

Local Plan Review Topic Paper

Recreation and Tourism



April 2021

	page
Introduction	3
Summary	4
Part 1: Context	5
1.1 National Park Context	5
1.2 National Planning Policy Framework	6
1.3 Local Plan: Core Strategy and Development Management Policies	7
Part 2: Performance of Policy	10
2.1 What are we judging policy against?	10
2.2 Evidence: Annual Monitoring Reports	11
2.3 Other evidence and data	11
2.4 Conclusion	12
Part 3: Issues and Evidence Driving New Policy	14
Part 4: Requirement for Further Evidence and Questions Arising	15
4.1 Further evidence	15
4.2 Questions arising	15

Introduction

This topic paper has been prepared to inform the review of the Peak District National Park Local Plan. Its focus is *Recreation and Tourism*.

Its purpose is to:

- assess the performance of existing policy
- examine emerging issues and the latest research, guidance and evidence that will impact on new policy
- highlight gaps in knowledge and generate areas of further research

Other topic papers in this series cover:

- Climate Change and Sustainable Buildings
- Economy
- Health and Well-being
- Heritage and Built Conservation
- Housing
- Landscape, Biodiversity and Nature Recovery
- Minerals (pending)
- Shops and Community Facilities
- Spatial Strategy
- Sustainable Transport and Infrastructure
- Utilities

Executive Summary

What has worked well

Planning permission has been granted and work commenced on a hotel in Bakewell. Outside Bakewell, hotel development has been restricted except in relation to the enhancement of the former Rising Sun site in Bamford.

The development of static caravans and lodges has been restricted, except in relation to the enhancement of a static caravan site by replacement of caravans by lodges.

Day and overnight visits continue to increase. The Covid-19 pandemic has highlighted the vital role of the National Park to its visitors.

What has not worked so well

There was a decline in the number of permissions granted for recreation, environmental education and interpretation over the life of the Core Strategy. It is unclear if this is due to a decline in the number of applications.

The availability of alternative means of access to many popular recreational sites has declined. This is particularly the case in relation to access by public transport.

Problems such as dangerous or obstructive parking, dangerous or antisocial driving, fly camping, littering and other anti-social behaviours were reported during the easing of the Covid-19 lockdown.

What are the big questions for plan review?

To what extent should development at recreation sites be linked to more sustainable or environmentally-friendly means of access?

Should camper van use of car parks for overnight stays be encouraged / accommodated?

There are a number of gateway sites on the fringes of the National Park that provide easy access from surrounding urban areas. Should these sites be a priority for recreational development?

Given the benefit that hotels bring to neighbouring towns, should their development within the National Park continue to be restricted?

Should policy continue to restrict the provision of new static caravans, chalets and lodges, but give scope for camping pods and shepherd huts at appropriate locations?

Does the policy on removal of occupancy conditions for self-catering accommodation to meet local housing need provide enough flexibility?

Part 1: Context

1.1 National Park Context

1.1.1 The Peak District National Park lies at the heart of England surrounded by urban areas and with a visitor catchment of approximately 13.5 million¹. The National Park experiences up to 26 million visits per year², with the majority of visitors arriving by private car.

1.1.2 National Park status brings with it two statutory purposes:

- i. The conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park; and
- ii. The promotion of opportunities for the public to enjoy and learn about those special qualities.

The two purposes carry equal weight unless there is conflict between them, in which case conservation and enhancement takes priority (the Sandford principle).

1.1.3 The popularity of the Peak District National Park as a visitor destination continues to grow. According to the State of Tourism Report (2019), visitor volumes in 2017 were at a record high, with 13.24 million visitor days³. This represents a growth in visitor days of 11.6% since 2009. Expenditure from tourism also hit record levels in 2017 at £643 million generated. This represents a real term growth of 12% since 2009.

1.1.4 It should be noted that, whilst statutory purposes require us to facilitate recreational opportunities for visitors, the National Park's planning policies also enable the delivery of local recreational facilities within the Park's settlements.

