution.	Will air quality be improved?
4b To maintain and improve water quality and supply.	Will water be used efficiently and with care?
	Will water quality be improved?
4c To maintain and improve soil quality.	Will it improve soil quality?
	Will it remediate contaminated land?
4d To preserve remoteness and tranquillity.	Will noise and light levels reduce, particularly in relation to roads, industry and development?
5. To minimise the consumption of natural resources	
5a To safeguard mineral reserves for future generations and promote the reuse of secondary materials.	Will it prevent the sterilisation of mineral resources by development?
	Will it ensure efficient/prudent use of mineral and other resources?
5b To reduce waste generation and disposal and increase recycling.	Will it result in a reduction in the amount of waste requiring treatment and disposal, and encourage recycling or EfW in line with the waste hierarchy?
5c To reduce water consumption.	Will it reduce water consumption?
6. To develop a managed response of climate change	
6a To reduce greenhouse gas emissions.	Will it reduce greenhouse gas emissions?
6b To conserve and enhance carbon sinks within the Park.	Will it conserve and protect carbon sinks, such as peat and woodland?
6c To promote the use of renewable energy exploring innovative techniques.	Will it promote the use of alternative renewable energy?
6d To achieve efficient energy use.	Will it improve energy efficiency?
6e To ensure development is not at risk of flooding and will not increase flooding elsewhere.	Will it reduce the vulnerability to fluvial flooding?
7. To achieve and promote sustainable land use and built development	
7a To maximise the use of previously developed land and buildings.	Will it enable development to take place on brownfield land?
	Will it encourage the conversion of existing buildings?
7b To consider sustainable construction in	Will local materials be sourced?

Objective	Criteria
	Will it seek to support sustainable design and construction techniques considering energy efficiency measures, water and waste conservation?
	Will measures be considered to mitigate against health and safety concerns i.e. radon precautions?
	Will it encourage sensitive design of road infrastructure? (E.g. reduced signage road markings, use of local materials and alternative traffic calming methods).
7d Spatial development to be focussed in settlements.	Will development be directed towards strategic settlements, before considering remote areas?
8. Increase understanding of the special qualities of the Park by target groups, young people (14-20 years); people from disadvantaged areas, with disabilities and from ethnic minority backgrounds	
8a Increase learning opportunities, information and interpretation.	Will it address the sports and recreational needs of children and disadvantaged groups?
9. To promote access for all	
9a Increase use of the National Park by under represented groups from surrounding urban areas.	Will target audiences be engaged, and will their requirements/aspirations be catered for?
9b Manage the range of recreational activities so that all types of users can enjoy the Park and its special qualities.	Will it improve access to and provision of better quality formal and informal recreational opportunities?
10. Promote good governance	
10a To improve opportunities for participation in local action and decision making.	Will it empower all sections of the community to participate in decision-making and the impact of those decisions? Is there a framework for engagement with communities, including novel approaches to reach particular groups/sectors?
10b Raise partners awareness of National Park purposes.	Will it encourage partnership involvement and joint working with other sectors?
11. To help meet local need for housing	
11a To provide affordable /social housing which meets identified local need both in terms of quantity and type.	Will it provide housing that meets the needs of the young, elderly, local people and those on limited incomes?
11b To ensure housing in the National Park is appropriate in terms of quality, safety and security.	Will it provide high quality safe, secure housing?
11c To ensure that new housing is located appropriately in terms of employment and services.	Will it provide levels of housing consistent with local employment opportunities and carrying capacities of services and infrastructure? Will it provide housing which is located appropriately in terms of local employment and services?
12. Encourage better access to a range of local centres, services and amenities	
12a To improve access to and retention of schools, shops, post offices, pubs and GPs in order to support local need	Does it improve access to healthcare? Will it support the provision and retention of key facilities and services ensuring that local needs are met locally wherever possible?
12b To improve access to and retention of countryside, parks, open space and formal leisure and recreation facilities	Will it improve access to community facilities and services?
12d To increase opportunities for skills development and access to education and training	Will it provide improved access to vocational training, education and skills for young people?
13. Promote a healthy Park wide economy	
13a To encourage a viable and diversified farming and forestry industry	Will it support the changing needs of agriculture and forestry including diversification?

Objective	Criteria
I3b To increase and improve jobs related to National Parks purposes including tourism	Will it encourage sustainable tourism?
	Will it improve the quality of jobs tourism in the tourism sector, and reduce seasonal dependence?
	Will it offer alternative opportunities for employment, to offset declining minerals activity?
I3c To encourage business growth	Will it continue to support high levels of self employment?
	Will it encourage and support existing local business?
	Will it attract new businesses?
I4. To reduce road traffic (especially private cars and freight), traffic congestion and improve safety, health and air quality by reducing the need to travel, especially by car	
I4a To promote the provision of public transport	Will it promote sustainable forms of transport (public transport including bus and rail, cycle and pedestrian routes) and ensure that the necessary associated infrastructure is made available?
I4b To increase opportunities for walking and cycling	Will it reduce traffic congestion by promoting alternative modes of transport?
I4c To reduce levels of traffic congestion	Will it minimise the need to travel - balancing homes and jobs?

5. ALTERNATIVES ASSESSMENT

- 5.1. Alternatives are a useful tool when considering different ways of achieving a plan in order that adverse environmental and sustainability effects are avoided. Alternatives are also a statutory part of the SEA process. The SEA Directive (Article 5.1 and Annex I(h)) requires that ‘...reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme are identified, described and evaluated’ and ‘an outline for the reasons for selecting the alternatives dealt with’ are provided. Alternatives must be reasonable and can only be prepared within the legal scope of the responsibilities and powers of the plan that the relevant authority is preparing. In developing the range of options, full recognition of geographic, technological and financial constraints must also be taken into account.
- 5.2. The Sustainability Appraisal process has played a key part in helping to identify and refine alternatives.

