

Bakewell Neighbourhood Plan

Sustainability Appraisal

Incorporating Strategic Environmental Assessment

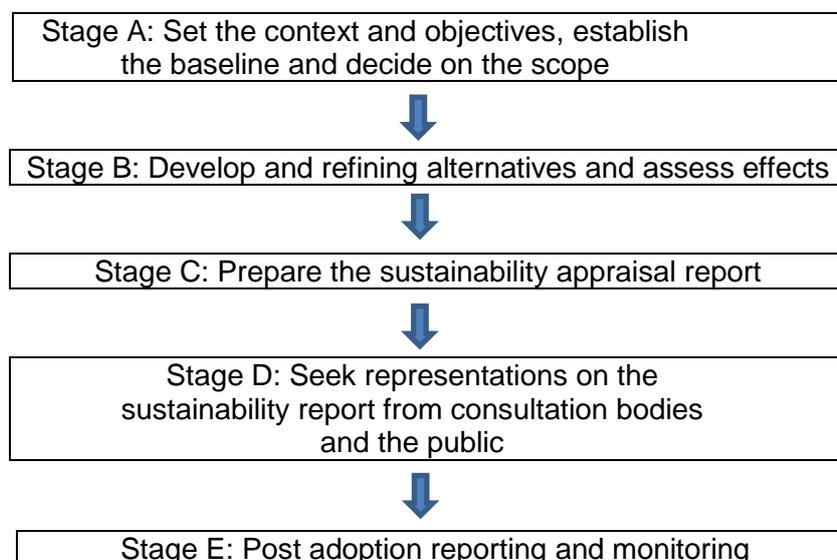


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1.0 Introduction

1.1 This Sustainability Appraisal (SA) (including Strategic Environmental Assessment SEA) considers the Submission Version of Bakewell Neighbourhood Plan (BNP). It follows on from, and should be read in conjunction with the Screening Statement and the Scoping Report, and comprises Parts B, C and D of the SA process as set out below.



1.2 The Scoping Report (Stage A) set out baseline information on the environmental, social and economic characteristics of Bakewell Neighbourhood Area and established a **Sustainability Appraisal Framework** (SAF) for this appraisal. Consultation on the Scoping Report was undertaken during autumn 2018. Feedback was received by the Environment Agency which has been taken account of in this report and in the evidence base.

1.3 A Habitat Regulations Assessment screening report has been prepared separately.

Methodology

1.4 The methodology follows the stages set out in 'A Practical Guide to the Strategic Environmental Assessment Directive' (September 2005).

1.5 This report will:

- test the neighbourhood plan objectives against the sustainability appraisal framework
- develop neighbourhood plan options including reasonable alternatives and a 'do nothing' scenario.
- evaluate the likely effects of the neighbourhood plan and alternatives
- consider ways of mitigating adverse effects and maximising beneficial effects
- Propose measures to monitor the significant effects of implementing the Local Plan
- Propose next Steps

1.6 The purpose of this SA is to appraise the environmental, social and economic effects of Bakewell Neighbourhood Plan to demonstrate how it fulfils the requirements of Schedule 4B to the 1990 Town and County Planning Act with respect to:

- Part (d) contributing to the achievement of sustainable development; and
- Part (f) not breaching, and otherwise being compatible with EU obligations.

1.7 BNP Sustainability Assessment Framework was informed by a review of other plans and policies, particularly the Peak District National Park Authority's *Core Strategy* and emerging *Development Management Policies* (and their associated sustainability frameworks) and in consultation with Natural England, Historic England and the Environment Agency. The following table shows this Framework alongside the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004, in order to demonstrate compatibility of the Framework with the Schedule 1 criteria.

	BNP Sustainability Appraisal Framework (incorporating a Strategic Environmental Assessment)	Schedule 1 Criteria
1	To protect, maintain and enhance the landscape and townscape of Bakewell	Landscape Cultural heritage
2	To protect, maintain and enhance biodiversity, flora and fauna and geological interests	Biodiversity Flora Fauna
3	To preserve, protect and enhance Bakewell's historic and cultural environment	Cultural heritage
4	To protect and improve air, water and soil quality and minimise noise and light pollution	Soil Water Air
5	To minimise the consumption of natural resources	the inter-relationship between the issues
6	To develop a managed response to climate change	Climatic factors
7	To achieve and promote sustainable land use and built development	the inter-relationship between the issues
8	To improve the health and well-being of the community	Population Human health
9	To promote access for all	Population Human health
10	To promote local governance	the inter-relationship between the issues
11	To help meet local need for housing	Population Human health Material assets
12	Encourage better access to a range of local services and amenities	Material assets
13	Promote a healthy economy	Material assets
14	To develop a managed response to road traffic and balance the needs of pedestrians, cyclists and vehicles to reduce road traffic, traffic congestion and improve safety, health and air quality by reducing the need to travel, especially by car	Human health Air Climatic factors
15	To reduce the risk of flooding	Water Soil

2.0 Testing Bakewell Neighbourhood Plan Policies against the Sustainability Assessment Framework (SAF)

2.1 The following table tests BNP Policies against the Sustainability Assessment Framework for "the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects."¹

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

2.2 Key to significance

+	Positive effect Number = strength of positive effect +++ is high ++ is medium + is low
-	Negative effect Number = strength of negative effect --- is high -- is medium - is low
+/-	Both positive and negative effects
0	Negligible effect or neutral effect insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the appraisal at this stage
S	Short term effect 0-5 years
M	Medium term effect 5-10 years
L	Long term effect 10+ years
Secondary	Secondary effect
Cumulative	Cumulative effect
Synergistic	Synergistic effect

BNP Sustainability Assessment Framework		
(1) To protect, maintain and enhance the landscape and townscape of Bakewell		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+/- L Synergistic	<p>The Policy does allow for growth and development on the edge of Bakewell, which could have a negative effect on the landscape but a positive impact on sustainability ensuring that development is not isolated but is close to existing services and public transport provision.</p> <p>In combination with other policies in the plan which require new development to provide significant enhancement and green infrastructure, the Policy is likely to have a neutral effect on landscape and townscape.</p> <p>The areas of expansion were considered alongside other possible areas for development, including other sites outside the existing development boundary, and the areas of expansion included in the revised boundary are considered to be the least damaging in landscape terms².</p>
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+++ L Synergistic	The synergy with Policy DB1 means that development will only be permitted if the landscape and historic townscape setting is fully considered.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+++ L	The policy takes a positive approach to maintaining and enhancing the existing landscape and townscape of Bakewell. Part A supports the provision of new native trees which will (in a small way) help to combat CO2 levels. Part C promotes sustainable design. The policy also promotes Building for Life methods.
POLICY ENV3 Protection of Non-designated Heritage Assets	+++ L	Protecting important unlisted buildings safeguards buildings against unnecessary demolition and rebuild, thereby making good use of what already exists. Archaeological and field system designations protect the heritage of Bakewell and prevent encroachment into the countryside.
POLICY ENV4 Local Green Spaces	+++ L	Some sites are designated because of their local value for wildlife others are designated to protect the landscape and townscape of Bakewell from inappropriate development.
POLICY H1 Provision of Affordable Housing	+/- L Synergistic	The policy does permit new build housing, and in combination with Policy DB1 potentially on green field sites on the edge of Bakewell. The synergy with Policies ENV1, 2 and 3 mean that any negative effects are likely to be minimised by good design, ecologically appropriate landscaping and the provision of green infrastructure. Promotes a sustainable community by providing for those in housing need within/adjacent to the settlement in

² See 'Site Assessments for Boundary Extension' in <https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan>

		locations which have the least impact on the landscape and townscape of Bakewell.
POLICY H2 Market Housing and Starter Homes	+ L	This policy only applies where housing is built on previously used land to provide for a range of housing types to support a sustainable community, and also delivers an environmental enhancement.
POLICY H3 Age and Disability Related Considerations	+ L	Policy directs development on flat land to be for housing suitable for those most in need of this.
POLICY CF1 Newholme Hospital	+ + L	Policy seeks to retain medical facilities accessible to the local community whilst promoting the reuse of an existing listed building for a range of uses thereby making good use of an existing developed site which in turn will protect the landscape and townscape.
POLICY CF2 Development of Community, Sports and Arts Facilities	- L	In combination with strategic policies (Core Strategy DS1 which permits new build community facilities in or on the edge of Bakewell) the policy could lead to the development of new build community facilities on green field land on the edge of the built-up area. The policy also makes provision for replacement playing fields to be located within or adjacent to the development boundary which may also create some landscape harm. However, in terms of sustainability, this provision is within/adjacent to the existing settlement and together with other policies avoids any significant encroachment into the countryside.
POLICY CF3 Retaining Playing Fields and Sports Facilities	- L	Positive sustainability effect as it seeks to retain playing fields/sports facilities in existing accessible locations. However, in combination with CF2 replacement playing fields could be located within or adjacent to the development boundary which may create some landscape harm.
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+ + + L	The policy aims to retain shopping within the town centre close to the public transport interchange. Townscape will also be maintained.
POLICY E2 Employment Sites	+/- L	<p>This policy safeguards employment use on land that is already developed for such use, in line with the Local Plan 2001 and PDNPA Development Management Policies (DMP). The safeguarding of employment sites ensures that there is sufficient land for a growing economy which is located in or close to the existing settlement boundary with better public transport links and local workforce. Protects the townscape and landscape from encroachment.</p> <p>However BNP policy also allocates a site (Employment site 1 'former Cintrides Site') that has just been redeveloped for retail use (an Aldi store). It also includes some greenfield land that is subject to a 'blanket' TPO.</p> <p>Therefore BNP Policy E2 has the potential to result in the development of undeveloped land.</p>

		Clauses on the policy that require protection of the water course, a 10m buffer, a survey of the health of the mature trees, and protection of the health and longevity of the mature trees through siting and design, means that the significance of the negative effect of the policy is minimised.
Policy TC1 Improvements for Non-Car Users	+/- L	The policy supports physical development associated with the control of vehicles and cycles and for directing pedestrians, and could include for example bollards, signs, delivery bays etc. There is therefore potential to negatively affect Bakewell's townscape unless these are well-designed. Part C of the policy requires 'positive' design.
Policy TC2 Car and Cycle Parking	0	The policy supports physical development of cycle racks. Part B of the policy requires no adverse effect on the character of the Conservation Area.
Policy TC3 Re-opening of the Matlock to Buxton Railway	- L	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route which, depending on the route chosen and the quality of the landscaping, could impact negatively on the landscape and townscape.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'</p>
TC4 Broadband	0	Infrastructure associated with broadband provision could negatively affect the historic and cultural environment but PDNPA Local Plan Policy DMU4 provides that, 'landscape, built heritage or other valued characteristic of the National Park are not harmed'.

