



Peak District National Park Authority Local Plan Part 2 **Development Management Policies**

Equalities Impact Assessment

October 2016

Introduction

This document constitutes an Equalities Impact Assessment (EqIA) for the Development Management Policies Document (DMP) which is being published on 28 October 2016. Both documents have been prepared by Peak District National Park Authority.

The Authority is committed to the achievement of the twin statutory purposes of National Parks which are to:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- Promote opportunities for the understanding and enjoyment of the National Park's special qualities.

In pursuing these purposes the Authority also has a duty to seek to foster the social and economic wellbeing of the Park's communities.

The Authority also has an adopted Equality Policy from 2013. This reflects the statutory responsibilities of the Council under the Equalities Act 2010.

The Equality Duty and the Council's Responsibilities

The Equalities Act 2010 sets out the different ways in which it is unlawful to treat someone, such as direct and indirect discrimination, harassment, victimisation and failing to make a reasonable adjustment for a disabled person. It sets out an equality duty for public authorities.

The Equality Duty focuses on the transparency and accountability of public authorities, with a general duty of eliminating discrimination, harassment and victimisation; advancing quality of opportunity; and fostering good relations.

The Equality Duty is a duty on the Authority when carrying out public functions. The Authority must consider the needs of all individuals in their day to day work – in shaping policy, in delivering services and in relation to its own employees.

The Equality Duty covers the following protected characteristics:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race (including ethnic or national origin, colour or nationality)
- religion or belief (including lack of belief)
- sex
- sexual orientation.

There is no explicit requirement in the Equalities Act to refer to the Equality Duty in recording the process of consideration but it is considered good practice to do so.

Assessment of the Development Management Policies document

DMP seeks to deliver the adopted Core Strategy (October, 2011) by defining areas (referred to in the Core strategy) and by setting out more detailed complementary policies for managing development.

Both DMP and the Core Strategy have been subject to an iterative process of independent sustainability appraisal. Sustainability appraisal considers the social, environmental and economic impacts of policies. The purpose behind this is to promote “sustainable development”, making the plan as sustainable as possible. The social objectives which embrace equalities are a key component of this analysis and are set out in the sustainability appraisal scoping report as:

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 increase understanding of how those decisions are reached?
	Does the plan set a process for engagement with communities, including specific approaches to reach particular groups/sectors?
10b Raise partners’ awareness and understanding of National Park purposes and standing.	Will it encourage positive partnership involvement and joint working with other stakeholders and sectors?
10c To ensure compliance with Race, Disability and Gender Equality Duties.	Does the policy avoid potential for inequality of effect, or serve to positively address existing identified inequalities through its implementation comes?

The Core Strategy was adopted after examination and consideration of relevant planning and sustainability issues. DMP is a subordinate planning document to the Core Strategy which should (and does) accord with it. At a strategic level therefore, DMP has already been subject to satisfactory sustainability appraisal.

The policies in the Issues and Preferred Approaches document (2012) and Pre-Submission (or Publication) Draft DMP are accompanied by appraisals.

The detailed sustainability appraisal accompanying the Pre-Submission Draft indicates that most policies would either have no effect or positive effects on all of the social objectives. Areas flagged as potentially a negative impact are shown in Appendix 2 with suggested actions for amending or retaining policies.

Much of the basic thrust of preferred approaches are now carried forward into the Pre-Submission Draft.

The most significant differences between the two draft stages of the DMP include:

- Greater emphasis on heritage justification for the re-use of historic buildings

- Improved definition of the definition of locally needed affordable housing (strengthening the link to housing need as defined in the Housing Acts and to the systems employed by local Housing Authorities);
- Adding greater scrutiny in cases involving the replacement of existing houses with newer larger properties;
- Providing more opportunities for housing justified on conservation and enhancement grounds (including opportunities for conversion of historic buildings, and ancillary accommodation to support family connections and farmer succession). The Sustainability Appraisal highlights that these options may exacerbate affordability issues in the area;
- Stronger policies to protect the loss of community services (by seeking greater evidence of market testing);
- Stronger policy safeguarding key employment sites in between Bakewell and the Hope Valley;
- Greater support for camping pods and shepherds huts to allow simple, year round accommodation;
- an expansion of the policy coverage for Minerals and Waste to deal with the justification for new sites and their restoration;
- In addition to Development Management Policy production the Authority has also seen the inclusion of policy coverage for made (adopted) Neighbourhood Plans in Bradwell and Chapel en le Frith and a significant transfer of policy content from the saved Local Plan (2001) to the emerging Neighbourhood Plan for Bakewell;

Equalities Impact Assessment

An Equalities Impact Assessment (EqIA) is required when a public authority plans, changes or removes a service, policy or function. The EqIA is therefore an integral part of the development of a policy document.