SITUATION WITHOUT THE CORE STRATEGY

- 5.3. One of the first contributions the SA process made to identifying and refining alternatives was the assessment of the situation without the Core Strategy. The SEA Directive requires the provision of information on “relevant aspects of the current state of the environment and the likely evolution therefore without implementation of the plan or programme.” Without the development of a new planning policy framework represented by the Local Development Framework and other Local Development Documents the current planning policy context for the Peak District National Park would continue to apply.
- 5.4. The policy framework for the Peak District National Park at the time the Scoping Report was written and the development of the Core Strategy started, was the statutory Development Plan, which was composed of two parts:
- The Structure Plan, and
 - The Local Plan

The Structure Plan set out the National Park’s land-use strategy for 10 to 15 years ahead, and was replaced in March 2009 by the East Midlands Regional Plan. The Structure Plan outlined the basic directions and policies, taking into account key local issues and trends, Government policy and the policies of neighbouring authorities. The Local Plan, adopted in 2001 was required to conform with, and help implement, the strategy put forward in the Structure Plan. Legislation covering the change over to the new Development Plan system required the National Park to save a number of the structure and local plan policies beyond September 2007. Saved policies are valid until the Structure Plan and Local Plan have been fully replaced by the Local Development Framework documents. The following Supplementary Planning Guidance has also been adopted:

- Meeting the need for affordable housing (2003)
- Energy: renewables and conservation (2003)

- Agricultural developments (2003)
- A new Peak District Design Guide SPD was adopted in 2007

5.5. A number of likely implications of continuing this policy framework for the future of the National Park have been outlined below:

- **Legislation and national policy** – While many important principles established in the Structure Plan continue to be directly relevant, some aspects of the Plan are now outdated and do not accurately correspond to current legislation or national policy guidance. In particular the Structure Plan was written before the Environment Act 1995.
- **Evidence base** – the evidence contained within the Structure Plan and Local Plan is between 7 and 14 years old. Therefore, current policies are based on outdated information. A new policy framework, based on updated evidence is therefore required to ensure that development is directed in the most sustainable and appropriate way in accordance with current objectives and targets.
- **Regional Spatial Strategy** – without new policies, it is unlikely that the National Park would adequately contribute towards the targets of the East Midlands RSS, including those related to energy and waste and minerals apportionments.
- **Consultation** – The new LDF is also needed to provide “*full and fair opportunities for public consultation and community engagement*” in accordance with the UK Governments Sustainable Development Strategy (2007).
- **Biodiversity** – data on biodiversity status and priorities for conservation would not be updated and policies would therefore fail to respond effectively to the needs of threatened species and habitats or the indicators and targets contained in the Regional Environment Strategy.
- **Energy and climate change** – Changes in technologies, targets and legislation, mean that the current policy context is unlikely to be adequate to meet the requirements for renewable energy provision in the National Park. In particular, the Energy SPG is now five years old and fails to address the targets of the UK Energy White Paper. Therefore, in the absence of new policies, the National Park would be unlikely to provide an adequate contribution to the UK target of reducing CO² emissions by between 26 and 32% by 2020, against a 1990 baseline.
- **Economic** – the new plan will need to take into account the current economic position as set out in the commissioned Employment Land Review to help understand how best to react to the changing economic needs of the National Park. In particular, the Plan needs to create a policy environment which is compatible with the changing nature of agriculture, mining and quarrying and tourism whilst prioritising the conservation aims of the National Park. New policies will need to consider the scope for encouraging sustainable travel to

work patterns (including home working), provision of adequate and appropriate levels of employment land, and the ability to take advantage of new technologies and business models (e.g. retail, logistics and IT). In addition, new policies will need to consider the changes in agriculture and forestry and their potential role in meeting bioenergy targets and the economic benefits that this represents. Without a new set of policies to address this negative demographic trends and unemployment are likely to continue/increase.

- **Housing** – between 2001 and 2016 population is likely to fall by around 6%, working age population will fall by around 29%, and the population aged 60 years and over will rise by around 47%. However, the overall level of housing completions is also forecasted to fall as mills available for conversion become fewer in number. If present trends and forecasts continue the numbers of affordable housing completed will be a greater proportion of the overall numbers of housing permitted.
- **Transport** – Traffic has increased since the last plan, and failure to adopt new transport policies would therefore miss opportunities to address transport according to current local requirements. The Natural Environment and Rural Communities (NERC) Act (2006) gives powers to National Park Authorities to make traffic regulation orders to close routes, or to introduce speed restrictions, where unacceptable damage is being done by vehicular pressures.
- **Waste** – As a result of changes in technology and legislation since the adoption of the Structure Plan and Local Plan, the current policy framework would be inadequate. In particular, current National Park policy fails to correspond to the EC Directive on Waste Electrical and Electronic Equipment (WEEE) Directive, the Landfill Allowance Trading Scheme (LATS) and recycling targets.
- **Flooding** – Existing policy also does not take into account the findings of the Strategic Flood Risk Assessment (SFRA) (2008), and could therefore direct new development according to outdated or inadequate information, leading to flood impacts.

5.6. Since work started on the Core Strategy the Structure Plan has been replaced by a new regional level planning framework, the East Midlands Regional Plan, which was adopted in March 2009. This means that currently the policy framework for the Peak District National Park is the East Midlands Regional Plan and the Local Plan. The Regional Plan sets the spatial framework to inform the preparation of the Local Development Documents including the Core Strategy. The East Midlands Regional Plan is therefore a significant influence on the Policy Approaches proposed in the Core Strategy and an explanation can be found in the Preferred Approaches Consultation Document under each Policy to explain how it conforms and takes on board the Regional Plan. Therefore the recent adoption of the Regional Plan means that currently the situation without the Core Strategy would be a mixed one. Whilst its introduction means that the new policy direction it promotes (that will also be reflected in the Core Strategy once it is adopted) will start to have an influence many of the findings given above would still stand as there is no local mechanism to implement the new policy direction in the Regional Plan.