BNP Sustainability Assessment Framework

(2) To protect, maintain and enhance biodiversity, flora and fauna and geological interests

	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	0	The development boundary is extended into 'green field' areas on the edge of Bakewell. Existing information suggests these sites are of limited ecological interest. Sites with the most ecological interest are protected by Policy ENV4 (green spaces) and Policy ENV1 requires ecologically appropriate landscaping, so any potential adverse effects are minimised. ENV1 also required net gain for biodiversity. Area 3 is adjacent to the

		River Wye so development could have a minor impact on the river corridor. A buffer zone to the river would mitigate the potential impact. In addition to these policies PDNPA Core Strategy policy L2 protects sites of biodiversity or geodiversity and Policy DMC11 of PDNPA Part 2 Local Plan (Development Management Policies) requires development proposals to achieve no net loss of biodiversity.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+++ L	The policy requires the provision of ecologically appropriate landscaping. The policy also requires net gain for biodiversity.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	0	
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	+++ L	Some of the sites are designated for their wildlife and others by virtue of their nature may attract or support existing wildlife.
POLICY H1 Provision of Affordable Housing	0	These homes could be built on greenfield sites which may have some local ecological interest. Sites with the most ecological interest are protected by Policy ENV4 (green spaces) and Policy ENV1 requires ecologically appropriate landscaping, so any potential adverse effects are minimised. ENV1 also requires net gain for biodiversity. In addition to these policies PDNPA Core Strategy policy L2 protects sites of biodiversity or geodiversity and Policy DMC11 of PDNPA Part 2 Local Plan (Development Management Policies) requires development proposals to achieve no net loss of biodiversity.
POLICY H2 Market Housing and Starter Homes	0	This policy permits development on previously developed land that may have some ecological interest. Sites with the most ecological interest are protected by Policy ENV4 (green spaces) and Policy ENV1 requires ecologically appropriate landscaping, so any potential adverse effects are minimised. ENV1 also requires net gain for biodiversity PDNPA Core Strategy policy L2 protects sites of biodiversity or geodiversity and Policy DMC11 of PDNPA Part 2 Local Plan (Development Management Policies) requires development proposals to achieve no net loss of biodiversity.
POLICY H3 Age and Disability Related Considerations	0	
POLICY CF1 Newholme Hospital	0	

POLICY CF2 Development of Community, Sports and Arts Facilities	0	<p>The facilities permitted by this policy could be built on sites that may have some local ecological interest. However the requirement for a net gain for biodiversity in Policy ENV1 makes the effect neutral.</p> <p>PDNPA Core Strategy policy L2 protects sites of biodiversity or geodiversity and Policy DMC11 of PDNPA Part 2 Local Plan (Development Management Policies) requires development proposals to achieve no net loss of biodiversity.</p>
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	<p>The facilities permitted by this policy could be built on sites that may have some local ecological interest. However the requirement for a net gain for biodiversity in Policy ENV1 makes the effect neutral.</p> <p>PDNPA Core Strategy policy L2 protects sites of biodiversity or geodiversity and Policy DMC11 of PDNPA Part 2 Local Plan (Development Management Policies) requires development proposals to achieve no net loss of biodiversity</p>
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	0	
POLICY E2 Employment Sites	0	<p>Although most sites are already in employment use, one site is partly greenfield (site 1, former Cintrides Site). The policy could lead to development on a greenfield site and impact on the river corridor. The site contains some mature trees and is subject to a 'blanket' TPO.</p> <p>Clauses on policy E2 that require protection of the water course, a 10m buffer, a survey of the health of the mature trees, and protection of the health and longevity of the mature trees through siting and design, means that the significance of the negative effect of the policy is minimised.</p> <p>The requirement in ENV1 to secure net gains for biodiversity, results in a neutral impact.</p>
Policy TC1 Improvements for Non-Car Users	0	
Policy TC2 Car and Cycle Parking	0	
Policy TC3 Re-opening of the Matlock to Buxton Railway	<p>---</p> <p>L</p> <p>Secondary</p>	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP, in part for its "richness in wildlife". BNP Policy TC3 also provides for the creation of a new recreation route which also has the potential to negatively impact on biodiversity.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which</p>

		also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'
TC4 Broadband	0	

BNP Sustainability Assessment Framework (3) To preserve, protect and enhance Bakewell's historic and cultural environment		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	0	The development boundary is expanded only in areas where the significance of the historic or cultural environment is low. These areas of expansion were considered alongside other possible areas for development both inside and outside the existing development boundary ³ . These areas of expansion are considered to be the least damaging in terms of the historic and cultural environment.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+++ L Cumulative Synergistic	In combination with other ENV policies in BNP there will be a long term positive effect.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+++ L Cumulative Synergistic	In combination with other ENV policies in BNP there will be a long term positive effect.
POLICY ENV3 Protection of Non-designated Heritage Assets	+++ L Cumulative Synergistic	In combination with other ENV policies in BNP there will be a long term positive effect.
POLICY ENV4 Local Green Spaces	+++ L Cumulative Synergistic	In combination with other ENV policies in BNP there will be a long term positive effect.
POLICY H1 Provision of Affordable Housing	0	The protection to the historic and cultural environment afforded by national legislation (national parks), PDNPA strategic planning policy and BNP Policies ENV1-4 mean that the risks of significant impact of this policy, even though it enables development, are negligible.
POLICY H2 Market Housing and Starter Homes	+	Development is only permitted that would enhance the built environment.

³ See 'Site Assessments for Boundary Extension' in <https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan>

	L	
POLICY H3 Age and Disability Related Considerations	0	
POLICY CF1 Newholme Hospital	+ + L Synergistic	The Main building on site is listed and the BNP policy requires a heritage and landscape assessment to also consider non-listed buildings and landscaping.
POLICY CF2 Development of Community, Sports and Arts Facilities	0	The protection to the historic and cultural environment afforded by national legislation (national parks), PDNPA strategic planning policy and BNP Policies ENV1-4 mean that the risks of significant impact of this policy, even though it enables development, are negligible.
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	The protection to the historic and cultural environment afforded by national legislation (national parks), PDNPA strategic planning policy and BNP Policies ENV1-4 mean that the risks of significant impact of this policy, even though it enables development, are negligible.
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+ L	This policy maintains a central shopping area in the historic core of the town.
POLICY E2 Employment Sites	0	Except for the former Cintrides employment site (BNP Site 1, Map 9) this policy is in accordance with the safeguarded employment sites in PDNPA Part 2 Local Plan. That is, they are already in employment use and therefore the BNP policy will have a negligible effect on the historic and cultural environment. The Riverside employment site (BNP Site 4 Map 12) is subject to planning permissions that satisfy the constraints of the listed building and scheduled monument. Site 1 is not considered to have any historic or cultural significance.
Policy TC1 Improvements for Non-Car Users	+/- M	The policy supports physical development associated with the control of vehicles and cycles and for directing pedestrians, and could include for example bollards, signs, delivery bays etc. There is therefore potential to negatively affect Bakewell's historic and cultural environment unless these are well-designed. Part C of the policy requires 'positive' design.
Policy TC2 Car and Cycle Parking	0	The policy supports physical development of cycle racks. Part B of the policy requires no adverse effect on the character of the Conservation Area.
Policy TC3 Re-opening of the Matlock to Buxton Railway	- L	The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route which, depending on the route chosen and the quality of the landscaping, could impact negatively on the historic and cultural environment. BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which

		also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'
TC4 Broadband	0	Infrastructure associated with broadband provision could negatively affect the historic and cultural environment but PDNPA Local Plan Policy DMU4 provides that, 'landscape, built heritage or other valued characteristic of the National Park are not harmed'.

