




High Peak Local Plan
Habitats Regulations Assessment
Addendum to the Submission Version

Prepared for:
High Peak Borough Council

Prepared by:
ENVIRON
Exeter, UK

Date:
August 2014

Project or Issue Number:
UK18-18153

Contract No:	UK18-18153
Issue:	4
Author (signature):	V Pearson
Project Manager/Director (signature):	J Curran
	
Date:	15 th August 2014

This report has been prepared by ENVIRON with all reasonable skill, care and diligence, and taking account of the Services and the Terms agreed between ENVIRON and the Client. This report is confidential to the client, and ENVIRON accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by ENVIRON beforehand. Any such party relies upon the report at their own risk.

ENVIRON disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the Services.

Version Control Record				
Issue	Description of Status	Date	Reviewer Initials	Author Initials
1	First draft	16/07/14	JC	VP
2	Final	21/07/14	JC	VP
3	Final with amendments	23/07/14	JC	VP
4	Final with amendments following NE comment	15/08/14	JC	VP

Contents

1	Introduction	3
1.1	This Addendum Report	3
1.2	Publication of the Submission version of the High Peak Local Plan and the HRA	3
2	The Submission version of the High Peak Local Plan	5
3	Potential Effects of the High Peak Local Plan	6
3.1	Summary of the Potential Effects of the Local Plan	6
4	Assessment of air quality	13
4.1	Background	13
4.2	Addressing Comments from Natural England	13
4.3	Avoidance measures	19
5	Tongue Lane Allocations	21
5.1	Addressing Comments from Natural England	21
5.2	Avoidance measure	21
6	Assessment of urban effects	22
6.1	Background	22
6.2	Addressing Comments from Natural England	22
6.3	Avoidance measure	23
7	Assessment of water quality	24
7.1	Background	24
7.2	Addressing Consultee Comments	24
8	In-combination effects	26
8.1	Background	26
8.2	Addressing Consultee Comments	26
9	Conclusions	28

List of Tables

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation 7

Table 4.1 Traffic flows on A roads that pass within 200 m of a component of Peak District Dales SAC 16

Table 4.2 Effect of estimated increased traffic on A roads that pass within 200 m of a component of Peak District Dales 18

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects

28

Appendices

- Annex A Consultation responses relating to the Revised Preferred Options version of the High Peak Local Plan HRA Report (March 2014)
- Annex B Results of Screening of Minor Modifications
- Annex C 2012 Updated Screening Assessment
- Annex D Exchange of letters in relation to phosphates and the River Wye
- Annex E Summary of HRA for use by Development Management staff at High Peak Borough Council

1 Introduction

1.1 This Addendum Report

This document is an addendum to the Habitats Regulations Assessment (HRA) Report which accompanied the Submission version of the High Peak Local Plan which was published and made available for receipt of formal representations over the period 23rd April to 23rd June 2014. This addendum should be read in conjunction with the High Peak Local Plan Submission Version Habitats Regulations Assessment Report (March 2014) (hitherto referred to as the 'submission HRA Report') which is available from High Peak Borough Council via:

<http://www.highpeak.gov.uk/hp/council-services/evidence-base/habitats-regulations-assessment>

Following receipt of representations and identification of minor amendments to be made to the Local Plan by High Peak Borough Council (the Council), this addendum has been prepared in order to conclude the HRA prior to submission of the Local Plan, together with the list of recommended minor changes, to the Secretary of State for examination.

Comments received from Natural England and Derbyshire Wildlife Trust on the submission HRA Report have been taken on board within this addendum report and within the wording of the Submission Local Plan. It is now possible to conclude that the **High Peak Local Plan would not result in adverse effects on European designated sites, both alone and in combination with other plans**. See Section 9 of this addendum report for further details of the HRA conclusions.

1.2 Publication of the Submission version of the High Peak Local Plan and the HRA

Consultation responses directly related to the HRA were received from Natural England and the Derbyshire Wildlife Trust. The correspondences received can be found within Annex A of this addendum report. This addendum report addresses the comments raised by these consultees. Comments from Natural England related to:

- Presentation of information (addressed in Section 3 of this addendum);
- Air quality assessment methodology (addressed in Section 4 of this addendum);
- Potential impacts from traffic (addressed in Section 4 of this addendum);
- Tongue Lane Allocations (addressed in Section 5 of this addendum);
- Mitigation for potential urban effects (addressed in Section 6 of this addendum);
- Mitigation for potential water quality effects on the Peak District Dales SAC (addressed in Section 7 of this addendum); and
- In combination effects (addressed in Section 8 of this addendum)

Natural England also stated that they agreed with the conclusions within the submission HRA Report that the policies within the Local Plan will not cause adverse effects on the Peak District Moors (South Pennine Moors Phase 1) SPA and SAC in terms of recreational disturbance.

Derbyshire Wildlife Trust raised a concern about the mitigation for potential water quality effects on the Peak District Dales SAC.

2 The Submission version of the High Peak Local Plan

High Peak Borough Council's Local Plan is the key planning document for delivering sustainable development across the plan area of the Borough to 2031. The Local Plan has been through an extensive period of consultation and refinement culminating in the Submission version which was agreed by the Council on 18th March and 8th April 2014. The submission Local Plan was subsequently published and made available for receipt of formal representations, over the period 23rd April to 23rd June 2014.

The Council has considered the representations made and the latest evidence available and considers that the Local Plan is a sound document and that no significant changes are appropriate or necessary. However in order to improve the legibility of the Local Plan and update its content and to address those representations which it is considered raise issues of unsoundness which need to be resolved, a number of further minor modifications are being recommended to the Inspector.

