

High Peak Local Plan (Preferred Options) - Summary of all consultation feedback





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1 Introduction

1.1 The High Peak Local Plan - Preferred Options document (February 2013) was published by the Borough Council as part of the second stage of preparing High Peak's Local Plan. Consultation on the Preferred Options Plan held February to April 2013 built on the earlier options consultation held during September and October 2012.

1.2 This document is a summary record of all consultation responses received during both rounds of consultation on the emerging High Peak Local Plan. Separate documents have been published to record the feedback received at the drop-in consultation events. These documents are available to view on the Council's web-site at:

http://highpeak-consult.objective.co.uk/portal/high_peak/report_consultation_events_2012

<http://www.highpeak.gov.uk/hp/council-services/the-high-peak-local-plan/local-plan-preferred-options-2013>

1.3 The consultation responses set out in these documents have been used by the Council's Planning Policy team to guide the amendments made to the draft Plan, during preparation of the submission version High Peak Local Plan. This final version of the Plan is due to be published in March 2014.

2 Summary of responses to Local Plan - by chapter

Introduction and general Local Plan responses

	Support	Support with conditions	Object	Observations	Other	Total
Supporting text	2	0	9	8	2	21

Summary of feedback

Objections:

- No mention is made of a Gypsy and Traveller Accommodation Assessment.
- Object to a lack of opportunity to comment on issues relating to Chapel-en-le-Frith.
- Consultation methodology flawed - fairer to carry out a targeted poll of residents via residents' forums.
- Objections to building on greenfield sites.

Observations:

- Report too lengthy and difficult to read.
- Improvements to the A57 are required.
- Previous objections to development south of Macclesfield Road, Whaley Bridge (made in response to the joint Core Strategy) should be noted in the document.
- Consultation on the Chapel-en-le-Frith Neighbourhood Plan must take place with neighbouring Parish Councils.
- Further documentation relating to the historic environment should be referenced.

Support:

- Support for neighbourhood planning and the Duty to Cooperate.
- Support is available for the Chapel-en-le-Frith Neighbourhood Plan from English Heritage.

Other:

- Has consultation been carried out with Public Health Departments?

Key characteristics and issues

	Support	Support with conditions	Object	Observations	Other	Total
Supporting text	3	3	5	7	0	18

Summary of feedback

Objections:



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- Para 2.8 should include full reporting of all designated heritage assets.
- No further supermarkets are required.
- Key Issues do not adequately reflect the role of the natural and built environments in contributing to the character of High Peak.
- KI 3 should also refer to species and habitats loss and the need to protect the natural environment.
- Historic environment attributes should be referenced in Key issues 1, 2, 4, 5 and 6.

Observations:

- A Strategy to deal with congestion hot spots is required.
- Support for KI 1.
- Support for providing more affordable homes.
- KI 7 should refer to the need to to deliver more market housing to meet objectively assessed need.

Support:

- Support for Key Issues 9 and 10.
- Support for affordable housing delivery.
- Support for references to the historic environment in the chapter introduction.

Support with conditions:

- Could a reference to Section 62 of the Environment Act and the National Park Vision and Circular be included in the footnotes to KI 2?
- KI 2 should refer to the need for development proposals to respect and enhance the setting of the National Park.
- Need to maintain investment in rail infrastructure serving Glossop.

Vision and objectives

	Support	Support with conditions	Object	Observations	Other	Total
Supporting text	2	4	3	1	0	10

Summary of feedback

Objections:

- The reference in the spatial vision to ‘affordable homes will be provided to help people remain in, or return to, their local communities according to local needs’ requires clarifying. A re-wording of the sentence that identifies the Borough’s vision of ensuring that properties are available and can be afforded by all sectors of the community is needed.
- Objection to reference in Vision to previously developed land being maximised, as this may not always be the most sustainable approach and may be contrary to the NPPF. The prosperity

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section should refer to providing sufficient new homes to sustain villages and support local employment.

- Council performance needs to improve with respect to SO3.

Observations:

- By setting a housing requirement that falls below objectively assessed need, the Plan will fail to meet SO9. SO12 is confusingly worded and inconsistent with terminology used in the NPPF. It could refer to "previously undeveloped" for greenfield.

Support:

- Support for the Strategic Objectives.
- Support for SO2.

Support with conditions:

- Support for Spatial Vision, but para 6 should use the term "sport and recreation".
- SO10 supported provided that it includes sports facilities.
- Support for Vision reference to multi-functional Green Infrastructure and habitat creation. But, could this be expanded to include benefits of tree planting and creation of woodland?
- The Vision should include a reference to the future protection of Green Infrastructure and biodiversity; SOs 1 and 2 need to include "creation" as well as "protection".

Spatial strategy and strategic policies

Policy S1 - Sustainable Development Principles (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S1	0	4	5	2	1	12
Supporting text	0	0	1	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO26		Observations	
PO59	Brian Barber Associates	Object	Policy S1 provides the overarching sustainability policy. The problem that has been identified is that other policies within the plan do not properly follow this approach. For example, protection of areas of low value employment premises which significantly degrade the character of the local area for which there is no justification. Additional concerns exist over allocations of greenfield land when brownfield sites exist and placing of unreasonable restrictions which would hinder the delivery of regeneration sites.

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			There is a conflict between the Framework, Policy S1 and other policies in the document.
PO454	Derbyshire County Council	Object	Travel demand management issues are under-represented. A new hierarchical approach should be considered to ensure that sustainable transport networks are delivered, and that the effective operation of the local highway and other transport networks, and their ability to provide sustainable transport solutions, are not compromised. It is suggested that the following additional bullet points be included in Policy S1: "Providing site specific and area wide demand management measures (i.e. measures to reduce the need to travel by the private car and incentives to encourage walking, cycling and public transport use for appropriate journeys, including the implementation of agreed Travel Plans)"; "Improving walking and cycling facilities and public transport services early in the building period of new developments to encourage sustainable travel"; "Optimising the use of the existing highway and other transport networks in advance of, or early in the building period of new developments, for example, by improved or new cycle and bus lanes, improved pedestrian, cycle and bus priorities".
PO297	Sport England	Support with conditions	Policy S1 - generally supported and particularly welcome the final two bullets. The final bullet perhaps could be sharpened such that it seeks to encapsulate and deliver the right quantity, quality, accessibility and maintenance of community facilities.
PO354	Friends of the Peak District	Object	Whilst Friends of the Peak District has a range of concerns about NPPF, the headline message has been the interpretation of a presumption in favour of sustainable development' as a presumption in favour of not-definitively-unsustainable development'. We do not subscribe to this interpretation and we would strongly encourage High Peak to clearly set out its position on what it understands by sustainable development. The key point here is that High Peak has unusual and distinctive geography and spatial issues: a unique and high quality landscape, surrounded by National Park, demographic pressures associated with out-commuting, ageing population and declined industries intrinsically linked to the landscape and cultural heritage. These are the features upon which any variance from the default national policy framework of NPPF should be founded. The explanation of Key Issues in Chapter 2 is useful here, but does not follow through clearly into the spatial planning policies. At present, Policy S1 contains a generic approach to sustainable development that could apply anywhere. We suggest that the Local Plan sets out a clear, locally-defined statement of what sustainable spatial development will be favoured, along the lines that it: Strengthens the identity of settlements and the landscape through a system of settlement boundaries, strategic gaps and a green infrastructure network; Seeks to readjust the economy away from commuting and towards local businesses by making it easier for businesses to start up and expand without leaving the borough; Targets housing provision on the people, type and tenure who need it by emphasising affordability, accessibility and the settlement hierarchy; Harnessing

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			the strong demand for market housing to ensure that all new housing is built to the highest possible standards of design, energy efficiency and climate change resilience.
PO371	Hallam Land Management Ltd	Support with conditions	Hallam Land Management generally support the wording of Policy S 1 however, it is considered that the council's proposal to follow a sequential approach to sustainable development by prioritising the use of previous developed land is unjustified. Implementing a policy of this sort could constrain the delivery of sites into the landbank as brownfield sites have longer lead in times and can often be constrained by viability. This is demonstrated at Buxton College where the site has been granted planning permission but cannot come forward due to viability issues. In order to address the conflict identified above it is requested that High Peak Borough Council re-word Policy S 1 as follows: New development should make the best use of previously developed land and buildings where possible but should not preclude the development of greenfield sites'.
PO576	English Heritage	Support with conditions	We welcome the reference to the historic environment in the fifth bullet point. We note that detailed requirements are set out in more detailed policies in the Local Plan - however, at present we do not consider that these are fit for purpose in achieving this. In addition, where there are to be Neighbourhood Plans, development proposals are only required to accord with strategic elements (including policies) of a Local Plan. We therefore consider that this policy should be improved and reference to the historic environment should go further than simply reiterating the NPPF requirement and set out how this is to be achieved. This could be achieved by adding "through recognition of significance of the historic environment and heritage assets, by ensuring sensitive alteration and adaption of assets, and protection of setting." We welcome the inclusion of the fourth bullet point in relation to character, townscape and setting.
PO654	United Utilities	Support with conditions	Suggested amendments re climate change It is relevant to consider the capacity of infrastructure and where necessary, coordinate the delivery of new development with the delivery of future Infrastructure. New development should manage surface water in a sustainable, effective and appropriate way. Applications will be required to demonstrate with evidence, how they have applied the drainage hierarchy set out in Building Regulations 2010 H3 Rainwater Drainage. If it is demonstrated that it is necessary to discharge to a watercourse or public sewer, then any discharge must be at an attenuated discharge rate.
PO740	National Trust	Other	The approach set out in this Policy, and indeed in the other Strategic Policies, does not include a specific strategic approach to either the historic or the natural environment. It is considered that these omissions will need to be rectified if a 'sound' Plan is to be presented having regard to the relevant advice in the NPPF (para 156).



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PO683	Chatsworth Settlement Trustees	Object	Paragraph 4.4 and Paragraph 8 of the NPPF. In stating that 'In all cases development should not conflict with the local planning policies, particularly the environmental policies', Policy S1 does not accord with the NPPF. Policy S1 should be amended to remove this favouritism' and imbalance.
PO763	Stockport Metropolitan Borough Council	Observations	Should the bullet point commencing: 'Minimising carbon or energy impacts...' refer to '...the use of renewable energy sources...' rather than 'non-renewable'?
PO511	Gladman	Object	Policy S1 states "In all cases development should not conflict with the local planning policies." Gladman object to this policy approach as it could arbitrarily restrict housing growth in sustainable locations. Within Policy S1 it states that "New development should make the best use of previously developed land and buildings and follow a sequential approach to the sustainable location of development". Gladman object to this element of the policy as a sequential approach' is no longer required by national policy and in fact is contrary to the whole tone of the Framework Gladman object to this Policy and in its current wording submit that it is unsound.

Community feedback

Summary of formal responses

- No additional comments

Summary of drop-in responses

- No comments sought or received

Summary of key points raised during 2012 consultation

- Consider capacity of infrastructure to support development.
- Include reference to the historic environment.
- Maintain emphasis on protecting and enhancing the natural environment.
- Include specific reference to NPPF technical guidance on flood risk avoidance.

Recommendations made by Sustainability Appraisal

- Bullet point relating to biodiversity needs to be more positively framed, with reference to NPPF requirement for net gain in biodiversity and creation of ecological networks. Policy could make specific reference to prioritising brownfield land development and the protection of cultural elements in the landscape. Consider whether policy should include a reference to improving access to cultural, leisure and recreational activities.

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Policy S2 - Settlement Hierarchy(and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S2	6	2	3	0	0	11
Supporting text	2	1	3	1	0	7

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO250	The Buxton Group	Support	Support even distribution of development.
PO372	Hallam Land Management Ltd	Support	support
PO512	Gladman	Object	Policy lacks clarity and should be revised. A green belt review is necessary it should be a full, comprehensive review not ad hoc
PO536	United Utilities Property Solutions Ltd	Support	Support Tintwistle as a larger village.
PO502	Persimmon Homes (North West)	Support with conditions	Agree that some land should be released from green belt for development and suggest a greater scale of release.
PO579	English Heritage	Support	support recognition of need to maintain distinctive character and appearance of settlements
PO742	National Trust	Support with conditions	Support There should be scope within larger settlements, not just town centre uses, to accommodate growth
PO545	Wm Morrison Supermarkets plc	Support	support hierarchy
PO686	Chatsworth Settlement Trustees	Support	support market towns being focus for development
PO714	bowsall ltd	Object	No reference to Gamesley in hierarchy should be identified within Glossop or Glossop with Gamesley
PO577	English Heritage	Object	Reference should be made here to historic landscape character which forms an important part of the overall landscape character of the area.
PO578	English Heritage	Support with conditions	We fully support and welcome the recognition that the historic environment is one of the plan areas greatest assets within this paragraph. This



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			key message should be fully and properly translated further into the later strategic and development management policies.
PO684	Chatsworth Settlement Trustees	Support	Emphasis on market towns
PO685	Chatsworth Settlement Trustees	Support	Recognising the need for the right type of housing in the right places and delivered at the right time is welcome.
PO506	Innovation Forge Ltd and Woodford Land Ltd	Object	Preferred option is based on out of date evidence and is not likely to be found sound.
PO535	United Utilities Property Solutions Ltd	Object	Preferred option is based on out of date evidence and is not likely to be found sound.
PO139	Derbyshire Wildlife Trust	Observations	Does the Council intend for the green infrastructure network to double for the ecological network required under the guidance set out in the National Planning Policy Framework? The two are closely linked, but not the same and different approaches may be needed to identify an ecological network.

Community feedback

Summary of formal responses

- Fairness or evenness of housing development is not in itself a reason for selecting this distribution.

Summary of drop-in responses

- No comments sought or received.

Summary of key points raised during 2012 consultation

- Although the requirement for a brownfield target has been removed High Peak should retain one.
- Flexible settlement boundaries.
- Sequential approach to brownfield and sites within the main settlements.

Recommendations made by Sustainability Appraisal

- The policy could do more to specify when development would be permitted in smaller villages and settlements including the provision on affordable and market homes, as well as greater specificity around when it is appropriate to release greenbelt land to enable growth.

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Policy S3 - Strategic Housing Development (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S3	2	4	22	7	0	35
Supporting text	0	1	2	1	0	4

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO60	Brian Barber Associates	Object	Housing figures conflict with para 37 of NPPF as they seek to reduce growth from that identified in the RSS and do not represent the objectively assessed needs of the area. Housing growth levels should be evidence based. The ONS projections do not show any decrease in household formations since the RSS was adopted. NPPF requires Councils to identify needs and meet the household population projections taking into account migration. Figure in Preferred option do not do this and it represents a fundamental flaw within the document.
PO159	Higham & Co	Observations	Granting planning applications for housing provide many benefits- helps maximise the levels of affordable housing which provide accommodation for working age people- increase demand for services to sustain village and town centres- boost infrastructure. Need for housing real lack of accommodation having a detrimental impact on towns and villages. By choosing Option 1 from the Issues and Options (270 homes per year over the whole plan period) High Peak will be missing the opportunity to address the requirement for new housing as well as achieve other objectives. Furthermore pushing the majority of the development beyond 2023 is delaying addressing the issue of chronic shortage of housing which exists now. Spreading the proposed development equally across the range of towns creates the opportunity to enhance the built environment, protect the character of the larger towns and their surrounding open countryside, and crucially, enable affordable housing to be provided throughout all parts of the Borough.
PO166	B & GT Dignan Properties	Observations	The need for new housing in High Peak is very real. The phasing indicated within Table 2 (2012 - 2018 = 220 homes per annum) is lower than the target set for High Peak in the East Midlands Regional Plan and therefore represents a lost opportunity to address the housing requirement, including the provision of affordable housing and other associated benefits.
PO198	Richborough Estates	Observations	Any assessment of housing need must not only take account of past need but also future need. It is not clear whether under

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			<p>delivery from previous years has been accounted for nor evidenced. One of the core principles and tests within the NPPF is that emerging policies must be backed up by credible evidence. In reviewing the windfall allowances across the sub-areas then it would appear that this equates to approximately 20% of the required housing which seems optimistic. Where the preferred options plan acknowledges the Regional Plan target as not been deliverable then due to infrastructure and environmental constraints then these constraints must also be evidenced.</p>
PO249	The Buxton Group	Object	<p>While conscious that development will always be dependent on the availability of resources (with house building being especially subject to the fluctuations of the market) the group is still concerned that with a projected demand of 410 housing units per year, across the borough, the preferred option is only 270. We therefore dispute the premise of paragraph 4.44 and favour a target of 300 units per year.</p>
PO422	Derbyshire Dales District Council	Observations	<p>DDDC is pleased to see that the plan generally carries forward much of the strategy contained within the Derbyshire Dales and High Peak Joint Core Strategy Draft Plan published in 2010. However 1. Whilst the evidence suggests that High Peak have suffered from low levels of development in recent years, the target set in the Regional Plan was already below that identified in the 2004-Based Household Projections by 25%, (300 per annum in RSS compared to 400 per annum in Household Projections) and thus a reduction from this figure equates to 32.5% below the 2004-Based Household Projections. The most recent 2008-Based Household Projections indicate that the annual rate for the 2006-2028 plan period should be in the order of 409 dwellings per annum - thus the proposed rate of 270 dwellings per annum is approx 34% below the required rate. This is a slightly higher reduction compared to our proposed rate of 200 dwellings per annum (27% below the required rate of 273 dwellings per annum) which is similar to the difference set out in the Regional Plan i.e. High Peak a greater reduction than Derbyshire Dales. 2. In the context of the Peak Sub Region the policy approach being advocated by both local authorities is one of environmental protection - along similar lines to that advocated within the RSS, albeit that the levels of protection are slightly higher than previously set out. The High Peak plan does not set out that neighbouring authorities will be required to meet any shortfall nor does it indicate that the strategy is one of supporting regeneration in adjoining areas. 3. On that basis, provided that High Peak are able to justify their figures at Examination, and in the context of advocating that no additional development should take place outside the plan area to offset the reduced provision, Derbyshire Dales does not consider that there is any significant basis for formal objection. However, the District Council would draw to your attention Para 47 of the NPPF which states that plans should seek to meet the full,</p>

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			objectively assessed needs for market and affordable housing in the housing market area and in this regard, the District Council will not be prepared to seek to accommodate any shortfall that may arise in the High Peak.
PO213	BARRATT DEVELOPMENTS PLC	Object	The 270 option has been carried forward into the draft Local Plan for High Peak, and as such, our objections to the lower target number remain. We recommend that HPBC review its housing target options in a robust and thorough manner based on the up to date evidence to ensure that the new Local Plan is sound.
PO298	Sport England	Observations	An additional 3,250 homes will generate additional demand for sports facilities. Assuming 3,250 homes has an occupancy rate of 2.3 then this will generate some 7,475 new residents. The facility planning modelling will be able to recommend where most unmet demand will be located taking into account planned population growth so that the LA can make decisions depending on current levels of supply/demand and planned changes. Once the analysis is completed a strategy for delivery can inform policy, the infrastructure delivery plan and S106/CIL levels.
PO373	Hallam Land Management Ltd	Object	Considers evidence base out of date. Hallam Land Management object to setting the housing target requirement at 270 dpa within Policy S 3 on the grounds that it does not align with the Council's economic growth aspirations in policy CS 2 and will fail to provide new homes, deliver affordable housing and support economic growth, all of which are key aspects of the NPPF. In deriving the figure of 270 dpa for the borough Hallam Land Management considers that the HPLPPO has given too much weight to preserving and protecting the Borough's environment. This approach results in a level of housing provision for High Peak that does not meet the full market and affordable housing needs of the local population over the Plan Period. In order to address the conflicts above and ensure that the policy criteria set out within Policy S 3 are sound, it is requested that High Peak Borough Council: 1. Updates its housing evidence to meet objectively assessed development requirements. 2. Amends Policy S 3 to ensure a responsive, flexible delivery of sufficient levels of housing to meet demand in the Authority area.
PO412	High Peak Developments	Object	We object to the housing requirement set out in the document as it would not meet the full, objectively assessed need for market and affordable housing in the housing market area. Meeting household and population projections is the starting point for the housing requirement. However the requirement also needs address the need for all types of housing, including affordable housing, and the scale of housing supply necessary to meet demand. The council's preferred option of 270 dwellings per annum is 10% less than the annual RSS requirement of 300 dwellings and 15% less than the residual



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			<p>annual RSS requirement of 320 dwellings when the shortfall in delivery from 2006 is taken into account. There is no justification for an arbitrary reduction in the housing requirement. It is unclear in the consultation document how this figure has been derived. The selection of the lowest possible target from the housing options paper is at odds with the Government's Planning for Growth agenda and also the NPPF, which requires local planning authorities to plan positively for the development and infrastructure required in the area to significantly boost housing supply, meet objectively assessed needs and respond to wider opportunities for growth. We consider that the requirement should be at least 410 net additional dwellings per annum throughout the plan period. Such a requirement would: meet the identified household projections; assist in addressing the significant shortfall in affordable homes; assist in addressing the demand for housing across the borough and within the particular sub-areas; respond positively to a clear opportunity for growth; and, be deliverable over the plan period on suitable, available and achievable sites, as demonstrated by the SHLAA. It is not clear how phasing the housing requirement is justified by market and economic conditions. We consider that the housing requirement should be phased equally across the plan period, with deliverable sites coming forward in the early years.</p>
PO443	Majic Rental Services Ltd	Object	<p>Paragraph 50 of NPPF requires local planning authorities to plan for housing based on current and future demographic trends. A higher annual target than 270 dwellings per annum is therefore justified by this evidence, in the absence of contrary evidence presented within the SHMA The Council should therefore be trying to boost the supply of housing yet instead the proposed target of 270 per year would reduce it below that of the RSS level. There is also no reference in the justification for the policy to cross-boundary working, including unmet requirements from neighbouring authorities. It is therefore not considered that the housing target put forward has been positively prepared or is effective in line with paragraph 182 of NPPF.</p>
PO447	Home Builders Federation	Object	<p>No consultation on 4 of the scenarios presented in the housing targets paper. In rejecting the other scenarios the Council appears to be dismissing legitimate housing needs identified by national population projections, long term migration, long term housing completion rates and economic growth. Update evidence base using 2011 projections. What homes where website shows an expected increase in households of 8,333 (417 per year) in High Peak between 2006-2028 based on Department of Communities and Local Government (DCLG) 2008-based household projections. This is just below the figure identified in Scenario 1. There is a major concern that the housing provision figure of 5,940 dwellings over the plan period does not represent an unbiased and thus objective assessment of housing need.</p>

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PO581	English Heritage	Observations	No comments
PO626	Loxley Developments Ltd	Object	<p>We object to the housing requirement set out in the document as it would not meet the full, objectively assessed need for market and affordable housing in the housing market area. Meeting household and population projections is the starting point for the housing requirement. However the requirement also needs address the need for all types of housing, including affordable housing, and the scale of housing supply necessary to meet demand. The council's preferred option of 270 dwellings per annum is 10% less than the annual RSS requirement of 300 dwellings and 15% less than the residual annual RSS requirement of 320 dwellings when the shortfall in delivery from 2006 is taken into account. There is no justification for an arbitrary reduction in the housing requirement. It is unclear in the consultation document how this figure has been derived. The selection of the lowest possible target from the housing options paper is at odds with the Government's Planning for Growth agenda and also the NPPF, which requires local planning authorities to plan positively for the development and infrastructure required in the area to significantly boost housing supply, meet objectively assessed needs and respond to wider opportunities for growth. We consider that the requirement should be at least 410 net additional dwellings per annum throughout the plan period. Such a requirement would: meet the identified household projections; assist in addressing the significant shortfall in affordable homes; assist in addressing the demand for housing across the borough and within the particular sub-areas; respond positively to a clear opportunity for growth; and, be deliverable over the plan period on suitable, available and achievable sites, as demonstrated by the SHLAA. It is not clear how phasing the housing requirement is justified by market and economic conditions. We consider that the housing requirement should be phased equally across the plan period, with deliverable sites coming forward in the early years.</p>
PO464	Derbyshire County Council	Support with conditions	
PO644	Federal Mogul	Object	<p>It is a concern that the Local Plan housing requirement and relevant plan period will not be based on a positively prepared, justified and objective evidence base, using latest available data. Disagree with phasing policy. The Plan cannot in this respect be considered to be an 'effective' policy which has been 'positively prepared' as required by the Framework, paragraph 182. It also fails to respond and purposefully rejects the evidence base upon which housing need and the requirement is founded. Housing requirement is effectively being set by housing supply. The housing requirement should be set at a minimum of 300 dpa net as supported by officers in the HTOP, and potentially should be set at 333 dpa net in line with latest CLG household projections. The proposed</p>

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			option does not allow any flexibility to change and assumes that there will be no housing market recovery over the plan period. The draft of the Neighbourhood Plan has not been made available for consultation alongside the Preferred Options and therefore the consultation on the Local Plan is seriously flawed and places those consulted at significant disadvantage.
PO645	Federal Mogul	Support with conditions	Federal-Mogul does not object to how the percentage distribution of housing requirement in terms of their spatial distribution to Glossopdale, Central and Buxton areas; 32%, 33% and 35% respectively.
PO622	Emery Planning Partnership	Object	The proposed target would be significantly lower than the latest Government household projections, and would not be capable of addressing the borough's affordable housing shortfall. We consider that the proposed housing requirement would fall significantly short of meeting objectively assessed needs, therefore failing to comply with the NPPF and the Government's growth agenda. The draft housing policies do not appear to be based upon an up-to-date evidence base. In the absence of an up-to-date and complete evidence base we would strongly question how the council has got to preferred options stage, and also how the council intends to adopt the DPD within the stated timescales.
PO550	Peak District National Park Authority	Object	The Authority also notes the absence of the previous reference to the fact that the National Park Authority is not required (a phrase we prefer to the previously used 'not committed') to provide the projected number of homes in the core strategy for the High Peak area i.e. 110 new homes between 2012 and 2028. The Authority would ask the Borough Council to re-instate such text, especially in light of the proposed reduced housing target
PO688	Chatsworth Settlement Trustees	Object	An Overall Average Annual Development Rate of 270 dwellings will fall to meet the full objectively assessed needs for market and affordable housing of the Borough. The proposal to phase the release of sites is flawed and should be deleted. Control of the release of planning permission on sites as set out in the LP will fail to achieve dwelling completions at the rate sought by the LP
PO513	Gladman	Object	Gladman question the proposed housing target of 5,940 dwellings over the plan period, suggesting that this requirement does not represent the full objectively assessed need for housing across High Peak. The back-loading of housing delivery proposed in Policy S3 is demonstrated through the table above. There is no justification for the back-loading of housing targets and this approach runs entirely counter to the objectives of the Framework which seeks to significantly boost the supply of housing. If you consider the overall housing delivery between 2006/07 and 2011/12 then High Peak has under supplied by 290 dwellings. There is no evidence to