- 5.7. The Policy context is continually changing with new national policy being introduced and amended and the continuing development of the Regional planning framework. A partial review is currently being undertaken on the East Midlands Regional Plan and so even the Regional framework that the Core Strategy is trying to align with will not be static for very long.

DEVELOPMENT OF THE ALTERNATIVES

- 5.8. In 2005 PDNPA produced a consultation document entitled '*Help Shape the Future*' which started to explore the issues that faced the National Park and the potential options for addressing these issues. Following the public consultation on this document PDNPA went on in October 2006 to produce an initial Issues and Options paper. This paper underwent a high level SA review to help inform the development of these options. This SA Assessment is available from PDNPA on request.
- 5.9. The SA found that there were some general issues that needed attention such as the large number of policies presented, the level of detail in the policies and that alternative options were not presented for all issues. The policies were also heavily concentrated on minerals yet the more general prudent use of natural resources was not addressed, renewable energy needed more consideration as did the use of previously developed land and 'softer' transport measures such as the use of travel plans.
- 5.10. In the Spring of 2007 PDNPA published and consulted on 12 Issues and Options papers covering a wide range of themes that the Core Strategy may need to address. A SA was undertaken of these papers to accompany them for the public consultation. The SA is available from PDNPA on request.
- 5.11. In 2008 a final Issues and Options paper for the Core Strategy was produced and a full SA assessment was undertaken using the SA Objectives that were developed as part of the scoping phase to accompany these Refined Options. The SA assessment was published on the PDNPA website alongside the Issues and Options paper and a workshop was held with key stakeholders in September 2008 to present the work being done on the SA and discuss the initial sustainability findings on the Issues and Options. The SA is available from PDNPA on request. Key findings of the SA at this stage included:
- There needs to be a stronger steer on what type of economic activity PDNPA wants to promote, for example Green Technology?
 - Opportunity to promote eco-tourism and high value tourism in the facilities that are provided rather than tourism in general.
 - The reuse of existing buildings needs to be promoted above new build.
 - Transport policies should focus more on the locally specific visitor / tourism transport impacts that the National Park faces.

- Access and future provision of public transport needs to be considered when looking at settlement patterns.
 - A balance needs to be found between climate change adaptation, mitigation and short and longer term landscape impacts.
 - Ensure very best practice is implemented with regards to reducing environmental impacts such as noise, dust and transport.
 - The energy hierarchy should be central to energy policies and should be applied to all sizes of development.
- 5.12. In November 2008, the Refined Options for the Core Strategy were produced and a full SA assessment was undertaken to accompany these Refined Options. The Refined Options and accompanying SA underwent a 12 week public consultation between January and April 2009. The full SA assessment can be seen in Appendix D.
- 5.13. The findings of each SA at every stage of the process were fed back in to the plan making process in order to be taken on board in developing the next iteration of the Options. Following the Refined Options Consultation PDNPA identified the Preferred Approaches that would be taken forward and developed at the next stage. Chapter 6 describes this process.

6. PREFERRED APPROACHES ASSESSMENT

IDENTIFYING AND DEVELOPING THE PREFERRED APPROACHES

- 6.1. The Preferred Approaches set out in the Consultation Draft Report that accompanies this SA Report have been identified by PDNPA and developed internally through a process of iteration before being finalised. The previous two iterations each underwent a Sustainability Appraisal the findings of which were fed back to PDNPA for them to take on board when developing the Preferred Approaches. These SA appraisals of the early versions of the Preferred Approaches can be viewed on request from PDNPA.
- 6.2. The finalised Preferred Approaches for Consultation has undergone a thorough SA employing the SA Framework, the baseline and the review of plans, programmes and policies (see Chapter 6). The full detailed Policy by Policy assessment can be found in Appendix E. Generally this assessment has shown that majority of the Preferred Approaches are likely to have a positive effect on the SA Objectives or there are likely to be mixed uncertain effects. Hopefully as the Preferred Approaches are finalised for the draft Submission Core Strategy some of this uncertainty will be reduced. The Preferred Approaches that are likely to have either a negative or significant negative impact are given below:

Preferred Approach	Reasons for potential adverse effects.
L1c: Landscape enhancement and improvement.	Removal of buildings for aesthetic landscape reasons may adversely affect climate change, natural resource use and sustainable built development.
L3c: Listed buildings and other buildings of historic or vernacular merit	The conversion of listed agricultural buildings to residential and amenity use will not be permitted or will be significantly limited which in some locations may have a minor negative impact on the opportunity for housing provision and local services.
HC4b: Housing for key workers, including those employed in agriculture, forestry and other rural enterprises.	Small scale housing development for key workers may occur in open countryside with a negative impact on the environment (only landscape is afforded protection) and with limited access to amenities and public transport.
HC5: Increasing the proportion of affordable housing on enhancement schemes including changes of use to existing buildings.	The promotion of affordable housing is made without mention of sustainable design, construction or locational requirements which could have similar negative effects on the environment as HC4b.