BNP Sustainability Assessment Framework														
(4) To protect and improve air, water and soil quality and minimise noise and light pollution														
	Significance of effect	Commentary												
POLICY DB1 Bakewell's Development Boundary	<table border="1"> <tr> <td>Air</td> <td>-</td> <td>L</td> </tr> <tr> <td>Water</td> <td>0</td> <td></td> </tr> <tr> <td>Soil</td> <td>0</td> <td></td> </tr> <tr> <td>Light</td> <td>0</td> <td></td> </tr> </table>	Air	-	L	Water	0		Soil	0		Light	0		<p>Air: The extension of the development boundary could lead to slight but long term negative effects on air quality. Increased levels of development are likely to increase vehicle use and could increase domestic solid fuel burning.</p> <p>Water: The determinants of water quality in Bakewell are the upstream water treatment and effects of agriculture (run off). (See SAF 15 for analysis of flood risk.)</p> <p>Soil: The boundary is not extended into any area of land that has soil classification of 1, 2 or 3.</p> <p>Light: The boundary extension is adjacent to existing sources of light pollution and away from the National Park's 'dark sky discovery sites'.</p>
Air	-	L												
Water	0													
Soil	0													
Light	0													
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	<table border="1"> <tr> <td>Air</td> <td>+</td> <td></td> </tr> <tr> <td>Water</td> <td>+</td> <td></td> </tr> <tr> <td>Soil</td> <td>+</td> <td></td> </tr> <tr> <td>Light</td> <td>0</td> <td></td> </tr> </table>	Air	+		Water	+		Soil	+		Light	0		<p>The policy requires the provision of ecologically appropriate landscaping which will have beneficial effects for air, water and soil.</p>
Air	+													
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POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	<table border="1"> <tr> <td>Air</td> <td>0</td> <td></td> </tr> <tr> <td>Water</td> <td>0</td> <td></td> </tr> <tr> <td>Soil</td> <td>0</td> <td></td> </tr> <tr> <td>Light</td> <td>0</td> <td></td> </tr> </table>	Air	0		Water	0		Soil	0		Light	0		
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<p>POLICY ENV3 Protection of Non-designated Heritage Assets</p>	<table border="1"> <tr><td>Air</td><td>0</td><td></td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	0		Water	0		Soil	0		Light	0		
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<p>POLICY ENV4 Local Green Spaces</p>	<table border="1"> <tr><td>Air</td><td>+</td><td></td></tr> <tr><td>Water</td><td>+</td><td>L</td></tr> <tr><td>Soil</td><td>+</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	+		Water	+	L	Soil	+		Light	0		<p>The designation of Local Green Spaces that are protected from development will have a small positive effect. The designation of the River Wye bank and nearby habitat as Local Green Space is likely to have small positive effect on water quality.</p>
Air	+													
Water	+	L												
Soil	+													
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<p>POLICY H1 Provision of Affordable Housing</p>	<table border="1"> <tr><td>Air</td><td>-</td><td>L</td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	-	L	Water	0		Soil	0		Light	0		<p>Air: The development of affordable housing could lead to slight but long term negative effects on air quality. Increased levels of development are likely to increase vehicle use and could increase domestic solid fuel burning. Water: The determinants of water quality in Bakewell are the upstream water treatment and effects of agriculture (run off). Soil: Development would not take place on any area of land that has soil classification of 1,2 or 3. Light: Development would be adjacent to existing sources of light pollution and away from the National Park's 'dark sky discovery sites'.</p>
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<p>POLICY H2 Market Housing and Starter Homes</p>	<table border="1"> <tr><td>Air</td><td>-</td><td>L</td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	-	L	Water	0		Soil	0		Light	0		<p>Air: The development of market housing and starter homes could lead to slight but long term negative effects on air quality. Increased levels of development are likely to increase vehicle use and could increase domestic solid fuel burning. Water: The determinants of water quality in Bakewell are the upstream water treatment and effects of agriculture (run off). Soil: Development would not take place on any area of land that has soil classification of 1,2 or 3. Light: Development would be adjacent to existing sources of light pollution and</p>
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<p>POLICY H3 Age and Disability Related Considerations</p>	<table border="1"> <tr><td>Air</td><td>0</td><td></td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	0		Water	0		Soil	0		Light	0		<p>away from the National Park's 'dark sky discovery sites'.</p>
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<p>POLICY CF1 Newholme Hospital</p>	<table border="1"> <tr><td>Air</td><td>-</td><td>L</td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	-	L	Water	0		Soil	0		Light	0		<p>Air: The redevelopment of Newholme Hospital could result in an increase in residential accommodation or employment use, leading to slight but long term negative effects on air quality. Increased levels of development are likely to increase vehicle use and could increase domestic solid fuel burning. Water: The determinants of water quality in Bakewell are the upstream water treatment and effects of agriculture (run off). Soil: Development would not take place on any area of land that has soil classification of 1, 2 or 3. Light: Development would be adjacent to existing sources of light pollution and away from the National Park's 'dark sky discovery sites'.</p>
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<p>POLICY CF2 Development of Community, Sports and Arts Facilities</p>	<table border="1"> <tr><td>Air</td><td>0</td><td></td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	0		Water	0		Soil	0		Light	0		
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<p>POLICY CF3 Retaining Playing Fields and Sports Facilities</p>	<table border="1"> <tr><td>Air</td><td>0</td><td></td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	0		Water	0		Soil	0		Light	0		
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<p>Policy E1 Bakewell Central Shopping Area and Primary Shopping Area</p>	<table border="1"> <tr><td>Air</td><td>+</td><td>L</td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	+	L	Water	0		Soil	0		Light	0		<p>This policy maintains a central shopping area adjacent to public transport hubs and existing car parks.</p>
Air	+	L												
Water	0													
Soil	0													
Light	0													
<p>POLICY E2 Employment Sites</p>	<table border="1"> <tr><td>Air</td><td>0</td><td></td></tr> <tr><td>Water</td><td>-</td><td>L Secondary</td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	0		Water	-	L Secondary	Soil	0		Light	0		<p>The policy could lead to development on a greenfield site adjacent to the River Wye and the floodzone.</p>
Air	0													
Water	-	L Secondary												
Soil	0													
Light	0													
<p>Policy TC1 Improvements for Non-Car Users</p>	<table border="1"> <tr><td>Air</td><td>+</td><td>L</td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	+	L	Water	0		Soil	0		Light	0		
Air	+	L												
Water	0													
Soil	0													
Light	0													
<p>Policy TC2 Car and Cycle Parking</p>	<table border="1"> <tr><td>Air</td><td>+/-</td><td></td></tr> <tr><td>Water</td><td>0</td><td></td></tr> <tr><td>Soil</td><td>0</td><td></td></tr> <tr><td>Light</td><td>0</td><td></td></tr> </table>	Air	+/-		Water	0		Soil	0		Light	0		
Air	+/-													
Water	0													
Soil	0													
Light	0													
<p>Policy TC3 Re-opening of the Matlock to Buxton Railway</p>	<table border="1"> <tr><td>Air</td><td>-</td><td>L</td></tr> <tr><td>Water</td><td>-</td><td>L</td></tr> <tr><td>Soil</td><td>-</td><td>L</td></tr> <tr><td>Light</td><td>-</td><td>L</td></tr> </table>	Air	-	L	Water	-	L	Soil	-	L	Light	-	L	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route. Together the creation of a new rail line and the creation of a new recreational route could impact negatively on these characteristics.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'</p>
Air	-	L												
Water	-	L												
Soil	-	L												
Light	-	L												
<p>TC4 Broadband</p>		<p>The policy could facilitate home working and reduced car use.</p>												

	Air	+	L		
	Water	0			
	Soil	0			
	Light	0			

BNP Sustainability Assessment Framework (5) To minimise the consumption of natural resources		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+/- L Secondary	Expanding the development boundary will have the secondary effect of leading to development on previously undeveloped land, therefore consuming natural resources. In combination with strategic policy, which restricts overall levels of development within the National Park, and other policies in the neighbourhood plan requiring development to respect environmental and landscape limits, the policy does have the effect of constraining development to sustainable levels. These areas of expansion were considered alongside other possible areas for development both inside and outside the existing development boundary ⁴ . These areas of expansion are considered to be the most sustainable.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+ L	Natural resources (and ecosystem services) are best preserved at a landscape scale. This policy respects the wider landscape setting of the town.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	- L Secondary	A secondary effect of this policy means that finite mineral resources (limestone and gritstone) for building materials may be consumed.
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	++ L	
POLICY H1 Provision of Affordable Housing	-- L	The requirements of policy ENV2 in combination with this policy means that finite mineral resources (limestone and gritstone) for building materials will be consumed.

⁴ See 'Site Assessments for Boundary Extension' in <https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan>

POLICY H2 Market Housing and Starter Homes	+/- L	The policy requires the reuse of brownfield land. The requirements of policy ENV2 in combination with this policy means that finite mineral resources (limestone and gritstone) for building materials may be consumed.
POLICY H3 Age and Disability Related Considerations	0	
POLICY CF1 Newholme Hospital	+ L	The policy requires re-use of underused land and buildings.
POLICY CF2 Development of Community, Sports and Arts Facilities	0	
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+ L	This policy maintains a central shopping area adjacent to public transport hubs and existing car parks.
POLICY E2 Employment Sites	- L	The policy could lead to development on a greenfield site. The site is subject to a 'blanket' TPO.
Policy TC1 Improvements for Non-Car Users	+ L Secondary	Improvements could lead to a shift away from car use.
Policy TC2 Car and Cycle Parking	+ L Secondary	Improvements could lead to a shift away from car use.
Policy TC3 Re-opening of the Matlock to Buxton Railway	- L	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route. Together the creation of a new rail line and the creation of a new recreational route could impact negatively on the consumption of natural resources.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'</p>
TC4 Broadband	+ L	The policy could facilitate home working and reduced car use.

(6) To develop a managed response to climate change		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	- L Secondary	The policy allows development but in combination with other strategic policies and BNP policies, (ENV1,4 and TC1,2 and 4) the significance is low.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+ L	The policy requires the provision of ecologically appropriate landscaping, including tree planting, which will have beneficial effects for climate change.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+ L	The policy requires new development to be designed to take in to account micro climate and the principles embedded in the PDNPA design guide which include sustainable design.
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	+ L	The designation of the River Wye and its flood plane as Local Green Space makes a positive contribution to climate change adaptation.
POLICY H1 Provision of Affordable Housing	- L	The provision of affordable housing will contribute to Co ₂ emissions but in combination with other strategic policies and BNP policies, (ENV1,4 and TC1,2 and 4) the significance is low.
POLICY H2 Market Housing and Starter Homes	- L	The provision of Market Housing and Starter Homes will contribute to Co ₂ emissions but in combination with other strategic policies and BNP policies, (ENV1,4 and TC1,2 and 4) the significance is low.
POLICY H3 Age and Disability Related Considerations	0	
POLICY CF1 Newholme Hospital	0	
POLICY CF2 Development of Community, Sports and Arts Facilities	0	
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+ L	This policy maintains a central shopping area adjacent to public transport hubs and existing car parks.
POLICY E2 Employment Sites	- L	The site is adjacent to the River Wye and incorporates Floodzone 2 and 3.
Policy TC1 Improvements for Non-Car Users	+ L	Improvements could lead to a shift away from car use.
Policy TC2 Car and Cycle Parking	+ L	Improvements could lead to a shift away from car use.
Policy TC3 Re-opening of the Matlock to Buxton Railway	+/-	Policy could facilitate public transport, but could negatively affect walking and cycling.

		BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'
TC4 Broadband	+ L	The policy could facilitate home working and reduced car use.