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			<p>suggest that this housing backlog has been accounted for by the housing target proposed through Policy S3. It is imperative that this is taken into consideration and an appropriate target which includes for past under delivery against the RSS is outlined through the Local Plan. The objective assessment of future needs should include for past under delivery along with the future requirements for market and affordable housing. The current proposals contained within the Local Plan include provision of 270 dpa over the Plan Period. This is despite the Council's own evidence that indicated that over 370 dpa would be needed to meet the needs of the housing market area. 2011-based household projections only cover a portion of the Plan Period (to 2021). For High Peak, these new projections show a slight fall in average annual household formation between 2011 and 2021: from 436 p.a. to 399 p.a. However, it remains the case that even this reduced rate of expected annual household formation is significantly greater than the Council's proposed annual housing delivery target. The evidence from the CLG's 2010-based population projections is that an increase in working age population (proxied by the 16-64 age group) of around 900 persons can be expected for the Borough between 2011 and 2028. In order to capture the potential for future employment growth in full, there will need to be a significant augmentation to the local labour supply, which in turn implies a need for a significant increase in the supply of housing in High Peak Borough. Balancing these three drivers of future housing need the Development Economic report suggests a housing delivery target of between 400dpa and 500dpa would provide a balance between fully meeting demographic and economic drivers of housing demand, as well as making a significant contribution towards meeting the newly arising need for affordable housing for affordable housing on the one hand, and making a significant contribution to addressing backlog on the other. Overall, Development Economics (and Gladman Developments) are concerned that the evidence base that underpins the targets proposed by the draft strategy fail to meet the standards expected by the NPPF, and in particular the requirements of Paragraphs 47, 152, 158 and 159 of that document. Gladman submit that Policy S3 in its current form is unsound.</p>
PO537	United Utilities Property Solutions Ltd	Object	<p>The preferred options conspicuously fail to account for why the higher figure of 300 dwellings per annum is not deliverable or provide clarity as to how a lower figure is justified. Concerns regarding a Council's ability to deliver the number of dwellings that are required to meet an objectively assessed need does not override or negate the Council's obligation to set an appropriate strategic requirement. The onus within the Framework is on delivering sufficient housing land to objectively meet the identified strategic needs of the Borough. The household growth projections identified by DCLG are significantly higher than the strategic housing requirement identified in the preferred options Local Plan. However, this</p>

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			disparity is not accounted for in the Council's methodology. In our view, the Council have sought to identify a lower overall housing requirement than previously set out in the East Midlands RS, but have singularly failed to provide a compelling justification for the conservative approach which has been adopted. For these reasons, the Plan has not been positively prepared and is not justified and is, therefore, likely to be found unsound upon examination.
PO499	Persimmon Homes (North West)	Object	NPPF states LPA should ensure their local plan meets full, objectively assessed need. House building in HP since 2008 not match RSS requirement. We would encourage the Council, if it is to positively plan for the delivery of new homes, raise its annual target in line with that of the accepted RSS requirement and give consideration to the existing accumulated shortfall, and to identify more housing sites for development to ensure the housing needs of High Peak can be met. We would therefore ask the Council to positively identify all deliverable, strategic opportunities in the Local Plan (include Harehills Kennels, Burbage, which was identified as a Housing Allocation under policy H3 of the previous version of the Local Plan (Ref: B16), as a deliverable housing site)
PO507	Innovation Forge Limited and Woodford Land Limited	Object	The preferred options conspicuously fail to account for why the higher figure of 300 dwellings per annum is not deliverable or provide clarity as to how a lower figure is justified. Concerns regarding a Council's ability to deliver the number of dwellings that are required to meet an objectively assessed need does not override or negate the Council's obligation to set an appropriate strategic requirement. The onus within the Framework is on delivering sufficient housing land to objectively meet the identified strategic needs of the Borough. The household growth projections identified by DCLG are significantly higher than the strategic housing requirement identified in the preferred options Local Plan. However, this disparity is not accounted for in the Council's methodology. In our view, the Council have sought to identify a lower overall housing requirement than previously set out in the East Midlands RS, but have singularly failed to provide a compelling justification for the conservative approach which has been adopted. For these reasons, the Plan has not been positively prepared and is not justified and is, therefore, likely to be found unsound upon examination.
PO560	Treville Properties Ltd	Object	We object to the housing requirement set out in the document as it would not meet the full, objectively assessed need for market and affordable housing in the housing market area. Meeting household and population projections is the starting point for the housing requirement. However the requirement also needs address the need for all types of housing, including affordable housing, and the scale of housing supply necessary to meet demand. The council's preferred option of 270 dwellings per annum is 10% less than the annual RSS

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			<p>requirement of 300 dwellings and 15% less than the residual annual RSS requirement of 320 dwellings when the shortfall in delivery from 2006 is taken into account. There is no justification for an arbitrary reduction in the housing requirement. It is unclear in the consultation document how this figure has been derived. The selection of the lowest possible target from the housing options paper is at odds with the Government's Planning for Growth agenda and also the NPPF, which requires local planning authorities to plan positively for the development and infrastructure required in the area to significantly boost housing supply, meet objectively assessed needs and respond to wider opportunities for growth. We consider that the requirement should be at least 410 net additional dwellings per annum throughout the plan period. Such a requirement would: meet the identified household projections; assist in addressing the significant shortfall in affordable homes; assist in addressing the demand for housing across the borough and within the particular sub-areas; respond positively to a clear opportunity for growth; and, be deliverable over the plan period on suitable, available and achievable sites, as demonstrated by the SHLAA. It is not clear how phasing the housing requirement is justified by market and economic conditions. We consider that the housing requirement should be phased equally across the plan period, with deliverable sites coming forward in the early years.</p>
PO634		Object	<p>The preferred option is not based on an objectively assessed evidence base and has instead sought to propose a target which would have the greatest protection of the environment and less pressure on infrastructure. However, this option will create issues of housing need and demand failing to be fully met and will result in worsening affordability and an increasing shortage of housing throughout the plan period. This is contrary to the Framework. The Council have not sought to address the severe backlog and persistent underdelivery of housing in the past. It is considered that the phased approach will not address the previous under-supply and will not meet the aims of the Framework to significantly boost the supply of housing.</p>
PO651	Heyrose Property Group	Object	<p>It is a concern that the Local Plan housing requirement and relevant plan period will not be based on a positively prepared, justified and objective evidence base, using latest available data. Disagree with phasing policy. The Plan cannot in this respect be considered to be an 'effective' policy which has been 'positively prepared' as required by the Framework, paragraph 182. It also fails to respond and purposefully rejects the evidence base upon which housing need and the requirement is founded. Housing requirement is effectively being set by housing supply. The housing requirement should be set at a minimum of 300 dpa net as supported by officers in the HTOP, and potentially should be set at 333 dpa net in line with latest CLG household projections. The proposed option does not allow any flexibility to change and assumes</p>

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			that there will be no housing market recovery over the plan period. The draft of the Neighbourhood Plan has not been made available for consultation alongside the Preferred Options and therefore the consultation on the Local Plan is seriously flawed and places those consulted at significant disadvantage.
PO652	Heyrose Property Group	Support with conditions	HPG does not object to how the percentage distribution of housing requirement in terms of their spatial distribution to Glossopdale, Central and Buxton areas; 32%, 33% and 35% respectively.
PO743	National Trust	Support	This approach accords with National Trust's response to last autumn's consultation
PO689	Chatsworth Settlement Trustees	Support	Tables 3 and 4 are supported in so far as they focus growth on Buxton
PO764	Stockport Metropolitan Borough Council	Observations	It is noted that High Peak are looking to provide for a lower housing figure than that set out in the East Midlands Regional Strategy, equating to approximately 270 dwellings per annum as opposed to 300 dpa. The lower figure appears to be based on the lowest possible requirement of 3 scenarios set out in the supporting documents, the fact that completions in High Peak have not matched those required to meet the higher figures and, finally, that the economy is in its current 'unhelpful' situation with little prospect of housing completions increasing significantly until much later in the plan period. Whilst there is merit in those arguments, a 10% reduction is relatively significant. High Peak should be satisfied that it has a suitable contingency plan if housing demand starts to exceed the supply coming through. Stockport is not in a position to deal with any subsequent shortfall in supply. We have identified our need (which is in line with the North West RS) and set out how we intend to deal with that in the Core Strategy. However, High Peak will need to be satisfied that it can justify the lower figure, in the context of neighbouring authorities (particularly Stockport) not having the capacity to take on any shortfall in supply which may result in High Peak.
PO715	bowsall ltd	Object	An annual rate of 270 dwellings is too low. The NPPF clearly states that local authorities should boost significantly the supply of housing. Adopting an annual requirement that is less than the historical RSS figure is contrary to this requirement. This is supported by the Council's own evidence, which was presented to the 26th July 2012 Committee The evidence clearly demonstrates why a figure of 270 is inappropriate for the High Peak. To boost significantly the supply of housing would require an annual figure greater than the RSS requirement. In light of these issues we support the figure of 370 dwellings per annum which will supply the projected households needed through the plan period and ensure the

2 Summary of responses to Local Plan - by chapter

			Local Plan is found 'sound' by an Inspector at an Examination in Public (EiP).
PO777		Object	<p>We object to the housing requirement set out in the document as it would not meet the full, objectively assessed need for market and affordable housing in the housing market area. Meeting household and population projections is the starting point for the housing requirement. However the requirement also needs address the need for all types of housing, including affordable housing, and the scale of housing supply necessary to meet demand. The council's preferred option of 270 dwellings per annum is 10% less than the annual RSS requirement of 300 dwellings and 15% less than the residual annual RSS requirement of 320 dwellings when the shortfall in delivery from 2006 is taken into account. There is no justification for an arbitrary reduction in the housing requirement. It is unclear in the consultation document how this figure has been derived. The selection of the lowest possible target from the housing options paper is at odds with the Government's Planning for Growth agenda and also the NPPF, which requires local planning authorities to plan positively for the development and infrastructure required in the area to significantly boost housing supply, meet objectively assessed needs and respond to wider opportunities for growth. We consider that the requirement should be at least 410 net additional dwellings per annum throughout the plan period. Such a requirement would: meet the identified household projections; assist in addressing the significant shortfall in affordable homes; assist in addressing the demand for housing across the borough and within the particular sub-areas; respond positively to a clear opportunity for growth; and, be deliverable over the plan period on suitable, available and achievable sites, as demonstrated by the SHLAA. It is not clear how phasing the housing requirement is justified by market and economic conditions. We consider that the housing requirement should be phased equally across the plan period, with deliverable sites coming forward in the early years.</p>
PO553	PDNPA	Support with conditions	<p>PDNPA requests reference to monitoring of housing consents and completions in NP part of HP as they count towards the overall target. Suggested additional wording "Ongoing monitoring of the development of new homes and planning consents in High Peak, including the Peak District National Park areas of High Peak, will continue to be undertaken to ensure that these consents and homes are taken into account in considering any need to review this strategy."</p>
PO687	Chatsworth Settlement Trustees	Object	<p>Insufficient evidence to justify a reduction from RSS housing target. Evidence to support RSS remains relevant even though it is revoked which already recognises high quality environment and need to support regeneration of adjoining urban areas. Reducing housing target below RSS is counter to NPPF requirement (para 47).</p>



2 Summary of responses to Local Plan - by chapter

Community feedback

Summary of formal responses

- Whaley Bridge settlement boundary should not extend beyond existing built area.

Summary of drop-in responses

- No comments sought or received

Policy S4 - Maintaining and Enhancing an Economic Base (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S4	0	1	0	1	0	2
Supporting text	0	0	1	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO582	English Heritage	Observations	No comment
PO646	Federal Mogul	Support with conditions	Support recognition for supporting businesses in bullet point 5 but request that this bullet is re-worded to make reference to improvement and enhancement rather than just "expansion"

Community feedback

Summary of formal responses

- No point in building industrial units without tenants.

Summary of drop-in responses

- No comments sought or received.

Summary of key points raised during 2012 consultation

- No comments received in response to Strategic Policy consultation.

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Policy S5 - Glossopdale Sub-area strategy (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S5	10	5	16	3	2	36
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO145	Derbyshire Wildlife Trust	Support	Derbyshire Wildlife Trust supports the Council's position with regard to maintaining a strategic gap between Glossop and Hadfield. However, we note that the area is already under threat of development. We would support a clear and robust policy on this that would prevent any further loss of land from within this strategic gap. We also consider that this area could be enhanced for biodiversity and quiet recreation and should be included as part of the green infrastructure/ecological network in and around Glossop. Derbyshire Wildlife Trust would also like to express support for the designation of Local Green Space at George Street and Padfield.
PO61	Brian Barber Associates	Object	Specific elements of concern. Policy seeks mixed use schemes for industrial legacy sites despite the evidence of a substantial oversupply of commercial land and older industrial sites. An open ended requirement for commercial uses to be included will adversely affect delivery. The policy supports meeting the housing needs of the area, however, as explained above the housing growth figures set out clearly fail to do this.
PO300	Sport England	Observations	Policy doesn't refer to sports facilities. Sports strategy should identify local requirements and be reflected in policy. Increase in school capacity often lead to loss of playing fields. Encourage opening up of school sports facilities for community access
PO455	Derbyshire County Council	Support with conditions	It would be helpful if potential schemes for infrastructure improvements were referred to in order to help reduce congestion.
PO474	Derbyshire County Council	Observations	George Street Local Green Space: the opportunity exists to improve the informal access, e.g. the route from Chapel Street along the riverside to the footpath at the end of George Street. Padfield Local Green Space: there is the potential for new informal access provision, e.g. a link between Regent Street and Temple Street. Strategic Gap between Hadfield and Glossop: this is supported and includes sections of the Trans Pennine Trail and the Pennine Bridleway National Trail, along with several public rights of way (PRoW). There is further scope for improvement, with further links and possibly new bridleways.

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PO394		Object	This land is currently the subject of a village green application which if upheld there is no need to designate this brown field site that HPBC previously listed as a development opportunity as urban green space. I believe this site has also been proposed as UGS to deflect attention from the wholesale destruction being wrought on other areas of greenbelt and woodland by HPBC so they can point to it as an example of their 'green and caring nature' This is private land that has been adversely possessed.
PO355	Friends of the Peak District	Object	Object to conflict between the strategic gap and the allocation of housing sites at Dinting. All these sites should be considered together and covered by a Neighbourhood or masterplan so that open space can be protected as well as allowing an appropriate level of development. This should also apply to sites within the Green Belt.
PO359	Friends of the Peak District	Support with conditions	We welcome and support each of the points in Policy S5, especially S5(1) in terms of its clarity in providing for the distinctiveness and definition of settlements. We are very concerned that the proposed allocation of housing sites in Glossopdale will specifically result in the abandonment of the strategic gap between Hadfield and Glossop. It should also be noted that, in our previous submission, we suggested that the Local Green Space in George Street should be used for housing development. Following representations to us from local residents, we have changed our position on this matter, as we realise that there is a wealth of local support for George Street Wood's value as an open space, and this had not come to our attention previously.
PO583	English Heritage	Support with conditions	We welcome the recognition of the historic environment characteristics within the Glossopdale sub-area, Specifically bullet point 5 cities that sites designated for environmental or historic value will be protected, but no guidance on how this is to be achieved is offered. Additionally, this only refers to designated heritage assets, and thus omits those assets (buildings or other) which are not statutorily designated. We do not consider that this policy would meet the NPPF in terms of delivering the conservation and enhancement of the historic environment as part of a positive strategy in this form and we suggest further criteria in relation to this as an identified key attribute. This should refer to both designated and non-designated heritage assets, and historic landscape. Reference to heritage at risk would also be appropriate, given the identification of historic buildings in need of refurbishment in paragraph 4.79. We also consider a significant weakness of this policy is that there is no recognition or protection within the policy wording of landscapes, other than the greenbelt designation. This is something which is identified in paragraph 4.63 and therefore it is disappointing that there is no recognition here. Similarly, there is nothing in this section regarding design.

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PO627	Loxley Developments Ltd	Object	We object to the principle of identifying a new strategic gap in the Glossopdale sub-area. We are particularly concerned about the potential inclusion of our client's site (the land at Dinting Road and Shaw Lane). The boundary of the Green Belt is tightly drawn around Glossop, Gamesley and Hadfield and already serves the purpose of preventing the three settlements from merging into one another. The creation of 'second tier' landscape designations devalues the protection and conservation of important landscapes. The proposed gap is not continuous as it is broken by the residential development to the north of Shaw Lane. We note that the boundaries of the strategic gap are not defined within the consultation document. However, without prejudice to our principle objection to the strategic gap, if the strategic gap is identified then we consider that the land at Dinting Road and Shaw Lane should not be included within it. Any strategic gap should extend no further north than Dinting Road.
PO623	Emery Planning Partnership	Object	The policies appear to attempt to give the strategic gap and green wedges the same level of protection to land as if it were designated Green Belt or Local Green Space yet the land proposed in the emerging plan would not be capable of meeting the tests required to be designated as either.
PO514	Gladman	Object	Gladman object to the protection of the Green Belt due to the fact that it is unclear whether the Council have truly determined what the full objectively assessed housing needs are for the authority area and therefore whether it will be necessary to consider release from the Green Belt or not to help accommodate this scale of housing. The Council should not adopt a policy approach which places a priority on brownfield development. The plan should not arbitrarily restrict sustainable greenfield sites from being developed as this is contrary to the ethos of the Framework. Gladman submit that in its current wording Policy S5 lacks clarity and therefore should be revised.
PO538	United Utilities Property Solutions Ltd	Support with conditions	Support the sub-area strategy for Glossopdale (which incorporates Tintwistle) and in particular, the need to provide for the housing needs of the community by planning for sustainable housing and mixed use developments. United Utilities further support the reference to support enhancements to key community services and infrastructure and connectivity to meet the needs of the local population but this should also include reference to specific recreation facilities (and improvements) within Tintwistle and other larger villages to ensure the social needs of the community are also met.
PO565		Object	The map online shows a piece of land at Platt Street Padfield, which belongs to us, combined with the children's play area into one piece of land. We would like you to show a clear boundary between your children's play area and our piece of land.



2 Summary of responses to Local Plan - by chapter

Community feedback

Summary of formal responses

- Welcome for the proposed designation of George Street Wood as a Local Green Space.
- Query relating to the boundary of the Padfield Local Green Space.
- There is no mention of the pockets of deprivation which include Whitfield, Hadfield North and Gamesley.
- Support for a Strategic Gap to be maintained between Glossop, Hadfield and Gamesley.
- Infrastructure must be improved first to cope with growth.
- Another supermarket could have a negative effect on the local high street.

Summary of drop-in response

George St Local Green Space

Total number of comments made: 30

- Those in support: 30
- Those with an objection: 0

In support

- Green space in the centre for all to enjoy.
- The open space and woodland should be protected. Ecological survey needed.
- This much needed open / green space should be retained for use by Glossop residents and visitors, also to preserve / enhance wildlife / vegetation within the town centre - it is a natural extension to the open land across the river. The existing trees are also protected
- Keep as a vital green space.
- This space should be preserved for the use of all Glossop folk and definitely not be allowed to be built on for any reason. Many people feel it is a valuable area for birds / bats / small animals / plants / trees / insects. All necessary for a healthy environment.
- Should stay as a green space - compliments river walk. Make a riverside feature.

Padfield Local Green Space

Total number of comments made: 11

- Those in support: 11
- Those with an objection: 0

In support

- This area forms a crucial part of Padfield's unique nature.
- It is recognised as an important part of the designated Padfield Conservation area.
- The "open heart" of Padfield village needs to be preserved. Gives the village its identity and character.

Strategic gap

2 Summary of responses to Local Plan - by chapter

Total number of comments made: 20

- Those in support: 20
- Those with an objection: 0

In support

- The strategic gap should be retained to prevent coalescence of urban development.
- This should be left as a strategic gap and any planning application should be delayed until the overall plan is agreed.
- Good idea but the boundary isn't correct - should also include G19, 20, 21 and 23.
- Agree not acceptable to build here (a) strategic gap between Padfield and Hadfield and (b) very necessary to preserve open spaces.
- Must protect open spaces between Glossop, Hadfield and Gamesley.

Summary of key points raised during 2012 consultation

- No comments received in response to Strategic Policy consultation

Recommendations made by Sustainability Appraisal

- Specific reference to distinctiveness and character of the Glossopdale area in the preamble should be supported by stronger policy wording and reference, to ensure that this is protected.

Policy S6 - Central Sub-area Strategy (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S6	4	4	12	5	0	25
Supporting text	2	0	0	2	0	4

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO367	Chinley, Buxworth and Brownside Parish Council	Observation	Why no mention of Chinley station at para 4.85 - since it directly serves Manchester, Stockport and Sheffield via the Hope Valley line and is well used. However, Chinley station suffers from inadequate parking provision and this can result in double parking along Station Road throughout the day. Provision needs to be made to address parking provision at Chinley station.
PO392	Chinley, Buxworth and Brownside Parish Council	Observation	Agree with the observation at para 4.87 that the proximity of the Peak District National Park gives Hayfield an important role in supporting the tourist industry. Hayfield's tourist access is mainly by car and coach. It has no rail

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			access. The bus service is an important lifeline for many residents, and provides an additional option for tourists, but has major limitations. Parking for cars and coaches is therefore essential.
PO88	Whaley Bridge Town Council	Support with conditions	Green Belt boundary change at Furness Vale supported - provided that land at the southern end of the proposed site is reserved for allotments in Furness Vale, in response to local demand.
PO188	Canal & River Trust	Support	Support for the Strategy including the protection and promotion of the Peak Forest Canal and its associated infrastructure - in order to encourage both tourism growth and growth of local employment opportunities.
PO195	CSC Construction Ltd	Support	Support the removal of the site at Furness Vale from the Green Belt allocation. It has extant planning permission for a 54 bedroom hotel, and should be allocated for housing. The need for housing in the High Peak has been noted in the evidence base and by Government Planning Inspectors. There are limited available sites for housing within the High Peak given the topography and constraints of the National Park. The application site is bounded on all sides by development, the site itself does not preserve openness. The site could provide around 25 houses at a location that is sustainable.
PO456	Derbyshire County Council	Object	Paragraph 4.86 on page 49 refers to congestion caused by car commuting, yet there is no mention of congestion reduction measures in the policy itself, nor is there any indication of the need to improve transport links to the surrounding area. It is therefore suggested that the following additional bullet point is added: "Working with partners to reduce congestion along the A6 and in the town centres, and to improve transport links to the surrounding area."
PO478	Derbyshire County Council	Observations	Both the proposed Green Wedges in New Mills are supported. New Mills Green Wedge between Church Lane and St Georges Road: Public footpath HP19/177 crosses the site, with the Sett Valley Trail (SVT) and public footpath HP19/179 adjacent to the western boundary. Opportunities exist to improve public access for walking and cycling by linking into the surrounding PRow and road network. New Mills Green Wedge, Ladyshaw Bottom: the SVT and several public footpaths cross the site. Opportunities could be focused to improve public access for walking, cycling and horse riding by linking into the surrounding PRow network. Green Belt boundary amendment, Furness Vale: the north western end of the site is affected by public footpaths HP23/1 and HP23/93, which provide access onto the Peak Forest Canal Greenway (part of the Midshires Way) from the A6. It would be useful if the route running via HP23/93, and then the HP23/1, could be upgraded to

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			facilitate access onto the canal towpath for cyclists. Land for new school building, Park Crescent, Furness Vale: Public footpath HP23/114 exits onto Park Avenue at the north west corner of the site. This should be protected and not be permanently affected by any works associated with the new school building.
PO301	Sport England	Observations	The Open Space, Sport and Recreation Assessment does not appear to have informed this policy. Education plans appear to be identifying playing fields at Eaves Knoll for a new primary school. We would object to any loss of playing field unless it complies with the exceptions set out in our policy and NPPF Par 74.
PO410	High Peak Developments	Object	No justification is provided as to why specified sites at Furness Vale and Whaley Bridge are to be released from the Green Belt. We do not object to the release of Green Belt, but request that further justification is provided to explain why the land opposite Tesco is proposed for new housing, whilst our client's site off Buxton Road, Bridgemont is not. Our client's land is enclosed by the A6 to the east, the A5004 to the west and the canal and towpath to the south. The land is entirely enclosed by physical features on the ground and is a logical end to the settlement of Whaley Bridge. It is recommended that the Green Belt boundary is reviewed to incorporate this site within the settlement boundary.
PO584	English Heritage	Support with conditions	Welcomes recognition of the historic environment attributes of the Central Area and its settlements within the text accompanying this policy. Welcomes reference for the need to reflect historic character in the first paragraph. However bullet point 3 (under section 1) makes no reference to how designated sites of historic value are to be protected and only refers to designated heritage assets. No reference is given within the policy for the protection of the canal and tramway, which are non-designated heritage assets. There is also no reference to landscape (other than greenbelt), and design, which we consider to be a significant omission - particularly given that this area is cited as offering good access into the National Park.
PO647	Federal Mogul	Object	Federal-Mogul objects to the proposed protection of the designated Green Belt with an allowance for minor Green Belt boundary changes at Furness Vale and Whaley Bridge. Federal-Mogul consider that this should be re-worded to allow for further Green Belt release for sites which fail to serve the purposes of Green Belt. Review of the Green Belt around Chapel-en-le-Frith at the site of Stodhart Farm is recommended. The land here is bounded by strong, defensible boundaries in the form of the A6 bypass and railway line, and forms a natural rounding of

2 Summary of responses to Local Plan - by chapter

			the settlement north of the factory. It serves no purpose of Green Belt in our view.
PO744	National Trust	Support	Support.
PO624	Emery Planning Partnership	Object	A serious issue of soundness relates to the proposed "strategic gap" and "green wedge" policies for certain settlements. The policies appear to attempt to give the same level of protection to land as if it were designated Green Belt or Local Green Space (designations recognised by the NPPF), yet the land proposed in the emerging plan would not be capable of meeting the tests required to be designated as either. The approach is clearly flawed and has no evidential basis.
PO515	Gladman	Object	The Council should not be placing a blanket protection of the Green Belt, when they are unclear of the overall objectively assessed housing need and the implications of this need in terms of land supply required to meet it and whether revisions to the Green Belt will need to be considered. In its current wording Policy S6 lacks clarity and therefore should be revised.
PO562	Treville Properties Ltd	Object	There is no justification as to why certain sites are to be released from the Green Belt. We do not object to the release of Green Belt, but request that further justification is provided to explain why the land opposite Tesco is proposed for new housing, whilst land off Buxton Road, Bridgemont is not. New Mills Green Wedge: In the absence of any objective assessment of the potential of this site as a Green Wedge we object to any such designation. The use of a "green wedge" policy is normally associated with urban areas where access to greenspace is both limited and likely to involve travelling over some distance. In this case there is ample opportunity to access greenspace and New Mills is surrounded by open, publicly accessible countryside. If designation is related to biodiversity, rather than some form of amenity benefit, we consider any biodiversity interest can be protected and potentially enhanced through any development of the site. The land to the rear of Elmwood House and Penlee, Church Lane is brownfield, not greenfield. This and the principle of residential development being acceptable at the site has been recognised by an Inspector and the council. The site is in private ownership and is not accessible as amenity space by the public.
PO635	Barry Wood	Object	Support given to the strategy of providing for the housing needs of the community by supporting the development of a range of new housing sites both within the built-up area boundary and on land adjacent to the urban area primarily in Chapel-en-le-Frith, New Mills and Whaley Bridge. Comment puts forward a number of sites in Chapel-en-le-Frith, adjacent to the main urban area, that

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			represent suitable options to contribute to meeting housing need. Any development sites identified in the Neighbourhood Plan will need to be consistent with the development approach and strategy in the new Local Plan and in particular for the Central Area. Comments are given on the potential housing sites identified by the Chapel Vision steering group.
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Community feedback

Summary of formal responses

- It is important that the role Whaley Bridge has as the tourist 'Gateway to the Goyt Valley' is recognised. Site C9 was rightly rejected due to the detrimental impact development would have had on the Goyt (Midshires) Way long-distance path, which is much used by walkers accessing the National Park from Whaley Bridge.
- Disappointed that there has been no information regarding the plan for Chapel-en-le-Frith.
- Agree that some minor changes are needed to the green belt boundary. Agree there is a shortage of housing and this should come from locations close to public transport. Green-belt site submitted, former quarry, south of the A6 at Newtown. Suggested the land should be allocated for housing.
- Concern at the proposal to amend the green belt boundary along the A6 in Furness Vale. The green belt is effective at stopping 'ribbon development' and the merging of villages. There are always houses for sale on the A6 and so this need for additional housing does not seem to exist. It would also lead to increased traffic on an already congested road.
- Ladyshaw bottom is a floodplain. Several times the river burst its banks and flooded the area.