E1: Businesses in the countryside	Restricting additional dwellings related to new business use will not be permitted which may have a negative effect on meeting housing needs and stifle the growth of the local economy.
E3: Identifying and safeguarding employment sites	The location of new employment sites will be assessed against strong sustainability criteria yet there is no criteria covering wider environmental impacts or requiring mitigation measures in terms of climate change, sustainable land use and resource consumption. Sustainable design and construction techniques should be promoted in this Policy.
E4: Hotels, bed and breakfast and self-catering holiday accommodation	Further accommodation development may result in increased waste production and water consumption. The conversion of traditional buildings to holiday accommodation may also reduce the stock of existing buildings that could be used to provide housing to meet local needs.
T9: Managing the demand for car and coach parks	Enhancing parking provision may encourage road traffic.
T10: Managing the demand for freight transport and the provision of lorry parking	Restricting developments such as road haulage operating centres may have negative impacts on the local economy. The more vigorous promotion of developments that use more sustainable modes of transport should mitigate any negative impacts.
T12: Utilities infrastructure.	Restricting utilities infrastructure may have a negative impact on the local economy, housing development and accessibility. Permitting conveyors that are part of mining operations may negatively affect natural resource extraction and therefore consumption.

SUMMARY OF SIGNIFICANT EFFECTS

- 6.3. Following on from the Preferred Approaches assessment found in Appendix E, a summary of the potential significant effects by SA Objective has been undertaken along with a cumulative assessment of the Preferred Approaches on each SA Objective. Recommendations / mitigation and potential monitoring indicators for each SA Objective proposed. A description is given below of each section that is included in the summary.

Significant Effects

- 6.4. It is evident from the assessment that the majority of Preferred Approaches will lead to sustainability benefits. The summaries given below describe both the potential significant positive and negative effects of the Preferred Approaches on each of the SA Objectives. A significant effect is defined by being of the highest magnitude (double positive or negative (++) or --) and / or by the results of the cumulative effects assessment (see below).

Cumulative Effects

- 6.5. The assessment process has scrutinised the Preferred Approaches for positive and adverse effects. Many environmental problems however, result from the accumulation of multiple, small and often indirect effects, rather than a few large and obvious ones. These effects are difficult to deal with on a project-by-project basis through EIA. It is at the SA level that they are most effectively identified and addressed. Annex I of the SEA Directive requires that the assessment of effects include indirect (secondary), synergistic and cumulative effects. The geographical scale, probability, duration, frequency and reversibility of effects are also considered in the summary below.
- 6.6. Indirect or secondary effects are effects that are not a direct result of the Core Strategy, but occur away from the original impact or as a result of a complex pathway. For example a development that changes the water table may affect the ecology of wetland in a different part of the river basin or the construction of a road that then facilitates and attracts other developments associated with the logistical benefits that a road may provide.
- 6.7. Synergistic effects arise where several developments each have an insignificant effect but together combine to have a significant effect. For example where two developments in combination end up fragmenting a habitat where as on their own there would still be a link.
- 6.8. Cumulative effects produce a total effect greater than the sum of the individual effects, and cumulative effects over time are often not recognised. For example air pollution and climate change are both cumulative in nature when the hundredth application comes in on the same seemingly small level, this is the 'straw that breaks the camel's back'. The assessment of cumulative effects below in the summary is based on current baseline conditions against the accumulation of effects from each Policy and the likely scale and duration of predicted effects.

Recommendations / mitigation

- 6.9. A key advantage of SA is that it enables plan-makers to contemplate a large amount of information when making decisions on whether and how to provide for an identified need. In this respect the assessment of the Preferred Approaches has identified recommendations on how the sustainability of the policies could be improved in the draft-Submission version and these recommendations are summarised below. The way in which the Core Strategy is implemented will also be key to determining its impact, recommendations and best practice measures /

mitigation measures that need to be taken into account when implementing the Policies have been detailed below.

Monitoring

- 6.10. The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on responsible authorities. It is therefore beneficial if the monitoring framework builds on monitoring systems that are already in place and use data that is routinely collected by PDNPA and partner organisations. The indicators will help measure the environmental, social and economic effects (including unforeseen effects) of the plan and its overall success in terms of meeting the sustainability needs of the area. Potential indicators are given against each SA Objective in the summary below and are particularly focussed on those aspects of the environment that are likely to be negatively impacted upon, or where the impact is uncertain. The inclusion of potential indicators at this stage allows PDNPA and its partner organisations to start to engage and discuss how future monitoring might take place and link with other monitoring processes. PDNPA will be responsible for monitoring the sustainability of the Core Strategy once it has been adopted and will need to publish monitoring reports periodically.
- 6.11. The summary of significant effects for each SA Objective is given below.

SA OBJECTIVE I: TO PROTECT, MAINTAIN AND ENHANCE THE LANDSCAPE AND TOWNSCAPE OF THE NATIONAL PARK

Significant Positive Effects

- 6.12. A large number of the Preferred Approaches are expected to have significant positive effects on this objective. Particular positive effects are noted for the landscape and conservation Policies and the transport Policies.
- 6.13. A significant number of Policies aims are to conserve the landscape and character of the National Park, or contain a clause which states that where landscape interests conflict with other aims of the Policy, the conservation and enhancement of the landscape will take priority.

Significant Negative Effects

- 6.14. There are no negative or significant negative effects associated with any of the Preferred Approaches in terms of this Objective.

Cumulative Effects

SA Objective I: To protect, maintain and enhance the landscape and townscape of the National Park.						
Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility

++	Direct	National	High probability	Short - Medium term	Ongoing	Permanent
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Recommendations / mitigation

- 6.15. The likely effects of the Preferred Approaches for landscape and conservation would be clearer if wording was tightened up in places, e.g. where it is stated that an ‘effect can be mitigated to an acceptable degree’ it is unclear what would be considered acceptable.
- 6.16. Greater consideration needs to be given to the long term management and protection of the environment in the light of climate change.

Monitoring

- 6.17. Suggested indicators and/or sources for indicators/monitoring data are:
- Landscape quality and understanding of landscape character (including historic landscapes and coverage of Historic Landscape Characterisation and Countryside Quality Counts). (Local Authorities, Natural England and English Heritage).