Sustainability appraisal is concerned with the shaping (and delivery) of planning policy, and provides the fullest appraisal of social objectives.

An Equalities Impact Assessment (EqIA) is more broadly based. In this case it provides a check on whether DMP (and the process of preparing DMP) reasonably meets the Equality Duty and satisfies the National Park Authority Equality Policy. The underlying purpose of the EqIA is to help address and tackle inequality, by:

- using public expenditure in an efficient and fair way (in the context of reducing financial resources);
- creating strong social and community networks; and
- removing the obstacles to making things happen.

The Core Strategy was subject to a satisfactory Equality Impact Assessment.

The assessment for DMP is attached at Appendix 1.

Findings of the Equalities Impact Assessment

The assessment in Appendix 1 takes the form of a screening. **It concludes that there is no need to carry out a further or fuller Impact Assessment of DMP.**

No significant adverse impacts are identified.

Appendix 1: Assessment

Team	Policy Planning
Directorate	Conservation and Planning
Person responsible for the assessment	Brian Taylor (Policy Planning Manager)
Policy document to be assessed	Development Management Policies Development Plan Document (DMP)
Date of Assessment	4th October 2016
Is this a new or existing document?	New
1. What are you looking to achieve in this activity?	The purpose of DMP is to provide effective detailed criteria to assist the implementation of the Core Strategy and to assist the management of development across the whole National Park in accordance with the adopted Core Strategy (October 2011). This includes the delineation of areas and identification of specific areas and sites for protection or safeguarding.
2. Who in the main will benefit?	Potentially the whole community. The use of criteria based policies will depend on specific planning applications/development proposals under consideration. Residents (including younger and older residents) will benefit from an increase in development opportunities and in the retention/promotion of local facilities and services (e.g. shops, open spaces and community facilities). The Authority will benefit by having greater control in the manner in which development and related infrastructure will be delivered whilst having strong regard to National Park purposes. Developers/landowners and infrastructure providers will benefit by having a greater degree of transparency and certainty.
3. What are you trying to achieve with this document?	DMP has two main purposes: (a) to provide environmental and other criteria, against which all development proposals and planning applications can be judged; and (b) to define areas and constraints:- these are shown on a Policies Map. They include the Natural Zone and associated landscape designations, towns and villages designated in the Core Strategy, safeguarded employment areas and conservation features. DMP fits

	<p>within the framework of the objectives in the Core Strategy. The relevant strategic policies are listed at the beginning of each Chapter in DMP.</p>
<p>4. How will you tell people about the document?</p>	<p>The Authority has consulted on the document previously and, of course, on the adopted Core Strategy. Consultation was carried out in accordance with the Council's Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012. There was a full public consultation in respect of the Issues and Preferred Approaches version between September and December 2012 (12 weeks). The launch of the 2012 document prompted a series of discussions with parishes and forums linked the National Park Authority's work such as the Local Access Forum and Land Managers Forum. The annual Parishes Day has proved invaluable in debating key development issues such as affordable housing, the reuse of traditional buildings, farming and local business sites.</p> <p>All responders to the Issues and Preferred Approaches document will be directly notified by letter/email that DMP has been published, in addition to 'consultation bodies' and those asking to be added to the consultation database. Copies of the proposed submission documents (including Pre-Submission Draft of DMP) will be made available at deposit points across the National Park and on the Authority's website.</p>
<p>5. What could prevent your communities getting the most out of the document?</p>	<p>Unforeseen factors affecting development viability and/or progress, such a new economic downturn. Changes in legislation or Government policy which might impact on the ability to deliver DMP.</p>
<p>6. Who is the document for?</p>	<p>Local residents, parish councils, community and interest groups, land owners, private individuals, utilities and infrastructure providers, developers, local agents, and the National Park Authority.</p>
<p>7. Who implements the policy document, and who is responsible for the policies?</p>	<p>Delivery is guided by the planning policies, encouraging change and conservation in the most appropriate places. However, it is the drive of individuals, organisation and developers, supported by the Authority</p>