Summary of drop-in responses

Green Belt Boundary Amendment Furness Vale:

Total number of comments made: 14

- Those in support: 3
- Those with an objection: 10
- Other: 1

In Support

- Cannot see much of a problem with this site compared to a lot of others.
- Always feel sad about loss of green belt land, but if used for quality housing built with environmental issues and community need at the forefront of planning could accept.

Object

- I do not see the need to de-designate green belt land. Other brownfield/post industrial land constantly being available in the local area in High Peak if not precisely in Furness Vale. Furness Vale is too small an area to demand its own housing need - people can be accommodated in nearby towns.



2 Summary of responses to Local Plan - by chapter

- This land should stay as green belt as there is already enough properties.
- What is the point of having any green belt if slowly but surely it is eaten away. Originally this land was set aside to provide distinct separation between areas/villages. If this land is developed we will end up living in a suburb as villages amalgamate.
- I am seriously concerned about the traffic situation, this development would cause. Already this stretch of road has experienced fatal accidents.

Other

- Agree that green belt argument should be reassessed when a Local Plan is being developed, in line with NPPF. However rather than nibble here and there without any strategic direction, consider how green belt protects the area it serves. Can green belt at A6 be removed to allow new assignment to the south of Whaley Bridge? Important to prevent sprawl of development between Furness Vale and New Mills, but Furness Vale and Whaley Bridge need not be separated as strictly land of lower landscape character may offer future development opportunities.

Land for new school building Park Crescent Furness Vale

Total number of comments made: 4

- Those in support: 3
- Those with an objection: 0
- Other: 1

In Support

- I am very much in favour of a new school away from the A6 but access would be a huge problem.
- Support if taking the school off the A6.

Other

- Please ensure any new school is designed as full community resource available all day - all week.

New Mills Green Wedge between Church Lane and St Georges Road

Total number of comments made: 17

- Those in support: 14
- Those with an objection: 0
- Other: 3

In Support

- Should be extended to include football pitches adjacent.
- Keep it! Yes please - green spaces are very important, recreation and aesthetics.

2 Summary of responses to Local Plan - by chapter

- Should remain a green wedge. Important to have natural spots around high density housing and schools. Helps with noise reduction.
- Wildlife corridor. New Mills' best (not kept) secret nature reserve and educational resource and one of the only "wild" and accessible pieces of land in that area.
- It used to be Beard Brook as New Mills before 1382 was Beard before New Mills was built. Most of this is always in shadow especially in winter. Snow always lies on this north facing slope. Deer, badgers, fox have been seen in this green corridor.

Other

- Church own from St George's Primary up to Low Leighton Road.
- Derby Diocese own St George's school land up to Church Road.

New Mills Green Wedge, Ladyshaw Bottom

Total number of comments made: 19

- Those in support: 19
- Those with an objection: 0
- Other: 0

In Support

- An important local resource - most of it on (or just above) floodplain!
- Used to have 2 football pitches on and sewage beds.
- Important for wildlife conservation - so it must be kept. Aesthetics / local character also important.
- Should be extended to include Burial Ground and land to north of Watford Bridge Road.

Summary of key points raised during 2012 consultation

Green wedges in New Mills:

- Ladyshaw should remain. Low Leighton - Hyde Bank Road has had numerous applications and does have access.
- The only two areas in the whole of High Peak that are marked as "green wedge" are actually owned by developers / building companies. That appears to be a perverse decision.
- Deer spotted in New Mills Sett Valley green area on 2 October 2012.
- The green wedge areas should be properly employed for affordable housing. This would help alleviate the pressure being put on the true green belt that surrounds the town.

Policy S7 - Buxton Sub-Area Strategy (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy S7	3	2	1	3	1	10
Supporting text	0	0	0	1	0	1

2 Summary of responses to Local Plan - by chapter

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO261	The Buxton Group	Other	Support extension of school on existing site when needed. Support outdoor sport provision on land off Green Lane provided site is not developed other than single storey essential accommodation for playing fields.
PO272	Derbyshire County Council	Observations	Include policy relating to 'Area of Archaeological Interest' as identified in current adopted Local Plan and identify boundary on proposals map. The designation would identify where there is a high likelihood of unknown heritage assets and is an appropriate way for the local plan policy to address the requirements of NPPF para 169.
PO457	Derbyshire County Council	Support with conditions	Section 4, final bullet point - add reference to the need to reduce congestion. Assessment of the cumulative traffic impact of sites is required to identify necessary mitigation measures.
PO302	Sport England	Observations	Policy makes no reference to sports facilities. Include measures identified in the sports strategy to identify local requirements of provision based on an assessment of need. Sport England likely to object to any loss of playing field (related to expansion of schools etc) under NPPF para. 74. Encourage opening up school sports facilities for community access where facilities are suitable.
PO334	Buxton Civic Association	Support	Support use of land off Green Lane for outdoor sports provision rather than building a large new housing estate. This solution would allow the expansion of the school and retain the green nature of the site and preserve this environment as an ideal setting for the Country Park.
PO374	Hallam Land Management Ltd	Support	Broadly support the strategy and agree with the commitment to meet housing needs. Buxton provides the most sustainable location for development to meet the housing needs of the borough
PO585	English Heritage	Support with conditions	Support policy subject to certain amendments: Designations of assets should be reported fully - i.e. reference to the grade listing of other specified listed buildings and the registered park and gardens. Some conservation area and scheduled monument designations which have been omitted and warrant mention within the section. Do not consider that the generic bullet point (Section 1, bullet point 4) citing the protection of sites designated for their historic value is compliant with the NPPF as this does not state how this will be achieved, nor does it cover non-designated sites or assets. There is no reference to landscape setting and design in this.

2 Summary of responses to Local Plan - by chapter

PO691	Chatsworth Settlement Trustees	Support	Support recognition of the role Buxton has to play in providing a range of housing land both within and, adjacent to, the urban area.
PO516	Gladman	Object	Object to policy due to concerns regarding the potential impacts of the Fairfield Link Road on the development of development sites at Hogshaw and Fairfield. Requirement may impede housing growth. Additional housing sites should be allocated to avoid over reliance on delivery of link road and associated sites.

Community feedback

Summary of formal responses

- Appoint a consultant to identify true extent of Buxton mineral water protection zone.
- Ground water protection should be of a high standard across the area.
- Improve rail links to/from Buxton, including re-opening of Buxton - Matlock line for passengers and freight. Any plans for Nestle site should facilitate this.

Summary of drop-in responses (general comments on Buxton area)

- More consideration should be given to car parking provision in the town.
- Concern regarding traffic congestion on A6 and through town centre.
- Preference for brownfield development and re-use of existing buildings to accommodate housing development.

Summary of key points raised during 2012 consultation

- No comments received in response to Strategic Policy consultation

Recommendations made by Sustainability Appraisal

- Policy may need to be more specific on the issue of built heritage and townscape, given the national importance of Buxton's heritage features.

Development management policies

	Support	Support with conditions	Object	Observations	Other	Total
Supporting text	0	0	1	2	0	3

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO54	Network Rail	Other	Local Plan needs to consider impact of development of level crossings. Include a specific policy in Local Plan on level crossing that confirms:



2 Summary of responses to Local Plan - by chapter

			<p>1. The High Peak Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway; 2. As a first principle, Network Rail would seek to close Level Crossings where possible. 3. Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; and 4. The developer is required to fund any qualitative improvements required to the level crossing identified as a direct result of the development proposed.</p>
PO81	Mobile Operators Association	Object	<p>Introduce a new telecommunications policy to clarify requirements. It should read as follows: "Proposals for telecommunications development will be permitted provided that the following criteria are met: - (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</p>

Community feedback

Summary of formal responses

- Avoid bland and pastiche development.

Summary of drop-in responses

- No comments sought or submitted.

2 Summary of responses to Local Plan - by chapter

Summary of key points raised during 2012 consultation

- Include a new policy to support sprinkler installations in new residential developments.
- Include a policy to support self build housing developments e.g. by requiring a percentage of allocations to be self build. SHMA should consider needs.

Environmental quality section general comments

Total number of responses

	Support	Support with conditions	Object	Observations	Other	Total
Introductory text	0	2	0	1	1	4

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO146	Derbyshire Wildlife Trust	Support with conditions	Derbyshire Wildlife Trust supports the strategic objectives of the Environmental Quality section.
PO552	Peak District National Park Authority	Support with conditions	Paragraph 5.5 is welcome; however the Authority feels that it should be added to with reference to the supplementary planning document Climate Change and Sustainable Building, which was adopted on March 15th 2013.

Community feedback

Summary of formal responses

- Has the potential in using the Longdendale chain of reservoirs for hydro-electricity generation been explored?
- The sustainability of local developments can be increased by the provision of local services such as pantry shops.

Policy EQ1 - Climate Change (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ1	0	3	6	1	0	10
Supporting text	0	0	0	1	0	1

2 Summary of responses to Local Plan - by chapter



Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO171	The Woodland Trust	Support with conditions	Inclusion of reference to climate change adaptation welcomed particularly the role which trees and woodland can play in reducing temperatures through shading in the summer time. Recommend also mentioning the role which trees and woods planted in the correct locations can play in helping alleviate certain types of flooding.
PO552	Peak District National Park Authority	Support with conditions	Add reference to the supplementary planning document Climate Change and Sustainable Building, which was adopted on March 15th 2013.
PO358	Friends of the Peak District	Object	A specific requirement for all affordable units to be built to lifetime standards and CSH3 should be written into Policy EQ1. Para 5.10 implies that affordable houses need not fulfil such high standards of design and energy efficiency as market houses.
PO558	McCarthy & Stone Developments	Object	Concern that the Policy details a requirement for all new homes to be built to the highest viable standard of Code for Sustainable Homes (CfSH). Prescribing compliance with the full Code goes much further than the Building Regulations and as such the viability of enhanced sustainability targets should be justified to ensure that it does not impede the pace of house building as set out in the Council's housing trajectory.
PO661	Environment Agency	Support with conditions	The Agency welcomes this policy. With regards to the last bullet point on "high water efficiency", the efficient use of water resources is important as a climate change adaptation and mitigation measure. Local Plan policies should promote efficient use of water resources stating specific targets. We suggest that new homes built before 2016 achieve level 3/4 of the Code for Sustainable Homes (as a minimum). For those built after 2016 the EA would expect code level 5/6 as a minimum. We welcome bullet point 6 which refers to BREEAM and non-residential buildings seeking at least "Good" standard. We consider for non-residential buildings the developers should demonstrate that they have considered water efficiency and conservation in the design and maintenance of the buildings. Where standards currently exist for a particular building type, the developers should aim for BREEAM Very Good or Excellent standards and we would request that maximum points are scored on water.
PO451	Home Builders Federation	Object	The Council is proposing to exceed the national timetable for zero carbon development. This policy proposes to set local standards ahead of the Government's Zero Carbon Homes programme, which is contrary to Paragraph 95 of the NPPF. Moreover it is not appropriate for the Councils to set as policy obligations the use of best practise guidelines, which were designed for voluntary rather than mandatory use. It is unrealistic to negotiate every site on a one by one basis because the

2 Summary of responses to Local Plan - by chapter

			base-line aspiration of a policy is set too high as this will jeopardise housing delivery.
PO671	Country Land and Business Association	Object	Recognition of the importance of climate change welcomed. The CLA believes generating energy from low carbon or renewable energy sources should have a higher priority in the Local Plan. A requirement for renewable energy proposals to be accompanied by an environmental impact assessment is considered to be over-regulation. The strategy should adopt the Merton Rule, which requires at least 10% of energy on new developments above 10 houses or 10,000sq feet of workspace to be generated on-site. It should welcome renewable energy developments in the wider countryside and should encourage single farm-based wind turbines to supply farm needs. The strategy should welcome energy crops and new woodland creation in rural areas, whether in designated countryside or not. Projects involving bio-energy e.g. farm anaerobic digesters, wood pellets and chips and developing bio-fuels from green matter, should be carried out without excessive hindrance from the planners.
PO745	National Trust	Support with conditions	Reference is made to adopting adaptation strategies but the policy is silent about what this means in practice. This is a particularly important consideration in respect of the measures to be taken to ensure the well being of flora and fauna in a changing climate. The wording in the fourth bullet point should specifically refer to impacts upon heritage assets, and also be clear that where there are unacceptable and unmitigated impacts upon valued assets, that renewable energy developments will not be supported.
PO692	Chatsworth Settlement Trustees	Object	Requirements for renewable development proposals to be supported by Environmental Impact Assessment are set out in legislation. It is unnecessary for such a requirement to be repeated in LP policy. The Policy fails to adequately justify the requirement that "new homes...achieve the highest viable Code for Sustainable Homes rating which would at least meet or exceed the requirements of the current Building Regulations". The NPPF (para. 154) states "Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan".
PO784	Churches in the Peak	Observations	Rather than constrain designers and builders of new properties to require them only to meet the Government's current statutory targets for carbon-reduction measures in new buildings; it is better to have a requirement now for all new build to aim for the best case standard without waiting for the statutory obligation to become legally binding.
PO716	Bowsall Ltd	Object	Requiring new homes in residential developments of five dwellings or more achieve the highest viable Code for Sustainable Homes rating which would at least meet or exceed the requirements of the current Building Regulations will require viability assessments for every application. Policy must be defined and viability tested at its inception. A more appropriate wording

2 Summary of responses to Local Plan - by chapter



			would be: "Residential developments of five dwellings or more must be supported by a sustainability statement that demonstrates how the scheme will seek to achieve a holistic sustainable development".
PO701	Chatsworth Settlement Trustees	Observation	Paragraph 5.16 refers to 'the local planning authorities'.

Community feedback

Summary of formal responses

- None received.

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
National Trust	Intended approach agreed.
Peak District National Park	This Policy ought to include reference to Peak District National Park Authority's 'Landscape Strategy and Action Plan 2009' being a relevant considerations in assessing any impact on the setting of the National Park, and where harm to the National Park's landscape setting is identified then this should carry significant weight in the decision making process. The Peak Sub-region Climate Change Study is also useful in understanding the potential for renewable energy in the area. The Authority suggest that reference should be made to this in the preamble of the policy.
National Farmers Union	We would like to see more encouragement for renewable energy installations on farms, be it wind power, pv, ground source heat pump, hydro power, anaerobic digestion or biomass or biofuels. This would be in line with the National Policy Planning Framework.
Environment Agency	Energy and water efficiency should be based next to the bullet point Code for Sustainable homes (8th bullet) as they are interlinked. The 8th bullet talks about the Code for sustainable homes, but then states as a minimum to building regulations, this undermines the initial requirement to reach the highest level. This will promote aiming higher than existing Building Regulations.

Policy EQ2 Landscape Character (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ2	2	1	4	1	0	8

2 Summary of responses to Local Plan - by chapter

	Support	Support with conditions	Object	Observations	Other	Total
Supporting text	0	0	1	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO172	The Woodland Trust	Support	We welcome reference in this policy to the important role which trees and woods can play in defining landscape character. Well wooded landscapes and individual old trees of particular cultural or historical importance are often much valued by local people.
PO458	Derbyshire County Council	Observations	It is requested that reference is made to DCC's study of 'Areas of Multiple Environmental Sensitivity (Historic, Ecological and Landscape)' which assessed the sensitivity of the landscape at a strategic level. The study's role was to produce a new 'qualitative' evaluation to identify 'Areas of Multiple Environmental Sensitivity' (AMES).
PO593	English Heritage	Support with conditions	We welcome reference within this policy to the "historic characterisation" although this would appear to omit the word "landscape" and should read "historic landscape characterisation". Such studies should also be referenced within the list of supporting evidence.
PO517	Gladman	Object	Objection to the element: "ensuring that development has due regard to the relative tranquillity of the landscape and to maintaining dark skies by limiting light pollution" as there appears to be no justification for it. This element of the policy is vague and does not provide developers with any clarity in relation to the implications of this policy on new development.
PO640	DLP Planning Consultants	Object	The Council has opted for a lower housing target in order to reduce the impact on the environment. However this approach has severe impacts on the economic and social dimensions of sustainable development as set out in the Framework and alternative options which reduce or eliminate such impacts should be pursued. It is considered that development in the countryside is required in order to meet local need.
PO672	Country Land and Business Association	Object	The CLA has a number of concerns regarding a landscape character approach / landscape character types. Characterisation leads to the imposition of unnecessary restrictive and prescriptive management policies, leading to the stagnation of rural areas. Furthermore, recognition must be given to the changing



2 Summary of responses to Local Plan - by chapter

			nature of agricultural businesses and cropping (e.g. miscanthus and willow biomass) and the need to grow renewable energy crops to assist in the Government's renewable energy and climate change targets. In order to meet government targets, land managers farming in designated areas must not be prevented from growing new/renewable energy crops through the misuse of the England Landscape Character Assessment tool.
PO746	National Trust	Support	Support.
PO693	Chatsworth Settlement Trustees	Object	The requirement (4th bullet point) that development proposals preserve or enhance the character, appearance and local distinctiveness of the landscape is inconsistent with the Policy's overall aim to protect, enhance and restore the landscape character of the Plan Area. "Preservation" suggests "staying the same". Development will have some impact on landscape character (be it positive or negative) and so "preservation" is an inappropriate policy test.

Community feedback

Summary of formal responses

- Object to Policy on grounds that developments in the countryside cannot "assimilate into the landscape". The Waterside Industrial shed development is an example of where this policy has failed previously.

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
National Trust	National Trust would particularly support an approach that considered the historic dimension of landscape character assessment.
English Heritage	We agree with the need to consider historic landscape character as part of this policy as part of an integrated approach to landscape assessment. Paragraph 170 of the NPPF cites the use of landscape character assessments integrated with historic landscape characterisation as part of the evidence base and we consider it to be crucial to reflect this in the relevant policy.
Natural England	Natural England welcome the proposal to consider the new evidence base set out in the Derbyshire County Council Areas of Multiple Sensitivity document and how this impacts on the direction of the policy. The purpose of the Areas of Multiple Sensitivity document is to identify those areas that are sensitive due to their historic, ecological and landscape

2 Summary of responses to Local Plan - by chapter

Organisation	Response to Issues and Options consultation
	value. This should enable clear text to be included within the policy in relation to protecting parts of the High Peak Borough that are identified as being in areas of multiple environmental sensitivity.
Peak District National Park	It may be beneficial if the Policy acknowledges that where the National Park's landscape setting is impacted by a proposal in the High Peak area then the Peak District National Park Authority's 'Landscape Strategy and Action Plan 2009' is a relevant evidence base to take into account. The Authority suggest that it would be of strategic benefit to require that this is taken into account when determining such applications.

Policy EQ3 Countryside development (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ3	0	2	4	1	0	7
Supporting text	0	0	2	0	0	2

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO594	English Heritage	Object	We welcome the inclusion of this policy in relation to ensuring that development in the countryside is strictly controlled. The historic environment is an intrinsic part of the area's landscape character and we consider that the policy is lacking without any reference to it. The first bullet point deals with conversion of rural buildings. No criteria are given in relation to design. The policy also does not define what "suitable and worthy of conversion to residential use" means. We consider these issues should be made more explicit and that the wording for a development management policy is too vague. Without criteria, the policy does not accord with paragraph 154 of the NPPF which requires clear policies on what will or will not be permitted.
PO655	United Utilities	Support with conditions	In order to ensure that the capacity of infrastructure is considered, the following bullet point should be added: "Considering the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and future infrastructure works."
PO641	DLP Planning Consultants	Object	The Council has opted for the lowest housing target in order to protect the environment. It is considered that this preferred option will not enable the Borough to fulfil its requirements to meet housing need and deliver affordable housing. This will put additional pressure to develop on land in the countryside during the plan period. It is considered that, in order to reduce pressure

2 Summary of responses to Local Plan - by chapter

			to develop in the countryside, sufficient land should be identified now in order to meet the objectively assessed need.
PO673	Country Land and Business Association	Observations	The CLA believes that countryside development is very important to continue the viability and prosperity of rural areas. The CLA supports the need for affordable housing in rural areas which does not preclude suitable open market development which could subsidise affordable provision and in any event would support the needs of rural businesses. The CLA does not support the provision of disproportionate housing developments in villages and equally does not wish to see erosion of Green Belt policy to provide large scale housing estates. The CLA believes that there should be sufficient housing to meet identified needs whilst at the same time respecting the character of the particular village and the countryside concerned. In addition, there may be a case for more positive consideration of reusing rural buildings for residential use in the Green Belt and open countryside.
PO718	Bowsall Ltd	Object	Open Countryside and Green Belt should be separated and defined separately. National Policy requires the protection of Green Belt under section 9. Development in open countryside (eg outside the settlement boundary, sustainable urban extension) is suitable on a number of occasions.
PO747	National Trust	Support with conditions	Reference to the historic environment should be added.

Community feedback

Summary of formal responses

- Green belt policy cannot "prevent urban sprawl by keeping land permanently open".
- Prevention of urban sprawl is only one of a number of purposes of Green Belt. In Whaley Bridge the protection offered by Green Belt has the wrong emphasis. Furness Vale is a ward of Whaley Bridge and development of the area between already contains ribbon development. Land to the south of Whaley Bridge is of particularly high landscape quality and in close proximity to the National Park. Here, Green Belt should be used for one of its other purposes – namely, to protect the character and setting of the town. Note that land between Furness Vale and New Mills should continue to be protected by Green Belt from sprawl between the two towns.
- In the event that a future needs assessment demonstrates a need for a Traveller site, the policy needs to allow for this.

Summary of drop-in responses

- No comments sought or submitted.

2 Summary of responses to Local Plan - by chapter

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
Natural England	Natural England acknowledges the proposed changes set out for this policy to ensure it conforms with the NPPF. However, the NPPF also sets out the important role that Green Belts can play in terms of providing opportunities for outdoor recreation and retaining and enhancing landscapes, visual amenity and areas of biodiversity value. This ought to be acknowledged when considering the potential direction of change to this policy.
Friends of the Peak District	We believe this policy does not require any change in the context of the NPPF.
Peak District National Park	The Policy could have regard to Peak District National Park Authority's 'Landscape Strategy and Action Plan 2009' where the National Park's landscape setting may be affected.

Recommendations made by Sustainability Appraisal

- The policy preamble makes specific reference to the protection of landscape character and the setting of the Peak District National Park, however this could be more explicit in policy wording.

Policy EQ4 Biodiversity (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ4	3	0	3	1	0	7
Supporting text	0	0	0	1	0	1

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO147	Derbyshire Wildlife Trust	Support	Derbyshire Wildlife Trust supports the policy on biodiversity.
PO174	The Woodland Trust	Object	We welcome the fact that ancient woodland is specifically referred to in the policy as an asset worthy of protection. However, we do not believe that the protection is strong enough in respect of ancient woodland, which is an irreplaceable habitat. It is therefore not meaningful to talk about mitigation measures for ancient woodland loss, as once it is destroyed it is impossible to recreate it even through very extensive new planting. We would therefore prefer to see an absolute and unqualified commitment to protection of ancient woodland included within the policy.

2 Summary of responses to Local Plan - by chapter

PO595	English Heritage	Support	We welcome reference to geological interests, and ancient woodland. Both of which form an intrinsic part of historic landscape character.
PO662	Environment Agency	Support	We welcome paragraph 5.39, which aims to increase connectivity between habitats. New wildlife/biodiversity areas will provide greater overall benefits if they can be connected to existing ones.
PO518	Gladman	Object	In its current form this policy lacks clarity and specificity, for example including statements such as "resisting any proposed development that could have an adverse effect on the integrity of a European site..." This vague policy wording provides developers with no clarity in relation to how adverse impacts will be judged and the implications on development.
PO642	DLP Planning Consultants	Object	This Policy is applicable to a site at Long Lane, Chapel-en-le-Frith. Through the delivery of two parts of the site, the biodiversity resource at a third can be enhanced and conserved. It is considered that a degree of flexibility is required in order to meet local needs. Should this policy restrict the options for providing conservation and mitigation measures to allow sites or parts of a site to come forward, then the policy would fail to meet the aims of achieving each of the economic, social and environmental dimensions of sustainable development, and net gains across all three as set out in paragraph 152 of the Framework. Where significant adverse impacts are unavoidable or cannot be mitigated, where possible, then alternative options which reduce or eliminate such impacts should be pursued.
PO748	National Trust	Observations	It is considered that a stronger approach to protection and enhancement of the natural environment is needed. In particular that a) there should be a clear demonstration of over-riding wider benefit before adverse impacts upon natural resources are permitted, and b) where those circumstances do exist that the mitigation measures should ensure as a minimum no "net loss" and wherever possible "net gain" for biodiversity. These comments are made in the context of generally declining levels of biodiversity in this area.

Community feedback

Summary of formal responses

- This policy could be applied with vigour to the Dinting area. The current state of Glossop Brook is a disgrace and it should be a priority to improve it.

Summary of drop-in responses

2 Summary of responses to Local Plan - by chapter

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
The Woodland Trust	We support the strong emphasis on protection of ancient woodland and veteran trees in the current policy and we would like to see this retained in the new local plan. In fact, as these habitats are irreplaceable, we would like to see them given absolute protection from development. We support broadly the direction of change proposed, although we would be concerned about over emphasis on statutory designations, as we estimate that around 85% of ancient woodland in the UK has no statutory protection through a designation.
National Trust	Agreed that this will need to address the NPPF issue identified.
Natural England	Natural England acknowledges the proposed changes set out for this policy to ensure it conforms with the NPPF. However, the high level of protection afforded to biodiversity features that are set out in the existing policy wording ought to be retained.
Friends of the Peak District	<p>The proposed amendments fail to adopt the landscape scale approach to developing resilient and coherent ecological networks that was laid down in the Natural Environment White Paper¹ and in the NPPF para 117, and is now being progressed by Local Nature Partnerships and through Nature Improvement Areas. In order to reflect these policy documents we would expect the HP Local Plan to:</p> <ul style="list-style-type: none"> • plan for biodiversity at a landscape-scale, including across the local authority boundaries; this requires setting out a strategic approach in the Local Plan, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; • identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; • promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; • aim to prevent harm to geological conservation interests; and • identify the Dark Peak Nature Improvement Area in the Local Plan, specifying what types of development, if any, may be appropriate in this area.
Environment Agency	We welcome the inclusion of Biodiversity as a strategic policy in the and overall, we agree with the potential direction of change to the policies. We would recommend amending the first point to include the creation of biodiversity sites so that it reads “Conserving, enhancing and creating biodiversity and geodiversity sites and features”.