SA OBJECTIVE 2: TO PROTECT, ENHANCE AND IMPROVE BIODIVERSITY, FLORA AND FAUNA AND GEOLOGICAL INTERESTS

Significant Positive Effects

- 6.18. Many of the Preferred Approaches are expected to have significant positive effects on this SA Objective, particularly those relating to landscape and conservation and transport.
- 6.19. The interests of the natural environment are directly protected in many policies, e.g. preventing development in situations where it may result in damage to biodiversity or geological interests.

Significant Negative Effects

- 6.20. Small scale housing developments for key workers and the promotion of affordable housing may lead to localised negative impacts on biodiversity and geodiversity.

Cumulative Effects

SA Objective 2: To protect, enhance and improve biodiversity, flora and fauna and geological interests

Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
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++	Direct	Local/regional	Short - Medium probability	Medium Term	Ongoing	Permanent
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Recommendations / mitigation

- 6.21. More reference to biodiversity/geodiversity issues within the housing policies would be beneficial and should result in more positive and significant positive scores being associated with this SA Objective.
- 6.22. Best practice guidance should be followed when carrying out all types of development in order to mitigate potential impacts on biodiversity and geodiversity, for example when planning minerals developments, dust generation should be assessed.
- 6.23. Measures which enhance biodiversity with a view to adaptation to climate change such as wildlife corridors, stepping stones and refuges would also be beneficial.

Monitoring

- 6.24. Suggested indicators and/or sources for indicators/monitoring data are:
 - Populations of wild bird species (farmland and woodland species) – reported in AMR and National Statistics but based on Breeding Bird Survey (BTO/JNCC/RSPB).
 - Local Biodiversity Action Plans

SA OBJECTIVE 3: TO PRESERVE, PROTECT AND ENHANCE THE NATIONAL PARK'S HISTORIC AND CULTURAL ENVIRONMENT

Significant Positive Effects

- 6.25. The majority of the significant positive effects associated with this objective are expected to result from the landscape and conservation and transport Preferred Approaches.
- 6.26. Positive effects are mostly as a result of Policies which have the direct purpose of conserving the historic and cultural environment of the National Park, or where they state that protection of the landscape / townscape and the historic environment will take priority over other policy aims.

Significant Negative Effects

- 6.27. There are no negative or significant negative effects associated with any of the Preferred Approaches in terms of this Objective.

Cumulative Effects

SA Objective 3: To preserve, protect and enhance the National Park's historic and cultural environment						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
++	Direct	National	High probability	Short - Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.28. Although indirect it is important that the spatial strategy takes account of the need for spaces where the protection and enhancement of the cultural aspects of the National Park can be fostered; such as ensuring that appropriate amenity spaces are created for cultural activities.

Monitoring

- 6.29. Suggested indicators and/or sources for indicators/monitoring data are:
- Listed Buildings, Buildings at Risk (English Heritage, Heritage Counts Indicators)

SA OBJECTIVE 4: TO PROTECT AND IMPROVE AIR, WATER AND SOIL QUALITY AND MINIMISE NOISE AND LIGHT POLLUTION

Significant Positive Effects

- 6.30. The majority of the significant positive effects related to with this objective are associated with general spatial Policies, climate change and transport Preferred Approaches.
- 6.31. Positive effects are anticipated to arise from Policies that specify the protection of the special qualities of the National Park, which includes tranquillity (so would require noise and light pollution to be avoided).

Significant Negative Effects

- 6.32. Small scale housing developments for key workers and the promotion of affordable housing may lead to localised negative impacts.

Cumulative Effects

SA Objective 4: To protect and improve air, water and soil quality and minimise noise and light pollution						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Indirect	Local	Medium probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.33. Best practice guidelines should be followed when undertaking all new developments, to ensure that negative impacts on air, water and soil quality are mitigated and to avoid excessive noise or light pollution. For example the use of porous surfaces and SuDS techniques to reduce soil sealing and allow water filtration.

Monitoring

- 6.34. Suggested indicators and/or sources for indicators/monitoring data are:
- Tranquillity maps (CPRE) & Dark Skies data.
 - % of rivers of good or fair ecological and chemical water quality (Environment Agency)
 - Number of pollution incidents (reported to Environment Agency)
 - Number of Air Quality Management Areas (AQMAs) in the area, as well as whether their objectives are being met (PDNPA)
 - Number of days on which air pollution is moderate or high (PDNPA, Environment Agency)
 - Ozone levels (annual mean of daily maximum 8-hour mean)
 - Area of farms with Environmental Stewardship agreements (Defra)
 - Change in amount and condition of Best and Most Versatile (BMV) agricultural land (Defra)

SA OBJECTIVE 5: TO MINIMISE THE CONSUMPTION OF NATURAL RESOURCES

Significant Positive Effects

- 6.35. Almost all of the significant positive effects associated with this objective relate to the Preferred Approaches for minerals, as in general they seek to conserve mineral resources for the future and avoid sterilisation.

6.36. The promotion of the reuse of existing buildings throughout the Preferred Approaches is likely to have a significant positive effect on this Option as is the reuse of construction and demolition waste on site.

Significant Negative Effects

6.37. A number of negative effects are associated with this Objective, mainly resulting from the Preferred Approaches for housing and the economy. These effects mainly arise from the fact that these Policies allow for new development, which may have associated demands for local natural resources.

Cumulative Effects

SA Objective 5: To minimise the consumption of natural resources						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	Local	Medium Probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

6.38. The promotion of the use of recycled aggregates and materials during development (new and conversion) projects would significantly benefit this Objective.