English national parks and the broads: UK government vision and circular 2010

1.1.5 Under the heading of 'Improving public understanding of the natural environment and the benefits of outdoor recreation' Paragraph 61 of the English national parks and the broads: UK government vision and circular 2010⁴ states that: -

"The Authorities should make the most of visitors they receive to increase understanding of the natural environment, promote healthy outdoor recreation and inspire lifestyle choices that support a diverse and healthy natural environment."

¹ Office for National Statistics Census Data (2011) indicates that 13.5 million people live within a one-hour drive of the National Park boundary.

² STEAM data indicates that there are approximately 13 million visits lasting 3 hours or more, whilst estimates suggest that an equal number of visits last less than three hours. Source Peak District National Park State of Tourism Report (2019)

³ STEAM data representing visits of three hours or more.

⁴ English national parks and the broads: UK government vision and circular 2010 [National Parks Circular \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/404222/national_parks_circular_2010.pdf)

1.2 National Planning Policy Framework

1.2.1 The National Planning Policy Framework, 2019 (NPPF)⁵ sets a national context for planning policy at the national and local levels. Under ‘*Supporting a prosperous rural economy*’, paragraph 83 states that:

*“Planning policies and decisions should enable... sustainable rural tourism and leisure developments which respect the character of the countryside”*⁶.

1.2.2 Paragraph 84 of the NPPF goes on to state that:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)”.

1.2.3 Under ‘*Open space and recreation*’, paragraph 96 of the NPPF states:

“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision”.

1.2.4 Paragraph 97 seeks to protect open space and recreational facilities from development, whilst paragraph 98 advocates the protection and enhancement of public rights of way, stating:

“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

1.2.5 Chapter 15 of the NPPF (2019) ‘*Conserving and enhancing the natural environment*’, states that “*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks*” (paragraph 172). The paragraph goes on to state that “*the scale and extent of development within these designated areas should be limited*”, and that: -

“Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.”

1.2.6 Paragraph 172 then sets out the criteria against which these exceptional circumstances may be judged, in relation to; the need for the development;

⁵ National Planning Policy Framework (2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁶ Paragraph 83, including part c of the National Planning Policy Framework (2019).

opportunities for the development to take place outside of the National Park; and the detrimental effects of the development on “*the environment, the landscape and recreational opportunities*”, balanced against opportunities to moderate such effects.

- 1.2.7 Under ‘*Ground conditions and pollution*’, paragraph 180 (part b) directs planning policies and decisions to “*identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value*”.

1.3 Local Plan

- 1.3.1 The Peak District National Park Authority is not the Tourism body for the National Park. That role is held by Visit Peak District and Derbyshire. However, our policies are aimed at guiding development for recreation and tourism.

Peak District National Park Core Strategy (2011)

- 1.3.2 Chapter 10 of the Core Strategy (2011) contains three policies. **Policy RT1: Recreation, environmental education and interpretation**, Part A offers support for such facilities where they are appropriate to the special qualities of the National Park. Opportunities for sustainable access are also sought.
- 1.3.3 Part B provides guidance on environmental capacity, whilst directing such development to the edge of settlements where appropriate. The policy makes it clear that for proposed schemes in the open countryside, a clear demonstration of need for the chosen location will be required. Part C of the policy encourages the reuse of existing traditional buildings of ‘*historic or vernacular merit*’ along with the enhancement of any existing facilities. However, it qualifies that new buildings may be acceptable, where the reuse of existing buildings is not possible.
- 1.3.4 Part D makes it clear that new or cumulative development and uses, must not be prejudicial to, or to the disadvantage of other uses, or the enjoyment of existing appropriate activities, including the quiet enjoyment of the National Park.
- 1.3.5 **Policy RT2: Hotels, bed and breakfast and self-catering accommodation**, Part A permits the change of use of a building of historic or vernacular merit to serviced or self-catering accommodation, providing that this does not constitute an unacceptable landscape impact in the open countryside. The policy makes it clear that turning whole farmsteads into serviced or self-catering accommodation will not be permitted.
- 1.3.6 Part B of the policy supports minor developments, which extend or improve the quality of holiday accommodation. Part C of the policy makes it clear that new build holiday accommodation will not be permitted, apart from a new hotel in Bakewell.
- 1.3.7 **Policy RT3: Caravans and camping**, Part A supports the provision of small touring caravan, camping and backpacking sites, particularly where there aren’t many. This is provided that they are well-screened, have appropriate access to the road network and do not adversely affect existing living conditions.
- 1.3.8 Part B of the policy makes it clear that static caravans, chalets or lodges will not be permitted. Part C of the policy recognises there may be a requirement for