2 Summary of responses to Local Plan - by chapter



Organisation	Response to Issues and Options consultation
	We would also like to recommend the inclusion of an additional point which specifically references the need to protect and enhance watercourses. We also feel it would be appropriate to highlight the need to preferentially develop biodiversity sites where they have the potential to create corridors between habitats (both terrestrial and freshwater).

Policy EQ5 Design and Place Making (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ5	1	1	3	3	0	8
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO303	Sport England	Observations	This policy would be enhanced by adopting the principles of "active design".
PO360	Friends of the Peak District	Object	The consultation document suggests that a more prescriptive policy requiring all new housing to achieve lifetime design standards and at least Code for Sustainable Homes Level 3, would over-burden developers. In our view, this judgement is wrong. Firstly, it implies that the need to build houses takes priority over the need for houses to be well-designed and sustainable. Secondly, High Peak has a generally high demand for open market housing, giving the Local Plan an opportunity to release only those sites for housing which it considers will contribute to the sustainability of the settlement pattern in the borough.
PO596	English Heritage	Observations	Conservation area character appraisals should also feature in the list of supporting documents as they give a clear indication of local character traits and features where these exist as well as indicating appropriate scale/materials etc.
PO694	Chatsworth Settlement Trustees	Object	Bullet point 2's criteria of "Ensuring that development on the edge of settlement is of high quality design that respects and enhances landscape character" is inconsistent with the terminology used in Policy EQ2 which seeks to "protect, enhance and restore...landscape character". Policy EQ5 should be amended to be

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			consistent with Policy EQ2. See comments above in response to Policy EQ1 re. requirement to comply with Code for Sustainable Homes.
PO663	Environment Agency	Support with conditions	Paragraph 5.48 refers to the Code for Sustainable Homes in relation to reducing carbon emissions and more sustainable homes, there should also be reference here to resource efficiency, particularly water and energy. We welcome policy EQ5, however the 9th bullet point referring to the code for sustainable homes should be more specific, providing clarification of "highest viable".
PO519	Gladman	Observations	Gladman note that the Code for Sustainable Homes is under review and in the near future may form part of building regulations. Gladman suggest that the Council should monitor this and check that reference to the Code for Sustainable Homes is still necessary within planning policy.
PO749	National Trust	Support	Support.
PO717	Bowsall Ltd	Object	Requiring new homes in residential developments of five dwellings or more achieve the highest viable Code for Sustainable Homes rating will require viability assessments for every application. Policy must be defined and viability tested at its inception. The policy already justifies not specifying a specific Code requirement due to development costs. A more appropriate wording would be: "Residential developments of five dwellings or more must be supported by a sustainability statement that demonstrates how the scheme will seek to achieve a holistic sustainable development".

Community feedback

Summary of formal responses

- None received.

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
English Heritage	We consider that the policy should be more positively worded in order to ensure

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Organisation	Response to Issues and Options consultation
	<p>compliance with the NPPF. Chapter 7 of the NPPF deals with 'Requiring Good Design' and paragraph 57 cites the need to plan positively for the achievement of high quality and inclusive design for all developments. More specifically, paragraph 58 states the need for robust and comprehensive policies which will establish a strong sense of place and respond to local character and history and reflect local identity. Paragraph 61 cites that policies should address connections between people and places and the integration of development into the natural, built and historic environment. This section of the NPPF also makes reference to advertisements – it may therefore also be beneficial to include something on this topic as part of this policy.</p>
Environment Agency	<p>The design quality relates to climate change, however it is not until bullet point 10 that climate change is mentioned. This policy is directly concerned with mitigating against climate change so this emphasis should be before issues of local distinctiveness & sense of place. As currently stated, this policy could imply climate change falls below the appearance of buildings.</p> <p>Reference to the Building for Life framework should be reviewed as the 20th criteria (Do buildings or spaces outperform statutory minima, such as building regulations) still mentions that the Code for Sustainable Homes is the relevant reference point for design standards. This is what your emerging Local Plan should be aiming for in terms of energy & water efficiency. Also Energy & water efficiency should be applicable to all new development, not just proposals for 10 dwellings and also affordable housing.</p>

Policy EQ6 Built and Historic Environment (and Supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ6	1	1	3	0	0	5
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO175	The Woodland Trust	Support	We welcome inclusion of heritage trees and woodlands as one of the heritage assets which the local plan will seek to safeguard and enhance. This is something which we asked for in our response to the previous consultation last year, so we are pleased to see that it has been included in this draft of the plan.
PO273	Derbyshire County Council	Support with conditions	The wording of this policy is generally good, although I recommend inclusion of the Buxton Area of Archaeological Interest by inserting the following text: "ensuring that development proposals within the Buxton Area of

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			<p>Archaeological Interest are informed by desk-based assessment/field evaluation as appropriate to assess the potential for impacts upon Roman archaeology." The accompanying paragraphs at 5.57 - 5.60 are excellent, with useful reference to un-designated assets and the proposed "local list". Again, I recommend reference here to the Buxton Area of Archaeological Interest, with wording based upon para 4.38 of the previous Saved Local Plan Policies.</p>
PO597	English Heritage	Object	<p>Para 5.58 - the actual number of scheduled monuments should be cited here. The word "ancient" should be deleted to accord with NPPF terminology. Para 5.59 - landscapes should be referenced in the first sentence, to better reflect the characteristics of the area and to encompass all types of heritage asset (as defined by the NPPF). The term "un-designated" is used within this paragraph, and paragraph 5.60 - this should be replaced with "non designated" - to reflect NPPF terminology. We do, however, welcome the recognition of the contribution that non-designated heritage assets make within this section and support the creation of a list of non-designated heritage assets. We welcome the inclusion of a development management policy for the built and historic environment, but it is too vague and there is risk that heritage assets will not be adequately protected. The first paragraph refers to the need to safeguard and enhance "interests of acknowledged importance" - what are these? The requirement to protect and enhance the historic environment is too vague for a development management policy, the policy should be much more detailed in setting out how this will be achieved, in order to comply with NPPF paragraph 154. The first paragraph states that particular protection will be given to designated heritage assets, however the bullet pointed list of these includes non-designated assets such as archaeological sites or heritage features and ancient trees. This is confusing and does not accord with the NPPF. Nowhere else in the policy is provision made for non-designated heritage assets which is a significant omission. The policy only requires setting to be assessed in relation to conservation areas. This is incorrect. Setting is defined within the NPPF and this is a clear consideration for all types of heritage asset (both designated and non-designated). The bullet points are overly generic, only account for designated assets and fail to set out detailed criteria to assess applications and development proposals against. The first bullet point requires re-wording. Assessment of impact is a requirement of the NPPF on the local planning authority, and should not be translated into policy in this way. What is needed in a development management policy is a clear set of criteria providing a clear framework against which proposals will be assessed. In addition, in relation to</p>

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			<p>impact NPPF paragraph 153 and paragraph 129, sets out a clear hierarchy in terms of assessing this. This paragraph goes on to cite the need for applications to be accompanied by evidence, yet does not state what this should include. The NPPF (p.128) specifies the historic environment record should be consulted at a minimum. It would be appropriate here to set out criteria for information requirements (in proportion to significance). It is also necessary to set out instances where recording is required. The next bullet point states refers to "interests of acknowledged importance". Again, it is not set out anywhere what these are. In addition, no information is given as to how harm will be assessed and this bullet point is too generic. The term "historic heritage" is poor. Bullet point 3, although well meaning, again is overly generic - it would be useful to set out criteria for new development i.e. in terms of scale, massing etc. We welcome reference to heritage at risk, but this is simply a statement, with no detail. Bullet point 4 deals with loss - both in terms of features and in terms of whole assets. It however weakens the tests for consideration of loss as set out in paragraphs 132 and 133 of the NPPF. This is not appropriate for a DM policy. Viability is only one of the tests outlined in the NPPF, and this is cited as being in the medium term. Planning benefit is not included. The NPPF also includes two other criteria in addition to this. The final bullet point only seeks to minimise loss and disturbance of materials, whereas in the first instance this should be avoided in order to comply with the NPPF.</p>
PO275	Derbyshire County Council	Object	Object
PO750	National Trust	Object	<p>Whilst the overall intention of this policy can be supported, it is considered that the detailed wording requires considerably more careful thought in the context of statutory requirements and the overall approach set out in the NPPF. In particular there appears to be some confusion in the use of the words "designated heritage assets" and "heritage assets", furthermore the development management elements of the policy as currently worded lack sufficient clarity and clear criteria for assessing "harm" and "substantial harm".</p>

Community feedback

Summary of formal responses

- None received.

Summary of drop-in responses

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- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
National Trust	It is agreed that the Plan will need to ensure consistency with the advice in the NPPF, in particular paragraphs 156 and 157 relating to plan making and 169 and 170 on the historic environment. The policy should also have regard to the advice in Section 12 of the NPPF relating to historic environment considerations more widely and, in the Trust's view, especially recognise the importance of 'settings' and their important contribution to the understanding and appreciation of the historic environment.
English Heritage	<p>We have previously made detailed comments with regard to the specific policy wording and raised concern at that time with regard to compliance with the then PPS5. We consider that in terms of the scope for the potential direction for change of the policies, requirements of the NPPF are not fully met by the existing wording. Chapter 12 of the NPPF deals with conserving and enhancing the historic environment with paragraph 126 citing the need for a positive strategy relation to the conservation and enjoyment of the historic environment (including those heritage assets most at-risk through neglect, decay or other threats). Please note this requirement is broader than a strategy for the conservation of heritage assets as identified within the table under the 'National Policy Changes' column as it relates to the historic environment as a whole. There is also a requirement of local plans to include strategic policies to conserve and enhance the historic environment of the area in paragraph 156. Any such policy should be derived from the overall strategy and could be a succinct synopsis of the strategy and include broad expectations for the conservation and enhancement of the historic environment. In response to the NPPF, English Heritage has produced guidance entitled 'Heritage is Local Plans: How to Create a Sound Plan under the NPPF' this can be downloaded from our website, along with PPS5 comparison guides.</p> <p>We would also question at this stage the saved policies of the previous local plan that this policy is intended to replace and consider that these should be carefully reviewed on formulation of a new policy. At present we are concerned that the policy in the previous draft joint Core Strategy would not adequately replace specified adopted local plan policies.</p> <p>We would be happy to work with you to develop a strategy and in formulating a strategic policy on that basis.</p>

Recommendations made by Sustainability Appraisal

- Whilst policy EQ1 deals directly with climate change, more specific guidance and policy wording could be given on the use of renewable technologies within the historic built environment.

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Policy EQ7 Green Infrastructure (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ7	2	2	1	2	0	7
Supporting text	0	0	0	0	1	1

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO148	Derbyshire Wildlife Trust	Support with conditions	Derbyshire Wildlife Trust support the green infrastructure policy. It is unclear though whether the green infrastructure referred to is also going to meet the requirement for an ecological network. There is overlap between the two, but each requires a different approach and there may be significant differences on the ground in terms of what is or is not included. Further clarification or discussion on this would be useful.
PO176	The Woodland Trust	Support with conditions	We broadly support the green infrastructure policy and in particular the statement that new development must contribute towards development of a green infrastructure network. We asked in the previous consultation that trees and woodland be specifically listed as important components of GI and we are pleased to see a reference to this in the policy.
PO598	English Heritage	Support	We welcome the inclusion of a policy relating to strategic green infrastructure, this plays an important role for the historic environment, not only in terms of historic landscape character, but in broader terms such as protecting the setting of towns and villages, areas of designated and non-designated archaeology, and areas of existing open space which has historic value such as country parks, cemeteries, and allotments etc.
PO664	Environment Agency	Object	This policy refers to the need for developments not to have a detrimental effect on the amount or function of existing green infrastructure unless replacement provision is made that is considered being of equal or greater value than that lost through development. We consider this should take into account that even if only a small area of habitat is lost and it results in habitat fragmentation, which is a major cause of species loss and decline, then the actual loss will be much greater and therefore the mitigation requirement will need to be much greater too.

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PO304	Sport England	Observations	Definitions of green infrastructure include outdoor sport, but the scope of the policy is mainly around biodiversity and informal recreation. Formal outdoor sport could include tennis courts, bowling greens, sports pitches, athletics tracks, MUGAs, golf courses etc. It would help to clarify if formal outdoor sport is intended to be captured by this policy, and if so, the wording would need to be amended. The policy also needs to ensure it is in accordance with NPPF Par 74 which has 3 clear criteria where the loss of open space, recreation and sports facilities might be considered. The Supporting Guidance and Evidence makes no ref. to the authority's Open Space, Sport and Recreation Assessment. The policy is also very broad and does not actually address any deficits in provision in a very clear and locally specific way - Sport England consider that it should to fully comply with Par 73 of NPPF.
PO643	DLP Planning Consultants	Observations	The provision of housing development on the parts 1 and 2 of the site at Long Lane, Chapel-en-le-Frith will allow improved access to part 3 which is currently designated as a wildlife site. The development of housing to the south of Chapel-en-le-Frith therefore has the opportunity to provide access to and enhance the existing value of a wildlife site and contribute to the green infrastructure of the Borough.
PO751	National Trust	Support	Support.

Community feedback

Summary of formal responses

- Reference Para 5.67. Everywhere the idea of "wildlife corridors" has been successful has been because it was incorporated into the initial development strategy. Or, as in other places, because the geography favoured it. In this instance, as you are discussing mapping it, I think it represents a bolt on added rather late in the process.

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
United Utilities	To ensure that the development is sustainable, properly drained; prevents flooding and environmental damage, the Council should seek opportunities to use developer financial and/or resources contributions to meet common objectives: <ul style="list-style-type: none"> Use green and open spaces, sports and recreation facilities to address surface water and climate change issues.

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Organisation	Response to Issues and Options consultation
	<ul style="list-style-type: none"> Building green infrastructure assets such as ponds, swales and wetlands will not only meet the Council's Green Space needs but also their local existing and/or future surface water/ climate change issues. Artificial pitches; cycle paths; play areas multi-use games areas and skate parks can be used to local underground civil engineering SuDS solutions. SuDS solutions that incorporate irrigation systems will help support and maintain the Council's allotments, parks and garden areas. The Council's should identify opportunities for the installation retro fitting SuDS.
National Trust	National Trust would support the approach to be taken to the creation of green infrastructure assets – this is often a matter of principle that it would be relevant to address at this strategic level, for example where contributions to new green infrastructure are required in relation to new residential (or indeed other) development.
Natural England	Natural England welcomes the proposed changes to this policy in terms of introducing the need to create new areas of green infrastructure. This will have a positive effect in terms of creating opportunities to protect and enhance the natural environment throughout the High Peak Borough. The creation of new green infrastructure provision would also increase opportunities for people to partake in recreational activities, which in turn would increase health and well being within the Borough.
Friends of the Peak District	This policy needs to set out a strategic approach in the Local Plan, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (NPPF para 114).

Policy EQ8 Trees, Woodlands and Hedgerows (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ8	4	1	2	1	0	8
Supporting text	0	0	0	1	0	1

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO149	Derbyshire Wildlife Trust	Support	Derbyshire Wildlife Trust supports this policy.
PO177	The Woodland Trust	Support with conditions	This is a very strong policy on trees and woodland and we broadly support it. The unqualified protection given to ancient woodland and ancient trees in this policy is very welcome as is the reasoned justification for it. However, this will be read in conjunction with the rather weaker more qualified protection of ancient woodland in the biodiversity policy, which seems to create some ambiguity in the overall impact of the local plan.

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PO599	English Heritage	Support	We welcome the inclusion of a policy relating to trees, woodland and hedgerows. These play an important role for the historic environment, not only in terms of historic landscape character, but in broader terms such as protecting the setting of towns and villages, areas of designated and non-designated archaeology, and areas of existing open space which has historic value such as country parks, cemeteries, and allotments etc.
PO665	Environment Agency	Object	We consider that replacement tree planting should always be undertaken at a ratio of 2:1. This will ensure that there are net biodiversity gains as many newly planted trees do not survive. We would also like to highlight that developments must also ensure that a tree management plan is in place once planted to maximise the chances of survival.
PO520	Gladman	Object	Objection to the final bullet point "resisting development that would directly or indirectly damage existing mature or ancient woodland, veteran trees and ancient or species rich hedgerows." as there may be instances where it is more appropriate to remove existing trees and provide sufficient mitigation.
PO674	Country Land and Business Association	Support	The CLA supports the protection of trees, woodland and hedges. They are an integral part of the natural environment and should be protected and enhanced.
PO752	National Trust	Support	Support.
PO719	Bowsall Ltd	Observations	The phrase "Unless material considerations indicate otherwise" should be added to this policy.

Community feedback

Summary of formal responses

- Reference Para 5.73. I would like to observe that until this point the policy has been reasonably clear. But who is to define the level of "semi-natural woodland" and therefore schedule preservation or management. For example in the case of TC11 it is colonising scrubland species with little evidence of amenity or value.

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- 2.1** None were raised.

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Policy EQ9 Pollution and Flood Risk (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy EQ9	0	1	4	0	0	5
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO178	The Woodland Trust	Object	The policy needs to include references to the role which trees and woodland can play both in improving air quality and in improving water quality and alleviating flooding.
PO243	The Coal Authority	Support with conditions	The Coal Authority supports the approach that Policy EQ9 takes towards land instability which is a locally distinctive issue within High Peak. The policy is considered appropriate to discharge the obligations placed on the Plan by paragraphs 109, 120, 121 and 166 of the NPPF with regard to land instability. To aid clarity, the policy title should be amended to read: "Policy EQ9, Pollution, Unstable Land and Flood Risk".
PO656	United Utilities	Object	Amend final bullet point to read: "Requiring new development to discharge surface water to one of the following, listed in order of priority: 1. Continue and / or mimic the site's current natural discharge process; 2. Direct discharge to a watercourse or to an on-site suitable form of Sustainable Urban Drainage System (SUDS); 3. Direct discharge to a surface water sewer or controlled discharge into a combined sewerage network."
PO666	Environment Agency	Object	We consider policy EQ9 should be split into two separate policies, one on Pollution and the other on Flood Risk. We would be happy to provide assistance to the Council on drafting a flood risk policy. We also believe that the wording of the policy is not appropriate, clear, or in line with the National Planning Policy Framework (NPPF). Phrases such as "cause unacceptable impact on the integrity of watercourses" are very difficult to interpret accurately. We consider that the policy should clearly define how the Sequential Test and approach will be applied to guide development to areas of lowest flood risk. It would also be helpful to give a more locally based requirement of how the Exception Test will be applied, rather than using the definition from, the now superseded, PPS25. We would recommend inclusion of a requirement to consider opportunities to provide a positive impact on flood risk,

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			<p>through acting to reduce flood risk on a wider catchment scale, potentially reducing downstream flood risk. The policy should also include requirements for new developments to provide positive gains to any watercourses which are impacted by the proposals. This should ensure that there is no detriment to the setting of the watercourse, and that access for improvements or maintenance is not adversely impacted. Developments would not be supported which result in the culverting of watercourses, other than for access purposes, and, wherever possible, should look to open up sections of existing culverted watercourses. We consider the 2nd bullet point which refers to maintaining integrity of watercourses needs to also make reference to water quality. We would suggest that the sixth bullet point "Permitting development within areas at risk of flooding only where" is replaced by the second bullet point from paragraph 102 of the NPPF: "a site-specific flood risk assessment must demonstrate that 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 flood risk overall".</p>
PO521	Gladman	Object	<p>Gladman object to this policy as in its current wording there is no clarity over what level of light pollution is deemed unacceptable. As noted previously Gladman query whether a light pollution policy is necessary and justified. Within High Peak there is one of Europe's largest quarries - Tunstead Quarry (Buxton) which lights up the sky significantly at night. Applying a light pollution policy such as that proposed through Policy EQ2 and EQ9 is arbitrarily restrictive.</p>

Community feedback

Summary of formal responses

- None received.

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- 2.2** None were raised.

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Economy section general comments

Total number of responses

	Support	Support with conditions	Object	Observations	Other	Total
Supporting text	0	0	0	3	0	3

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO462	Derbyshire County Council	Observations	Proposed employment sites appear to be reasonable. However, too much emphasis is placed on the scope for regeneration through retail. Due to the changing nature of retail such as online trade, showrooming and downsizing, the Local Plan should focus on how to manage the rearrangement of retail space rather than growth.
PO675	Country Land and Business Association	Observations	Rural policies must be dynamic and flexible so the economy in rural areas can diversify and thrive leading to sustainable communities

Community feedback

Summary of formal responses

- One comment regarding the objective in the Community Strategy to develop a high-skill, high-wage economy. It was considered that more emphasis should be placed on creating a diverse economy rather than focusing on high-skill, high-wage.

Summary of drop-in responses

- No comments sought or submitted

Officer response

- Review retail policy (CF1) and supporting text to further reflect the need to respond to changes in the High Street
- The identified need for an additional foodstore in Buxton needs is under review. Policy CF1 may be amended to reflect the outcome of the review
- Economic and countryside development policies are considered to provide an appropriate degree of flexibility to support the rural economy whilst protecting the environment.
- No change required emphasis on high-skill, high-wage economy. The reference is to the objectives of Community Strategy. The Local Plan reflects this objective but has also broadened its own objectives and policies to enable the diversification of the local economy.

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Policy E1 - New Employment Development (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E1	0	0	1	0	0	1
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO70	Brian Barber Associates	Object	The policy will stifle regeneration and is in conflict with NPPF. Primary Employment Zone designations will restrict development opportunities for other uses. In relation to Turnlee Rd / Charlestown PEZ, this will prevent the comprehensive regeneration of the area. Poor quality site for employment. Oversupply of employment land.

Community feedback

Summary of formal responses

No comments submitted

Summary of drop-in responses

No comments sought or submitted

Summary of key points raised during 2012 consultation

- HPBC should review environmental capacity for development and amend employment land provision as necessary.

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Policy E2 - Employment land allocations (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E2	3	2	5	5	7	22
Supporting text	0	0	0	0	0	0

Feedback on sites

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Waterside, Hadfield	3	0	2	0	0		Question further development when there are vacant units on site
Land off Wren Nest Road, Glossop	4	1	1	2	0	B> Dignan Properties - Support Employment Land Allocation at Wren Nest Road, Glossop	Consideration should be given to traffic congestion
Hoffman Quarry, Buxton	2	3	0	1	1	<p>Buxton Group - support allocation and suggest that it could be extended into the Blue Lagoon area as long as the access is still from Grin Low Road and not from Harpur Hill village</p> <p>English Heritage - Clarity needed on what is required in terms of these issues. e.g. Hoffman Quarry only requires consideration of setting, yet it would be essential to have an archaeological assessment as well as a study on setting.</p> <p>Derbyshire County Council - Development adjacent to Harpur Hill industrial area would be visually prominent in the open landscape of the White Peak: Plateau Pastures LCT and therefore would require sensitive design and mitigation</p> <p>Buxton Civic Association - support with conditions</p>	
Staden Lane extension, Buxton	2	2	2	1	1	<p>Buxton Group - support this allocation</p> <p>Derbyshire County Council - The Staden Lane extension is on rising ground on the north east side of the existing industrial estate, in the White Peak: Plateau Pastures LCT and therefore would be potentially visually prominent. Any development should enhance the character of the White Peak and mitigate impact on the surrounding countryside</p> <p>Buxton Civic Association - object</p>	<p>Extension of site is essential to support business</p> <p>Site is too prominent in landscape</p> <p>Move proposed Ashbourne Road employment allocation to Staden Lane</p>

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Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Tongue Lane extension, Buxton	4	1	1	2	1	<p><u>Stephen Robinson</u> - Object due to its elevated position and impact on SLA, view from Peak Park</p> <p><u>Buxton Group</u> - support this allocation subject to access being provided, before the start of the development, by a new road link from the A6.</p> <p><u>Derbyshire County Council</u> - The Tongue Lane extension is also in the White Peak; Plateau Pastures LCT; unfortunately the landscape is in poor condition with derelict dry stone walls. The opportunity should therefore be taken for development to enhance the character of the White Peak and its impact to be mitigated on the surrounding countryside in this open landscape.</p> <p><u>Buxton Civic Association</u> - support</p> <p><u>Omya Ltd</u> - site in close proximity to proposed extension to Ashwood Quarry. Application due by end on 2013.</p>	
Watersallows extension, Buxton	4	2	2	1	1	<p><u>Buxton Group</u> - support the carefully controlled extension of this area for employment.</p> <p><u>Nestle Waters</u> - Support extension of Watersallows that would enable the bottling plant to expand should demand arise in the future</p> <p><u>Buxton Civic Association</u> - support with conditions</p>	<p>Logical extension of estate</p> <p>Further sprawl into the countryside should be avoided</p> <p>Traffic concerns re. Local narrow roads</p> <p>Use as a last resort when other options have been ruled out or realised</p>
Land off Ashbourne Rd, Buxton	1	2	3	1	1	<p><u>Buxton Group</u> - support the proposal for some employment development here (if there is capacity available - see note re housing site B20)</p> <p><u>Buxton Civic Association</u> - object</p> <p><u>Hallam Land</u> - Remove allocation from policy E 2. Allocation should be considered for wider employment uses which will form a local centre. Inconsistencies identified in the Local Plan regarding amount of land allocated for employment off Ashbourne Rd</p> <p><u>Stephen Robinson</u> - Object due to visual impact. SLA, roman road and negative impression development would give to tourists.</p>	

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General stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO253	The Buxton Group	Other	Propose that the British Legion building on Hardwick Square South is allocated for employment/community use as, by virtue of the lack of parking space, it is not suitable for housing.
PO276	Derbyshire County Council	Support	Support for guidance on levels of archaeological surveys required to support planning applications
PO232	CJK Packaging Ltd	Other	Retain industrial designation on land to north of river (in Chinley Parish) at Bridgeholm. Land to south (in Chapel Parish) being considered by Chapel Vision for industry. Also consider land to north of river for residential
PO305	Sport England	Observations	Any proposal affecting playing field will need to comply with NPPF Para 74 and Sport England policy to protect playing fields
PO600	English Heritage	Observations	Support references to the need for archaeological assessments. Plan should clarify that archaeological assessments typically assess the land for potential of further archaeological remains through desk based analysis and then field evaluation. Where setting is an issue, a further, separate study is required. Clarity needed on what is required in terms of these issues. e.g. Hoffman Quarry only requires consideration of setting, yet it would be essential to have an archaeological assessment as well as a study on setting. Also refer to our more detailed comments were given in relation to these sites in our previous correspondence.
PO528	Gladman	Object	Policy E2 is unsound as it is based on unsound evidence. The land requirement is based on out-of-date forecasts which indicate jobs decline. Oxford Economic forecasts from 2011 suggest jobs growth of around 1100 from 2011 to 2028. The land requirement is therefore pessimistic



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General community feedback

Summary of formal responses

- Existing industrial units are empty.
- Sites are only proposed in Buxton and Glossop.