BNP Sustainability Assessment Framework		
(7) To achieve and promote sustainable land use and built development		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	++ L	The policy provides for the growth and development of Bakewell within the constraints of national legislation (national parks) and strategic planning policy. In combination with other policies (ENV1,2,3 and 4 and TC1,2 and 4) it achieves growth in a sustainable way. These areas of expansion were considered alongside other possible areas for development both inside and outside the existing development boundary ⁵ . These areas of expansion are considered to be the most sustainable.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	++ L	In combination with Policy DB1 this policy provides for sustainable growth of the town.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	++ L	In combination with Policy DB1 this policy provides for sustainable growth of the town.
POLICY ENV3 Protection of Non-designated Heritage Assets	++ L	In combination with Policy DB1 this policy provides for sustainable growth of the town.
POLICY ENV4 Local Green Spaces	++ L	In combination with Policy DB1 this policy provides for sustainable growth of the town.
POLICY H1 Provision of Affordable Housing	+ L	This policy provides affordable housing for local needs which, in combination with other policies, would be in the most sustainable locations.
POLICY H2 Market Housing and Starter Homes	+ L	This policy provides for land to be re-used for the provision of Market and Starter Homes.
POLICY H3 Age and Disability Related	0	

⁵ See 'Site Assessments for Boundary Extension' in <https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan>

Considerations		
POLICY CF1 Newholme Hospital	+ L	This policy provides for the re-use of land and for under-used/empty buildings to be used for housing or business.
POLICY CF2 Development of Community, Sports and Arts Facilities	0	
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+ L	This policy maintains a central shopping area adjacent to public transport hubs and existing car parks.
POLICY E2 Employment Sites	+/- L	This policy protects the existing use of employment sites. However it also designates a greenfield site as an employment site which is subject to a blanket TPO.
Policy TC1 Improvements for Non-Car Users	+ L	Improvements could lead to a shift away from car use.
Policy TC2 Car and Cycle Parking	+ L	Improvements could lead to a shift away from car use.
Policy TC3 Re-opening of the Matlock to Buxton Railway	0	BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use. Therefore the potential harmful effects of a new railway are due to strategic policy and not BNP policy.
TC4 Broadband	+ L	The policy could facilitate home working and reduced car use.

BNP Sustainability Assessment Framework (8) To improve the health and well-being of the community

	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	0	
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+ L Secondary	This policy will contribute positively to Bakewell's environment, which in turn can improve health and well-being.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+ L Secondary	This policy will contribute positively to Bakewell's environment, which in turn can improve health and well-being.
POLICY ENV3 Protection of Non-designated Heritage Assets	+ L Secondary	This policy will contribute positively to Bakewell's environment, which in turn can improve health and well-being.
POLICY ENV4 Local Green Spaces	+ L	This policy will contribute positively to Bakewell's environment, which in turn can improve health and well-being.

	Secondary	
POLICY H1 Provision of Affordable Housing	++ L	The provision of affordable homes for local people will contribute to well-being
POLICY H2 Market Housing and Starter Homes	+ L	The provision of Starter Homes and Market Housing will contribute to well-being.
POLICY H3 Age and Disability Related Considerations	+++ L Secondary	This policy directly seeks to address the housing needs of older and disabled residents.
POLICY CF1 Newholme Hospital	0	
POLICY CF2 Development of Community, Sports and Arts Facilities	+++ L	This policy directly seeks to address the community's health and well-being.
POLICY CF3 Retaining Playing Fields and Sports Facilities	+ + + L	This policy directly seeks to address the community's health and well-being.
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+ L	This policy seeks to retain shops in the most accessible location.
POLICY E2 Employment Sites	0	
Policy TC1 Improvements for Non-Car Users	+ L	This policy directly seeks to address the community's health and well-being.
Policy TC2 Car and Cycle Parking	+ L	This policy directly seeks to address the community's health and well-being.
Policy TC3 Re-opening of the Matlock to Buxton Railway	+/-	Positive effect of creating options for public transport but probable negative effect on walking, cycling, horse-riding and informal recreation. BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'
TC4 Broadband	0	

**BNP Sustainability Assessment Framework
(9) To promote access for all**

	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+ + L	This policy provides for the development boundary to be expanded in 3 areas and acknowledges that this may lead to housing development. These 3 areas of expansion were considered for their accessibility

		<p>(amongst other things) alongside other possible areas for development both inside and outside the existing development boundary⁶.</p> <p>The site assessment showed that, of the areas where the boundary is proposed to be extended:</p> <ul style="list-style-type: none"> • Lady Manners playing fields (Site 16) is ranked 5 out of 18 sites (1 being the most accessible and 18 being the least). • Land east of Lakeside (Site 4) is ranked 9 out of 18 sites (1 being the most accessible and 18 being the least). • Land around Stoney Closes (Site 15) is ranked 3 out of 18 sites (1 being the most accessible and 18 being the least). <p>See https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan for site assessments.</p>
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	0	
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	0	
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	0	
POLICY H1 Provision of Affordable Housing	0	
POLICY H2 Market Housing and Starter Homes	0	
POLICY H3 Age and Disability Related Considerations	+++ L	This policy directly considers the needs of older and disabled residents to be able to access the town centre.
POLICY CF1 Newholme Hospital	0	
POLICY CF2 Development of Community, Sports and Arts Facilities	++ L	This policy requires that provision should be made for access for all and to link to pedestrian and cycle routes.
POLICY CF3 Retaining Playing Fields and Sports Facilities	++ L	This policy requires that replacement facilities should have equivalent or better access.
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+++ L	This policy aims to retain a central shopping area so that it is accessible for all.

⁶ See 'Site Assessments for Boundary Extension' in <https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan>

POLICY E2 Employment Sites	0	
Policy TC1 Improvements for Non-Car Users	++ L	This policy aims to improve conditions for non-car users.
Policy TC2 Car and Cycle Parking	++	This policy aims to improve conditions for cyclists.
Policy TC3 Re-opening of the Matlock to Buxton Railway	+/-	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route.</p> <p>Positive effect on access in terms of creating options for public transport but probable negative effect in terms of walking and cycling.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'</p>
TC4 Broadband	+ L	This policy supports access to the internet.

BNP Sustainability Assessment Framework (10) To promote local governance

The Neighbourhood Plan as a whole enables local people to have more say with regard to development in Bakewell, therefore each policy represents a high, long term positive effect.

	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+++ L	
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+++ L	
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+++ L	
POLICY ENV3 Protection of Non-designated Heritage Assets	+++ L	
POLICY ENV4 Local Green Spaces	+++ L	
POLICY H1 Provision of Affordable Housing	+++ L	
POLICY H2 Market Housing and Starter Homes	+++	

	L	
POLICY H3 Age and Disability Related Considerations	+++ L	
POLICY CF1 Newholme Hospital	+++ L	
POLICY CF2 Development of Community, Sports and Arts Facilities	+++ L	
POLICY CF3 Retaining Playing Fields and Sports Facilities	+++ L	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+++ L	
POLICY E2 Employment Sites	+++ L	
Policy TC1 Improvements for Non-Car Users	+++ L	
Policy TC2 Car and Cycle Parking	+++ L	
Policy TC3 Re-opening of the Matlock to Buxton Railway	+++ L	
TC4 Broadband	+++ L	

BNP Sustainability Assessment Framework (11) To help meet local need for housing		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+++ L	The policy creates new areas inside the development boundary giving scope for new development in line with Core Strategy Policy DS1, which includes affordable housing to meet local need.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	++ L	The policy supports new development inside the development boundary, which could include affordable housing to meet local needs in line with core Strategy policy DS1.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+ L	The policy supports new housing development that contributes to local character.
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	0	
POLICY H1 Provision of Affordable Housing	+++ L	Policy supports the provision of affordable housing to meet local needs.

POLICY H2 Market Housing and Starter Homes	+++ L	Policy supports open market housing and starter homes on brownfield land.
POLICY H3 Age and Disability Related Considerations	+++ L	Policy requires new housing schemes to consider the needs of older and disabled residents.
POLICY CF1 Newholme Hospital	+++ L	Policy supports redevelopment of hospital site for mixed use including the provision of affordable housing.
POLICY CF2 Development of Community, Sports and Arts Facilities	0	
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	0	
POLICY E2 Employment Sites	0	
Policy TC1 Improvements for Non-Car Users	0	
Policy TC2 Car and Cycle Parking	0	
Policy TC3 Re-opening of the Matlock to Buxton Railway	0	
TC4 Broadband	0	

BNP Sustainability Assessment Framework		
(12) Encourage better access to a range of local services and amenities		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	++ L	<p>This policy provides for the development boundary to be expanded in 3 areas and acknowledges that this may lead to housing development. These 3 areas of expansion were considered for their accessibility to local services and amenities alongside other possible areas for development both inside and outside the existing development boundary.</p> <p>The site assessment showed that, of the areas where the boundary is proposed to be extended:</p> <ul style="list-style-type: none"> • Lady Manners playing fields (Site 16) is ranked 5 out of 18 sites (1 being the most accessible and 18 being the least). • Land east of Lakeside (Site 4) is ranked 9 out of 18 sites (1 being the most accessible and 18 being the least). • Land around Stoney Closes (Site 15) is ranked 3 out of 18 sites (1 being the most accessible and 18 being the least). <p>See https://www.peakdistrict.gov.uk/planning/neighbourhood-</p>

		planning/neighbourhood-plans/bakewell-neighbourhood-plan for site assessments.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	0	
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	0	
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	0	
POLICY H1 Provision of Affordable Housing	0	
POLICY H2 Market Housing and Starter Homes	0	
POLICY H3 Age and Disability Related Considerations	+++ L	Policy requires that new housing development that is in easy reach of the facilities in the town centre contributes to meeting the needs of older and/or disabled residents.
POLICY CF1 Newholme Hospital	+++ L	Policy supports the re-use of a hospital site for community uses.
POLICY CF2 Development of Community, Sports and Arts Facilities	+++ L	Policy supports the development of community, sports and arts facilities.
POLICY CF3 Retaining Playing Fields and Sports Facilities	+++ L	Policy seeks to prevent loss of playing fields and sports facilities.
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+++ L	Seeks to retain shops and services in the town centre
POLICY E2 Employment Sites	0	
Policy TC1 Improvements for Non-Car Users	+ M Secondary	The policy could lead to better access to facilities for those without access to a car, or choosing not to use it.
Policy TC2 Car and Cycle Parking	+ M Secondary	The policy could lead to better access to facilities for those without access to a car, or choosing not to use it.
Policy TC3 Re-opening of the Matlock to Buxton Railway	+/-	The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route. Positive effect on access in terms of creating options for public transport but probable negative effect in terms of walking and cycling.

		BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'
TC4 Broadband	+++ L Secondary	Policy supports access to online services.