	<p>as local planning authority, and other constituent authorities responsible for housing, transport, social services, education, health etc that will ensure that new infrastructure and services are delivered.</p> <p>The Authority is responsible for implementation and review of the policies.</p>
8. Could this policy document have a differential impact on racial groups	No policies have a specific racial component
What existing evidence (either presumed or otherwise) do you have for this differential change? N/A	
9. Could this policy document have a differential impact on gender?	No policies have a specific gender component
What existing evidence (either presumed or otherwise) do you have for this differential change? N/A	
10. Could this policy document have differential impact on disability?	<p>Generally no, except for potentially beneficial criteria in the following policies:</p> <ul style="list-style-type: none"> • DMR 1 which introduces scope for more accessible camping pods; • DMH 2 which allows for housing need to be established on the basis of infirmity, and includes scope for carers to be accommodated close to a person with such need; • Policy DH5 which provides scope for ancillary accommodation (linked/tied accommodation such as granny annex style accommodation allowing family and support networks to be retained and strengthened) • DMS1 which provides that access for people with a mobility difficulty is provided where practical (in relation to shops, professional services and related activities in settlements named in the Core Strategy policy DS1); • DMT4 which seeks to protect and provide for public rights of way which, where appropriate, is of benefit to users with special needs, including those with disabilities; • DMT 5,6,7 which all provide scope for parking spaces (by

	residential, business and visitor use) catering for disabled persons. Technical appendices also provide detailed parking arrangements responding to the needs of disabled persons.
What existing evidence (either presumed or otherwise) do you have for this differential change? Housing Acts re housing need, national expectations on parking standards and general disability awareness for accessibility design.	
11. Could this policy document have a differential impact on people due to sexual orientation?	No policies have a specific sexual orientation component
What existing evidence (either presumed or otherwise) do you have for this differential change? N/A	
12. Could this policy document have a differential impact on people due to their age?	See answers to question 10.
What existing evidence (either presumed or otherwise) do you have for this differential change? See answers above	
13. Could this policy document have a differential impact on people due to their religious belief?	No policies have a specific religious component. Core Strategy policy HC4 and emerging policy DMS2 include churches/chapel in the list of community facilities we will protect so this positively impacts on those with religious beliefs by protecting their places of worship.
What existing evidence (either presumed or otherwise) do you have for this differential change? N/A	
14. Could this policy document have a differential impact on people due to their having caring/ dependant responsibilities?	See answers to question 10.
What existing evidence (either presumed or otherwise) do you have for this differential change? See answers above	
15. Could this policy document have a differential impact on people due to their offending past?	No policies have a specific component relating to offending
What existing evidence (either presumed or otherwise) do you have for this differential change? N/A	
16. Could this policy document have a differential impact on	No policies have a specific transgender or transexual component

<p>people due to their being transgender or transsexual?</p>	
<p>What existing evidence (either presumed or otherwise) do you have for this differential change? N/A</p>	
<p>17. Could this policy document have a differential impact on people due to issues surrounding poverty?</p>	<p>Generally no, except for potentially beneficial criteria in the following policies:</p> <ul style="list-style-type: none"> • DMH 1 and 2 regarding the promotion of affordable housing linked to a definition of housing need. • DMS 2 which seeks to protect local services (thus avoiding the need to travel)
<p>What existing evidence (either presumed or otherwise) do you have for this differential change? The higher level Core Strategy DPD establishes a sustainable development strategy which seeks to locate homes, jobs and services into sustainable locations reducing the need to travel. This is also based on accessibility evidence provided by Derbyshire County Council.</p> <p>The Authority also maintains involvement in constituent authority evidence studies establishing local housing needs and the level of housing affordability across the area.</p>	
<p>18. Could the policy document impact on the relationships and attitudes between different groups of people? Could this impact be negative?</p>	<p>There is no clear evidence of any negative impact actually or potentially arising between different groups of people.</p> <p>By focussing on real problems of affordability, mechanisms are established which define people in certain groups as qualifying for affordable housing, e.g. by their local connection, by being in housing need, by being infirm, etc. The local connection mechanism could be viewed as the creation of a locally favourable housing market, but is nationally accepted as a means of securing affordable housing in perpetuity.</p> <p>This is balanced by the wider routes to market housing provision justified on conservation and enhancement grounds. Hence there is a balanced approach to housing provision in the overall context of constraint which is placed upon the National Park.</p> <p>In this sense any potential negative impact is mitigated and justified by the statutory purposes and duty on the National Park Authorities.</p>