Summary of drop-in responses

- General support for new employment opportunities to support housing.

Summary of key points raised during 2012 consultation

- Traffic concerns at Wren Nest Road, Glossop.
- More emphasis required on encouraging manufacturing in Glossopdale.
- More consideration required on landscape impacts of sites e.g. Staden Lane.
- Infrastructure needed to support businesses as well as land e.g. broadband and transport.
- Link road required to support Tongue Lane.
- Support development of Hoffman Quarry for employment / leisure.
- Allocate land at Cowdale Quarry for employment purposes and support the natural mineral water business.



2 Summary of responses to Local Plan - by chapter

Policy E3 - Primary Employment Zones (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E3	3	3	8	3	3	20
Supporting text	0	0	0	0	0	0

Feedback on sites

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Brookfield Industrial Estate	2	1	2	0	0		
Dinting Lane Industrial Estate	2	1	2	0	0		Wildlife concerns
Dinting Lodge	1	0	3	0	0		
Dinting Vale Industrial Estate	2	1	2	0	0		
Dover Mill	1	1	0	0	0		
Etherow Park (Graphite Way)	2	0	3	0	0	Peter Rossington - Exclude the "panhandle" site from the PEZ and allocate the land for housing. This site previously had consent for live/work units and a hotel. The land is sustainable for housing development and there is an oversupply of employment land in High Peak. residential development would better accord with policies and objectives of the NPPF and Local Plan.	
Hadfield Mill	1	0	1	0	0		
Logwood Mill	1	0	1	0	0		
Shepley Street, Old Glossop	1	1	0	0	0		
Surrey Street	3	2	0	0	0		Would rather see Ferro Alloys site/Surrey St used for housing
Turnlee / Charlestown Road	2	0	1	0	0	Brian Barber Associates - Object to designation of Turnlee Rd / Charlestown Rd. Employment use is in conflict with neighbouring proposed housing/employment allocation and jeopardises the regeneration of the wider area and new link road through the site as required by highways authority. PEZ designation is in conflict with evidence in Employment Land Review as the site is poor quality and there is scope to reduce the over supply of employment land. The designation is contrary to the NPPF which requires LPA's to avoid the long	Site in need of improvement / prominent location

2 Summary of responses to Local Plan - by chapter

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Waterside, Hadfield	2	0	2	0	0	term protection of sites with their being a reasonable prospect of the site being used for that purpose. Greenfield sites are being allocated in favour of brownfield land at Charlestown.	Traffic concerns
Woolley Bridge Road, Hadfield	1	0	2	0	0		Traffic concerns
Birch Vale Industrial Estate	1	0	1	0	0		
Botany Works, Whaley Bridge	2	1	0	0	0		Control impact on traffic levels on Macclesfield Road or at Horwich End Restrict development to within the existing site boundary. No additional visual impact on rising land towards the National Park boundary.
Furness Vale Industrial Estate	2	0	0	0	0		Development will support Furness Vale Traffic concerns re. Station Road level crossing and A6 junction
Knowles Industrial Estate, Furness Vale	2	0	0	0	0	Whaley Bridge Town Council - Support inclusion of Knowles Industrial Estate, Furness Vale	
Land off Church Road, New Mills	1	0	0	0	0		
New Mills Rd, Hayfield	1	0	1	0	0		
Newtown, New Mills	1	0	0	1	1	Canal and Rivers Trust - PEZ boundary at New Mills, Newtown should exclude the canal and towpath. Development of PEZ at Newtown should take account of multi functional use of canal, avoid negative impact on canal and design of buildings should maximises surveillance of water and access to/from/along it.	Scope for further housing Retain village feel of New Mills Consider new footbridge to improve links from A6 and site through to town centre and Goyt Valley Consider conversion of buildings Parking concerns

2 Summary of responses to Local Plan - by chapter

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
St Georges Mill, New Mills	1	0	0	0	1		
Stephanie Works, New Mills	1	0	0	0	1		
Thomsett Industrial Estate	1	0	0	1	1	DCC - Public footpaths HP19/117 and 119 should be safeguarded and improved wherever possible. The SVT to the south could be upgraded to connect the footpaths to encourage cycling to work. Refer to the Bluebell Wood and Mousley Bottom LNRs, the SVT and Mousley Bottom LWS (which are all owned by DCC) and Waitford Lodge LNR (DWT).	Employment is needed but it should be eco-friendly Site is under utilised and should be redeveloped
Watford Bridge, New Mills	0	0	0	0	0		
Staden Lane	3	1	1	1	1	Buxton Group - support Buxton Civic Association - support DCC - there should be better provision for walking and cycling along Staden Lane for journeys to work and to access PROWs, including the public bridleway which terminates at the northern end of lane. Stephen Robinson - Object to Staden Lane PEZ	
Harpur Hill	4	1	0	0	1	Buxton Group - support Buxton Civic Association - support	
Smalldale Road, Smalldale	3	2	0	0	1	Buxton Group - support Buxton Civic Association - support	
Tongue Lane	3	1	0	0	1	Buxton Group - support Buxton Civic Association - support	
Waterswallows Road	2	2	1	1	1	Buxton Group - support Buxton Civic Association - support	



2 Summary of responses to Local Plan - by chapter

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
						DCC - Public footpath HP13/1 crosses the site and should be safeguarded/improved as required, e.g. better surfacing and a safer exit point and crossing of the Waterswallows Road/ Waterswallows Lane junction. Stephen Robinson - Object to Waterswallows due to impact on landscape and Peak Park landmark Nestle bottling plant	

General stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO362	Stephen Robinson		Support other PEZ's in High Peak. Use Harpur Hill college site for employment.
PO601	English Heritage	Observation	Many PEZ's include heritage assets. Efforts should be made for retention of buildings where they have historic significance
PO649	Federal Mogul	Object	In absence of the Chapel Neighbourhood Plan, object to adopted PEZ boundary and request that only the consolidated plant should be retained within a PEZ (plan attached)
PO531	Whaley Bridge Town Council	Support with conditions	Local Plan should also include Ringstones Industrial Estate, Bridgement
PO772	Rock Asset Management	Object	Object to designation of Birch Vale Industrial Estate as a PEZ. Site should be re-designated to allow mixed-use development, including housing and facility for current business. Much of current site is surplus to requirements.



2 Summary of responses to Local Plan - by chapter

General community feedback

Summary of formal responses

- Policy objectives are not a realistic assessment of business needs and achievability.
- Support local business growth.
- Focus on sustainable and value added sectors, technology and science and develop strong links to local education.
- Important that the buildings and the impact of their activities are sensitive to the local environment and landscape.

Summary of drop-in responses

- No general comments.

Summary of key points raised during 2012 consultation

- Mixed views on some sites with calls for housing on some PEZ's including; Birch Vale, Bingswood, Thornsett, Newtown, Botany Works and Charlestown.
- General support for other PEZ's subject to appropriate access, design and landscaping etc.

Policy E4 - Change of Use on Existing Business Land and Premises (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E4	2	0	1	2	0	5
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO252	The Buxton Group	Support	Support policy which provides a flexible approach to change of use whilst providing some protection to employment.
PO445	Majic Rental Services Ltd	Observations	Wording of policy is confusing - the use of "and" and "or" do not provide sufficient clarity regarding the status of sites allocated for non-employment uses. It confuses the issue of which criteria need to be met in order to permit a change of use. " Except for sites already allocated for non-employment uses in the Local Plan , development proposals involving the redevelopment or change of use of existing business or industrial land or premises (falling within Use Classes B1, B2 or B8) for non-employment uses will only be permitted where: 1. The continuation of the land or premises in

2 Summary of responses to Local Plan - by chapter

			industrial or business use is no longer financially or commercially viable as demonstrated by a comprehensive marketing assessment and marketing exercise and/or; 2. The current use is incompatible with the surrounding properties and land uses."
PO753	National Trust	Support	Support policy
PO676	Country Land and Business Association	Object	Object - policy should not conflict against the proposed changes under the General Permitted Development Order 1995 for the conversion of offices into residential use. The changes in the law should be reflected in the Local Plan under Policy E4.
PO773	Rock Asset Management	Observations	Policy E4 should not apply to Birch Vale Industrial Estate as the redevelopment of the part of the site (for housing) would enable the retention of jobs.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- No comments sought or submitted

Summary of key points raised during 2012 consultation

- No comments submitted

2 Summary of responses to Local Plan - by chapter

Policy E5 - Regenerating an Industrial Legacy (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E5	2	6	6	0	2	16
Supporting text	0	0	0	0	0	0

Feedback on sites

2.3 Feedback is provided in the table below.⁽ⁱ⁾

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Bingswood Industrial Estate, Whaley Bridge	3	1	1	0	1	Whaley Bridge Amenity Society - Object to designation at Bingswood. Existing employment should be protected and/or relocated in the area.	New bridge is critical Retain employment Link site to regeneration at Transshipment Warehouse Support an element of housing development Keep housing and employment apart-estate is too noisy for residential Traffic concerns on Canal Street re. housing development
Land at Furness Vale Business Park	3	1	0	0	1		Support mixed-use development Development would benefit Furness Vale Concern regarding traffic on Station Rd / A6 / level crossing

ⁱ Please note that additional representations relating to industrial legacy sites have been made against the relevant Strategic Development Site (DS) Policies. Please see the summary of these policies for further details.



2 Summary of responses to Local Plan - by chapter

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Torr Vale Mill, New Mills	2	1	0	0	1		<p>Support for mixed-use</p> <p>Historic mill / character must be retained</p> <p>Include housing</p> <p>Concerns regarding access / infrastructure</p> <p>More clarity needed on end uses - what type of business?</p> <p>Provide new links to Millennium Walkway, railway station and town centre</p>
Britannia Mill, Buxworth	3	3	2	0	1	<p>Chinley, Buxworth & Brownside PC - Support the principle of housing / mixed-use development at Britannia Mill. More detail required in Local Plan, particularly regarding tourism/business element. Development should be high quality, maintain openness of Green Belt (as far as possible) and add to tourism potential of Buxworth Basin. Support need for phasing and masterplan. Parish Council wish to be involved in masterplan.</p>	<p>Concern regarding access and parking</p> <p>Too many homes</p> <p>Protect greenfield land / Green Belt</p> <p>Wildlife concerns on land below New Rd</p> <p>Prefer light industrial use</p> <p>Improve quality of life for existing residents</p> <p>Enhance buildings of heritage value</p> <p>Site is an eyesore and needs redevelopment</p> <p>More clarity needed on tourism proposals</p> <p>Sensitive design needed</p>
Woods Mill, Glossop	1	5	0	0	0		<p>Ensure renovation of mill buildings</p> <p>No need for another supermarket / concern over impact on High Street</p> <p>Support mixed-use</p> <p>Use for affordable housing</p>

2 Summary of responses to Local Plan - by chapter



Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback (formal and drop-in)
Charlestown Works, Glossop	1	3	0	0	0	Brian Barber Associates - Support the principle of the redevelopment of industrial legacy sites. However the requirement for mixed-use development, including employment is in conflict with the evidence base which identified an oversupply of employment land. Requirement may also prevent the delivery of sites. Policy is inflexible and fails to address opportunities offered by sites with poor quality employment provision such as Charlestown Works.	<p>Access / congestion concerns</p> <p>Demolish mill buildings</p> <p>Concern regarding over-development</p> <p>Accommodate Glossop Community Transport</p> <p>Comprehensive layout needed to consider disabled access, open up Glossop Brook etc.</p> <p>Support brownfield development</p> <p>Site is an eyesore in need of regeneration</p> <p>Highways / access concerns</p> <p>Use for housing only</p> <p>Retain south of site for employment - develop north for mixed-use</p>
Ferro Alloys, Glossop	2	2	1	0	0		<p>Concern regarding contamination and impact on viability</p> <p>Prefer housing over business development</p> <p>Use for leisure / recreation</p> <p>Access constraints</p> <p>Remove chimney</p> <p>Culverts need to be considered</p>

General stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response

2 Summary of responses to Local Plan - by chapter

PO363	Stephen Robinson	Support with conditions	Support redevelopment of employment sites when supported by marketing data from at least 2 years at a reasonable rate. Employment should be dominant element of mixed-use development.
PO602	English Heritage	Support with conditions	Welcome recognition of industrial legacy. Concerned that the fourth bullet point only relates to retention and reuse of heritage assets where feasible or viable. This does not follow the tests set out in the NPPF (paras. 132-135) Update policy to reflect NPPF and cross reference with Policy EQ6 and relevant Sub-Area Policy.
PO771	Rock Asset Management	Object	Redesignate Birch Vale Industrial estate to enable residential development, retention/development of new R&D facility and provision of public open space (including leisure / recreation at reservoir). Site no longer meets needs of business due to poor quality buildings, access, lack of market demand for industrial and viability. Dow Hyperlast manufacturing facility closed in 2012 and now over 50% of buildings are vacant/surplus to requirements. High value uses (housing) needed to maintain jobs on site. Site is sustainably located for housing and is within close proximity to a range of services. Flood zone 2/3 on parts of site. Site is deliverable within 5 years. Rock is seeking to retain Dow Hyperlast on the site however the Birch Vale site is competing against other better located sites in the Borough. Rock is exploring the options of retaining Dow on site or relocating them elsewhere in the Borough. Rock is working with Stirling Lloyd in development viable redevelopment options for the site. Rock seeks to work with the Local Authority and adjacent landowners in the preparation of a masterplan for the site



2 Summary of responses to Local Plan - by chapter

General community feedback

Summary of formal responses

- Support principle of re-use of old mills sites.
- Support business development.

Summary of drop-in responses

- No general comments submitted

Summary of key points raised during 2012 consultation

- Some support for housing / mixed-use on sites identified in the Preferred Options and a degree of support for options sites not taken forward (Birch Vale & Thornsett Industrial Estates)
- Positive strategy required to preserve and enhance designated and non-designated heritage assets

Policy E6 - Promoting Peak District Tourism and Culture (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E6	1	2	0	0	0	3
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO255	The Buxton Group	Support with conditions	Support policy and suggest that a site should be identified in Buxton (possibly on Station Road) to be reserved for an additional hotel at the affordable end of the market.
PO269	The Theatres Trust	Support with conditions	Support policy and assume it will cover Buxton Opera House which should be protected. Definition needed for term "tourist and visitor facilities".
PO754	National Trust	Support	Support policy

Community feedback

Summary of formal responses

- No comments submitted

2 Summary of responses to Local Plan - by chapter

Summary of drop-in responses

- No comments sought or submitted

Summary of key points raised during 2012 consultation

- Policy should distinguish between support facilities (e.g. hotels, B&B's) and location free attractions that can be located in accessible locations and those attractions that are "site specific" and can only be provided where they are located (e.g. heritage and nature conservation assets).
- Policy should make it clear that it relates to the whole plan area, not just the Peak District.

Policy E7 - Chalet Accommodation, Caravan and Camp Sites Developments (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy E7	1	0	0	0	0	1
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO755	National Trust	Support	Support policy

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- General support for tourism in High Peak

Summary of key points raised during 2012 consultation

- No comments submitted

2 Summary of responses to Local Plan - by chapter



Policy CF1 - Retail and Town Centres (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF1	0	1	4	1	1	7
Para. 5.156	0	0	2	0	0	2

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO158	Nestle Waters	Support with conditions	Support objective of policy which seeks to enhance the vitality and viability of town centres, in parts, through the provision of additional retail floorspace to compete with out-of-centre shopping. Nestle site provides potential to transform the vitality and diversity of uses in the town centre. The availability of the Nestle Waters site for new town centre uses should be given greater recognition in the Draft Local Plan, particularly in relation to new retail development. Redevelopment of the Spring Gardens car park is heavily constrained (parking, flood risk, conservation, design and lack of availability) whereas redevelopment of the Nestle Waters site is reasonably free from impediments. Apply sequential test for retail development to town centre boundary, not Primary Shopping Area. Current approach is inconsistent with NPPF. Expand range of uses for site to include retail, leisure, commercial, office, tourism, cultural, community and residential development to make the policy more consistent with the NPPF and support the early regeneration of the site.
PO264	The Buxton Group	Object	Exclude Nestle site from town centre.
PO477	Derbyshire County Council	Observations	Glossop town centre boundary - Several existing public footpaths and proposed multi user Greenways could be improved to assist in town centre regeneration. Buxton town centre: There are several public footpaths and proposed multi-user Greenways which could be improved/ provided to complement town centre regeneration
PO546	Wm Morrison Supermarkets plc	Object	Identify a town centre boundary in Chapel-en-le-Frith as required by NPPF and include the Morrison's store within it.
PO307	Sport England	Object	The policy fails to address the role of town centres for key leisure facilities such as leisure centres (sports hall/swimming pools etc.). There are no specific proposals for sport. Update policy once leisure needs have been identified through modelling work (see other comments).

2 Summary of responses to Local Plan - by chapter

PO427	Waitrose Limited	Object	Evidence base does not justify allocation of site for a large operator supermarket. Current policy is therefore unsound. Replace with text explicitly stating that the only need identified is for a new a discount foodstore' in Buxton. Sequential site assessment needed to justify allocation. A number of smaller sites or existing units (including extensions to existing Town Centre stores) within the defined Primary Shopping Area which could potentially accommodate the reduced need. Amend Table 8 to distinguish between capacity for medium and discount operators.
PO769	HPBC Economic Development	Other	Extend New Mill town centre boundary to include; small parade of shops on High Street including the shop on the corner of Market Street/High Street adjacent to the public toilet and the Post Office and Sainsbury's Local store on Torr Top Street.

Community feedback

Summary of formal responses

- Buxton does not need another supermarket. The identified need is incorrect as it is based on Morrison's being classed as an out of town store.
- Supermarket development in Buxton does not accord with objective to promote the town as a visitor destination.
- Develop land off Station Road for leisure / recreation facilities to support families and visitors.

Summary of drop-in responses

- Presumption that retail development is necessary to support redevelopment (at Woods Mill) is not correct.
- Glossop doesn't need another supermarket.
- Keep Glossop town centre boundary to the town side of Glossop Brook in the west. Remove Ellison Street.
- Extend Glossop town centre boundary to Shrewsbury Street bridge over brook.
- Improve shop fronts in Glossop town centre.
- Designate George Street Wood, Glossop as a Village Green.
- New Mills East is already desperately lacking in community facilities e.g. corner-shop, meeting and leisure facilities.
- No more supermarket in Buxton.
- Support sensitive regeneration in Station Road area of Buxton.
- Develop new leisure / recreation provision in Station Road area, Buxton.
- Provide additional parking in Buxton town centre.

Summary of key points raised during 2012 consultation

- Mixed views on whether town centre boundary in Buxton should include the Nestle site.
- Various suggestions to extend primary shopping frontage in Buxton, including Spring Gardens Shopping Centre.



2 Summary of responses to Local Plan - by chapter

- Mixed views on the need for a new supermarket in Buxton and on the most appropriate site for a store (Nestle or Spring Gardens).
- Various suggestions for the designation of local centres including at Harpur Hill, Fairfield, Horwich End.
- Extend Whaley Bridge town centre to Horwich End. Exclude Transhipment Warehouse.
- General support for Glossop town centre boundary.
- Some support for designation of local centres in Gamesley and Hadfield.

Policy CF2 Primary Shopping Areas and Frontages (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF2	0	0	0	0	0	0
Supporting text	0	0	0	0	0	0

Stakeholder feedback

- No comments submitted

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- Higher Buxton is not a secondary area, it is half of the town centre.
- Surprise that Spring Gardens Shopping Centre was not already considered to be primary retail frontage.

Summary of key points raised during 2012 consultation

- Mixed views on appropriate extent of Primary Shopping Area in Buxton (include Spring Gardens, exclude Nestle, include High Street, no change necessary).
- General support for a Primary Shopping Area designation in Whaley Bridge and New Mills. Few suggestions in relation to appropriate boundaries.
- General support for retention of defined frontages in Glossop with suggested extensions including Tesco and west of Shrewsbury Street.

Recommendations made by Sustainability Appraisal

- Policy should make reference to place making strategies for the Buxton and Glossop areas where they would influence the character of the primary shopping areas.

2 Summary of responses to Local Plan - by chapter

Policy CF3 - Local Infrastructure Provision (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF3	0	1	2	2	0	5
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO53	Network Rail	Observations	The policy should include the following: A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the High Peak Local Plan Preferred Options. A requirement for Transport Assessments that accompany applications to assess impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. Improvements required by Network Rail would be restricted to a local level and would be necessary to make the development acceptable. Network Rail would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.
PO308	Sport England	Support with conditions	Support principle of policy but it should contain locally specific proposals as informed by the evidence base.
PO472	Derbyshire County Council	Object	Specify that transport infrastructure can include cycling and walking facilities (bullet point 4)
PO526	Gladman	Object	Policy lacks clarity. Following changes advised: First bullet point - clarify to state that only in cases where health and social care need results from the impact of development should developments support them Second bullet point - query how it is possible to evidence whether a development will prejudice educational attainment. Third bullet point - policy should clearly state that where as a consequence of development there is a deficiency in primary and secondary provision, developers should provide the required capacity
PO783	Churches in the Peak	Observations	Include requirement for new build developments (housing and commercial) to include ducting to enable easy installation of fibre optic broadband.

Community feedback

Summary of formal responses



2 Summary of responses to Local Plan - by chapter

- No comments submitted

Summary of drop-in responses

- General concerns raised regarding infrastructure to support development

Summary of key points raised during 2012 consultation

- Policies must make provisions for the sustainable use of existing and/or the delivery new water supply and wastewater infrastructure; not only meeting the growth needs of a single development but also supports your Local Plan; your neighbouring community's growth aspirations; maintains the health and wellbeing of your community and also protects the environment; if not, then new policies must be drafted to address this issue.
- Include reference to possible community orientated benefits provided by Community Fire Stations. This is also pertinent in terms of future Derbyshire Fire and Rescue Service capital programmes where new or improved Community Fire Stations may be envisaged through the plan period.

Policy CF4 Provision of Open Space and Recreation Facilities (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF4	1	1	1	0	0	3
Supporting text	0	0	0	2	0	2

Stakeholder feedback

ID	Company / Organisation	Nature of Response:	Summary of response
PO309	Sport England	Observation	Par 5.168 - The High Peak and Derbyshire Dales Open Space, Sport and Recreation 'Strategy' is said to have been adopted in 2012. Is this correct? Sport England recommend that a strategy is unlikely to be regarded as up to date if it has been more than 3 years since data collection and no annual monitoring has been undertaken. The strategy may be out of date and not accord with Par 73 of NPPF.
PO703	Chatsworth Settlement Trustees	Observation	Para 5.172 - In some developments, it may be possible, practicable or advantageous for "developers to arrange for the management of new areas of open space to be undertaken by community owned and run trusts". This is unlikely to be the case however for the majority of residential developments where new open space is provided. It could lead to unnecessary community

2 Summary of responses to Local Plan - by chapter

			tension. Disparate management of such areas across a single settlement could also lead to varying standards of maintenance. Providing and maintaining areas of public open space for leisure and recreation is a core local service that the Council should only seek to give up in exceptional circumstances.
PO310	Sport England	Support with conditions	The inclusion of this policy is supported and welcomed. However the title should include the terminology 'sport' as well as recreation. This is consistent with NPPF. It highlights that the policy does not incorporate indoor sport - making the policy not fully consistent with NPPF Par 74. The introductory text includes accessibility standards and the policy includes quantity standards. Why are they not both within the policy? The Sports Facility Calculator could be used to work out contributions towards built sports facilities (which should also be identified in the Infrastructure Delivery Plan). What quality standards are the Council going to apply? Sports facilities could usefully be required to be designed in accordance with Sport England and National Governing Body technical guidance notes. The first bullet does not fully comply with NPPF Par 73. In relation to the 'outdoor sports facilities' standard (1.05 ha 1,000 how is this to be determined and implemented eg is it pitches that are needed or MUGAs? The Strategy should give clarity in each catchment area as to the priorities for facility requirements.
PO495	Glossopdale Action for Allotments	Object	GAFAs believes that the provisions listed to achieve Policy CF4 and provide adequate amounts of different types of Open Space are reasonable - but that the space requirement calculated for allotments is likely to be inaccurate. GAFAs appreciates that HPBC is finalising an Allotments Strategy for the term of the present Council up to April 2015 and anticipates that the Strategy will deal with the present shortfall of allotments that has existed for many years. GAFAs expects HPBC:a) To fulfil its pledge in Policy CF4 to force developers to include land for allotments in major housing developments - and we expect that developers will be encouraged by HPBC at a very early stage to include meaningful provision in their plans for each site.b) To identify and reserve sufficient land for allotments in the new Local Plan in anticipation of increased demand from local residents that already live in Glossopdale; GAFAs is particularly concerned that there is sufficient land to provide allotments and/or community gardens for residents living in flats and/or social housing.
PO759	National Trust	Support	Support.

Community feedback

Summary of formal responses

- None received.

Summary of drop-in responses

2 Summary of responses to Local Plan - by chapter

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

Organisation	Response to Issues and Options consultation
Sport England	<p>The policy CS18 regarding open space and recreation needs to take into account the National Planning Policy Framework, in particular Par 73, which requires policies to be based on robust and up to date assessments of needs for open space, sports and recreation facilities. These assessments should identify deficits or suppluses and be used to determine what is required in the Borough, inform what community/social facilities are required to deliver sustainable communities in terms of sport and then inform the policy, the infrastructure delivery plan and CIL charging schedules appropriately.</p> <ul style="list-style-type: none"> • The background evidence base to the Local Plan makes no reference to any such assessment or Playing Pitch Strategy and therefore any development of local plan policy going forward needs to be underpinned by such an evidence base and then the appropriate detail and delivery mechanisms can be provided/supported through the Local Plan.

Policy CF5 - Provision and Retention of Local Community Services (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF5	1	0	2	0	0	3
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO527	Gladman	Object	First bullet point - amend policy to include reference to instances where by losing some land to another use it could support or enhance the viability of the existing local community service or facility.
PO761	National Trust	Support	Support
PO788	The Theatres Trust	Object	Disappointed that Policy CF5 does not include cultural facilities (such as museums). The examples given at para.5.176 are not adequate to encompass all relevant facilities and we strongly suggest this description is used - "community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community"

2 Summary of responses to Local Plan - by chapter

Community feedback

Summary of formal responses

- No responses submitted

Summary of drop-in responses

- General concerns raised regarding infrastructure to support development

Summary of key points raised during 2012 consultation

- New policy for Preferred Options. No comments sought previously

Policy CF6 - Accessibility and Transport (and supporting in text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF6	1	0	0	0	0	1
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO473	Derbyshire County Council	Support	Support but bullet point 14 should require applicants to submit and implement travel plans.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- General concerns relating to transport services and infrastructure

Summary of key points raised during 2012 consultation

- A mitigation strategy should be included in the Local Plan to address the cumulative impact of development on transport infrastructure during the plan period.
- Policy should refer to need to change travel behaviour to help address climate change.