improved on-site facilities at existing sites. However, these should be at a scale appropriate to the existing site. Finally, Part D supports development that improves the quality of existing sites, including the upgrade of facilities, landscaping improvements, improvements to access and to the appearance of existing static caravans.

Peak District National Park Development Management Policies (2019)

- 1.3.9 Chapter 5 contains four policies under the heading of ‘*Recreation and tourism*’. The chapter adds detail to the strategic policies contained within the Core Strategy.
- 1.3.10 **Policy DMR1: Touring camping and caravan sites** adds clarity to Policy RT3. Part A sets out the criteria that must be met for new or extended touring caravan and camping sites. This includes “*scale, location, access, landscape setting and impact upon neighbouring uses*”, along with its setting within its surroundings.
- 1.3.11 Part B of the policy supports the provision of shopping, catering or sport and leisure facilities on sites provided that they accord with the criteria provided in part A, and that they don’t have a significant adverse effect on existing facilities in surrounding communities.
- 1.3.12 Part C of the policy allows for wooden structures for accommodation, such as camping pods or shepherd’s huts. The policy sets the locations where such structures may be acceptable, for example where they do not harm the natural or historic landscape.
- 1.3.13 **Policy DMR2: Holiday occupancy of touring camping and caravan sites** sets out the time constraints of occupancy and operation of sites. Part A limits the occupancy for any person, at any site, to 28 days per calendar year. Part B permits the removal of conditions limiting the operation of sites to particular months of the year, providing that the sites are well screened under winter conditions; and that there are no adverse impact on special qualities or residential amenity.
- 1.3.14 **Policy DMR3: Holiday occupancy of self-catering accommodation** sets out the time constraints on occupancy of self-catering accommodation. The policy is divided into four parts. Parts A and B apply to self-catering accommodation outside of DS1 Settlements⁷ and parts C and D apply to self-catering accommodation inside DS1 settlements.
- 1.3.15 Part A limits occupancy of a self-catering property for any person to 28 days per calendar year. Part B allows for the removal of limits of occupation from existing accommodation, provided that: -
- i) There is no negative impact on special qualities or residential amenity
 - ii) The dwelling unit is tied by legal agreement, to those in housing need and with a required local connection⁸

⁷ DS1 settlements are listed within the Peak District National Park Core Strategy Policy DS1: Development Strategy.

⁸ The definition for the local connection is provided in Development Management Policies DMH1 and DMH2.

- iii) The dwelling unit is of an appropriate size to constitute affordable housing and be reasonably rented or part-owned⁹.

1.3.16 Part C stipulates that a holiday occupancy condition will be applied to self-catering accommodation, where there is insufficient space for permanent occupation or it would negatively affect neighbouring amenity.

1.3.17 Part D of the policy allows for the removal of a holiday occupancy condition, where the criteria in part B of the policy are met.

1.3.18 **Policy DMR4: Facilities for keeping and riding horses** supports the provision of facilities for keeping and riding horses within specified criteria. These are design, scale, location, landscape character, road safety and, for commercial operations, adequate road access to and from the site as well as access to the bridleway network.