BNP Sustainability Assessment Framework (13) Promote a healthy economy		
	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+++ L	Policy enables and directs the future growth of Bakewell.
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	0	
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	0	
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	0	
POLICY H1 Provision of Affordable Housing	++ L Secondary	Policy supports the provision of housing which supports the 3 strands of achieving sustainable development, including the economic objective.
POLICY H2 Market Housing and Starter Homes	++ L Secondary	Policy supports the provision of housing which supports the 3 strands of achieving sustainable development, including the economic objective.
POLICY H3 Age and Disability Related Considerations	++ L Secondary	Policy supports the provision of housing which supports the 3 strands of achieving sustainable development, including the economic objective.
POLICY CF1 Newholme Hospital	+++ Secondary	Policy supports the redevelopment of the site for employment, housing and community uses.
POLICY CF2 Development of Community, Sports and Arts Facilities	0	
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	++ L	Supports the vitality and viability of the central shopping area.

POLICY E2 Employment Sites	++ L	Safeguards and designates employment sites.
Policy TC1 Improvements for Non-Car Users	+ L Secondary	Promotes accessibility.
Policy TC2 Car and Cycle Parking	+ L	Promotes accessibility.
Policy TC3 Re-opening of the Matlock to Buxton Railway	+/-	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route.</p> <p>Positive effect on access in terms of creating options for public transport but probable negative effect in terms of walking, and cycling.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that 'any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.'</p>
TC4 Broadband	++ Secondary	Supports communication facilities that are necessary for all business.

BNP Sustainability Assessment Framework

(14) To develop a managed response to road traffic and balance the needs of pedestrians, cyclists and vehicles to reduce road traffic, traffic congestion and improve safety, health and air quality by reducing the need to travel, especially by car

	Significance of effect	Commentary
POLICY DB1 Bakewell's Development Boundary	+++ L	<p>This policy provides for the development boundary to be expanded in 3 areas and acknowledges that this may lead to housing development. These 3 areas of expansion were considered for their accessibility (amongst other things) alongside other possible areas for development both inside and outside the existing development boundary⁷.</p> <p>The site assessment showed that, of the areas where the boundary is proposed to be extended:</p> <ul style="list-style-type: none"> Lady Manners playing fields (Site 16) is ranked 5 out of 18 sites (1

⁷ See 'Site Assessments for Boundary Extension' in <https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan>

		<p>being the most accessible and 18 being the least).</p> <ul style="list-style-type: none"> • Land east of Lakeside (Site 4) is ranked 9 out of 18 sites (1 being the most accessible and 18 being the least). • Land around Stoney Closes (Site 15) is ranked 3 out of 18 sites (1 being the most accessible and 18 being the least). <p>See https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan for site assessments.</p>
POLICY ENV1 Protection and Enhancement of Bakewell's Setting	+ L Secondary	Policy would protect the natural landscape and requires ecologically appropriate landscaping in new development, including new native trees, which could improve air quality and human health.
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	+ L Secondary	Policy requires provision of new native trees, which could improve air quality and human health.
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	++ L Secondary	Policy protects the natural landscape, including woodland and open spaces, which could improve air quality and human health.
POLICY H1 Provision of Affordable Housing	0	
POLICY H2 Market Housing and Starter Homes	0	
POLICY H3 Age and Disability Related Considerations	++ L	Requires health issues of older and disabled residents to be considered in the development of housing close to the town centre.
POLICY CF1 Newholme Hospital	+ L	Proves for a mix of uses close to the town centre.
POLICY CF2 Development of Community, Sports and Arts Facilities	++ L	Requires development to link to cycle and pedestrian routes.
POLICY CF3 Retaining Playing Fields and Sports Facilities	+ L	Requires equivalent or improved access, which includes access by those without a private car
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	+++ L	Retains shopping in a central location which can be accessed by walking and public transport
POLICY E2 Employment Sites	- - L	Creates a demand for travel by means other than walking, cycling and public transport, due to the location of the sites.
Policy TC1 Improvements for Non-Car Users	++ L	Creates an environment more conducive to walking and cycling.
Policy TC2 Car and Cycle Parking	+/-	Acknowledges that visitor and local travel by car is likely to continue, but also attempts to balance this by addressing the lack of cycle parking.

Policy TC3 Re-opening of the Matlock to Buxton Railway	+/-	<p>The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route.</p> <p>Positive effect in terms of creating options for public transport but probable negative effect in terms of walking and cycling.</p> <p>BNP Policy TC3 is in accordance with PDNPA Core Strategy T5 which also safeguards the land for future rail use and the supporting text to the policy states that ‘any proposal will be assessed on its own merits, and will need to demonstrate the ability to provide a net positive effect on the National Park environment.’</p>
TC4 Broadband	++ L	May lead to a reduction in the need to travel.

BNP Sustainability Assessment Framework (15) To reduce the risk of flooding		
	Significance of effect	Commentary
POLICY DB1 Bakewell’s Development Boundary	- L	<p>The area referred to in BNP as ‘Area 3: land between Ashford Road and River Wye) is by this policy included within the development boundary. Policy DB1 states that future development of Bakewell will be contained within this boundary. A strip of land on this site that is adjacent to the River Wye, and classified as Environment Agency Floodzone 2 and 3.</p> <p>Para 155 of the National Planning Policy Framework (2018) (NPPF) states ‘ inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk ...’ and this should be determined by ‘applying the sequential test and then if necessary the exception test ... (para 157a)’</p> <p>In order to apply the sequential and the exception test and ‘steer new development to areas with the lowest risk of flooding’ during consideration of expansion of the development boundary, the following process was undertaken by the Bakewell Neighbourhood Plan Working Group.</p> <ul style="list-style-type: none"> • A public consultation process identified 18 areas for consideration for possible development; 10 of these areas were outside the existing development boundary • The 10 areas outside the existing development boundary were further

		<p>considered in terms of the strategic policies of the national park, in particular DS1 which directs development in Bakewell to ‘in or on the edge of’ the settlement, L1 which requires development to conserve and enhance valued landscape character, and L3 which protects cultural heritage assets.</p> <ul style="list-style-type: none">• Of these 10 sites, 7 sites were not acceptable in terms of strategic planning policies DS1, L1 and L3 because:<ul style="list-style-type: none">○ land at Burre House is important open space in the Conservation Area and the setting for a Listed Building;○ land north of Burre House is important open space in the Conservation Area;○ land adjacent to Aldern House would lead to isolated development and harm to valued landscape character;○ land adjacent to the Monsal Trail would lead to isolated development and harm to valued landscape character;○ land east of Station Road would lead to isolated development and harm to valued landscape character;○ land at Brooklands would lead to isolated development and harm to valued landscape character;○ land south of Stanege Road would lead to isolated development and harm to valued landscape character• The remaining 3 sites were considered for their flood risk:<ul style="list-style-type: none">○ Land at Stoney closes (BNP site 1)– no flood risk○ Land at Lady Manners (BNP site 2) – no flood risk○ Land between Ashford Road and the River Wye (BNP site 3) (also called Land East of Lakeside) – a small part of the site is adjacent to the River Wye, and classified as Environment Agency Floodzone 2 and 3. <p>The site assessments for the development boundary extension can be found here:</p> <p>https://www.peakdistrict.gov.uk/planning/neighbourhood-planning/neighbourhood-plans/bakewell-neighbourhood-plan</p> <p>A map of the Ashford Road site in relation to the Floodzone can be found here:</p> <p>https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0008/1392290/Appendix-4-Map-of-Environment-Agency-Floodzones.pdf</p>
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		<p>Para 158 of the NPPF states ‘ development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding’.</p> <p>The above sequential test has demonstrated that, due to the sensitive and protected nature of Bakewell’s landscape and cultural heritage, areas for expansion of the development boundary are extremely limited. In fact there are only 2 other ‘reasonably available sites’.</p> <p>The NPPF (para 160) then requires the Ashford Road site to pass the exception test and demonstrate: <i>‘the development would provide wider sustainability benefits to the community that outweigh the flood risk’; and ‘the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk.’</i></p> <p>In its consultation response to the SEA Scoping report, the Environment Agency stated (emailed letter dated 35.10.18):</p> <p><i>“Whilst no development is actually being proposed (at the Asher Lane (sic) site), development will need to meet the requirements of the National Planning Policy Framework (NPPF) , and as a minimum a 8m buffer zone should be maintained to the banks of the River Wye to maintain access where appropriate.’</i></p> <p>Options for the Ashford Road site are therefore:</p> <ol style="list-style-type: none"> I. Keep the existing boundary as shown in the PDNPA Local Plan 2001 II. Keep the development boundary as proposed in BNP III. Redraw the boundary so that area of flood risk is outside IV. Keep the development boundary as proposed in BNP but include within policy DB1 a requirement to maintain an 8m buffer zone to the banks of the River Wye.
<p>POLICY ENV1 Protection and Enhancement of Bakewell’s Setting</p>	<p>+ L</p>	<p>This policy requirement will help to mitigate against flooding by conserving and creating green infrastructure in accordance with the Derbyshire Dales District Level 1 Strategic Flood Risk Assessment which states (Executive Summary pg ii) <i>“new development and re-development of land should, wherever possible,</i></p>

		<i>seek opportunities to reduce overall level of flood risk at the site, for example by ... creating space for flooding (and) Green Infrastructure (GI) should be considered within the mitigation measures for surface water runoff from potential development ..."</i>
POLICY ENV2 Protection and Enhancement of Bakewell's Special Character	0	
POLICY ENV3 Protection of Non-designated Heritage Assets	0	
POLICY ENV4 Local Green Spaces	++ L	Most of the Environment Agency defined flood plane in Bakewell is proposed to be designated as a Local Green Space (proposed LGS1), in accordance with the Derbyshire Dales District Level 1 Strategic Flood Risk Assessment which states (Executive Summary pg ii) " <i>new development and re-development of land should, wherever possible, seek opportunities to reduce overall level of flood risk at the site, for example by ... creating space for flooding (and) using Flood Zones 2 and 3 as public open space.</i> "
POLICY H1 Provision of Affordable Housing	+/- L Synergistic	The policy in itself does not allocate sites. In combination with Policy DB1 development could take place on green field sites, including one which is partly within the Floodzone.
POLICY H2 Market Housing and Starter Homes	0	
POLICY H3 Age and Disability Related Considerations	0	
POLICY CF1 Newholme Hospital	0	
POLICY CF2 Development of Community, Sports and Arts Facilities	0	
POLICY CF3 Retaining Playing Fields and Sports Facilities	0	
Policy E1 Bakewell Central Shopping Area and Primary Shopping Area	0	
POLICY E2 Employment Sites	- L	The site is protected by a blanket TPO and has a narrow strip of Floodzone 2 and 3.
Policy TC1 Improvements for Non-Car Users	0	
Policy TC2 Car and Cycle Parking	0	
Policy TC3 Re-opening of the Matlock to Buxton Railway	0	
TC4 Broadband	0	

3.0 Neighbourhood Plan Options and Alternatives

3.1 The previous section highlighted a number of possible negative effects of Bakewell Neighbourhood Plan, when tested against the Sustainability Assessment Framework (SAF). These are summarised below.