2 Summary of responses to Local Plan - by chapter



Policy CF7 - Planning Obligations and Community Infrastructure Levy (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy CF7	1	0	0	2	0	3
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO484	Derbyshire County Council	Observations	Consideration could be given to other potential funding sources, for infrastructure such as Growing Places, New Homes Bonus and, in the longer term, investment in rail services via the rail franchise system.
PO680	Country Land and Business Association	Observations	Full consultation needed on policy regarding infrastructure funding. Development may be stifled if charges are set too high and they may have consequences for the farming community. Developers should have opportunity to negotiate payments.
PO704	Chatsworth Settlement Trustees	Support	Welcome the consideration of economic viability.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- General concerns raised regarding infrastructure to support development

Summary of key points raised during 2012 consultation

- No comments received

Recommendations made by Sustainability Appraisal

- The formulae to be used to calculate contributions should be included in the policy, or the CIL document when available.

2 Summary of responses to Local Plan - by chapter

H1 Location of Housing Development

	Support	Support with conditions	Object	Observations	Other	Total
Policy H1	1	2	7	2	0	12
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO256	The Buxton Group	Support with conditions	In general, we are supportive of policies H1 and H2. The biggest concern of Buxton residents is that infrastructure provision should keep pace with any new development, to avoid increased pressure on already stretched services and congested roads.
PO357	Friends of the Peak District	Object	Policy H1 needs to be modified as it implies that providing affordable housing is a reason to build on greenfield sites. Brownfield sites are likely to be closer to amenities required by people needing affordable housing.
PO470	Derbyshire County Council	Object	In addition to the requirements referred to in Policies H1 and H4, a new requirement is recommended that is relevant to all potential housing sites, elements of which are already included in Policy H7: "The site should be well located on the highway network and provide safe and convenient vehicular and pedestrian access and adequate parking, and should not result in a level of traffic generation which is inappropriate for roads in the area, without appropriate intervention or mitigation."
PO522	Gladman	Object	This policy along with various others within the Local Plan prioritises housing development on previously developed land. Gladman object to this policy approach. Paragraph 111 of the NPPF encourages the use of brownfield land, however does not state that this should be prioritised. Policy H1 states that "Development on greenfield land, other than sites allocated in the plan will not normally be permitted..." Gladman believe that this policy is arbitrarily restrictive. If allocations have not come forward then sites in sustainable locations (including greenfield sites) should be able to come forward to help deliver housing to meet the identified need. The policy approach to the location of housing development should include contingencies rather than enforcing unnecessary constraints. Policy H1 states that "Exceptionally larger unallocated schemes may be permitted where it would provide and over-riding affordable housing, regeneration, conservation or infrastructure benefits..." Gladman suggest that this element of the Policy should also include that these sites would be permitted when there is a demonstrable housing need that is not being met.

2 Summary of responses to Local Plan - by chapter

PO449	Home Builders Federation	Object	Policy H1 prioritises the development of brown-field sites before green-field sites. This approach is contrary to NPPF. Paragraph 17 encourages the re-use of brown-field land it does not advocate a brown-field before green-field policy. By inclusion in a Local Plan all sites are deemed sustainable and therefore should be granted planning permission as and when planning applications are submitted under the presumption in favour of sustainable development (Paragraphs 6-14 of the NPPF) rather than judged against a prioritising mechanism. Indeed this approach to development is stated in the Housing Target Options Paper December 2011 as one of the advantages of choosing Scenario 6 as the preferred option:- This lowest housing target gives most scope to meet the requirement largely on brownfield sites and on land within settlements and will result in less pressure for the release of greenfield/agricultural land in the countryside with associated environmental benefits.
PO503	Persimmon Homes (North West)	Observations	Policy H1 states that 'development on Greenfield land, other than the sites allocated in the Plan, will not normally be permitted'. As we have highlighted from the outset, High Peak has demonstrated a chronic undersupply of land for housing development - coupled with under delivery - since 2008, and we would encourage the Council to identify a quantum of strategic opportunities that will prevent ad-hoc planning at a later date. Policy H1 also states that 'exceptionally larger unallocated schemes may be permitted where it would provide over-riding affordable housing, regeneration, conservation or infrastructure benefits'. The Company encourages flexibility, but it would be more advantageous, in place making terms, if sites were identified in a strategic process, and with the intention of meeting true housing need.
PO695	Chatsworth Settlement Trustees	Support	development of specific sites through new site allocations' is supported, in particular in respect of land at Dukes Drive, Buxton.
PO696	Chatsworth Settlement Trustees	Object	The provisions of the 4th main bullet point are contrary to the NPPF, are vague and would unnecessarily restrict development that could meet the objectives of the LP. As drafted, Policy H1 would limit the ability of non allocated (windfall) sites of 10 or more dwellings to come forward for development within towns (6 or more dwellings in villages). The LP recognises the role that windfall sites make to housing supply yet fails to justify this arbitrary restriction. Inclusion of such limits on the number of dwellings that can be proposed on sites that have not been identified through an allocations process establishes in policy a 'problem' rather than seeking to find a 'solution'. As such, the approach is contrary to paragraph 187 of the NPPF. This provision within Policy H1 would establish a barrier to boosting significantly the supply of housing The 4th main bullet point of Policy H1 should be deleted.
PO539	United Utilities	Support with conditions	United Utilities Property Services support the identification of housing allocations in the Local Plan. In terms of the exceptions criteria listed under the second bullet point of H1, the policy states

2 Summary of responses to Local Plan - by chapter

	Property Solutions Ltd		that priority for new housing will be given to previously developed land and that development on greenfield sites will not normally be permitted, unless it involves inter alia development within the defined settlement boundary to meet a local housing need on land which has no local amenity or recreational value and will not have a detrimental impact on the character and appearance of the area. This policy should recognise that there may be instances whereby housing is justified as it would lead to wider community benefits, which could include the provision of recreational facilities.
PO636		Object	Policy H1 identifies that development on Greenfield land, other than the sites allocated in the plan will not normally be permitted unless: 'it is identified for development through a Neighbourhood Plan or Community Right to Build Order' The Neighbourhood Plan for Chapel-en-le-Frith to date has not progressed to a draft plan. It is therefore difficult to identify whether the requirement for the Chapel-en-le-Frith area can be met other than assessing the housing sites which have previously been developed. We have demonstrated that there is insufficient Brownfield land to meet the preferred option housing target of 400 units. Therefore Greenfield sites will need to be considered for development in order to meet the identified need. It is considered that sufficient Greenfield land should be identified now in order to avoid the need for a review during the plan period. As the Chapel-en-le-Frith Neighbourhood Plan has yet to be drafted it raises questions as to the delivery of housing in this area of the Borough.
PO720	bowsall ltd	Object	This policy is therefore not consistent with Paragraph 17 of the NPPF, which encourages the effective use of land by reusing land that has been previously developed and does not specify a sequential approach to brownfield first. This is supported by a recent appeal decision at Burgess Farm (2157433) where the Inspector states that there is 'there is no sequential approach within the NPPF' in reference to brownfield first.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- 2.4** None were raised.

2 Summary of responses to Local Plan - by chapter

H2 Phasing Housing Development

	Support	Support with conditions	Object	Observations	Other	Total
Policy H2	0	1	10	1	0	12
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO199	Richborough Estates	Object	No evidence to suggest why this is necessary. The phasing policy would be detrimental in terms of maintaining a 5 year supply given that High Peak is already suggesting they are unable to meet their identified need. Further restrictions and limitations will hinder delivery.
PO258	The Buxton Group	Support with conditions	In general, we are supportive of policies H1 and H2. The biggest concern of Buxton residents is that infrastructure provision should keep pace with any new development, to avoid increased pressure on already stretched services and congested roads.
PO523	Gladman	Object	Gladman object to this policy approach. Phasing policies should not be utilised to arbitrarily stop development that is considered acceptable from coming forwards particularly as the Framework sets out the presumption in favour of sustainable development. Phasing should only be applied in areas where there are infrastructure deficiencies which need addressing prior to development. It should not be a blanket policy covering the entire plan area. Policy H2 makes reference to how in circumstances where delivery either exceeds or falls short of delivery targets by 20% then this will trigger the release of further housing allocations. Gladman object to this approach, suggesting that it should be removed from the policy as it is no longer a requirement of national policy. Gladman submit that in its current wording Policy H2 is unsound.
PO376	Hallam Land Management Ltd	Object	Hallam Land Management consider the Council's proposed phasing policy to be restrictive as it could potentially hold back deliverable sites, that are available now and offer a suitable location for development. Hallam Land Management therefore objects to the phasing proposed as the approach is contrary to the objectives and policies of the NPPF, which seek to proactively drive and support sustainable development to deliver new housing. It will also fail to provide flexibility, competition and choice of sites to address the housing needs of the Borough. It is requested that High Peak Council: 1. Revisit its restrictive phasing policy to allow for sites to be delivered flexibly through

2 Summary of responses to Local Plan - by chapter

			the plan period. 2. Allocate the Ashbourne Road site within the early development phase to meet identified housing needs.
PO413	High Peak Developments	Object	Policy H2 seeks to allocate, phase and release land for residential development to accord with the level of dwellings and annual rates of delivery identified in policy S3. We have set out our objections to the phasing of the housing requirement in our response to policy S3 elsewhere. We reserve the right to comment on the proposed phasing of sites until the viability information is made available. Several sites identified with questions over phasing (see full response) and require further justification.
PO500	Persimmon Homes (North West)	Object	Raise concerns with regards to the concept of phasing. Significant under delivery has already been accumulated. It has already been demonstrated that the current supply of land only satisfies 2.4 years of the 5 year requirement. Would like to enforce the importance of ensuring deliverability and certainty in a location such as High Peak, where sites without planning permission can not be relied on as deliverable opportunities. An assertion supported by the recent Chapel-en-le-Frith appeal decision. We would encourage the Council to identify and allocate a number of sites beyond what's required to meet required, to ensure meeting housing requirements and balance the shortfall in delivery, occurred over the previous 5 years since 2008. We consider the formulation of strategic policies and identification of sufficient sites to meet the assessed need, to be a significantly important part of the plan making process, and we would strongly urge the Council to identify a sufficient number of sites as part of its housing allocations' policy to meet the entire recognised need, to do otherwise would contradict the NPPF and make the Local Plan unsound
PO628	Loxley Developments Ltd	Object	Policy H2 seeks to allocate, phase and release land for residential development to accord with the level of dwellings and annual rates of delivery identified in policy S3. We have set out our objections to the phasing of the housing requirement in our response to policy S3 elsewhere. We reserve the right to comment on the proposed phasing of sites until the viability information is made available. Several sites identified with questions over phasing (see full response) and require further justification.
PO697	Chatsworth Settlement Trustees	Object	Policy H2 should be deleted. It would fail to positively contribute to the delivery of the Borough's housing requirement. Controlling the release of housing sites through phasing, as set out in Policy H2, is not an efficient or effective means of delivering the Borough's housing requirement. Rather than the LP identifying sites for phased release, it should identify (a) those sites the development of which is acceptable in principle (i.e. as per Policy H3 Housing Allocations) and (b) the constraints that need to be addressed to allow those sites to be released. Land owners and developers, working positively with the Council and other

2 Summary of responses to Local Plan - by chapter

			agencies, should then be supported in seeking to address the relevant constraints to allow planning permission to be secured and new homes built. Policy H2 should be replaced, to the extent as may be necessary for the provision of certainty, with a focus on constraints needing to be addressed to allow allocated sites to be granted permission.
PO563	Treville Properties Ltd	Object	Policy H2 seeks to allocate, phase and release land for residential development to accord with the level of dwellings and annual rates of delivery identified in policy S3. We have set out our objections to the phasing of the housing requirement in our response to policy S3 elsewhere. We reserve the right to comment on the proposed phasing of sites until the viability information is made available. Several sites identified with questions over phasing (see full response) and require further justification.
PO637		Object	However, it is considered that this approach to phasing will not address the previous under-supply and will not meet the aims of the Framework to significantly boost the supply of housing. The phasing approach is considered to be unsound as it will simply exacerbate the previous undersupply during the early stages of the plan period and will fail to meet the housing requirement for the Borough throughout the plan period
PO721	bowsall ltd	Observations	There is no reference to maintaining a 5 year housing supply as identified in the NPPF under paragraph 47. There is no reference to a 5% buffer to provide choice and competition in the market. The NPPF encourages frontloading to ensure delivery where possible.
PO778		Object	Policy H2 seeks to allocate, phase and release land for residential development to accord with the level of dwellings and annual rates of delivery identified in policy S3. We have set out our objections to the phasing of the housing requirement in our response to policy S3 elsewhere. We reserve the right to comment on the proposed phasing of sites until the viability information is made available. Several sites identified with questions over phasing (see full response) and require further justification.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- No comments sought or submitted.

2 Summary of responses to Local Plan - by chapter

Summary of key points raised during 2012 consultation

2.5 None were raised.

Policy H3 - Housing allocations (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy H3	8	10	126	11	23	179
Supporting text	0	0	1	1	0	2

2 Summary of responses to Local Plan - by chapter

Glossopdale

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Paradise Street Hadfield (G2)	5	1	3 (8)	1	1		Access issues. Should be used for allotments
North Road (G6)	2	1	35 (31)	3	1	Potential impact on semi-natural grassland and common toad population as well as pond. Potential to fragment habitats and reduce sustainability of biodiversity locally.	Landscape and wildlife impact. Traffic congestion
Land off Woodhead Rd (G8)	2 (1)	1	18 (26)	4	0		Impact on local area, too much development in one place G8,9,10), infrastructure issues, possible flooding, impact on wildlife and character of the area.
Land off Woodhead Road (G9)	2 (1)	2	17 (16)	3	0		Too much development in one area (G8,9,10) infrastructure issues, possible flooding, traffic congestion, character of the area
Land off Woodhead Road (G10)	2 (1)	2	17 (12)	4	0 (1)		Too much development in one area (G8,9,10) character of the areas, traffic , infrastructure. Looks perfect site. If developed it should be for affordable housing.
Hawkshead Mill Old Glossop (G13)	5 (11)	0	6 (9)	1	2 (2)		Use brownfield land, factory is derelict and an eyesore. Site plan includes residential property and a factory currently in use Too many houses in Glossop
Hope Street Old Glossop (G14)	3 (1)	0	5 (12)	1	1		Greenfield site, should be used for allotments, too many houses in Old Glossop. Congestion.
York Street Depot Glossop (G15)	5 (2)	0	3 (9)	0	1		Brownfield site. Infrastructure congestions, too many houses in Glossop.



2 Summary of responses to Local Plan - by chapter

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Woods Mill High St East (G16)	3 (12)	7	3 (13)	1	1 (1)		Brownfield site, currently an eyesore, adjacent to the town centre, should be affordable houses Traffic congestion, No more retail or commercial as it will damage the High street Should be comprehensively developed and the Glossop brook protected.
Bank Street Glossop (G18)	5 (7)	0	5 (11)	2	2 (1)		Adj to the built up area, access ok, suitable for small scale development Impact on countryside and conservation area sleep, landowner not willing to allow development
Dinting Road/Dinting Lane (G19)	3	1	15 (24)	4	0	Landowner confirms site is available	Within the strategic gap. Public right of way, springs steep slope, close to railway, access issues.
Dinting Lane (G20)	2	2	14 (11)	3	0		No safe access / egress - restricted. Resident wildlife. Strategic green space. Area constantly grid-locked as road traffic at optimum. Flood plain. Current residents well-being. Noise pollution. Light pollution
Land off Dinting Road Glossop (G21)	2 (1)	1	11 (14)	1	0		Restricted dangerous egress / access. Wildlife threat. Strategic gap. Light and noise pollution. Utilities over-subscribed. Congestion already optimum. Current residents' safety. General area over-subscribed.
Former railway museum (G23)	6 (1)	0	13 (17)	2	0		Access issues, contamination, should be strategic gap
Land off Melandra Castle Road (G25)	5 (1)	0	22 (13)	2	1 (1)		Only green space in Gamesley, play area for children, traffic issues. Gamesley was designed with green areas around it Will increase different tenures and provide affordable housing

2 Summary of responses to Local Plan - by chapter



Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Land adj to Gamesley Sidings (G26)	7 (1)	0	15 (11)	2	0 (2)		Site is countryside, traffic congestion, infrastructure, close to already approved housing (Roneo Vickers), greenfield site.
Charlestown Works Glossop (G31)	6 (9)	1	4	1	1 (2)	Site can accommodate more than stated number of units	Brownfield, derelict eyesore, needs development, part of site should remain in employment use
Adderley Place	5 (1)	0	22 (33)	3	1	support allocation but move to early phase	Traffic congestion on A57, difficult access to site, close to school, contamination, loss of green buffer, effect on wildlife, should be local green space, gas pipeline, public right of way

Central

Preferred Options site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Hayfield Road Hayfield (C1)	2 (1)	0	4 (11)	1	0 (2)		Retain public parking Sufficient development in Hayfield already, need to retain bus station, car park and other uses, has sett valley trail running through it, retain tourist attraction
New Mills Road (C2)	1	1	4 (3)	2	0		Not required sufficient development already, access
Derby Road New Mills (C3)	2	0	3 (14)	1	0 (6)		Should be used for a new school, pylons, lack of local infrastructure and services, busy road, too many new houses, impact on the sett valley trail
Ollersett Lane/Pingot Road New Mills (C5)	1 (2)	1	2 (10)	4	0 (4)		Good location if low density and includes local facilities. Local services already stretched, too many houses proposed, increase in traffic, ecology issues, possible mining issues
Laneside Road New Mills (C6)	2 (3)	0	1 (10)	4	0 (1)		Suitable for some low density development if accompanied by additional services.

2 Summary of responses to Local Plan - by chapter

Preferred Options site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Woodside Street New Mills (C7)	3 (8)	0	1 (2)	2	0 (7)	development of this site considers the relationship of development with the canal and looks to enhance the character of the canal corridor.	Good use of underused industrial site, look at reuse of buildings, will improve canal frontage
Wharf Road Whaley Bridge (C8)	5 (8)	3	4 (13)	2	0 (8)	WBTC support. Could be elderly persons accommodation	Good site for development but 40 houses are too many. Suitable for the elderly or sheltered accommodation. Access and egress from this site is very poor.
Buxton Road Chinley (C13)	2	1	2 (1)	1	0		Concern over traffic close to the school
Between Old Road and Buxton Road WB	2	0	0 (33)	10	0 (1)	WBTC object	Access too narrow and will cross the linear parkway which is supposed to be part of a safe walk to town. Greenfield. There is a restrictive covenant on the field
Opp Tesco along railway embankment	2 (5)	2	3 (10)	4	1	WBTC object	No problem with development as long as access is made safe. Keep as green belt. May restrict use of Hogs yard for employment
Britannia Mill	4 (13)	2	1 (1)	2	1		Site is an eyesore and redevelopment would be welcome. Access issues.

Buxton

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Batham Gate Road Peak Dale (B1)	1	1	3 (6)	1	1 (2)		Too far away from the town. Should be used as church land for graveyard extension
Land at Batham Gate Peak Dale (B2)	2 (2)	1	5 (8)	0	1		Too big for small village, development against the Local Plan strategy. Road already busy
Land at Hogshaw (reserve land) Buxton (B3)	1 (4)	1	7 (20)	2	0 (2)		Land currently underused. Access, contamination, loss of green space, unviable

2 Summary of responses to Local Plan - by chapter

Preferred Option site	Support	Support with conditions	Object	Observations	Other	Stakeholder feedback	Community feedback
Land at Hogshaw (B4)	3	1	7	3	0		
Ambulance Station The Glade Buxton (B5)	4 (14)	1	1 (5)	1	0		Keep ambulance station. Access to narrow for 11 dwellings
Hardwick Square South Buxton (B6)	4 (16)	1	1 (2)	2	0		Brownfield site, infill, should be for a mixed used development
Market Street Depot Buxton (B7)	3 (11)	3	1 (8)	2	0		Good use of land but should be mixed use and retain the car parking
West of Tongue Lane Fairfield Buxton (B8)	3 (6)	1	3 (7)	3	0		Flat , will help regenerate Fairfield.but needs new access. Too large for the area
Land off Dukes Drive Buxton (B10)	1 (3)	1	6 (15)	3	0		Logical extension, access issues
Sherbrook Lodge Harpur Hill Rd Buxton (B11)	1 (7)	2	4 (11)	2	0 (1)		Wooded, poor access
Land off Ashbourne Road Buxton (B20) Land at Foxlow Farm Buxton (B21) Foxlow Farm Ashbourne Road Buxton (B22)	1 (2)	9	13 (14)	11	1		Additional community facilities in Harpur Hill., no mix of uses, prominent in the landscape, greenfield
Harpur Hill College campus (B27)	5 (20)	1	2 (4)	1	0		Should be developed first before B20,21,22, currently unsightly and dangerous, mixed use
Leek Rd/ Macclesfield Rd former car showroom	4 (23)	7	8 (6)	1	0 (1)		Site need redevelopment but number is too high
Frontage to Cavendish Golf club Manchester Rd	0 (3)	1	5 (14)	2	0		Would effect the golf course Away from the town centre.



2 Summary of responses to Local Plan - by chapter

Stakeholder feedback

- Table above summarises individual stakeholder comments.

Community feedback

Summary of formal responses

- These are included in the table above.

Summary of drop-in responses

- Please see separate drop-in report.

H4 New Housing Development

	Support	Support with conditions	Object	Observations	Other	Total
Policy H4	0	0	6	0	0	6
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO471	Derbyshire County Council	Object	In addition to the requirements referred to in Policies H1 and H4, a new requirement is recommended that is relevant to all potential housing sites, elements of which are already included in Policy H7: "The site should be well located on the highway network and provide safe and convenient vehicular and pedestrian access and adequate parking, and should not result in a level of traffic generation which is inappropriate for roads in the area, without appropriate intervention or mitigation."
PO557	McCarthy & Stone Developments	Object	McCarthy and Stone commend the Council for the acknowledgement of its ageing population and the Council's aspiration to provide a suitable housing mix to meet the needs of its elderly residents but it should be given greater weight in the emerging Local Plan. One method of achieving the above could be the inclusion of a standalone policy to the Local Plan outline the need for the provision of Housing Choices for an Ageing Population. It is respectfully suggested that the policy be worded in line with the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we feel, offers a more suitable approach than the one currently suggested by the Council: (see full text) Were the

2 Summary of responses to Local Plan - by chapter

			Council to decide against the inclusion of an additional policy for specialist accommodation for the elderly then we would respectfully request that the Council revise the justification and wording of Policy H4 so that it more positive about the provision of specialist accommodation for the elderly.
PO700	Chatsworth Settlement Trustees	Object	The justification for this part of this policy is inconsistent with its requirements. The LP may seek to encourage compliance with Lifetime Homes criteria but should not require it for all dwellings.
PO639		Object	The Council's preferred housing target option will provide the highest level of environmental protection and the least amount of pressure on infrastructure. However, this target has the lowest level of housing provision in comparison to the projected needs and it is considered that should this option be taken forward then there will be a significant shortfall of new homes for the Borough. This means the Council will fail to meet the requirements set out in Policy H4 of providing a range of affordable and market homes that can reasonably meet the requirements and future needs of a wide range of household types The proposed housing target option will therefore render the plan unsound and will create issues of housing need and demand failing to be fully met and will result in worsening affordability and an increasing shortage of housing throughout the plan period.
PO677	Country Land and Business Association	Object	Point e The CLA believes that the new housing development should not be limited to one set of design criteria in Lifetime Homes. The Lifetime Homes criteria will limit both characteristic design and the quality and affordability of individual and multiple housing schemes in rural areas. The strategy must recognise that market forces have led to the increase in house prices in rural areas. Rural settlements that do not have new areas of housing and employment land will stagnate and be unable to maintain village shops, pubs schools and other facilities. It is important that these settlements are allowed to grow and maintain their services, even where there is an unavoidable reliance on private cars. The CLA would like to see a flexible approach to planning in rural areas and would urge High Peak Borough Council to recognise the importance and need for flexible planning envelopes in rural areas. The strategy housing policies must encourage new, small-scale, well designed rural housing development of all types (affordable/shared equity and open market) in all rural communities, whether or not the settlements are able to provide shops, schools or public transport. It is unsustainable to direct new housing development to only a few local service centres because of the pressure that this puts on local services.

Community feedback

Summary of formal responses

- No comments submitted

2 Summary of responses to Local Plan - by chapter

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- None were raised.

H5 Affordable Housing

	Support	Support with conditions	Object	Observations	Other	Total
Policy H5	0	0	6	2	0	8
Supporting text	0	0	0	0	0	0

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO356	Friends of the Peak District	Object	None of the overall housing number options can deliver the amount of affordable housing that is needed. Increasing overall housing numbers is not a viable option, and reliance on Section 106 agreements to deliver affordables as a proportion of market housing is unworkable, the Plan will be ineffective in delivering the affordable housing that is needed. The Plan should make clear that a different delivery mechanism will be required, and set out a process for designing that. There are three distinct features of the housing patterns in the borough The fact that 40% of all working age people in High Peak commute out so affordable housing for working age people must focus on providing for those who wish to work within the borough; The fact that the ageing population of High Peak has clear implications for the types, location and tenure of housing needed, especially in terms of proximity to local amenities; The fact that the borough has both an urban pattern of affordable need within the main towns, but also a rural pattern of localised need that mirrors that in the Peak District National Park.
PO378	Hallam Land Management Ltd	Object	In order to address the conflicts identified and ensure that the policy criteria set out within Policy H 5 are sound, it is requested that: The requirement for 30% affordable housing to be delivered on new housing sites over 25 dwellings should be a maximum. The policy should provide greater flexibility to ensure that it is responsive to a sites viability. Insert wording to allow viability to be considered as part of the planning application process to allow a lower percentage of affordable housing. Insert wording to allow the tenure of affordable housing to be negotiated on a site by site

2 Summary of responses to Local Plan - by chapter

			basis. Include affordable rented units and NewBuy as a mechanism for delivering affordable housing in the Borough.
PO525	Gladman	Observations	The provision of affordable housing is a key priority that High Peak Borough Council acknowledge. However, the only way to improve affordability is to provide housing. If the evidence base suggests that a certain level of affordable housing is required and the authority are not seeking to address that need in full through the Local Plan, then the only possible result is that the affordability gap will get worse.
PO450	Home Builders Federation	Object	Policy H5 Affordable Housing proposes 30% on-site affordable housing provision for sites of 25 or more units and 20% provision for sites of 5 - 24 units. This is the Authority wide based policy recommended under Option 1 of the Affordable Housing Viability Assessment Final Report Derbyshire Dales District Council & High Peak Borough Council January 2010 by Ekosgen. This report assesses a number of affordable housing provision scenarios. However the report is now out of date, for example residential sales values and build costs are based on 2009/10 values and only include costs equivalent to Code for Sustainable Homes (CfSH) Level 3. The Council should consider up-dating this report, so that more up to date sales revenue prices and build costs are used.
PO501	Persimmon Homes (North West)	Object	Persimmon Homes considers this level of affordable housing provision is in conflict with the principles of the NPPF. Paragraph 4.33 of the High Peak Local Plan Core Strategy states 'ensuring sites are economically viable is also a key consideration in the Local Plan.' The Company strongly supports this statement, and would urge the Council to maintain a flexible approach to affordable housing provision. However the preference for all stakeholders is to have a robust and certain suite of strategic policies.
PO678	Country Land and Business Association	Observations	The importance of mixed housing should be emphasised. The strategy should recognise the ageing population and this should be reflected in future housing development. Affordable housing must also be available for young people, thus encouraging them to stay in the area. The affordable housing sector should not be seen or tackled in isolation. Part of the increasing perceived need for greater provision of affordable housing has arisen as a result of excessively restricted flexibility and supply within the housing market as a whole. Thus, part of the solution for the provision of suitable rural housing must lie in reversing these excessive restrictions, and in encouraging the planning system to meet the local need for all types of housing, not just in the affordable sector.
PO702	Chatsworth Settlement Trustees	Object	Policy H5 fails to provide certainty as to what development may be subject to a requirement to provide affordable housing, and what that requirement would be. Reference is made elsewhere within the Policy and its Justification to a future 'Affordable Housing Supplementary Planning Document'. It is not clear if it is intended that the SPD will provide guidance as to how and on what basis a 'financial contribution' might be 'negotiated' and how 'suitable

2 Summary of responses to Local Plan - by chapter

			sites' will be defined. This introduces unnecessary uncertainty to smaller residential developments and the requirement should be deleted.
PO724	bowsall ltd	Object	The affordable housing policy should be supported by up to date viability evidence as to the appropriateness of not just the proposed affordable housing provision but the wider implications of the plan. The current viability evidence base was produced in 2009 and is therefore out of date. This policy is not, therefore justified and subsequently we object. In addition, there is an identified need for between 443 and 591 affordable homes per annum. This requirement far exceeds the identified annual housing requirement of 270 homes per annum. To ensure delivery of an appropriate amount of affordable homes, the annual requirement for the borough must be increased to a minimum of 370 units per year.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- None were raised.