1.3.19 Chapter 5 contains a section on Recreation Hubs. Paragraph 5.14 refers to the bringing forward of a Recreation Hubs Supplementary Planning Document. This document is currently under development.

⁹ Policy Development Management Policies DMH1 provides guidance on appropriate floor space for affordable accommodation.

Part 2: Performance of Policy

2.1 What are we judging policy against?

2.1.1 The Core Strategy's (2011) ambition for recreation and tourism is: -

*"A network of high quality, sustainable sites and facilities will have encouraged and promoted increased enjoyment and understanding of the National Park by everybody including its residents and surrounding urban communities."*¹⁰

Peak District National Park Management Plan (2018–23)

2.1.2 The updating process included a topic paper on 'tourism'. It referred to the vision of the 2012-17 National Park Management Plan, which was *"for the Peak District National Park to be a Welcoming and Inspiring Place."*¹¹

2.1.3 We also produced a topic paper for 'access and recreation'. It put forward the following aspiration: -

"A more active, harmonious and accessible Peak District National Park. The Peak District National Park will be a welcoming place offering outstanding experiences. There will be good access for all outdoor activities and facilities will be high-quality, well-maintained and well-connected. Everyone will have the information and opportunities to access and enjoy the Peak District National Park responsibly. They will be happy, healthy, confident, motivated and inspired by the outdoors. They will recognise and value the quality of the natural environment and be willing to care for and support the Peak District National Park. The respect between participants and those managing the land and for the special qualities of the Peak District National Park will bring about understanding and enable conflicts and impacts to be readily managed in a balanced manner."

2.1.4 The current National Park Management Plan focuses on 6 key 'areas of impact': -

- 1: Preparing for a future climate
- 2: Ensuring a future for farming and land management
- 3: Managing landscape conservation on a big scale
- 4: A National Park for everyone
- 5: Encouraging enjoyment with understanding
- 6: Supporting thriving and sustainable communities and economy

Recreation and tourism plays a key role in 'areas of impact' 2, 4, 5 and 6.

2.1.5 Area of Impact 4 contains an action to *"Create a programme to develop a sustainable visitor economy that encourages the Peak District National Park to be a welcoming place for all."* One of the milestones was *"Produce and adopt*

¹⁰ Paragraph 8.3 of the Peak District National Park Core Strategy

¹¹ Peak District National Park Management Plan Topic Papers

https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0032/78179/Background-Topic-Papers.pdf

*Recreation Hubs Supplementary Planning Document*¹². There is a revised target date for adoption of 2021.

2.2 Annual Monitoring Reports (AMR) (2012-13 to 2016-17)¹²

2.2.1 Chapter 10 of the AMRs judge performance of the Core Strategy Policies against three indicators. The following text provides an assessment of the performance against those indicators.

2.2.2 **Policy RT1: Recreation, environmental education and interpretation** – the indicator for this policy is the ‘*Number of applications granted and completions for development to promote recreation / understanding*’, with the target being ‘*an increasing number*’. The AMR for 2016-17 showed a downward trend in permissions from seventeen in 2013-14, to nine in 2016-17.

2.2.3 **Policy RT2: Hotels, bed and breakfast and self-catering accommodation** – the indicator is ‘*Permissions granted for hotels use class C1*’, with the target being ‘*No new build hotel accommodation of more than (>5 beds) outside Bakewell*’. At the time of the 2016-17 AMR, there had been no new build hotel accommodation of more than five rooms outside of Bakewell. Since 2016-17, planning permission has been granted for a new build hotel in Bakewell and for the conversion and expansion of an existing public house and hotel in the Hope Valley.

2.2.4 **Policy RT3: Caravans and camping** – the indicator is ‘*Caravan & Camping site Permissions*’ with the target being ‘*0 new static caravans, chalets or lodges*’. At the time of the 2016-17 AMR, there had been no permissions granted for new static caravans, chalets or lodges since 2011. Since 2017, permission has been granted for a redevelopment of an existing site that incorporates static caravans. The redevelopment includes replacement of static caravans with lodge style structures over time. It was considered that the replacement of static caravans with lodges delivered sufficient enhancement to justify the retention of static structures.