<p>19. Can this negative impact be justified on the grounds of promoting equality of opportunity for particular equalities groups?</p>	<p>Rather than being justified on the grounds of promoting equality the issues above are largely justified on the basis on National Park purposes and duty and is supported by the National Parks Vision and Circular from 2010.</p> <p>Nevertheless the policies referred to do offer a positive response to people in vulnerable or disadvantaged groups.</p>
<p>20a. As a result of this assessment is a Full Impact report Assessment necessary?</p>	<p>No. DMP is not considered to have any adverse effects that are not capable of being mitigated.</p>
<p>20b. Date on which the Full assessment will commence.</p>	<p>N/A</p>

Appendix 2 – Flagged areas arising from Sustainability Appraisal

Policy	Initially ‘flagged’ issue	Action?
DMC1	Conflict between landscape conservation and facilitating renewable energy generation	The October 2012 Interim Sustainability Assessment (ISS) did not flag this up as an issue of concern and the post core strategy work to produce SPD and landscape sensitivity criteria mean that there is now no potential conflict between landscape conservation and facilitating renewable energy conservation ^{1 2}
	Conflict between landscape conservation and use of previously developed land	The earlier ISS didn’t raise this as an issue in the context of wider landscape conservation or DM1 settlement level development. In response to the latest SA, at a scale of landscape, other policies such as those for the Natural Zone (DMC2), policy safeguarding nature conservation interests (DMC11) and policies safeguarding sites of features or species of wildlife geological or geomorphological importance (DMC12) plus policy for countryside (anywhere outside of settlements listed in DS1) as (DMH6 A(i) all ensure that re-development of previously developed land can only take place where landscape and its valued component parts can be conserved. Recommend no change to policy
	Conflict between landscape conservation and use of innovative sustainable design and construction	The use of innovative sustainable design and construction, beyond the scope encouraged by the NPPF paragraph 55 bullet point 4, has not been presented as an option or a policy since the core strategy does not permit new build housing in the countryside other than as a replacement or where the conservation merits of introducing housing to previously developed land represent an enhancement to the landscape. In practice application of the Core Strategy, Local Plan and NPPF has enabled innovative sustainable design in such cases and it is not considered that the policy DMC1 makes this possibility less or more likely. Recommend no change to policy
DMC2	Significant landscape impacts commonly arise from mature renewable energy technologies.	The ISS suggested no alternative options were reasonable with regard to renewable energy technologies, and the point raised in the current SA does not add to that earlier

¹ http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0007/536992/3401-EF-Sustainable-Planning-Doc.pdf

² http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0010/332974/SPD-Landscape-Sensitivity-Assessment-and-Wind-Turbine-Guidance.pdf

Policy	Initially ‘flagged’ issue	Action?
	This sustainability test focuses on accommodating RE development within the capacity of the National Parks’ special qualities to do so - and is therefore positive in effect, although overall this may serve to reduce the harnessing of theoretical renewable energy resources in the national park.	view. The Natural Zone is a distinctive area of countryside which is designated on the back of Statutory Section 3 Maps so the higher level of protection is evidenced and justified. However large tracts of landscape are not Natural Zone, and in these there is scope within DMC1 and other policies such as DMC3 as well as the Core Strategy CC policies and the SPD and landscape sensitivity guidance to facilitate renewable energy generation. Recommend no change to policy
DMC3	Policy does not address integrated recycling and waste management facilities within new development, although other policy elements address this.	This was not raised as a concern in the initial ISS but this does not mean that reference to recycling and waste management facilities has been removed through subsequent iterations, therefore its inclusion as concern through the current SA is thought to be minor in light of other policies and SPD for sustainable building. Recommend no change to policy
	Policy does not overtly address embedded renewable energy opportunities in new development.	This was not raised as a concern in the initial ISS but this does not mean that reference to embedded renewable energy opportunities has been removed through subsequent iterations therefore its inclusion as concern through the current SA is thought to be minor in light of other policies and SPD for sustainable building. Recommend no change to policy
	Policy does not overtly address embedded energy efficiency opportunities in new development.	This was not raised as a concern in the initial ISS but this does not mean that reference to embedded energy efficiency has been removed through subsequent iterations therefore its inclusion as concern through the current SA is thought to be minor in light of other policies and SPD for sustainable building. Recommend no change to policy
	Policy does not overtly address climate change resilience in new development.	This was not raised as a concern in the initial ISS but this does not mean that reference to climate change resilience has been removed through subsequent iterations therefore its inclusion as concern through the current SA is thought to be minor in light of other policies and SPD for sustainable building. Recommend no change to policy
DMC4	Strict application of policy may limit opportunity	This was not raised as an issue at the ISS and the fact that boundaries does not exist