BNP Policy	Possible negative effect (SAF number)
DB1 Bakewell's Development Boundary	Could lead to development on the edge of Bakewell, which has the potential to harm landscape (1)
	Could lead to development with consequent long term negative effects on air quality (4)
	Could lead to development on undeveloped land, consuming natural resources (5)
	Could lead to development with consequent production of greenhouse gases (6)
	Could lead to development in flood zone (15)
ENV2 Protection and Enhancement of Bakewell's Special Character	A secondary effect of this policy means that finite mineral resources (limestone and gritstone) for building materials will be consumed (5)
H1 Provision of Affordable Housing	In combination with Policy DB1, could lead to new development on green field sites on the edge of Bakewell, having the potential to harm landscape (1)
	Could lead to a slight but long term negative effect on air quality due to increased traffic generation (4)
	In combination with Policy ENV2 the effect of this policy means that finite mineral resources (limestone and gritstone) for building materials will be consumed (5)
	Could contribute to CO ₂ emissions through traffic generation and domestic consumption (6)
	In combination with Policy DB1 development could take place on green field sites, including one which is partly within the flood zone (15)
	Could lead to a slight but long term negative effect on air quality due to increased traffic generation (4)
	In combination with Policy ENV2 the effect of this policy means that finite mineral resources (limestone and gritstone) for building materials will be consumed (5)
	Could contribute to CO ₂ emissions through traffic generation and domestic consumption (6)
CF1 Redevelopment of Newholme Hospital	The redevelopment of Newholme Hospital could result in an increase in residential accommodation or employment use, leading to slight but long term negative effects on air quality. Increased levels of development are likely to increase vehicle use and could increase domestic solid fuel burning (4). If redevelopment of this site results in a much less intensive use than formerly, effects on air quality will be reduced.
CF2 Development of Community, Sports and Arts Facilities	In combination with strategic policy (Core Strategy DS1 which permits new build community facilities in or on the edge of Bakewell) the policy could lead to the development of new build community facilities on green field land on the edge of the built-up area. The policy also makes provision for replacement playing fields to be located within or adjacent to the development boundary which may also create some landscape harm but CS and DMP

	policies would ensure these are mitigated against. (1)
CF3 Retaining playing fields and sports facilities	In combination with CF3 replacement playing fields could be located within or adjacent to the development boundary which may also create some landscape harm but CS and DMP policies would ensure these are mitigated against. (1)
E2 Safeguarding and Designating Employment Sites	This policy safeguards employment use on land that is already developed for such use, in line with PDNPA Development Management Policies (DMP). The BNP policy also allocates a site (Employment site 1 'former Cintrides Site') that is not 'safeguarded' in the DMP. Therefore BNP Policy E2 has the potential to result in the development on undeveloped land which is unlikely to be reversible. This site is also partly subject to a 'blanket' TPO (1)
	The policy could lead to development on a greenfield site adjacent to the River Wye and the Floodzone (4, 5, 6, 7)
	Development on a green field site which could lead to a demand for travel other than walking, cycling or public transport. (14)
TC1 Improvements for non-car users	The policy supports physical development associated with the control of vehicles and cycles and for directing pedestrians, and could include for example bollards, signs, delivery bays etc. There is therefore potential to negatively affect Bakewell's townscape unless these are well-designed. Part C of the policy requires 'positive' design (1,3)
TC3 Re-opening of Matlock to Buxton Railway	The line of the railway is currently the Monsal Trail (a multi-user recreational route linking Bakewell to Millers Dale) and it is also proposed as a Local Green Space in BNP. BNP Policy TC3 also provides for the creation of a new recreation route which, depending on the route chosen and the quality of the landscaping, could impact negatively on the landscape, townscape and biodiversity. (1,2,3,4,5)

3.2 The options, reasonable alternatives and the likely effects of the reasonable alternatives are considered for each of the above policies in turn.

Options	Reasonable Alternatives (in blue)	Likely Effects of Reasonable Alternatives, and any Mitigation.
Policy DB1 (and associated Development Boundary Map 2)		
Do not extend development boundary	This is not a reasonable alternative as it would mean future growth of Bakewell could be prevented, contrary to NPPF, or occur in an unplanned fashion contrary to Core Strategy.	
Extend development boundary but in alternative locations	This is not a reasonable alternative as many other areas for extension were considered and were more damaging in terms of harm to the landscape, cultural heritage, biodiversity and Floodzone.	
Amend development boundary to exclude the whole of Area 3 (land between River Wye and Ashford Road) due to inclusion of and proximity to Floodzone.	This is not a reasonable alternative as it would unnecessarily reduce the area of land inside the development boundary.	
Amend development boundary to exclude that part of Area 3 (land between River Wye and Ashford	This is not a reasonable alternative as it would lead to an inconsistency in the line of the	

Road) that is Floodzone.	development boundary in this location.	
Require a 10m buffer zone to the banks of the River Wye.	Area 3 is required to leave an 10m buffer zone to the banks of the River Wye.	This would address the negative impact with regard to item 15 of the SAF (reduce the risk of flooding). The other areas of negative impact are considered to be acceptable at this (neighbourhood plan) level, given the protections existing at a more strategic level and other policies within the neighbourhood plan.
Policy ENV2 Protection and Enhancement of Bakewell's Special Character		
Do nothing	This is not a reasonable alternative as the positive scores of this policy with regard to the Sustainability Assessment Framework clearly outnumber and outweigh the negative.	
Re-write policy so that reference to strategic design guidance (and therefore requirements to use 'the same palette of materials used traditionally in the area' (PDNPA Design guide p 24 para 4.1) is removed.	This is not a reasonable alternative as neighbourhood policy must be in general conformity with strategic policy.	
H1 Provision of Affordable Housing		
Do nothing	<p>This is not a reasonable alternative as it would be contrary to NPPF and strategic policy.</p> <p>Potential negative effects are only in combination with policy DB1.</p> <p>The areas of negative impact are considered to be acceptable at this (neighbourhood plan) level, given the protections existing at a more strategic level and other policies within the neighbourhood plan.</p>	
H2 Market Housing and Starter Homes		
Do nothing	<p>This is not a reasonable alternative as it would be contrary to NPPF and strategic policy.</p> <p>Potential negative effects are only in combination with policy DB1.</p> <p>The areas of negative impact are considered to be acceptable at this (neighbourhood plan) level, given the protections existing at a more strategic level and other policies within the neighbourhood plan.</p>	
CF1 Redevelopment of Newholme Hospital		
Do nothing	This is not a reasonable alternative as it would be contrary to NPPF and strategic policy.	

	The areas of negative impact are considered to be acceptable at this (neighbourhood plan) level, given the protections existing at a more strategic level and other policies within the neighbourhood plan.	
CF2 Development of Community, Sports and Arts Facilities		
Do nothing	This is not a reasonable alternative as it would be contrary to NPPF and strategic policy. The areas of negative impact are considered to be acceptable at this (neighbourhood plan) level, given the protections existing at a more strategic level and other policies within the neighbourhood plan.	
Amend policy so that proposals do not adversely affect landscape, special character or biodiversity.	This is not a reasonable option as strategic policies and other policies in the neighbourhood plan protect landscape, biodiversity and require a good standard of design in keeping with Bakewell's special character.	
CF3 Retaining playing fields and sports facilities		
Do nothing	This is not a reasonable alternative as it would be contrary to NPPF and strategic policy.	
Amend policy requiring any new playing fields to be well landscaped and integrated into the landscape.	Amend policy requiring any new playing fields to be well landscaped and integrated into the landscape.	This would address the likely adverse impact on SAF 1.
E2 Safeguarding and designating employment sites		
Amend policy to remove Site 1 (remainder of former 'Cintrides' site.)	Amend policy to remove Site 1 former 'Cintrides' site.)	This would address all the negative impacts of this policy with regard to the SAF (1,2,4,5,6,7,14) However it is not considered to be a reasonable option because: (i) the site would remain inside the development boundary and in principle acceptable for development, including industrial development, provided that the trees protected by the TPO, and the other issues concerning habitat and flood zone, could be addressed. (ii) 0.8ha would be removed from the supply of additional employment land. This would take the total additional available

		employment land (estimated to be 1.4 ha ⁸) to 0.6ha which is below the estimated demand of 1.3ha ⁹ . (iii) this site has long been identified by the community as suitable for industrial use and most of it is now in retail use.
Amend policy so that the watercourse and trees are given protection.	Amend policy so that the watercourse and trees are given protection.	This would address most of the negative impacts of this policy with regard to the SAF except 14, as it may still lead to a demand for car-based travel.
TC1 Improvements for non-car users		
Amend policy to require all such improvements to be of a high standard of design, protecting and enhancing Bakewell's special qualities.	Amend policy to require all such improvements to be of a high standard of design, protecting and enhancing Bakewell's special qualities.	This would address all the negative impacts of this policy with regard to the SAF 1,3
TC3 Re-opening the Matlock-Buxton Railway		
Do nothing	The neighbourhood plan process has evidenced 'mixed' views about re-instatement of the railway but on balance the neighbourhood plan supports it. PDNPA Core Strategy Policy T5 also supports re-instatement but this position will be debated during Core Strategy review beginning in 2019. Deleting the policy would address the negative impacts with regard to the SAF but is not considered to be a reasonable alternative as it would misrepresent the communities view and in any event neighbourhood level policies would not prevent harmful effects with regard to strategic issues.	