2.3 Other Evidence and Data

Parish Statements

2.3.1 The Parish Statements include the aspirations of each parish, along with an assessment of its existing level of facilities and access to services. The Peak District National Park First Report on Parish Statements (2020) amalgamates the information from these statements.

2.3.2 When asked about the issues affecting them, the most common was ‘parking’, with 9 parishes raising this as a problem. The second most common concerns were ‘busy roads and speed limits’ (7 parishes)¹³. In addition, 7 parishes had concerns about visitor management¹⁴.

¹² Annual Monitoring Reports

¹³ Parking, busy roads and speed limits are included within this topic paper because in most cases, concerns about visitor management focus strongly on driver / rider (motorised and non-motorised) behaviours, both from an amenity and safety perspective.

¹⁴ Peak District National Park Authority First Report on Parish Statements (2020)

2.3.3 Perhaps, unsurprisingly, these topics also featured when parishes identified their future aspirations: -

- Tackling issues around speed limits and busy roads (4 parishes)
- Visitor management issues (1 parish)

State of Tourism Report (2019)

2.3.4 The National Park receives approximately 12.64 million visits of more than three hours per year. It is estimated that the National Park receives at least as many visits lasting less than three hours.

2.3.5 Approximately 70% of visitors to the National Park are day visitors. Of the staying visitors only one-third use overnight accommodation inside the National Park., with others travelling in on the day of their visit. Most staying visitors within the National Park use campervans, caravans and tents. These types of accommodation provide half of the visitor bed supply in the National Park.

2.3.6 The majority of visitors come to take part in an active recreational activity. The National Park Visitor Survey (2015) indicates that more than half of visitors walk between two and ten miles. Cycling has become increasingly popular, with high levels of use recorded on the National Park's multi-user trails. This growth follows significant investment in infrastructure, and nationally, an upwards trend in leisure cycling. Anecdotally, mountain biking and road cycling have also increased in popularity.

2.3.7 Other recreational activities remain popular; the iconic gritstone edges and limestone cliffs remain nationally important destinations for climbers. Similarly, the presence of the Trans Pennine Bridleway and other off-road routes attract horse riders.

2.3.8 The majority of visitors to the Peak District arrive by car (83%), as this is the most convenient. It is likely that this percentage may be higher in those making day visits lasting less than three hours because of the ease of access by car for short visits.

2.3.9 Most visitors come from within an hour's drive of the National Park boundary and visit areas or gateways within the National Park closest to them. Three-quarters of visitors come from the National Park's constituent regions (East Midlands 27%; North West 22%; Yorkshire & the Humber 19%; and the West Midlands 9%). Overall, approximately 10% of visitors come from Sheffield (more than half of all visits from the Yorkshire & Humber region).

2.4 Conclusion

2.4.1 The evidence from the documents above suggests that whilst the Core Strategy policies appear to be largely successful, there has been a reduction in the number of applications granted and completions¹⁵ for development to promote recreation and understanding. It is not clear why this is the case, but may reflect the number of such applications coming forward.

¹⁵ Planning permissions that have been built or implemented

- 2.4.2 The Peak District National Park Recreation Hubs Supplementary Planning Document is currently under development. It is anticipated that a formal public consultation will take place towards the end of 2020/21.
- 2.4.3 Planning consent has been given for a new hotel in Bakewell and for the redevelopment of an existing pub / hotel site in the Hope Valley to deliver a larger hotel. Some bodies have questioned why we don't permit large hotels in the National Park, citing the visitor economy as a driver for a greater provision of serviced accommodation. However, there are a number of hotel developments in surrounding urban areas, serving the wider business and visitor economy.
- 2.4.4. The Peak District has always been a popular day visit destination, and the private car offers a convenient means of access for the majority of our visitors. The National Park Authority has previously worked with partners to address visitor pressure. This culminated in four Visitor Management schemes in the Goyt and Upper Derwent Valleys, the Roaches and Stanage.