Monitoring

- 6.39. Suggested indicators and/or sources for indicators/monitoring data are:
- Area of minerals sterilised by development (Minerals Planning Authorities)
 - Recycling rates (Audit Commission Area Profiles)
 - Annual CO2 emissions (www.sustainable-development.gov, Audit Commission)

SA OBJECTIVE 6: TO DEVELOP A MANAGED RESPONSE TO CLIMATE CHANGE

Significant Positive Effects

- 6.40. There are a number of significant positive effects associated with this objective, mainly arising from the Preferred Approaches for climate change and Transport.
- 6.41. The recommendations for the use of renewables and achieving sustainable low carbon development should have significant benefits for the National Park’s response to climate change.
- 6.42. The transport Policies encourage the use of sustainable transport and reduced car and vehicular use within and around the National Park which should help to respond to climate change.

- 6.43. The protection of habitats that provide wildlife corridors etc is a positive step towards adapting to climate change. The promotion of SuDS and the active stance to reduce vulnerability to flooding are also positive steps towards adaptation to climate change.
- 6.44. The promotion of the reuse of existing buildings throughout the Preferred Approaches is likely to have a significant positive effect on this Option as is the reuse of construction and demolition waste on site.

Significant Negative Effects

- 6.45. The promotion of the removal of buildings for purely aesthetic reasons, where they are not in keeping with the surroundings is likely to have a significant effect on mitigating climate change through increasing resource use unnecessarily.

Cumulative Effects

SA Objective 6: To develop a managed response to climate change						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Direct	International	Medium probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.46. All new developments should incorporate sustainable design and construction measures. In particular, placing more emphasis on sustainable design within the Preferred Approaches for housing should result in a higher number of positive scores in relation to this Objective.
- 6.47. Measures to adapt to climate change are limited especially with regard to the large number of policies that protect the landscape and biodiversity but do little to consider how these things need to be managed to cope with future climate change. Planning for the future protection and management of the environment should be more heavily emphasised in the Preferred Approaches.

Monitoring

- 6.48. Suggested indicators and/or sources for indicators/monitoring data are:
 - Amount of energy produced from renewable sources (DBERR Energy Trends)
 - Annual CO2 emissions (www.sustainable-development.gov, Audit Commission)
 - Incidence of flooding events

SA OBJECTIVE 7: TO ACHIEVE AND PROMOTE SUSTAINABLE LAND USE AND BUILT DEVELOPMENT

Significant Positive Effects

- 6.49. There are a small number of significant positive effects associated with this objective, most of which are expected to result from the Preferred Approaches for climate change.
- 6.50. Focusing development (housing and recreational) in existing settlements with good access to public transport and amenities is likely to help achieve sustainable land use. The promotion of sustainable design and construction is also likely to have a positive effect on this objective.
- 6.51. The reuse of existing buildings and previously developed land throughout many of the Preferred Actions may have a significant positive impact on sustainable land use and built development within the National Park as is the promotion of reuse of construction and demolition waste on site.

Significant Negative Effects

- 6.52. Negative effects may arise where affordable housing developments may not be able to include the most sustainable design and construction measures, as a result of financial viability.
- 6.53. Specifying that buildings not in keeping with the local character may be removed for landscape purposes, goes against the reuse of existing buildings and therefore may have a negative effect on the sustainable use of land and buildings.

Cumulative Effects

SA Objective 7: To achieve and promote sustainable land use and built development						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Both direct and indirect	Local	Medium probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.54. The promotion of sustainable design and construction techniques needs to be much more widespread throughout the Preferred Approaches.

- 6.55. When assessing the financial viability of affordable housing projects, the long term financial costs and benefits of sustainable design and construction techniques should be taken into account. Wider environmental benefits for the community should also be considered.
- 6.56. Buildings that are felt not to be in keeping with local character should be remodelled, keeping as much of the existing frame as possible, through the use of recladding and landscaping etc, rather than being demolished.

Monitoring

- 6.57. Suggested indicators and/or sources for indicators/monitoring data are:
 - New dwellings built on previously developed land or through conversions or all new development on previously developed land (Defra -Govt sustainable development indicator)
 - Area of greenfield land developed (Local Planning Authorities)

SA OBJECTIVE 8: INCREASE UNDERSTANDING OF THE SPECIAL QUALITIES OF THE PARK BY TARGET GROUPS, YOUNG PEOPLE (14-20 YEARS); PEOPLE FROM DISADVANTAGED AREAS, WITH DISABILITIES AND FROM ETHNIC MINORITY BACKGROUNDS

Significant Positive Effects

- 6.58. The Preferred Options are not expected to have any significant positive effects on increasing the understanding of the special qualities of the National Park by target groups.

Significant Negative Effects

- 6.59. The Preferred Options are not expected to have any significant negative effects on increasing the understanding of the special qualities of the National Park by target groups.

Cumulative Effects

SA Objective 8: Increase understanding of the special qualities of the Park by target groups, young people (14-20 years); people from disadvantaged areas, with disabilities and from ethnic minority backgrounds						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
0	Indirect	National	Uncertain	Medium	Ongoing	Permanent

				term		
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Recommendations / mitigation

6.60. This SA Objective is currently not addressed in the Preferred Approaches. Where there is mention of increasing understanding there is currently specific groups are not targeted. The supporting text to the Preferred Approaches should emphasise those groups that PDNPA particularly wants to encourage to understand and enjoy the National Park.

Monitoring

- 6.61. Suggested indicators and/or sources for indicators/monitoring data are:
- Visitor demographics e.g. age, ethnic background etc. (PDNPA)

SA OBJECTIVE 9: TO PROMOTE ACCESS FOR ALL

Significant Positive Effects

6.62. Policies specifically address the promotion of access for all to the National Park for both local people and those from further afield. Therefore, the positive effects associated with this objective may be experienced nationally.