⁸ [Summary of Employment Land in the Peak District National Park \(PDNPA\)](#)

⁹ [Hearn Report](#)

4.0 Conclusion and Recommendations for Modification of Bakewell Neighbourhood Plan

4.1 There are a number of policies in Bakewell Neighbourhood Plan (BNP) that have no harmful effects with respect to the Strategic Environmental Assessment Framework (SAF). These are:

ENV1: Protection and Enhancement of Bakewell's Setting
ENV3: Protection of Non-Designated Heritage Assets
ENV4: Local Green Spaces
H3: Age and Disability Related Considerations
E1: Central Shopping Area and Primary Shopping Area
TC2: Car and Cycle Parking
TC4: Broadband

4.2 A number of policies in BNP have been identified that are likely to have 'low level' harmful effects with regard to one or more elements of the SAF. The harmful effects are mitigated either by strategic planning policy or by other policies in BNP. Alternative options were considered but determined not to be reasonable and not necessary in light of the low level effect and existing mitigation. These are:

H1: Provision of Affordable Housing
H2: Market Housing and Starter Homes
CF1: Redevelopment of Newholme Hospital
CF2: Development of Community, Sports and Arts Facilities

4.3 One policy is considered to have an adverse impact on the consumption of finite natural resources (SAF 5) by encouraging the use of limestone and gritstone. Alternative options are not reasonable and would be contrary to strategic policy. This policy is:

ENV 2: Protection and Enhancement of Bakewell's Special Character

4.4 One policy is considered to have 'high level' adverse impacts on several elements of the SAF. Deletion of the policy could be considered, but this would misrepresent the communities view and neighbourhood level policies would not, in any event, prevent harmful effects with regard to strategic issues. This policy is:

TC3: Re-Opening of the Matlock-Buxton Railway

4.5 Four policies are considered to have significant adverse impacts with regard to one or more elements of the SAF. Reasonable alternatives are possible and with some modification the adverse impacts could be negated or mitigated. Taking each of these in turn:

DB1: Development Boundary

Amend policy so that any development in Area 3 is required to leave a 10m buffer zone to the banks of the River Wye.

CF3: Retaining Playing Fields and Sports Facilities

Policy amended to require any new playing fields to be well landscaped and integrated into the landscape.

E2: Safeguarding and Designating Employment Sites

Policy amended so that any development must maintain and where possible enhance the continuity and integrity of the river corridor, including associated water courses, and protect the trees at Site 1.

TC1: Improvements for Non-Car Users

Policy amended to require all such improvements to be of a high standard of design, protecting and enhancing Bakewell's special qualities.

5.0 Consultation with Statutory Bodies and Further Recommendations for Modification of Bakewell Neighbourhood Plan

5.1 The SA/SEA and the draft Neighbourhood Plan were subject to consultation with Natural England, Historic England and the Environment Agency from 21 May 2019 to 3 July 2019.

5.2 The following comments were received from the Environment Agency (see Appendix 3):

“Policy DB1: Development Boundary

As our previous comments to the draft Bakewell neighbourhood plan highlighted the extension area 3 (area between Ashford Road and the River Wye) is situated partially within flood zones 2 and 3 and future development would need to undertake to the sequential test if located there. From reading through the SEA we note that the sequential test has been undertaken by the group for extension area to show that the site is acceptable. Therefore we would ask that the following wording is incorporated within the policy. ‘Any development in an area of flood risk will need to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk.’

We welcome the inclusion of a 10m buffer to the River Wye as already incorporated and the aim to allow the River Corridor to be maintained and enhanced.

Policy E2: Employment Site

We welcome the inclusion of a 10m buffer to the River Wye as already incorporated within this policy for the Cintride site. We also welcome the requirement to enhance the continuity and integrity of the river corridor. We would also ask that the following wording is added to this policy as well ‘Any development in an area of flood risk will need to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk.’

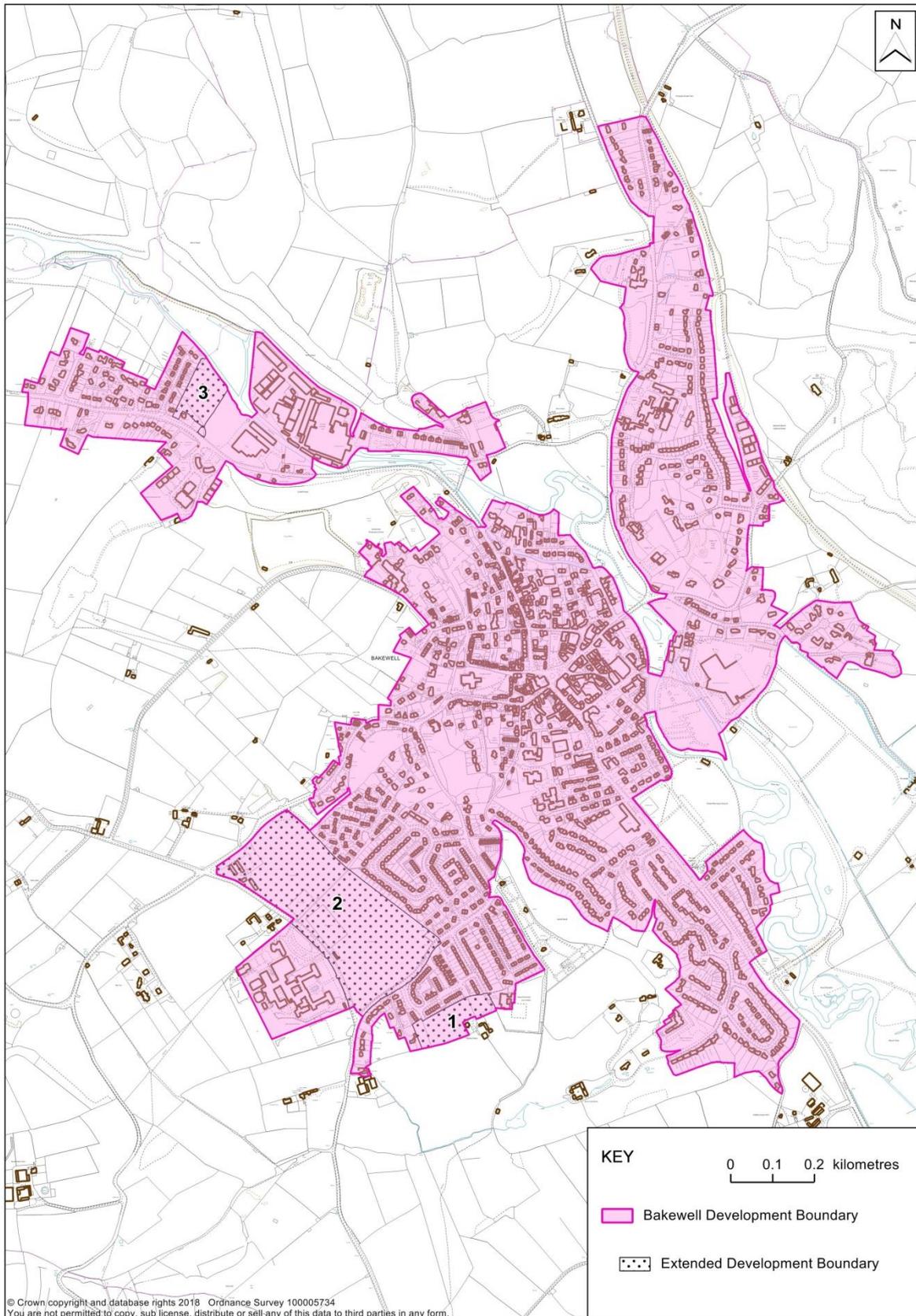
Policy ENV1: Protection and Enhancement of Bakewell's Setting

We welcome the requirements of this policy to ensure development secures measurable net gain for biodiversity. We also support the requirement to provide green infrastructure to help restore and enhance connectivity for nature.”

5.3 The draft plan was amended according to the Environment Agency’s comments.

5.4 Natural England and Historic England do not have any comments on the draft plan or the SA/SEA (see appendices 4 and 5.)

Appendix 1 Bakewell Neighbourhood Plan – Proposed Development Boundary



Appendix 2 Comments on SA/SEA and HRA from NPA Ecologist

COMMENTS ON BAKEWELL NEIGHBOURHOOD PLAN AND ASSOCIATED DOCUMENTS1. SUBMITTED NEIGHBOURHOOD PLAN SEPT 2018

Policy DB1- Area 1 appears from aerial photographs to be improved grassland, Area 2 is amenity grassland and Area 3 is species-poor semi-improved grassland. All three areas are therefore likely to be of limited ecological interest and I have reflected that in my comments below on the sustainability Appraisal. However Site 3 obviously abuts the River Wye and development here could impact on the river corridor. Core Strategy policy CC5 requires a set-back distance to allow adequate maintenance of watercourses, but not necessarily to protect the ecological integrity and continuity of the river corridor. I would therefore support the recommendation set out in the Sustainability Appraisal to amend the policy to require a buffer zone to the banks of the River Wye, but would recommend a 10 metre buffer rather than an 8 metre buffer, in line with recent development on the Cintride site.

Policy ENV1- This refers to the provision of new native street trees within the development boundary. Native trees may be most appropriate in and around the local green spaces, but in the context of more built-up areas they may not necessarily be the most appropriate from an amenity/landscape point of view, nor be better for wildlife. I suspect some of the important existing townscape trees in Bakewell are not native, for example. I would therefore suggest not limiting this to native trees but referring to “trees of an appropriate scale, form and species”, to which could possibly be added “favouring native trees particularly in less formal settings”.

Policy ENV2A- Same comment about native trees as for ENV1 above.

Policies ENV1 or ENV2- Consideration might be given to incorporating a policy around any development providing a proportionate net gain for landscape and biodiversity as part of one or other of these policies. Taken in conjunction, this could then allow some of the other policies which are shown by the Sustainability Appraisal to have negative effects, to have neutral or even positive effects (but perhaps Core Strategy Policies L1 and L2, which refer to enhancement, are deemed sufficient to address this?)

Policy ENV4- “Important for wildlife” could be added to Sites 2 and 29 in Table 1. Both have areas of species-rich grassland. Site 13 could usefully be extended to include the two fields outlined red below, which are unimproved/semi-improved grassland of wildlife importance with a public footpath through them.



Policy CF1- The policy itself doesn't refer to native trees but the preceding text (para. 5.11) does. Same comments apply as for ENV1 above.