Recommendations made by Sustainability Appraisal

- Consider including an area trigger alongside a minimum number of units to trigger the policy. Eg 20% affordable housing on sites of 5 – 24 dwellings (0.16 hectares) – to prevent developments of 4 units coming forward on sites that would normally deliver 5. Policy should include reference to design standards for affordable homes, particularly those not funded through the HCA, perhaps by referring it to the content of the SPD.

H6 Rural Exceptions Sites

	Support	Support with conditions	Object	Observations	Other	Total
Policy H6	1	0	2	0	0	3
Supporting text	0	0	0	0	0	0

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Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO679	Country Land and Business Association	Object	In order to allow villages to sustain their population, shops, pubs and schools, smaller, well designed housing developments are more preferable to disproportionately sized estates grafted onto village perimeters. A commitment to more small-scale housing in rural settlements of all sizes would assist flexibility in the provision of rural housing, by giving more options for people to move up the housing ladder and enabling employees to live closer to diversified rural businesses. The positive impact on flexibility would benefit the rural economy and its sustainability. True sustainability in the countryside must rest on economic and social pillars and conservation of the environment. If the planning system continues to follow a top-down sequential approach to housing, local needs will not be reflected and therefore rural sustainability will not be promoted.
PO757	National Trust	Support	With the detailed criteria set out in this Policy it is considered that this is a reasonable approach to dealing with rural exceptions sites.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- None were raised.

H7 Gypsies, Travellers and Travelling Show People

	Support	Support with conditions	Object	Observations	Other	Total
Policy H7	0	0	0	0	0	0
Supporting text	0	0	5	0	0	5

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Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO142	Ms Siobhan Spencer	Object	The GTAA is now out of date and the need for provision beyond 2012 has not been established. The potential need for future sites, based on a future review of the GTAA should be acknowledged in this paragraph
PO143	Ms Siobhan Spencer	Object	This policy is not sound and does not accord with current national guidance as set out in the DCLG's "Planning policy for traveller sites." The policy needs to acknowledge the need for a new GTAA and to acknowledge that provision will be made, as a minimum, in accordance with any identified need arising from the review of the GTAA. The reference to "proven need" in the second paragraph is wholly unacceptable. National guidance in paragraph 10 of "Planning Policy for Traveller Sites" states that "where there is no identified need, criteria based policies should be included (in Local Plans) as a basis for decisions..." Thus, the criteria set out in this policy should be applied irrespective of "proven need." The phrase "to meet proven need" must thus be deleted from the policy. The first criterion is unacceptable. Traveller sites will inevitably have some impact upon the landscape and this criterion could be used to effectively prevent any provision. The words "unacceptable" or "significant" should be introduced before the word "adverse". The words "and convenient" in the fourth criterion are unnecessary.
PO144	Ms Siobhan Spencer	Object	There is a grammatical error in this paragraph 5.143 ("not" should be "no").The paragraph should acknowledge that the need for a site will be reviewed in the light of a future GTAA. The paragraphs on "supporting guidance" and "alternative policy options" are out of date. They should not refer to the Regional Spatial Strategy or the Regional Plan or Circular 01/06. The reference to "Gypsy and Traveller guidance" should be corrected to refer to Planning Policy for Traveller Sites. The supporting guidance should include reference to the GTAA.
PO604	English Heritage	Object	Whilst criteria are given in relation to landscape and nature conservation issues, no reference is given to historic environment considerations. We consider that the first bullet point should be amended to incorporate reference to this
PO758	National Trust	Object	The criteria against which proposals will be tested need to be expanded to include the historic environment.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses



2 Summary of responses to Local Plan - by chapter

- No comments sought or submitted.

Summary of key points raised during 2012 consultation

- None were raised.

Strategic development sites

	Support	Support with conditions	Object	Observations	Other	Total
Para. 6.1	0	0	1	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO204	Stephen Robinson	Object	Two "Broad Locations for Growth" (land at off Heathfield Nook Road and Burlow Road Harpur Hill, Buxton and land off Long Lane and rear of Chapel's large Secondary School) as identified in Derbyshire Dales and High Peak Joint Core Strategy Draft Plan should be allocated in Local Plan. In contrast to many of the Preferred options sites, the above sites are available, achievable, deliverable, sustainably located, capable of financially supporting local infrastructure and could enhance vibrancy of local communities. The sites also accord with the NPPF.

Community feedback

Summary of formal responses

- No comments submitted

Summary of drop-in responses

- No comments submitted

Summary of key points raised during 2012 consultation

- No comments sought or submitted

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Policy DS1 Woods Mill, Glossop (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS1	0	0	0	3	0	3
Para. 6.10	0	1	1	0	0	2
Para. 6.11	0	1	0	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO277	Derbyshire County Council	Observations	Archaeological desk-based assessment and buildings appraisal should be required as part of any application (regardless of whether significant demolition is proposed).
PO311	Sport England	Observations	Para 6.11 - this highlights the potential need for a new leisure centre but this is not referenced in the sports policy nor in the town centre policy for this area. Policy only identifies leisure uses classes under appropriate use and does not specifically identify need for leisure centre - therefore policy is not clear. Need for leisure centre (and badminton court) should be evidence based (see other comments re. modelling). If not, securing S016/CIL will be difficult.
PO605	English Heritage	Observations	No objection to principle of development and support reference to retention of Woods Mill. Further bullet point relating to the setting of the Howard Town House required in relation to new development proposals. Development of the site for housing or other requires careful consideration of the historic environment attributes, including non-designated assets

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

Summary of key points raised during 2012 consultation

- Mixed views from local community (as above).
- Transport Assessment would be required. Significant works likely to be required to provide suitable access (DCC highways).
- Housing can be supported with appropriate S106 to support education (DCC education).
- Archaeological desk based assessment/buildings appraisal needed pre-application; further work could be conditioned. Opportunity for reuse of historic industrial structures (loss of mill buildings unacceptable within Conservation Area) (DCC archaeology).



2 Summary of responses to Local Plan - by chapter

- Part of site is at high risk (flood zone 3) of flooding from the Glossop Brook and has been affected by flooding. This site will need to be sequentially allocated as part of the Sustainability Appraisal and refined flooding information produced to ensure that all potential flood risk issues to the site are clearly identified (Environment Agency).
- Development of the site requires careful consideration of the historic environment attributes, however we do not object to the principle of allocating of the site, ideally for a mixed use, which includes the retention of historic buildings and protects the setting of Howard Town House (English Heritage).
- Within 1km of Shire Hill ancient woodland. Seek reassurance that there would be no adverse impact from increased recreational use (Natural England).

Policy DS2 Dinting Railway Museum (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS2	0	0	3	2	0	5
Para. 6. 16	0	0	2	2	0	4

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO606	English Heritage	Observations	This site may contain non-designated archaeology and as such this should be reflected within the bullet points
PO278	Derbyshire County Council	Observations	Because the historic railway infrastructure and industrial archaeology on the site is likely to be lost through redevelopment, an archaeological desk-based assessment and buildings appraisal should be required as part of any application.
PO152	Derbyshire Wildlife Trust	Object	Include in strategic gap and form part of ecological network and green infrastructure.

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

Summary of key points raised during 2012 consultation

- None

2 Summary of responses to Local Plan - by chapter

Policy DS3 Charlestown Works, Glossop

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS3	2	1	1	1	0	5

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO69	Brian Barber Associates	Support with conditions	Remove reference to need for flood risk and contamination assessments - both documents have been prepared in support of a planning application. Policy requirement to retain mature trees is also not specific and does not provide the clarity necessary to inform development. Important trees are already subject to TPO. Limit of 76 dwellings is not justified. A range of homes (76-120) should be specified instead. Housing development needs to be maximised to ensure viability. Some employment development may be possible but flexibility is required to ensure viability.
PO607	English Heritage	Object	Policy is not clear on whether buildings are to be re-used or demolished. Query whether assessments have been undertaken in terms of significance of the buildings on sites as should be expected to support an allocation that would result in demolition. Draw attention to NPPF para. 135 re. non-designated heritage assets. Opportunity to conserve and adapt buildings
PO279	Derbyshire County Council	Observations	An archaeological desk-based assessment and buildings appraisal should be required as part of any application

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

Summary of key points raised during 2012 consultation

- General support from local community for redevelopment.
- Transport Appraisal required to support an application (DCC highways).
- Housing development on this scale can be supported with an appropriate S106 education contribution (DCC education).
- Archaeological desk based assessment/buildings appraisal needed pre-application; further work could be conditioned. Opportunity for reuse of historic industrial structures (DCC archaeology).
- Significance of buildings should be assessed and retained if necessary (English Heritage).

2 Summary of responses to Local Plan - by chapter



Policy DS4 Adderley Place(and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS4	1	0	4	1	0	6

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO153	Derbyshire Wildlife Trust	Object	Land of greater value as greenfield site. Close to Gamesley sidings wildlife site. protected species, contribution to local and national BAP targets.
PO280	Derbyshire County Council	Observations	The site contains the likely route of a Roman road and archaeological evaluation should therefore be required as part of any application
PO201	Richborough Estates	Support	The site is well located in relation to the wider settlement. The site accords with the NPPF paragraph 47 footnote 11. It is bound by residential development to the North, East and South of the site and also has good access to transport links. Access into the site could be via the A57 or Kestral View. There are no know ecological, flood or geo-technical constraints associated with the site. Land atAdderley Placealso has a strong defensible physical boundary (railway) to the West. We believe that the site should be delivered early on in the plan process.

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

Summary of key points raised during 2012 consultation

- Not available for comment at this time.

Policy DS5 Ferro Alloys, Glossop (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS5	0	0	0	2	0	2
Para. 6.28	2	1	0	0	0	3

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Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO476	Derbyshire County Council	Observations	Surrey Street and public footpath (HP12/56) could be connected with the proposed Greenway south of the site.
PO608	English Heritage	Observations	This site is adjacent to a conservation area. Development here may also affect the setting of a Grade II listed building. Provision within the policy should be made with regard to protecting the setting of these assets.

Community feedback

- See comments related to development of site recorded under Policy E5

Summary of key points raised during 2012 consultation

- General support for redevelopment for a range of uses, including housing, leisure and business.
- Support retention or contraction to help strengthen and sustain future of the town centre (English Heritage).

Policy DS6 Land off Derby Road(and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS6	0	0	1	1	0	2

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO281	Derbyshire County Council	Observations	As a substantial undeveloped greenfield site, archaeological potential should be subject to assessment as part of any application.
PO762	National Trust	Object	refer to I and O comments

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

2 Summary of responses to Local Plan - by chapter



Summary of key points raised during 2012 consultation

- Greenfield site.
- Impact on schools.
- Ideal for housing or industrial, connecting it to Thornsett Industrial Estate.
- Extra traffic on High Hill Road a problem.
- Infill with good access.
- Cemetery on High Hill road needs to be maintained.

Policy DS7 Land at Ollersett Lane/Pingott Road(and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS7	0	0	1	1	0	2

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO282	Derbyshire County Council	Observations	As a substantial undeveloped greenfield site, archaeological potential should be subject to assessment as part of any application.
PO609	English Heritage	Object	This site may affect the wider setting of Ollersett Hall Farm, which is grade II listed. Merge with adjacent sites to environmental designations are properly considered - including the setting of Ollersett Hall Farm. We would also like to see a criterion in relation to the protection of the setting of the listed building form part of this allocation.

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

Summary of key points raised during 2012 consultation

- Greenfield site
- Impact on schools.
- Slopes.
- Marshy.
- Loss of views for existing residents.
- Sewers can't cope.
- Infill with good access.
- Loss of farming land.

2 Summary of responses to Local Plan - by chapter

- Traffic.
- Coal mines.

Policy DS8 Britannia Mill, Buxworth

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS8	0	2	5	2	0	9

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO189	Canal & River Trust	Observations	In principle the Trust supports appropriate proposals for development which will help to enhance the role of the canal as a multi-functional community resource. Development should consider the extent to which it can complement the canal. Design should maximise views / surveillance of water and encourage access to/from along water.
PO370	Chinley Buxworth & Brownside Parish Council	Support with conditions	Support the principle of housing and mixed use development. Policy contains too little detail at present, particularly in respect of the proposed business and tourism element Development should be high quality and respect Green Belt and Conservation Area. Support preparation of masterplan. Parish Council wish to be involved in its preparation.
PO283	Derbyshire County Council	Observations	An archaeological desk-based assessment and buildings appraisal should be required as part of any application.
PO610	English Heritage	Object	Policy is too vague and does not highlight many key historic environment issues. Other strategic site policies have more criteria. The area contains a number of heritage assets in the area but no SA of the site is available. No detail is given in policy regarding demolition or conversion of former mill buildings - as non-designated assets, they should be re-used where possible (see NPPF para. 135). New development should not adversely affect the setting of any designated heritage assets. Policy should require an assessment of the setting of heritage assets and archaeology.
PO766	Jonathan Smith	Support with conditions	Support principle of allocating site but the cap on the level of housing development is unjustified. Dispute apparent restriction of housing development to footprint of former mill (1.5ha). This is in conflict with NPPF (paras. 47, 54, 55 and 89). More land (2.2ha) is available that would not necessarily have a greater impact on the openness of Green Belt than the historic use. Due to shortage of housing land in High Peak, the Council should fully investigate the housing capacity of the site. Borough housing target should be increased by 20% in light of NPPF and under

2 Summary of responses to Local Plan - by chapter



			delivery of housing since 2009. Council has a duty to consider a Green Belt review - this should include removal of site from Green Belt. If Green Belt is retained on the site, an exception to Green Belt policy is sought on the grounds of poor housing delivery.
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Community feedback

- See comments related to development of site recorded under Policy E5 and Policy H3.

Summary of key points raised during 2012 consultation

- General support for redevelopment of Britannia Mill, including housing.
- Need to consider impact on Goytside Meadows Local Nature Reserve in terms of increased air quality and recreational use (Natural England).

Policy DS9 Bingswood, Whaley Bridge

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS9	0	1	4	3	0	8

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO154	Derbyshire Wildlife Trust	Observations	Site lies very close to a Local Wildlife Site and ancient woodland that should not be adversely affected by development.
PO216	Whaley Bridge Town Council	Support with conditions	Suggest the following be added: "Existing employment should be protected on this site."
PO479	Derbyshire County Council	Observations	Site is adjacent to several footpaths, including canal greenway. Improvements to PRoW and road to encourage walking, cycling and public transport use should be considered. Plan should include a strategy and phasing programme to support regeneration of canal and basin including Bingswood and other Local Plan sites with heritage assets that are linked by the canal e.g. Newtown, Britannia Mill and Furness Vale Industrial Estate. DCC would seek developers contributions towards the above, in particular for greenway improvements.
PO284	Derbyshire County Council	Observations	An archaeological desk-based assessment and buildings appraisal should be required as part of any application

2 Summary of responses to Local Plan - by chapter

PO529	Whaley Bridge Town Council	Object	Support Goyt Bridge. Concerns regarding: compatibility of housing with heavy industry - more flexible approach to siting of housing on site needed. Remove requirement for housing to be developed south of Goyt. loss of employment land in Whaley Bridge - protect employment on site
PO409	High Peak Developments	Object	High Peak Development owns 2 plots of the designation north of River Goyt at Hogs Yard. Plot 1 (central Hogs Yard) - Allocation is supported in principle but the wording of the policy replicates current policy and needs to be amended to take into account planning consents granted after the adoption of 2005 plan. Criteria relating to floorspace restrictions should be removed. Plot 2 (Hogs Yard south) - should be released from the mixed-use allocation proposed and allocated for residential development of 14 dwellings. The plot is sustainable for housing and there is little market demand for its current designation and consent (office, leisure, food & drink).
PO611	English Heritage	Object	Concern that no reference to the historic environment (former mill) are made within the policy. If demolition of mill is intended, a study of the significance of the buildings and scope for retention / conversion is required.
PO549	United Utilities Property Solutions Ltd	Object	Object to the allocation of the site for business and mixed use development. Due to infrastructure constraints, more flexibility should be provided and the site identified as "white land".

Community feedback

- See comments related to development of site recorded under Policy E5

Summary of key points raised during 2012 consultation

- Mixed views on future of site - support for housing, retention of employment, need for investment.
- Consensus on need for additional access - provide Goyt Bridge or new link from A6.

Policy DS10 Furness Vale Industrial Estate, Calico Lane (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS10	0	2	1	3	0	6
Para. 6.62	1	0	0	0	0	1

2 Summary of responses to Local Plan - by chapter

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO190	Canal & River Trust	Observations	Canal should be central to design of development. The siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water.
PO612	English Heritage	Support with conditions	Welcome recognition of the former mill buildings and their retention in the supportive text of this policy. However we are concerned that this is not translated into the policy text and criteria. We would suggest the addition of a further bullet point in response to this.
PO480	Derbyshire County Council	Observations	Site is adjacent to several footpaths, including canal greenway. Improvements to PRoW and road to encourage walking, cycling and public transport use should be considered. Plan should include a strategy and phasing programme to support regeneration of canal and basin including Bingswood and other Local Plan sites with heritage assets that are linked by the canal. DCC would seek developers contributions towards the above, in particular for greenway improvements.
PO285	Derbyshire County Council	Observations	An archaeological desk-based assessment and buildings appraisal should be required as part of any application.
PO530	Whaley Bridge Town Council	Support with conditions	Support mixed-use development subject to Calico Lane being upgraded with pavements, street lighting etc. Industrial use should be as detailed and take account of proximity to housing.

Community feedback

- See comments related to development of site recorded under Policy E5.

Summary of key points raised during 2012 consultation

- Land owner proposal to develop site for mixed-use (business, residential and tourist accommodation).

Policy DS11 Torr Vale Mill, New Mills

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS11	0	0	1	3	0	4

2 Summary of responses to Local Plan - by chapter

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO155	Derbyshire Wildlife Trust	Object	Concern over potential impact on woodland. Level of impact is not clear. Woodland will be of local importance for wildlife.
PO286	Derbyshire County Council	Observations	An archaeological desk-based assessment and buildings appraisal should be required as part of any application
PO613	English Heritage	Observations	Supporting text should recognise that the buildings are on the national Heritage at Risk Register (2012) as a priority A site. In principle support for re-use of buildings appropriate for mix of uses. Intensive sub-division could be problematic. Assessments in relation to the significance, condition and repair of the buildings are required.
PO481	Derbyshire County Council	Observations	Safeguard local footpaths / PRoW. Request to be closely involved in the preparation of a comprehensive masterplan, viability assessment and phasing programme. Assessment needed on impact to listed buildings, Mousley Bottom LNR and footpaths.

Community feedback

- See comments related to development of site recorded under Policy E5.

Summary of key points raised during 2012 consultation

- Strong support for regeneration of site for housing, leisure, business and community uses.

Policy DS12 Land at Hogshaw (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS12	0	1	4	1	0	6
Para. 6. 76	0	1	3	1	0	4
Para 6.77	0	0	1	0	1	2
Para 6.83	0	0	1	0	0	1
Para. 6.90	0	0	0	1	0	1

2 Summary of responses to Local Plan - by chapter



Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO614	English Heritage	Support with conditions	We welcome the inclusion of a criterion relating to archaeological assessment. Provision should also be made for assessment of setting of other assets.
PO161	Derbyshire Wildlife Trust	Object	Derbyshire Wildlife Trust would prefer not to see this site developed due to the impacts on wildlife and the loss of a green corridor into Buxton. However, should development take place it will need to be preceded by a full suite of ecological surveys to address any impacts on protected species, habitats and species of conservation value at a county or local level. We remain concerned that the development at Hogshaw will result in an overall loss of biodiversity. In order to achieve a net gain for biodiversity an area greater than 1.2 ha may be required either adjacent to the site or through greater retention of parts of the existing site. A further option would be to provide compensation at a nearby local site or sites through enhancement, management works or habitat creation
PO313	Sport England	Observations	Does the 3.9ha for recreation (first para.) include formal sport?
PO207	JR Consulting/High Peak Land	Object	It is clear that this site will never be delivered, certainly in the short to medium term. As the council will be aware, the key tests of allocating sites for housing are their deliverability and viability. JRA strongly suggest that the proposed Hogshaw allocation be removed from the plan for the reasons set out above.
PO126		Object	B3 and 4 not viable due to high contamination, not available Redesignate as amenity and recreation areas
PO206	JR Consulting/High Peak Land	Observations	The land at Hogshaw can no longer be defined as brownfield land. The site has been comprehensively "welcomed back into nature" and is covered by grasses and mature trees.

Community feedback

- See comments related to development of site recorded under Policy H3.

Summary of key points raised during 2012 consultation

- Would require a traffic impact assessment.
- Network rail would require a trespass proof fence.

2 Summary of responses to Local Plan - by chapter

Policy DS13 Land west of Tongue Lane, Fairfield, Buxton(and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS13	1	0	0	0	0	1
Para. 6.101	1	0	0	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO615	English Heritage	Support	We welcome the inclusion of a criterion relating to archaeological assessment.

Community feedback

- See comments related to development of site recorded under Policy H3

Summary of key points raised during 2012 consultation

- Possible impact on Buxton Infants school.
- Traffic impact on A6.
- Landowner interest.

Policy DS14 Land off Dukes Drive, Buxton(and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS14	2	0	1	1	0	4
Para. 6.102	0	0	0	1	0	1
Para 6.105	0	0	1	0	0	1
Para 6.107	0	0	1	0	0	1
Para 6.111	0	0	1	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
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2 Summary of responses to Local Plan - by chapter

PO135		Object	B10 (Dukes Drive) this site is acknowledged by the council to be only deliverable in the long term. It should be removed from the plan as it is elevated, remote, will not add sustainability, has no developer interest, has no suitable access, viable and with high development costs will not deliver affordable housing.
PO168	Derbyshire Wildlife Trust	Observations	If this land were to come forward for development Derbyshire Wildlife Trust would like to see the grassland vegetation communities on the steeper slopes protected and the grassland vegetation at Dale Road Local Wildlife Site extended. We also note that the site needs an up to date ecological assessment to inform any development of this area.
PO616	English Heritage	Support	We welcome the inclusion of a criterion relating to archaeological assessment.
PO709	Chatsworth Settlement Trustees	Support	Allocation of Land off Dukes Drive, Buxton for residential development is strongly supported. Analyses undertaken to date by CST confirm the suitability of the site for residential development and its ability to achieve compliance with the objectives of emerging policy.

Community feedback

- See comments related to development of site recorded under Policy H3 and Policy E5

Summary of key points raised during 2012 consultation

- Possible impact on Buxton infants school.
- National Rail require a trespass proof fence.

Policy DS15 Land off Ashbourne Road and Foxlow Farm, Buxton (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS15	0	0	3	1	1	5
Para. 6.112	0	0	1	0	0	1
Para 6.1116	0	0	1	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response

2 Summary of responses to Local Plan - by chapter

PO136		Object	B20. B21 & B22 (Foxlow Farm) Currently provides stunning countryside views from the main southerly approach Road to Buxton. This important elevated scenic approach road into Buxton's historic Any housing development of this site is far too remote from the centre of Harpur Hill
PO150		Object	Nothing has changed since the previous local plan other than whilst many manufacturing jobs and quarrying jobs have disappeared tourism, on the other hand, is now growing at a fast pace. This should coupled with the fact that Buxton's location in the centre of the Peak Park with its 2 million visitors per year results in the economic future of the town is now very heavily dependant on such tourists which generate more jobs and wealth combined than any other sector.
PO617	English Heritage	Observations	There is also potential for non-designated archaeology within this area as well as historic landscape impacts. We note that the SA recommends a master planning approach to the development of these sites and support this approach in the policy text. Whilst we welcome the inclusion of a criterion relating to archaeological assessment, the setting of the scheduled monument should also be taken into account as part of this policy.
PO208	JR Consulting/High Peak Land	Object	Foxlow Farm has been considered, but discounted at previous local plan inquiries due to the extent of the harm to the landscape setting of Buxton which the development of this site would cause. There are no prominent views in or around Buxton from which the Foxlow site cannot be readily viewed. At night, when the site is illuminated, the damage will appear more severe. Nothing on the ground has changed to warrant a different judgement today. Significant development on the Foxlow site would be extremely damaging. In view of the scale and nature of harm, there is nothing which could justify the allocation of this site. If High Peak are promoting a reduction in their housing targets on the basis that they are seeking to protect the character and setting of the Peak District National Park, then the allocation of the Foxlow Land would be clearly contrary to the preferred strategy of a reduced housing target in High Peak. In addition, access to this site and its relationship to the urban area in terms of accessibility must be considered carefully.
PO379	Hallam Land Management Ltd	Other	Hallam Land Management broadly support Policy DS 15. Policy DS 15 currently allocates the land for a maximum of 250 dwellings but we consider that the site can accommodate at least 350 dwellings. Policy DS 15 restricts the development of the site to below the 350m contour line. Hallam Land Management does not believe that there is any evidence to restrict development at this level and believe it to be unjustified. Initial results of a Landscape and Visual Impact demonstrate that development can be comfortably accommodated above the specified contour level in a sympathetic manner respecting

2 Summary of responses to Local Plan - by chapter



			<p>the landscape and the S.A.M A proportion of the land at Ashbourne Road is currently identified as a high quality business park for B1 uses. Hallam Land Management object to this allocation. It is considered that this 2 Ha area should be flexible by allowing a wider range of employment and community uses. In order to address the conflict identified above, it is requested that High Peak Borough Council:</p> <ol style="list-style-type: none"> 1. Remove the restriction of a 350m contour line as it is not justified. 2. Increase the sites capacity to deliver 350 new dwellings. 3. Remove the allocation of part of the site for a B1 high quality office park and instead allocate the land approx. 2 Ha for a mix of uses including: a community centre, a doctor's surgery, a local shop and a public house amongst other employment uses as a local centre.
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Community feedback

- See comments related to development of site recorded under Policy H3

Summary of key points raised during 2012 consultation

- Developer promoting site and a higher number of units.
- Landscape and visual impact concerns.
- Possible National Park impact if too far up Foxlow.
- Buxton group support development at lower levels but limited to 350 m from road frontage.