Policy	Initially ‘flagged’ issue	Action?
	for sustainable affordable housing site identification, although other policy addresses such exceptions	other than for Bakewell means that strict application always gives scope for communities and the NPA to agree careful evolution of settlement form. No alternatives were suggested in the ISS
	Risk from flooding. Dependent upon case specific circumstances. Settlements with areas at risk from flooding may be less able to accommodate necessary growth within SDLs free from flood risk.	This was not raised as an issue at the ISS and the fact that boundaries does not exist other than for Bakewell means that strict application always gives scope for communities and the NPA to agree careful evolution of settlement form in light of flood risk . Recommend no change to policy
DMC5	Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource	Policy establishes the requirements to understand the historic built heritage as a prerequisite to conserving it. The policy also establishes criteria which restricts development but is justified in the context of national park purposes and special qualities. Recommend no change to policy.
	Policy presents potential constraints on development within settlements characterised by historic built heritage resource.	Policy establishes the requirements to understand the historic built heritage as a prerequisite to conserving it. The policy also establishes criteria which restricts development but is justified in the context of national park purposes and special qualities. Recommend no change to policy.
DMC6	Policy presents potential constraints on development within settlements in vicinity of SM.	The policy mirrors the national legislation and is therefore a sustainable approach Recommend no change to policy
DMC7	Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource.	No issues raised in ISS and no alternatives suggested so, notwithstanding the SA comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy and officers recommend no change to policy
	Policy presents potential constraints on some development within settlements within setting of Listed Buildings.	No issues raised in ISS and no alternatives suggested so, notwithstanding the SA comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy and officers recommend no

Equality Impact Assessment – Development Management Policies

Policy	Initially 'flagged' issue	Action?
		change to policy
DMC8	Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource	No issues raised in ISS and no alternatives suggested so, notwithstanding the SA comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy and officers recommend no change to policy
	Policy presents potential constraints on some development within settlements with potential for negative impacts on Conservation Areas.	No issues raised in ISS and no alternatives suggested so, notwithstanding the SA comment that policy potentially restricts development within the historic built environment, this is considered to be a sustainable policy and officers recommend no change to policy
DMC10	Policy presents potential restrictions of use of contemporary sustainable design and construction techniques within the existing historic built heritage resource.	The ISS suggested that greater clarification of what heritage and non designated heritage assets are to avoid any confusion thrown up by the core strategy. The preferred approach was followed through taking into account the ISS findings and recommendations, and supporting text to this policy clarifies this as the basis for considering proposals for conversion of the built heritage resource. Recommend no change to policy.
DME4	In relation to sustainability test 13b, the policy allows for the loss of employment space but only where it is demonstrably no longer viable or needed. It allows for other appropriate use in higher tier settlements which can deliver other economic and community viability benefits through diversification to services other than general business and industry. Overall effect of this policy therefore uncertain in this specific sustainability criteria	The policy requires market testing for business demand before land is released for other uses so in the event that land is released it would have been done on evidence that business and jobs was an unviable prospect. The risk to job prospects and the economy is therefore negligible. Recommend no change to policy.
	The policy may alter travel to work patterns or consumer travel in some settlements but at a	No evidence suggests a loss or retention of employment space affect levels of public transport provision. The commuting patterns of residents may be affected at a very

Policy	Initially ‘flagged’ issue	Action?
	very low level of significance. It is feasible this could have implications for public transport provision, either positively or negatively.	low level but people commute into the park for jobs as well as out so the loss of jobs in the Park may actually improve some workers commuting patterns. Recommend no change to policy.
DMH5	Meeting affordable housing needs. Policy facilitates semi-independent additional living accommodation for young, elderly or those with special needs. However, where ancillary accommodation is provided within the curtilage of an otherwise ‘smaller’ dwelling, the long-term implications of its increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties.	The Authority contends that all market housing is already prohibitively expensive. Ancillary use may create the relationship of dwelling units that offers some families the opportunity to remain in the area. Without this scope, it may encourage use of smaller properties for holiday homes and lets which renders housing stock unavailable to local people. Recommend no change to policy.
DMH7	Meeting affordable housing needs. Where extended accommodation is provided within the curtilage of an otherwise ‘smaller’ dwelling, the long-term implications of its increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties.	The Authority contends that all market housing is already prohibitively expensive. Without the scope for extensions, it may encourage use of smaller properties for holiday homes and lets which renders housing stock unavailable to local people. Recommend no change to policy.
DMH8	Meeting affordable housing needs. Where additional built structures are provided within the curtilage of an otherwise ‘smaller’ dwelling, the long-term implications of its increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the	This was not assessed at the ISS because no options were proposed. The policy was introduced to clarify the circumstances in which new storage buildings would be permitted. It works with DMH5, which gives scope for ancillary dwelling use through new buildings, negating the need to try and force this use following overinvestment in storage buildings. The Authority contends that all market housing is already prohibitively expensive.