Policy E2- Both the Riverside Business Park and Cintride sites have potential to impact on the River Corridor. Although Core Strategy policy CC5 requires a set-back distance to allow adequate maintenance of watercourses, this may not necessarily to protect the ecological integrity and continuity of the river corridor. I would therefore suggest that Policy E2 might usefully include a policy for any development to "maintain and where possible enhance the continuity and integrity of the river corridor, including associated watercourses", with a buffer zone of 10 metres from the river and millstream (in line with recent development on the Cintride site). I also support the suggestion that the TPO on the site needs to be recognized and the policy therefore amended to include both the safeguarding of existing trees on site, and for any development to be accompanied by suitable landscaping and planting to ensure long-term continuity beyond the life of the existing trees.

2. HABITAT REGULATIONS ASSESSMENT SCREENING REPORT

I agree with the conclusion of the HRA that there is likely to be no significant effect of the BNP on the European sites, which are remote from and generally ecologically unconnected with the BNP area. The possible exception is the River Wye but the BNP sections are downstream from the SAC and likely impacts of the BNP on the Wye are limited. I therefore have only a few minor suggested amendments to the text:

- **Para 2.5 (p. 5)-** should read "The Peak District Dales SAC", not SPA.
- **Para 2.6 (p. 6)-** not sure what the source was for identifying threats to the SAC but they only cover the threats to the grassland habitats, not other SAC features. This doesn't materially affect the HRA Assessment but shouldn't really stand as a record of the threats. I would therefore suggest the following amendment:

The main threats are inappropriate grazing management, water quality and low flows, and introduced disease. The ideal management for the grassland habitats for nature conservation purposes...[retain existing text re grazing, then add...]...The woodland habitats are under significant threat from Ash Dieback, and are likely to undergo major changes over the next decade and more. Work is underway to increase species diversity and improve the resilience of these woodlands in the long term. Crayfish Plague is a massive threat to the native White-clawed Crayfish and may already have eliminated it from the River Wye. Water quality, both from sewage treatment works and diffuse agricultural pollution, is a threat with phosphate levels exceeded in the Wye, and low flow affects some rivers such as sections of the Lathkill.

- **Table 1 Policy DB1 (p. 9)-** Development of Site 3 has potential to impact on the continuity of the River Wye corridor, and hence on populations of White-clawed Crayfish (if still present), Brook Lamprey or Bullhead, or may hinder their upstream migration. The small length of river affected compared to existing riverbank modifications through the town are likely to make any additional impact negligible, so it is still reasonable to conclude that there is unlikely to be a significant impact on the European sites. However the recommended amendment to this policy in the Sustainability Appraisal, to provide a buffer zone to the river, would strengthen this conclusion (subject to comments on the Sustainability Appraisal below re the extent of the buffer). Core Strategy policy CC5 on its own is insufficient to safeguard the ecological integrity of the river corridor (see comments on the Submitted Neighbourhood Plan (Policy DB1) above).
- **Table 1 Policy DB1 (p. 9)-** 2 further suggested minor amendments in last column- I would hesitate to describe any site as having no ecological value, so would recommend this says "...and have negligible inherent ecological value." Related to this, Site 3 should be described as "species-poor semi-improved grassland" rather than improved.

- **Table 1 Policy E2 (p. 20)**- 2 of the sites (Cintride and Riverside) have potential to impact on the continuity of the River Wye corridor, so the comments above re Policy DB1 (Site 3) also apply to this policy. Again I would consider it reasonable to conclude that there is unlikely to be a significant impact on the European sites as the policy stands, but my comments on the Submitted Neighbourhood Plan (Policy E2) above would strengthen that conclusion.

3. SUSTAINABILITY APPRAISAL

- **Protect, Maintain and enhance biodiversity, flora and fauna and geological interests: Policy DB1 (p. 8)**- Suggest low negative impact and following amends (in red) to text in column 3:

The development boundary is extended into 'green field' areas on the edge of Bakewell. Existing information suggests these sites are of limited ecological interest. Sites with the most ecological interest are protected by Policy ENV4 (green spaces) and Policy ENV1 requires ecologically appropriate landscaping, so any potential adverse effects are minimised. Site 3 is adjacent to the River Wye so development could have a minor impact on the river corridor. An amendment to retain a buffer zone to the river would mitigate the potential impact. In addition to these policies PDNPA Core Strategy policy L2 protects sites of biodiversity or geodiversity and Policy DMC11 of PDNPA Part 2 Local Plan (Development Management Policies) requires development proposals to achieve no net loss of biodiversity.

- **Protect, Maintain and enhance biodiversity, flora and fauna and geological interests: Policy ENV1 or ENV2 (p. 9)**- including a policy of net gain (see comments on Submitted Neighbourhood Plan above) could increase the positive effect of these policies.
- **Protect, Maintain and enhance biodiversity, flora and fauna and geological interests: Policy CF2 (p. 9)**- including a policy of net gain in ENV1 or ENV2 (see comments on Submitted Neighbourhood Plan above) could shift this from low negative to neutral or low positive.
- **Protect, Maintain and enhance biodiversity, flora and fauna and geological interests: Policy E2 (pp. 9-10)**- Suggest following amend (in red) to text in column 3:

Although most sites are already in employment use, one site is partly green field (site 1, former Cintrides Site). The policy could lead to development on a green field site and impact on the river corridor. The site is subject to a 'blanket' TPO.

Again comments on the Submitted Neighbourhood Plan (Policy E2) above, together with a "net gain" policy under ENV1 or ENV2, could address this and reduce the impact to neutral or low positive.

- **Options and Alternatives: negative effects (pp 35-36)**- The possible negative effects of the following policies on biodiversity could be mitigated by incorporation of a "net gain" policy in ENV1 or ENV2: DB1; H1; H2; CF2; CF3; E2; TC3
- **Options and Alternatives: reasonable alternatives (p 37)**- Given the limited ecological interest of Site 3 I agree with the assessment that excluding the whole of this site from the development boundary is not a reasonable alternative, and that the option (as recommended on p.41) of leaving a buffer zone is a reasonable alternative. However in line with recent development on the Cintride site, I would recommend a buffer zone of 10 metres rather than 8 metres.

- **Conclusions and Recommendations: Policy DB1-** As indicated above, I welcome the suggested amendment to include a buffer zone to the banks of the Wye but would recommend 10 metres, in line with recent development on the Cintride site.
- **Conclusions and Recommendations: Policy E2-** I recommend a buffer zone of 10 metres to the river at Site 1 (former 'Cintride' site) and to the river and millstream on Site 4 (Riverside) if these areas are currently undeveloped, in line with recent development on the Cintride site. I also support the idea that the TPO covering Site 1 should be recognized and the policy amended to include safeguarding and long-term enhancement of the tree cover on the site, as part of any development proposals.

Rhodri Thomas
13 May 2019

Appendix 3

Ms Adele Metcalfe
Peak District National Park Authority
Aldern House Baslow Road
Bakewell
Derbyshire
DE45 1AE

Our ref: LT/2006/000238/OR-06/IS1-L01
Your ref:
Date: 24 May 2019

Dear Ms Metcalfe

Bakewell Draft Neighbourhood Plan and Strategic Environmental Assessment incorporating Sustainability Appraisal

Thank you for consulting the Environment Agency on the draft Bakewell Neighbourhood Plan, and the Strategic Environmental Assessment (incorporating Sustainability Appraisal). We have the following comments that we hope you will find of use in the continued development of your neighbourhood plan.

Policy DB1: Development Boundary

As our previous comments to the draft Bakewell neighbourhood plan highlighted the extension area 3 (area between Ashford Road and the River Wye) is situated partially within flood zones 2 and 3 and future development would need to undertake to the sequential test if located there. From reading through the SEA we note that the sequential test has been undertaken by the group for extension area to show that the site is acceptable. Therefore we would ask that the following wording is incorporated within the policy. ***‘Any development in an area of flood risk will need to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk.’***

We welcome the inclusion of a 10m buffer to the River Wye as already incorporated and the aim to allow the River Corridor to be maintained and enhanced.

Policy E2: Employment Site

We welcome the inclusion of a 10m buffer to the River Wye as already incorporated within this policy for the Cintride site. We also welcome the requirement to enhance the continuity and integrity of the river corridor. We would also ask that the following wording is added to this policy as well ***‘Any development in an area of flood risk will need to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce overall flood risk.’***

Policy ENV1: Protection and Enhancement of Bakewell’s Setting

We welcome the requirements of this policy to ensure development secures measurable net gain for biodiversity. We also support the requirement to provide green infrastructure to help restore and enhance connectivity for nature.

Yours sincerely

Mr Joseph Drewry
Planning Specialist

Direct dial 02030 253277
Direct e-mail joe.drewry@environment-agency.gov.uk

Appendix 4



Date: 03 July 2019
Our ref: 283305
Your ref: Bakewell Neighbourhood Plan - Draft

Adele Metcalfe
Peak District National Park Authority
BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Dear Adele

Bakewell Neighbourhood plan – DRAFT

Thank you for your consultation on the above dated 21 May 2019
Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Bakewell Neighbourhood Plan HRA Screening Assessment

Natural England welcomes the Screening Report which assesses the requirement for Habitat Regulations Assessment (HRA) for the Bakewell Neighbourhood Plan.

Natural England also agrees with the report's conclusions that the Bakewell Neighbourhood Plan would not be likely to result in a significant effect on any European Site either alone or in combination and therefore no further assessment work under the Habitats Regulations would be required.

For any further consultations on your plan, please contact:
consultations@naturalengland.org.uk.

Yours sincerely
Andy Stubbs
Lead Adviser, Planning and Licensing, Area Delivery
East Midlands Area Team

Appendix 5

Dear Adele

Thank you for your e-mail below. We do not wish to offer any comments of this occasion.

Kind regards

Victoria Walker
Business Officer, Midlands
Regions Group
Historic England
Direct Dial: 0121 625 6889

Historic England | The Axis
10 Holliday Street | Birmingham | B1 1TF

www.historicengland.org.uk

Please note that Historic England's East Midlands and West Midlands offices have merged and our Northampton office is now closed. Our Midlands office is based in Birmingham and contact details can be found on our Midlands Regional Office webpage [here](#).