Significant Negative Effects

6.63. The Preferred Options are not expected to have any significant negative effects on promoting access for all.

Cumulative Effects

SA Objective 9: To promote access for all						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Nationally	Medium Certainty	Medium Term	Ongoing	Permanent

Recommendations / mitigation

6.64. As with SA Objective 8, more could be done to ensure that target groups are encouraged to visit the National Park.

Monitoring

- 6.65. Suggested indicators and/or sources for indicators/monitoring data are:
- Visitor demographics e.g. visitor origin, age, ethnic background etc. (PDNPA)

SA OBJECTIVE I0: PROMOTE GOOD GOVERNANCE

Significant Positive Effects

- 6.66. The Preferred Options are not expected to have any significant positive effects on good governance.

Significant Negative Effects

- 6.67. The Preferred Options are not expected to have any significant negative effects on good governance.

Cumulative Effects

SA Objective I0: Promote good governance						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
0	Direct	Regional	Low Certainty	Medium Term	Ongoing	Permanent

Recommendations / mitigation

- 6.68. The supporting text to the Preferred Approaches should advocate improving links between partner organisations and also emphasise the importance of local participation in decision making.

Monitoring

- 6.69. Suggested indicators and/or sources for indicators/monitoring data are:
- Civic engagement. (Citizenship Survey, DCLG)
 - Voter turnout. (State of the Region Report, Audit Commission)
 - Participation in informal/formal volunteering activities. (National Survey of Volunteering and Charitable Giving, State of the Region Report)
 - Perceptions of community cohesion. (Citizenship Survey, DCLG)

SA OBJECTIVE 11: TO HELP MEET LOCAL NEED FOR HOUSING

Significant Positive Effects

- 6.70. All of the significant positive effects associated with this objective are expected to result from the Preferred Approaches for housing. The Policies allow for the provision of affordable housing, identify appropriate sites and set out criteria for the location of housing developments. Together, the Policies should therefore have significant positive effects on this Objective.

Significant Negative Effects

- 6.71. There are a small number of negative effects expected to arise from the Preferred Approaches, where housing provision may be restricted by, Policies that prevent the conversion of buildings such as listed agricultural buildings for housing use or prevent new housing developments from taking place.

Cumulative Effects

SA Objective 11: To help meet local need for housing						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct	Regional	High probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.72. Ensure that the housing needs of the local population are correctly and accurately understood through time. This needs to be undertaken in conjunction with SA Objective 10, with an emphasis on effective local participation in decision making.

Monitoring

- 6.73. Suggested indicators and/or sources for indicators/monitoring data are:

- Number of new dwellings provided
- Proportion of new dwellings classed as 'affordable'
- House price: average income data
- New housing supply by tenure (Annual Monitoring Report)
- Demand for affordable housing (Strategic Housing Market Assessments)

SA OBJECTIVE 12: ENCOURAGE BETTER ACCESS TO A RANGE OF LOCAL CENTRES, SERVICES AND AMENITIES

Significant Positive Effects

- 6.74. The small number of significant positive effects that are associated with this Objective relate to the Preferred Approaches for visiting and enjoyment, housing and transport. They mainly arise where Policies make specific allowances for the provision of services and facilities and where it is stated that these should be located in accessible positions for local communities. Housing policies, HC8 and HC9 specifically cover the provision of community services and shopping facilities.

Significant Negative Effects

- 6.75. Negative effects are related to restrictions to utilities infrastructure and other forms of development that may be associated with service provision.

Cumulative Effects

SA Objective 12: Encourage better access to a range of local centres, services and amenities						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+/-	Both direct and indirect	Local	Medium probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.76. Promote innovative, sustainable and small scale methods of providing utilities in areas that it would otherwise be difficult creating community amenities. For example the use of SuDS and on site renewable energy generation.
- 6.77. Consider innovative schemes to provide amenities and services to the population without the need for a new physical structure either through encouraging multiple use of buildings, for example public houses, providing post office facilities, or through mobile services.

Monitoring

- 6.78. Suggested indicators and/or sources for indicators/monitoring data are:

- Percentage of the population with access to: employment, primary school, secondary school, hospital and supermarket. This is based on access at the neighbourhood level by foot or public transport. (Defra & DfT)
- Extent of accessible open space
- Quality of open spaces data from PPG17 Open Space Audit
- Amount of investment in the creation and management of green space (Local authorities).
- Quality, extent, and use of public rights of way (footpaths and bridleways) (Local authorities, Natural England).

SA OBJECTIVE 13: PROMOTE A HEALTHY PARK WIDE ECONOMY

Significant Positive Effects

- 6.79. A small number of significant positive scores are associated with this objective, resulting from Preferred Approaches that directly promote economic activity (either local businesses or encouraging tourism.) or indirectly through supporting essential housing for key workers.

Significant Negative Effects

- 6.80. Restricting freight transport in the National Park may have a negative effect on the local economy as may restricting utilities infrastructure.

Cumulative Effects

SA Objective 13: Promote a healthy Park wide economy						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
+	Direct and Indirect	Local	Medium probability	Medium term	Ongoing	Permanent

Recommendations / mitigation

- 6.81. The unique selling points of the National Park should be utilised by businesses more to make their businesses distinctive and also add to the uniqueness of the National Park. For example businesses that keep the craft skills of the National Park alive should be promoted along with green technology businesses that help ensure the sustainability of the National Park.