Policy	Initially ‘flagged’ issue	Action?
	stock of smaller properties.	Without the scope for storage space, it may encourage use of smaller properties for holiday homes and lets which renders housing stock unavailable to local people. Recommend no change to policy.
DMH9	Where replacement dwellings are provided under this policy erosion of smaller housing stock may arise. Long-term implications of a site’s increased market value would be likely to exacerbate wider affordability issues in the settlement/National Park through erosion of the stock of smaller properties. Policy does allow for recognition of house size/type preferences of Neighbourhood plans for any net increase in housing delivered under the policy.	The erosion of smaller stock in the name of conservation and enhancement and improved quality of building and their sustainability is seen as more than offsetting any change to affordability in the housing market, which is already such that most houses proposed for replacement are out in the countryside, have large curtilages and are already very expensive. Changes to the policy since the ISS do however set the bar higher on design standards where larger replacement dwellings are proposed which may prevent some smaller houses being replaced by larger ones. The policy also enables replacement of one with more than one in DS1 settlements, which may increase the stock of smaller houses in the most sustainable locations. Recommend no change to policy.
DMS3	Whilst seeking to protect sustainable retail/service enterprise within settlements, the policy may serve to restrict other retail enterprise proposals which would otherwise provide employment opportunity	The ISS recommended a simpler policy than Local Plan LS3 and reliance on Core Strategy HC5. DMS3 is simpler than LS3 and in combination with Core Strategy HC5 gives a moderated approach to retail provision outside named settlements. It does restrict retail in the interests of sustaining local facilities in DS1 settlements and protecting the countryside, rather than to restrict job opportunities, although it is accepted this may be a consequence at a low level. Recommend no change to policy.
DMS6	Test 11a. Potential for conflict over the delivery of affordable housing sites across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.	The ISS saw the policy intent as sustainable, community sites are to be shown on the proposals maps, and facilities will be protected. This may remove some scope for affordable housing, but additional housing with reduced or absent community facilities is unsustainable. The policy nevertheless gives space to replace with affordable housing where sites no longer required so the change in use is driven by the demand for community space and not any demand for housing. Recommend no change to policy.
	Test 13b. Potential for conflict over the delivery of employment generating uses across	The ISS saw the policy intent as sustainable, community sites are to be shown on the proposals maps, and facilities will be protected. This may remove some scope for

Policy	Initially ‘flagged’ issue	Action?
	settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations	additional employment uses but at a strategic level there is no need for significant additional employment space. Additional employment space with reduced or absent community facilities is unsustainable. Recommend no change to policy.
	Test 13c. Potential for conflict over the delivery of employment generating uses across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.	The ISS saw the policy intent as sustainable, community sites are to be shown on the proposals maps, and facilities will be protected. This may remove some scope for additional employment uses but at a strategic level there is no need for significant additional employment space. Additional employment space with reduced or absent community facilities is unsustainable. Recommend no change to policy.
DMS7	13b. Potential for conflict over the delivery of employment generating uses across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.	The ISS saw the policy intent as sustainable. The policy gives space to replace with affordable housing where sites no longer required so the change in use is driven by the demand for community space and not any demand for housing. Recommend no change to policy
	13c. Potential for conflict over the delivery of employment generating uses across settlements within the National Park where suitable development sites are frequently in limited supply because of environmental considerations.	The ISS saw the policy intent as sustainable. This may remove some scope for additional employment uses but at a strategic level there is no need for significant additional employment space. Recommend no change to policy.
DMT1	Test 4a. Policy is likely to have local air quality benefits through strategic discouragement of cross-park trip generation. However, at a broader sustainability level, should effective restriction on cross park journeys lead to longer trips overall, vehicular emissions are likely to be greater overall. In addition should the policy	In combination with core strategy T2, and with the acknowledgement of the circumstances in which exceptional development may be permitted to address a compelling national need (i.e. there is no reasonable alternative) and notwithstanding the SA comment the policy is considered to be justified. Recommend no change to policy.