Policy DS16 Tongue Lane (land south of Tongue Lane Industrial Estate), Buxton

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS16	1	0	0	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO618	English Heritage	Support	Welcome the inclusion of a criterion relating to archaeological assessment

Community feedback

- See comments related to development of site recorded under Policy E2.

Summary of key points raised during 2012 consultation

- New access required to support development.

2 Summary of responses to Local Plan - by chapter

Policy DS17 Station Road and Spring Gardens Regeneration Area, Buxton (and supporting text)

	Support	Support with conditions	Object	Observations	Other	Total
Policy DS17	0	1	4	3	0	8
Para. 6.127	0	0	1	0	0	1
Para. 6.128	0	0	2	0	0	2
Para. 6.133	0	0	1	0	0	1
Para. 6.135	0	0	2	0	0	2
Para. 6.136	0	0	1	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO37	Green Holm Community Group	Object	Exclude Nestle site from regeneration area and designate land primarily for housing.
PO105	Buxton Traders	Object	Exclude Nestle from the regeneration area and designate the site primarily for housing development.
PO483	Derbyshire County Council	Observations	Public footpath HP4/79, and the proposed multi-user Greenway, run through the site on the northern side of Station Road with direct links to the railway station. These could be improved to complement town centre regeneration.
PO262	The Buxton Group	Object	Consider land to the north and south of Station Road separately. South of Station Rd - could accommodate some additional retail and provide car parking. development should screen rear of shopping centre. North of Station Rd - designate for affordable housing with a strip of commercial development along Station Rd (hotel, leisure)
PO156	Nestle Waters	Support with conditions	Support the general thrust of this policy which is to promote regeneration activity which is generally consistent with the Buxton Design and Place Making Strategy SPD and the Station Road Design Framework SPD Increase range of suitable uses to include retail, leisure, commercial, office, tourism, cultural, community and residential development. This will improve consistency with NPPF and help vitality of town centre, support regeneration and investment in the early period of the Local Plan. More emphasis should be placed in the policy on the ability to deliver development which will meet both retail and regeneration objectives



2 Summary of responses to Local Plan - by chapter

PO619	English Heritage	Observations	Amend paragraph 6.132 to acknowledge that southern part of site falls within the conservation area. Also reflect fact that two listed buildings (Winster Place and Grove Hotel and Parade) also fall within the boundary with associated need to consider setting etc. Support recognition of vision and principles in Station Rd and Design and Place Making Strategy SPD's. Both Nestle and Spring Gardens sites have distinct characteristics that should be reflected as part of development plan. Spring Gardens site offers the potential to significantly enhance Buxton's townscape and wider economy. Essential that development does not have a negative impact on the historic environment.
PO713	DPP	Object	Concern regarding requirements of policy. They should reflect the scale of development proposals on a scheme by scheme basis rather than being imposed across the board. Specific points: Bullet point 1 - amend so that need for comprehensive development only relates to application site rather than whole designation. This would be unreasonable / difficult to deliver due to ownerships. Bullet point 4 - planning obligation requirements should be revised or deleted. Contrary to NPPF, unduly onerous and should be related to the impacts of any scheme. Bullet point 7 - EIA requirement is onerous and assumes a scale of development that would require EIA. EIA might not be necessary. Previous application on Nestle site did not need EIA.

Community feedback

Summary of formal responses

- Buxton needs and anchor store (department store) but it should be located to south of Station Road.
- Additional town centre parking required.
- Strategy needed to support existing retailers / fill vacant shops.
- Limit retail to south of Station Road. Use north of Station Rd for other purposes e.g. library, leisure, student accommodation, housing.
- Sympathetic design required.

Summary of drop in responses

- See comments related to development of sites recorded under Policy CF1.

Summary of key points raised during 2012 consultation

- Mixed views on the need for a new supermarket in Buxton and the the most appropriate site for a store (Nestle or Spring Gardens).

2 Summary of responses to Local Plan - by chapter

Implementation and monitoring

	Support	Support with conditions	Object	Observations	Other	Total
Table 11	0	0	1	0	0	1
Supporting text	0	0	0	1	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
PO620	English Heritage	Observations	Implementation / monitoring of Policy EQ6 - other mechanisms should also include the removal of assets from the Heritage at Risk Register, retention of non-designated heritage assets in development schemes and evidence from grant funded schemes.

Community feedback

Summary of formal responses

- It is short sighted to build new homes where there are existing infrastructure problems.

Summary of drop-in responses

Summary of key points raised during 2012 consultation

- No comments sought or received.



3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

Consultation questions

1. Do you support the overall approach taken to the appraisal of preferred options for Local Plan policies?
2. Have we correctly identified the main significant effects and potential mitigation measures?
3. Do you wish to make a comment on the appraisal of any specific Local Plan policy(ies)?
4. Do you support the overall approach taken to the appraisal of options for housing site allocations?
5. Do you wish to make a comment on the scores given to any specific option(s) for a housing site allocation?
6. Does this Interim SA Report, together with the SA Scoping Reports provide sufficient information at this stage to ensure that an appropriate SA can be carried out of the emerging High Peak Local Plan?

Question	Support	Support with conditions	Object	Observations	Other	Total
1	0	5	0	1	2	8
2	0	1	4	0	1	6
3	0	0	2	6	0	8
4	0	1	3	0	0	4
5	0	0	9	1	0	10
6	1	0	0	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
SA26	Network Rail	Observation	No comment
SA27	Environment Agency	Observation / Objection	<p>Hawkshead Mill (G13): The EA has been consulted by a Flood Risk Consultant over a site specific Flood Risk Assessment (FRA) which confirmed that the Mill has been affected by flooding. At present the FRA has not demonstrated how the site could be developed safely without increasing flood risk elsewhere. SA scoring for flood risk should be 0 and the Sequential Test should be applied.</p> <p>Woods Mill (G16) and Bank Street (G18): The EA has conducted a flood hazard mapping exercise that should be used to determine whether or not the sites will pass the Exception Test.</p> <p>Land at Wharf Road (C8): The EA is concerned that the site has been taken forward despite being located entirely within Flood Zone 3.</p>

3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

SA28, SA29	Natural England	Observation / Objection	<p>Glossopdale</p> <p>Sites G6, G8, G9 and G10 all scored poorly in the SA but are being progressed due to their deliverability. Support for the SA finding that the lower part of G6 only should be developed. Similar avoidance / mitigation measures for the other sites north of Glossop should be considered. The assessment of landscape effects and mitigation should be driven by Landscape Character Assessment. The adverse ecological effects identified in Option G8 should be avoided, mitigated or compensated for. The SA has not concluded conclusively whether significant adverse effects exist (alone or cumulatively) - this should be determined before these options are allocated.</p> <p>Dinting Vale. The Council should consider mitigation measures to avoid significant effects on biodiversity of allocating G19.</p>
SA28, SA29	Natural England	Observation / Objection	<p>Central area</p> <p>Landscape effects of C5 and C6 at New Mills should be assessed and mitigation measures considered.</p>
SA28, SA29	Natural England	Observation / Objection	<p>Buxton</p> <p>Foxlow Farm, Ashbourne Road, (B20): Ecological and landscape impacts remain unresolved. The option needs to be re-assessed.</p> <p>Further assessment of the landscape impacts of all site allocations can be informed by newly updated National Character Assessments for the Dark Peak, White Peak and South West Peak.</p> <p>Land west of Tongue Lane is within 400m of the Peak District SAC and Wye Valley SSSI and 1km from Tim Lodge in the National Park. The likely significant effects of this option on the SAC, SSSI and its notified features must be assessed via the HRA and SA. Landscape impacts on the setting of the National Park must also be determined.</p> <p>Hogshaw is identified as a local wildlife site containing a national BAP priority habitat. The Council should consider the NPPF requirement to avoid, mitigate or compensate for any loss of the wildlife site and BAP habitat.</p> <p>Agree that Fox Low Farm should be brought forward within a masterplan and in partnership with the local community given the scale of development proposed and its potential impact on the Plateau Pastures landscape and National Park.</p>
SA30, SA31, SA32	Stockport Metropolitan Borough Council	Observation / Objection	<p>Trans-boundary impacts are not taken into account; there is a lack of evidence of consideration of neighbouring authorities' planning documents and potential synergies and inconsistencies. For example, the impact on the Peak District of the South East Manchester Multi Modal Strategy has not been considered. Nor has the cumulative impacts of housing delivery in and around Stockport.</p>



3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

			<p>When using the SA Framework to appraise sites - the issue of energy and carbon management was determined not to be applicable, since this will mainly be influenced by design. This approach does not take account of sites where renewable energy opportunities clearly exist and should be required through a site specific policy.</p> <p>The appraisal of Policy EQ1 (Climate Change) overlooks the benefits to the local economy of providing resource efficient buildings.</p>
SA33, SA34	English Heritage	Observation / Objection	<p>Glossopdale</p> <p>G6 (North Road) is adjacent to a conservation area and a grade II registered park and garden. Topography is likely to mean that the site would be highly visible. There may also be implications on the setting of the Castlehill Wood Scheduled Monument. Agree with SA that development may only be appropriate if restricted to the southern part of the site.</p> <p>Concerns over allocation of G8 and G10 (Land off Woodhead Road) due to topography and proximity to designated heritage assets including the Old Glossop Conservation Area and grade II listed buildings.</p> <p>G13 contains the former Hawkshead Mill. Buildings of historic significance must be retained.</p> <p>G18 (Bank Street): setting issues with the Glossop Conservation Area and listed Howards Town House will need to be addressed.</p> <p>G19, 20, 23, 25 and 26 (Dinting Road / Dinting Lane and former railway museum; land off Melandra Castle Road and at Gamesley Sidings) have the potential for non-designated archaeology.</p>
SA33, SA34	English Heritage	Observation / Objection	<p>Central</p> <p>C1 (Hayfield Road) is adjacent to a Conservation Area and a number of listed buildings. There may be potential for non-designated archaeology.</p> <p>C2 (New Mills Road) is adjacent to a Conservation Area and a grade II listed building.</p> <p>C5 (Ollersett Lane) and C6 (Laneside Road) may affect the setting of Ollersett Hall Farm which is grade II listed. Support SA identification of cumulative impacts.</p> <p>C8 (Wharf Road, Whaley Bridge) is adjacent to a conservation area and has the potential to contain non-designated archaeology.</p> <p>C13 (Buxton Road, Chinley) is adjacent to a Conservation Area.</p> <p>Between Old Road and Buxton Road. This site is within the conservation area and there are a number of listed buildings nearby. The site has not yet been subject to SA.</p>

3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

			Britannia Mill, Buxworth. There are multiple designated heritage assets adjacent to the site and there is significant risk to the historic environment. The site has not yet been subject to SA.
SA33, SA34	English Heritage	Observation / Objection	<p>Buxton</p> <p>B3 and B4 (Hogshaw) are adjacent to a Conservation Area and there may be other setting issues with nearby listed buildings, including Fairfield Farm. The sites have potential for non-designated archaeology.</p> <p>B6 (Hardwick Square south) is wholly within the Conservation Area and is also adjacent to a number of listed buildings.</p> <p>B7 (Market Street depot) is adjacent to the Conservation Area.</p> <p>B8 (West of Tongue Lane), B10 (Land off Dukes Drive) and B11 (Sherbrook Lodge) all have the potential to contain non-designated archaeology.</p> <p>B20-22 (Foxlow Farm, Ashbourne Road) and B27 (Harpur Hill College Campus) all surround a scheduled monument (Fox Low Bowl Barrow), the setting of which needs to be taken into account. There is also potential for non-designated archaeology, including the roman road which runs through B20. Also potential for historic landscape impacts. Supports the SA recommendation for a master-planning approach.</p>
SA33, SA34	English Heritage	Observation / Objection	Policy H7 (Gypsies, Travellers and Travelling Show People) SA assessment needs to reflect requirement to consider the historic environment.

Community feedback

Summary of formal responses

- I feel that the algorithm used for scoring housing sites is flawed, in that all negative assessments are given the value 0. This means that, even with weighting included, the overall effect is null, whilst positive values can end up 3 times greater. The effect of this is to slant the score in a positive fashion. Is there a good mathematical reason for this? Surely a negative assessment should have a negative effect on the final score. What would the results be if negative values were given in the same way as positive values which can have a trebling of the impact on the final assessment?
- I am concerned about the apparent lack of importance given to road infrastructure, particularly around the A57 / Glossop / Woodhead area. Surely these problems must be addressed before proposals for additional development, e.g. building more houses, increasing tourism, can be adequately assessed.
- Very little consideration has been taken into how developments will affect local infrastructure of any sort. For example, the A57 through Glossop and also towards Manchester from the Gunn Inn junction is already operating at, if not beyond, capacity; the local train service is also at capacity during rush hour, and due to the limitations on the Dinting Viaduct, has very



3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

little potential to be increased. Where are improvements to road capacity and public transport links, that are already needed before any more homes are built, going to come from? A lot of the housing stock in the borough, noticeable in Glossopdale, is already high density and a lot of local facilities are already over used / poor / rely on volunteers. For example, there is very little outside recreational space of any sort other than a few parks anywhere in the borough and these are generally on the outskirts of the towns. Introducing yet more housing without due consideration to this will only exacerbate the problem, by removing some of the few green spaces left and by cramming in as many housing units as possible into those spaces. The well-being of the community as a whole should be considered in the Local Plan policies in far more depth. It takes more to build a community than just houses, and HPBC seem to have forgotten this.

- Site G19 - Dinting Road/Dinting Lane, Glossop scores strongly and there are no insurmountable reasons why satisfactory access to the site for both vehicular and pedestrian users cannot be achieved.
- Site G19 is enjoyed by many people who walk through to enjoy the scenery or find it a safe, enjoyable place to regularly walk their dogs. The area is inhabited by various wildlife such as badgers, foxes, bats owls, kestrels and other species of birds.
- Site G19 - how is safe access is going to be gained to the new houses? How close to a train track can be safely built?
- Site C5 - has traffic and access problems. Major works would be needed to provide safe access to the site so near the junction of High Hill Road - large trucks can take up the whole of the junction as they try to manoeuvre on to the main road. Flooding: even the lower part of the site can remain under water for several weeks. Residential development could result in New Mills becoming a purely commuter belt town with people having to travel outside the area to work. Extensive development generally would remove that "edge of open country" feel which makes the whole Buxton to Glossop corridor so appealing and different.
- Strongly object to the proposals to reclassify Green Belt land along the A6 in Furness Vale. Brownfield sites should be exhausted first. Carving up the Green Belt for development sets a destructive precedent detrimental to the whole of High Peak. The A6 is already an exceptionally busy road, cutting through the heart of Furness Vale. Further building here can only add directly to the traffic congestion, noise and pollution. Taking away valued open land will begin to turn this beautiful village (already scarred by losing out on the A6 bypass in favour of larger local towns) into an over-developed traffic corridor. Furness Vale already has several houses for sale along the A6. Many have been on the market for months if not years, and have dramatically dropped their prices over time - the demand does not exist. I believe there are also plans to build approximately 26 homes at the Industrial Estate on Calico Lane - surely that is more than sufficient if housing really must be built here? We would also like to criticise in the strongest terms your presentation of the consultation documents online. They are mercilessly confusing, unwieldy and resolutely user-unfriendly.
- Query a number of inaccuracies in the report with regard to a direct comparison between C12: Land off Brierly Park, Buxworth and Option C13 Land at Buxton Road, Chinley. Both C12 and C13 are countryside sites yet C12 SA Objective Number 9 is scored Negative and C13 as Neutral. C12 is the residue of a field which has seen two developments since 1921. There

3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

is a substantial stone barn on the site dating back to the 17th Century; a metalled road leading towards the railway line gives credence to the notion that this barn was once part of Hollin Wood Farm. C13 is the residue of a field which has seen recent development; however it could in all reality be construed as “Ribbon Development” in that it furthers the joining together of the village of Chinley with the hamlet of New Smithy. I ask that C12 be given a similar score to C13 which would support the notion of limited development.

- Site B27 - has no decent public transport, the transport that is available is infrequent and subject to excessive charges. B27 has no local amenities. B27 is in no way a suitable development site and should be turned into a doctors surgery / pharmacy for the residents of Harpur Hill.

Summary of drop-in responses

- No comments sought or received.

Summary of key points raised during 2012 consultation

- The SA Scoping Report was consulted on in 2012. Responses to the Scoping Report are on-line at:

http://highpeak-consult.limehouse.co.uk/portal/high_peak/sa_scoping_update_2012

Habitat Regulations Assessment of the High Peak Local Plan - Preferred Options:

HRA Report - February 2013

Stakeholder feedback

Company / Organisation	Nature Of Response:	Summary of response
Natural England	Observation	<p>Natural England considers the HRA’s methodology compliant with the Conservation of Habitats and Species Regulations 2010 (as amended).</p> <p>The appropriate assessment identifies a number of adverse effects which remain uncertain. Before the next iteration of the Local Plan is published for consultation, Natural England can discuss the methodologies for further investigations of air and water quality issues, urbanisation effects, and recreational impacts of the preferred options allocations and potential mitigation measures.</p> <p>Air Quality</p> <p>Adverse air quality effects on the integrity of the Peak District Dales Special Area of Conservation (SAC) remain uncertain. Natural England welcomes the intention to move the Fairfield link road 200m from the SAC, this should be investigated before the next iteration of the Local Plan. If it cannot be</p>



3 Summary of responses to Sustainability Appraisal and Habitat Regulations Assessment

		<p>moved, in order to avoid the effect, this impact will need to be assessed in an Appropriate Assessment (AA) before the plan is adopted. Deferring the assessment to the planning application runs the risk of failure and an undeliverable plan. Natural England welcomes the HRA's recognition of the potential in combination effects of the Fairfield link road and residential development proposed in the Local Plan. Regarding air quality effects, if traffic increases acidity and/or nitrogen deposition by greater than 1% of the site's critical load, this is considered a significant effect and requires AA.</p> <p>Recreational Impacts</p> <p>Regarding mitigation of recreational impacts, the Council should consider whether Green Infrastructure and Open Space policies within the Local Plan and supporting documents/strategies can be used to reduce recreational disturbance of Special Protection Area (SPA) birds and damage to SAC habitats. If the council is minded to follow an alternative green-space mitigation approach, it should consider the quantity of evidence required to establish their effectiveness as well as funding methods, for example through Community Infrastructure Levy (CIL) or Section 106 agreements.</p> <p>Urban Effects</p> <p>The HRA identifies pet predation as a potential adverse effect of residential allocations within 400m of a protected site. This is one urban effect which requires further assessment. Other effects within this zone may include increased fly tipping and fire risk, pests and invasive species. A 400m zone within which these effects may occur has been applied elsewhere, however the HRA should justify the appropriateness of this zone in the High Peak.</p> <p>Option B8</p> <p>As recognised in the SA, Site B8 (Land West of Tongue Lane, Buxton) needs assessment within the HRA. This is a large site (215 dwellings) within 400m of the Wye Valley SSSI and part of the Peak District Dales SAC. This assessment should examine recreational and urban effects. Natural England would welcome further discussions on site B8.</p>
<p>Stockport Metropolitan Borough Council</p>	<p>Observation / Objection</p>	<p>The HRA document needs to take account of the findings of Stockport's HRA, especially the likely impacts of the South East Manchester Multi Modal Strategy (SEMMMS) including any assessment of that project and the potential impact of accumulated housing delivery across neighbouring areas, which can justify mitigation options such as requirements for environmental design standards. In addition any other HRA documents from relevant neighbouring authorities and the wider Greater Manchester conurbation should inform this work.</p>

4 Summary of responses to Interim Infrastructure Delivery Plan

Introduction and context chapter

	Support	Support with conditions	Object	Observations	Other	Total
Para. 1.7	1	0	0	0	0	1
Para. 1.9	0	0	1	0	0	1
Para. 1.11	0	0	1	0	0	1
Para. 1.12	0	2	1	0	0	3
Para. 1.14	0	0	0	1	0	1
Para. 1.18	1	0	0	0	0	1
Para. 1.19	0	0	0	0	1	1
Para. 1.21	0	0	0	1	0	1
Para. 1.34	0	0	1	0	0	1

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
IIDP10	Stephen Robinson	Support	
IIDP12	Stephen Robinson	Object	Local Plan will be found unsound due to allocation of sites that are not deliverable, available, achievable or in a suitable location.
IIDP11	Stephen Robinson	Object	Local Plan is flawed due to absence of proposals for Chapel-en-le-Frith and lack of Neighbourhood Plan.
IIDP13	Stephen Robinson	Object	Retain employment land for such purposes. Only permit residential in exceptional circumstances.
IIDP24	Chatsworth Settlement Trustees	Observations	Look forward to publication of Local Plan site viability appraisal and demonstrating the suitability, viability and deliverability of land off Dukes Drive for housing development.
IIDP3	CJK Packaging Ltd	Observations	Section 3.22 of the "Infrastructure Appraisal: Central Sub-Area" it shows Chapel-en-le-Frith as having 8Mbps broadband. It was upgraded in the middle of 2012 to 20Mbps (21CN infrastructure - the same as New Mills and Buxton already have)



4 Summary of responses to Interim Infrastructure Delivery Plan

IIDP18	Derbyshire Gypsy Liaison	Object	The delivery schedule also needs to take account of any future review of the Gypsy and Traveller Accommodation Assessment (GTAA).
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Community feedback

Summary of formal responses

- Focus office development in town centres where car use is not necessary.
- Locate manufacturing on the edge of town but enable access via public transport.
- Encourage more use of rail for freight.
- Require on site energy generation on business premises.
- Relocate Buxton library (possibly co-locate with museum) and develop existing site for housing.
- Use S106 to address contamination and bring forward brownfield sites.

Summary of drop-in responses

- No comments sought regarding IDP. Concerns comments submitted in relation to the need to have adequate infrastructure to support development.

Summary of key points raised during 2012 consultation

- No comments sought

Infrastructure delivery schedule

	Support	Support with conditions	Object	Observations	Other	Total
Table 1	0	1	7	4	0	12
General comments	1	0	1	1	0	3

Stakeholder feedback

ID	Company / Organisation	Nature Of Response:	Summary of response
IIDP28	National Trust	Object	Peak District Biodiversity Action Plan should be identified as critical, not desirable due to poor state of biodiversity in area.
IIDP19	Derbyshire Gypsy Liaison	Object	Subject to findings of Derbyshire GTAA, there a may be a need for gypsy and traveller sites and infrastructure that should be reflected in IDP.
IIDP20	Network Rail	Observations	(1) Chinley Railway Station - note proposals to provide disabled access bridge and estimated £1m cost. Amend IDP to provide more realistic cost of £2m as bridge would likely be located from

4 Summary of responses to Interim Infrastructure Delivery Plan

			station car park (2) Level crossings - NR would object to any development that would result in an increase in traffic over Dinting Lane level crossing. TA required. In 1st instance, NR would seek closure of crossing and developer contributions to fund bridge or diversionary route. If closure is not possible, S106 / CIL to sought to mitigate impact of development. HPBC should liaise Level Crossings Manager for further details.
IIDP30	Network Rail	Observations	Accessible bridge to serve Chinley Station likely to cost £2m rather than the £1m stated in IDP.
IIDP25	Chatsworth Settlement Trustees	Observations	It is stated that the 'cost' of increased capacity of Buxton Infants School' is 'TBD' yet the s106 committed or anticipated' is stated as £2279.80 per dwelling'. It is unclear how requirement is calculated when cost is not known. Concern that such a generic approach to education contributions may not comply with regulations as requirement may not be "fairly and reasonably related in scale and kind to the development of site B10.
IIDP26	Chatsworth Settlement Trustees	Observations	Transport operators (bus and rail operating companies) should be identified as potential funding sources for some of the infrastructure improvements sought.
IIDP21	Cheshire East Council	Support	<p>The following schemes could have a positive effect on Cheshire East and are therefore supported:</p> <ul style="list-style-type: none"> • Implementation of the North West River Management Plan • Electrification of Buxton railway line • Implementation of the Northern Hub
IIDP29	National Trust	Object	Insufficient support for heritage infrastructure. There are some 18 Listed Buildings in High Peak (outside the National Park area) on the County's list of 'Buildings at Risk'; several of these are Grade II* buildings and there are also likely to be other heritage asset of local importance at risk. It is requested that steps are taken to secure investment in heritage at risk through the Infrastructure Plan.
IIDP33	Derbyshire County Council	Observations	<p>General support for the content of the IDP that broadly reflect Derbyshire Infrastructure Plan. However the IDP is lacking a mechanism to address the cumulative impact of development in transport terms at present. This impact should be mitigated on a strategic basis.</p> <p>Annex A provides further information concerning the potential expansion of the schools set out in the IDP delivery plan:</p> <ul style="list-style-type: none"> • <u>St George Primary, New Mills</u> - some scope to extend but school is voluntary aided and negotiations with Diocese and Governors required



4 Summary of responses to Interim Infrastructure Delivery Plan

			<ul style="list-style-type: none"> • <u>Thornsett Primary</u> - site cannot accommodate an extension. A whole replacement school on a new site would be required. S106 unlikely to support this • <u>Secondary school, Buxton</u> - scope to extend by utilising play areas but a split site is not an optimum solution • <u>Fairfield Nursery and Infant</u> - school has potential for expansion • <u>Buxton Infants</u> - building / site has no potential to expand and is already at levels below DfE guidance • <u>Harpur Hill Primary</u> - some potential to expand depending on provision of an alternative access for the bus and drop off (under discussion) • <u>St Luke's Primary, Glossop</u> - scope for some expansion, depending on scale of development • <u>Dinting Primary</u> - school is voluntary aided and negotiations with Diocese and Governors required • <u>Duke of Norfolk Primary, Glossop</u> - recently moved onto a single site. Minimal opportunity to expand on single site. Old site being disposed of by Diocese <p>As Derbyshire Infrastructure Plan is a live document, High Peak IDP will need to be updated when the Derbyshire plan is refreshed.</p>
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Community feedback

Summary of formal responses

- Glossop Spur / Mottram - Tintwistle Bypass should be a priority and classed as "critical" in IDP.
- Remove Glossop Spur from IDP. Consider alternative such as link to Metrolink and fast track bus tracks along arterial routes.
- Consider more cost effective means of addressing congestion in Glossopdale.
- Mixed views on merits of additional housing in Glossopdale with concern regarding congestion.
- Doubt regarding the potential to expand St Luke's School, Glossop.
- Concern regarding traffic congestion at St Luke's, Dinting and Duke of Norfolk Schools in Glossop.

Summary of drop-in responses

- No comments sought regarding IDP. Concerns comments submitted in relation to the need to have adequate infrastructure to support development.

Summary of key points raised during 2012 consultation

- No comments sought.