Part 3: Issues and Evidence Driving New Policy

Covid 19 Pandemic

- 3.1 During the late spring and summer of 2020, there was a surge in the number of visitors to the National Park in response to the easing of lockdown. Visits were mostly by car and there has been only a slow return to both public transport provision and uptake. In some areas, demand outstripped the availability of facilities, particularly parking facilities. This had a negative impact on the safe and efficient operation of the road network, and the amenity of residents. Emergency temporary traffic regulation orders to restrict on-street parking were introduced at a number of locations.
- 3.2 The Covid-19 pandemic has resulted in extreme changes to the visitor profile and behaviours across the National Park.
- 3.3 The Autumn 2020 Covid-19 lockdown does not appear to have had the drastic effects on visitor numbers that the Spring lockdown did. However, the January 2021 lockdown is still in effect at the time of writing. This lockdown is more restrictive in relation to travel, with a perception of greater levels of enforcement.

Part 4: Requirement for Further Evidence and Questions Arising

4.1 Further Evidence

- 4.1.1 We need a better understanding of where visitors come from and what makes them visit the most popular sites. Our policies can then encourage provision of facilities in some areas, and offer options for dispersal.
- 4.1.2 The majority of popular recreation sites are easily accessible by car, but less so by alternative means of transport. Mapping the sites and outlining alternative means of access will help guide our policy, and identify which sites need facilities most.
- 4.1.3 It would be useful to better understand the delivery of camping pods and shepherd huts to assess how DMR1C is working in practice.
- 4.1.4 The National Park has not had a camping and caravanning study in recent years, so the accuracy of current information is not known. Given that this represents the majority of accommodation for overnight stays, it would be useful to update this.
- 4.1.5 It would be useful to produce up-to-date and accurate figures for serviced and self-catering bed spaces.
- 4.1.6 Anecdotally, campervan use of parking areas for overnight use is on the rise. It would be useful to assess demand, and identify the areas currently being used.

4.2 Questions Arising

4.2.1 Public transport accessibility to recreation sites

The majority of recreation sites are easily accessible by car, but less so by public transport. Should future development be restricted to those sites that can also be accessed by non-car means?

Where sites are currently dependent on car-borne access, should any future development include a commitment to invest in alternative means of transport?

4.2.2 Campervans

Should campervan use of car parks for overnight stays be encouraged / accommodated?

Is there scope for official sites where overnight parking of campervans is permitted, provided that there is appropriate space and facilities?

If official sites were to be provided, should stricter controls be introduced elsewhere?

4.2.3 Visitor management areas

The Peak District has previously worked with partner organizations to successfully manage popular areas such as the Goyt Valley, the Upper Derwent Valley, the Roaches and Stanage. Such schemes provide visitor facilities, including car

parks, and seek to limit any adverse impact. Should a similar approach be used again, and if so where?

4.2.4 Gateway sites

Should 'gateway' sites on the edge of the National Park that provide easy access from surrounding urban areas be more of a priority for recreational development?

4.2.5 Recreation Hubs

Should villages be included in any definition of a 'recreation hub'?

Should the local plan identify recreation hub sites where facilities for visitors will be permitted?

4.2.6 Hotel development

Is the restriction on new build hotels still the correct approach?

4.2.7 Static caravans, chalets and lodges

Should we continue to prevent new static caravans, chalets and lodges, but give some scope for camping pods and shepherd huts?

4.2.8 Removal of occupancy conditions for self-catering accommodation

Should occupancy conditions of some self-catering accommodation continue to be relaxed to meet local housing need?

Is the policy flexible enough to enable some local housing need to be met in this way?