Monitoring

6.82. Suggested indicators and/or sources for indicators/monitoring data are:

- New business registrations
- Employment levels
- Employment land provision (EMRA)

SA OBJECTIVE 14: TO REDUCE ROAD TRAFFIC (ESPECIALLY PRIVATE CARS AND FREIGHT), TRAFFIC CONGESTION AND IMPROVE SAFETY, HEALTH AND AIR QUALITY BY REDUCING THE NEED TO TRAVEL, ESPECIALLY BY CAR

Significant Positive Effects

- 6.83. A number of the Preferred Approaches are likely to have significant positive impacts on this objective, particularly those for transport as they are directly aimed at reducing car use and encouraging sustainable modes of transport.
- 6.84. Sustainable patterns of development which reduce the need for travel will also have a significant indirect effect on this SA Objective.
- 6.85. Promoting the onsite reuse and disposal of construction and demolition waste is likely to significantly reduce the level of construction related traffic (and associated safety, health, noise and air quality problems) in the National Park.
- 6.86. The health of the National Park population through reduced air pollution and increased exercise rates is also likely to be significant.

Significant Negative Effects

- 6.87. Only one of the Preferred Approaches is considered likely to have a negative effect on this objective, being the transport Policy which allows for the provision of coach and car parking. This may facilitate higher levels of road use, generating negative effects.

Cumulative Effects

SA Objective 14: To reduce road traffic (especially private cars and freight), traffic congestion and improve safety, health and air quality by reducing the need to travel, especially by car						
Cumulative Score	Direct / indirect	Geographical Scale	Probability	Duration	Frequency	Reversibility
++	Direct and	Regional	Medium probability	Medium term	Ongoing	Permanent

	Indirect					
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Recommendations / mitigation

- 6.88. The promotion of broader Smarter choices methods of gaining behavioural change and modal shift should be promoted as opposed to the narrow focus on Travel Plans. Investigating the barriers that currently prevent people from using public transport in the National Park will be central to this. The health benefits of encouraging more sustainable modes should also be publicised.
- 6.89. Incorporating tourist-related traffic into the Preferred Approaches for transport would be beneficial, as this issue is not specifically addressed at present, although encouraging one-off or more sporadic journeys to be made via sustainable transport may be more challenging than changing the mode of transport used for regular journeys such as commuting.

Monitoring

- 6.90. Suggested indicators and/or sources for indicators/monitoring data are:
- Levels of travel by different modes, in terms of numbers (journeys made) and passenger –km (distances travelled). Measures may be categorised by a number of factors, such as journey purpose, time, etc. Key sources include: Highways Agency; Department for Transport; National Travel Survey; Office for Rail Regulation; local transport authorities’ Local Transport Plans (LTPs)
 - Travel patterns, especially for journeys to work and education. Key sources include: National Travel Survey (NTS); Labour Force Survey (LFS).
 - Levels of freight movement, by tonnes (goods moved) and tonne-km (distances over which moved). Key sources include: Department for Transport (surveys of goods transport); Office for Rail Regulation (ORR).
 - Provision of transport infrastructure, by length and by category / mode: roads, rail and light rail lines, busways and bus priorities, levels of services provided, cycleways, footways, waterways. Key sources include: Highways Agency; Department for Transport; ORR; local transport authorities’ LTPs.

7. CONCLUSIONS

- 7.1. The Preferred Approaches to the Core Strategy are likely to have a positive effect on the SA Objectives and the SEA Directive topics. There are, perhaps unsurprisingly, relatively few significant adverse effects expected as a result of the Preferred Approaches, and these adverse effects are likely to be relatively small scale, localised and the result of Policies that deliver significant benefits to other SA Objectives. However, some caution is needed as there are still a relatively large number of Policies with mixed or as yet uncertain effects. Hopefully, as the Preferred Approaches are finalised for the draft Submission Core Strategy, some of this uncertainty will be reduced and a more accurate assessment of the likely sustainability effects will be ascertained.
- 7.2. Although predicted adverse effects are relatively minor, and overall the Preferred Approaches are likely to have a positive effect on the sustainability of the National Park, because of the very nature of the National Park, the Park should be aiming to be an exemplar of sustainability for other Local Authorities to follow. Presently the Preferred Approaches are, rightly, quite protectionist in their defence of the special qualities of the National Park yet it is our opinion that they could go further in actively promoting sustainable practices that would set the Peak District out as a leader in sustainability. This would not only help to improve the sustainability of the Park, but help to enhance and reinforce its image as one of the most important areas for the environment in the UK. Taking this approach would also help to redress the balance between landscape and other sustainability considerations, as presently the Preferred Approaches are heavily skewed towards protection of the current landscape.
- 7.3. The Preferred Approaches do not convey a clear message or position in terms of the future direction of the National Park as they could do due to the large number of Policies and very detailed specific nature of some of those Policies. For example the Transport Preferred Approaches incorporate several of Policies which cover quite specific issues, resulting in the loss of the strategic message concerning transport in the National Park.
- 7.4. Specific recommendations on each of the SA Objectives are included in Chapter 6 to be taken into account during the preparation of the draft Submission Core Strategy.

NEXT STEPS

- 7.5. Public involvement through consultation is a key element of SA. Consultation also takes place with statutory consultees. In England these are English Heritage, the Environment Agency and Natural England. Article 6(1) and 6(2) of the SEA Directive outline the requirements for public consultation which states that the authorities and public will be consulted on the draft plan and the accompanying environmental report before its adoption or submission to the legislative procedure.

- 7.6. This SA Report (which includes the Environmental Report as required by the SEA Directive) will be published for a 6 week public consultation alongside the Preferred Approaches Paper for the Peak District National Park Authority Core Strategy. The consultation will run between 26th October and 7th December. Any consultation comments or queries regarding the SA Process should be sent to:

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Peak District National Park Authority
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- 7.7. Following on from this consultation all comments received will be reviewed and taken into account during the preparation of the draft Submission Core Strategy and accompanying SA Report. There will then be another opportunity for the public to comment on the soundness of this draft submission Core Strategy and accompanying SA Report in June/ July 2010.