Policy	Initially ‘flagged’ issue	Action?
	curtail strategic improvements to the road network at the cost of local congestion points, localised air quality may suffer from on-going vehicle emissions. Other influences on trip generation and air quality from emissions are likely to be significant over the long term, such as vehicle technology.	
	Test 13b A possible short to medium-term implication of policy is to discourage inward investment and business expansion because of perceived logistical / road network connectivity and flow.	The policy does allow for exceptions where there is a demonstrable long term net economic benefit within the National Park which would allow inward investment in some circumstances. However the policy deliberately sets the bar very high on this which recognises the inherent economic value of a high quality landscape to the local and larger than local city region economies. Recommend no change to policy.
	<p>Test 13c. A possible short to medium-term implication of policy is to discourage inward investment and business expansion because of perceived logistical / road network connectivity and flow.</p> <p>Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up?</p> <p>Will it support existing business viability and local employment growth?</p>	If it is 13c), these types of business would not be sustainably located to co-incide with cross park routes and would make no impact on the strategically preferred locations for employment space. Recommend no change to policy.
DMT3	Policy focuses on ‘net benefits’ to the National Park’s valued environmental characteristics. This implies that some localised harm to those qualities may be expected as a consequence of the proposals.	In combination with core strategy T2, and with the acknowledgement of the circumstances in which exceptional development may be permitted to address a compelling national need (i.e. there is no reasonable alternative) the aim of net environmental benefit applies to the wider National Park. It is considered to be justified, although it is not intended that this aim should be used to attempt to

Policy	Initially ‘flagged’ issue	Action?
	<p>In relation to designated ecological sites and protected species the thresholds for allowing such harm by development may be high, for example N2K sites where these are in the vicinity of existing track beds, may over-ride the policy’s embedded approach of mitigation where harm arises if the provisions of the relevant Directives are not met.</p>	<p>override any thresholds applied to N2K or other protected sites. The NPA considers that mitigation whilst potentially beneficial in wider landscape terms may not of itself justify localised impacts on designated ecological sites or protected species. Recommend no change to policy.</p>
DMT5	<p>Test 13c. Restraint on new business parking and adoption of the Parking Standards set out at Appendix 17 may result in some perceived constraint on business efficiency, and hence viability, potentially discouraging investment, retention or expansion of economic/employment activity.</p>	<p>The Policy refers to the Parking Standards document which provides clear guidance as to the maximum levels of parking for developments, which also have a min & max for some types of development. NPA considers that this is preferable to adding the standards to the Policy. Recommend no change to policy.</p>
DMT6	<p>Test 5 d. Provision of visitor parking by definition facilitates car-borne trip generation. Whilst this may not have a negative impact on walking opportunities per se, it would not serve to encourage non-motorised trip generation.</p>	<p>The policy is restrictive rather than permissive and qualifies that links to park n ride and footpath networks should be considered to encourage sustainable use from within sites inside the Park. This is pragmatic and sustainable. Recommend no change to policy.</p>
	<p>Test 13c. Restraint on new visitor may result in some perceived constraint on accessibility for markets/consumers, and hence viability, potentially discouraging investment, retention or expansion of economic/employment activity.</p>	<p>The recreation hubs work will establish where visitor facilities and sites are best developed as new or expanded facilities, and this will include consideration of the commercial viability of facilities. Recommend no change to policy.</p>
DMT8	<p>Test 9b. The establishment of non- powered flight sites/facilities where valued characteristics</p>	<p>The NPA considers the policy is sufficiently controlling provided it specifies that landing and take-off sites and facilities will not normally be permitted. It is a policy that pre-</p>

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	<p>of the area are threatened. Ordinarily facilities will not be required for paragliding and hang gliding, but these are dependent to a degree on the special qualities of the park to operate. Restriction of such development and use may limit this objective but be consistent with Sandford Principle.</p>	<p>emptys foreseeable pressure for such sites and is sustainable in the context of special qualities. Policy changed to refer to take-off as well as landing sites.</p>
DMU1	<p>Test 6b. Policy and supporting text does not overtly address embedded renewable energy opportunities in new development.</p>	<p>CC1 provides for this. Recommend no change of policy</p>
DMU5	<p>Test 7a. Policy effectively removes opportunity for sustainable re-use of buildings/structures.</p>	<p>Telecommunications infrastructure is not generally in the form of buildings and sustainable re-use of the structures to achieve other plan objectives would not be a reasonable alternative in most cases. Where buildings or other structures are left redundant and an appropriate re-use in line with other plan objectives can be achieved, the Authority would be able make an exception, but prefers this approach rather than blanket encouragement of re-use of structures and buildings that will, in many cases have only been accepted in the landscape to meet an overriding national need as opposed to being positive additions to the landscapes valued character. Recommend no change of policy.</p>
DMMW2	<p>Test 2a</p> <p>Will it protect sites and habitats of nature conservation value, including SSSIs and other national and local designations? (note N2K sites covered by law)</p> <p>Will it protect BAP priority species and Habitats and Species of Principal Importance in England?</p>	<p>The Authority considers that the policy, used in combination with other Development Management Policies covering biodiversity and wildlife, is sufficient to afford protection to the ecology of an area when considered against the tests outlined. The paragraph preceding DMMW2 and DMMW3 (covering impact of working on amenity and the environment respectively) explains that these policies will be used in combination with policies for the ecology of the area which are set down earlier in the</p>

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	<p>Will it protect nature conservation interests outside designated areas, including wildlife corridors, and maintain or improve permeability of the landscapes to species responding to climate change?</p> <p>Will it generate opportunities for enhancement of habitats and biodiversity?</p> <p>Whilst focused upon amenity considerations, the scope of those factors considered by the policy is broad, yet does not include impacts upon the ecology of an area.</p>	<p>DMP document. Recommend no change of policy.</p>
	<p>Test 2b</p> <p>Will it conserve and where possible enhance geological interests, including designated as SSSI, RIGS, through conservation or managed accessible feature exposure?</p> <p>Whilst focused upon amenity considerations, the scope of those factors considered by the policy is broad, yet does not include impacts upon the geodiversity of an area. However other plan policies cover these issues sufficiently.</p>	<p>The Authority considers that the policy, used in combination with other Development Management Policies covering biodiversity and wildlife, is sufficient to afford protection to the ecology of an area when considered against the tests outlined. The paragraph preceding DMMW2 and DMMW3 (covering impact of working on amenity and the environment respectively) explains that these policies will be used in combination with policies for the ecology of the area which are set down earlier in the DMP document. Recommend no change of policy</p>
	<p>Test 3a Whilst focused upon amenity considerations, the scope of those factors considered by the policy is broad, yet does not include impacts upon the historic and archaeological assets of an area. However other plan policies cover these issues sufficiently.</p>	<p>The Authority considers that the policy, used in combination with other Development Management Policies covering biodiversity and wildlife, is sufficient to afford protection to the ecology of an area when considered against the tests outlined. The paragraph preceding DMMW2 and DMMW3 (covering impact of working on amenity and the environment respectively) explains that these policies will be used in combination with policies for the ecology of the area which are set down earlier in the</p>

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		DMP document. Recommend no change of policy.
DMMW7	<p>Test 1a Will it protect areas of highest landscape sensitivity from harmful incremental change? Will it protect key or characteristic landscape features? Will it support delivery LCA aspirations and facilitate landscape enhancement?</p> <p>The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise.</p>	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	<p>Test 2a The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise.</p>	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	<p>Test 2b The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability</p>	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy

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	impacts are likely to arise.	
	Test 4a The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	Test 4b The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	Test 4c The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	Test 4c The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy

Policy	Initially ‘flagged’ issue	Action?
	impacts are likely to arise	
	Test 4d The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	Test 5d The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
	Test 9a The development plan generally regards new minerals development as harmful to the national park’s special qualities. Policy seeks to accept but minimise such harm as a measure to ensure sustainable conservation of the historic built environment, but specific sustainability impacts are likely to arise	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy
DMMW8	Test 7a Sites pertinent to this policy are by definition previously used and will often include existing structures or buildings. Policy would generally preclude secondary uses or uses not closely associated with the ‘host’ minerals operation.	The minerals safeguarding map specifies the scope for mineral working to achieve other plan objectives for conservation of heritage assets so the impact is controlled and considered sustainable. Recommend no change of policy

Equality Impact Assessment – Development Management Policies

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