The minor modifications have been screened for Likely Significant Effects (LSEs). Should LSEs be identified, they would need to be subjected to HRA.

The results of the screening of the minor modifications are presented within Annex B. The screening exercise did not identify any changes to the Local Plan wording which requires any further HRA.

3 Potential Effects of the High Peak Local Plan

3.1 Summary of the Potential Effects of the Local Plan

Natural England suggested that a table should be provided which summarises the policies within the Local Plan which have LSE identified, and the European sites affected with the reason for the effect. This information is presented within Table 3.1, along with the conclusions of the Appropriate Assessment.

The LSEs identified within Table 3.1 have been addressed through the identification of mitigation/avoidance measures and these are presented within Table 9.1. Table 9.1 has been updated following minor modifications to the Local Plan which include insertion of policy wording to avoid potential effects on European sites.

Further amendments have been made to Table 9.1 in response to the consultation comments on the submission HRA Report received from Natural England¹ and Derbyshire Wildlife Trust² (see Annex A). The comments received in relation to the potential effects of the plan relate to in combination effects, air quality, urban effects and water quality. Each of these effects is dealt with in the subsequent sections of this addendum report and effects and avoidance measures are summarised within Table 9.1.

.

¹ Letter from Natural England to High Peak Borough Council, dated 23/06/14, Ref: 119109

² Letter from Derbyshire Wildlife Trust - Comments on Local Plan Submission April 2014, dated 22/06/14

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation			
Local Plan Policies / relevant site allocations	European site/s	Summary of Likely Significant Effects (LSEs) identified through screening	Conclusions of the Appropriate Assessment
<p>All policies which create the potential for additional journeys:</p> <ul style="list-style-type: none"> • Policy S2 Settlement Hierarchy • Policy S3 Strategic Housing Development • Policy S4 Maintaining and Enhancing an Economic Base • Policy S5 Glossopdale Sub-area Strategy • Policy S6 Central Sub-area Strategy • Policy S7 Buxton Sub-area Strategy • Policy E1 New Employment Development • Policy E2 Employment Land Allocations • Policy E3 Primary Employment Zones • Policy E6 Promoting Peak District Tourism and Culture • Policy H1 Location of Housing Development • Policy H3 Housing Allocations • Policy CF3 Local Infrastructure Provision • Policy DS19 Tongue Lane (land south of tongue Lane Industrial Estate, Buxton) 	<ul style="list-style-type: none"> • Peak District Moors (South Pennine Moors Phase 1) SPA; • South Pennine Moors SAC; and • Peak District Dales SAC. 	<p>Potential adverse effect via increased emissions to air from expected traffic increases on A roads passing within 200m of the component sites for journey between settlements in or beyond Plan Area. Qualifying habitats are vulnerable to additional nitrogen deposition.</p>	<p>The policies within the Local Plan will not result in an adverse effect on the integrity of the Peak District Dales SAC with regards to air quality, either through increased traffic, or through effects of the Fairfield Link Road.</p>
<p>All policies with residential / tourism development in uncertain locations:</p> <ul style="list-style-type: none"> • Policy S2 Settlement Hierarchy • Policy S3 Strategic Housing Development 	<ul style="list-style-type: none"> • Peak District Moors (South Pennine Moors Phase 1) SPA; and • South Pennine Moors SAC. 	<p>A potential effect of trampling of habitats or disturbance of birds as a result of increased recreational pressure from housing development and from increased</p>	<p>The policies within the High Peak Local Plan will not result in an adverse effect on site integrity of the South Pennine Moors (Phase 1) SPA / SAC with regards to recreational</p>

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation			
Local Plan Policies / relevant site allocations	European site/s	Summary of Likely Significant Effects (LSEs) identified through screening	Conclusions of the Appropriate Assessment
<ul style="list-style-type: none"> • Policy S5 Glossopdale Sub area Strategy • Policy S6 Central area; Sub area Strategy • Policy S7 Buxton Sub area Strategy • Policy EQ3 Countryside and Greenbelt Development • Policy E4 Change of use on existing business land and premises • Policy E6 Promoting Peak District Tourism and Culture • Policy E7 Chalet accommodation, caravan and camp site developments • Policy H1 Location of housing development • Policy H6 Rural Exception Sites • Policy H7 Gypsies, Travellers and Travelling Show People 		<p>tourism within the Plan Area.</p> <p>Possible effects are disturbance of the bird species for which the Phase 1 SPA is designated (either by people or by accompanying dogs), and trampling or erosion of the habitats for which the SAC is designated.</p>	pressure.
Policy EQ7 Green Infrastructure	<ul style="list-style-type: none"> • Peak District Moors (South Pennine Moors Phase 1) SPA; and • South Pennine Moors SAC. 	If new or improved recreational routes under this policy encouraged access onto the SPA/SAC this could result in increased recreational pressure.	Policy EQ7 will not result in an adverse effect on the integrity of the South Pennine Moors (Phase 1) SPA / SAC as regards effects of improvements to the green infrastructure.
<p>All policies with residential / tourism development in uncertain locations:</p> <ul style="list-style-type: none"> • Policy S2 Settlement Hierarchy • Policy S3 Strategic Housing Development • Policy S5 Glossopdale Sub area Strategy 	<ul style="list-style-type: none"> • Peak District Moors (South Pennine Moors Phase 1) SPA; • South Pennine Moors SAC; 	<p>Potential urban effects including:</p> <ul style="list-style-type: none"> • presence of dogs (disturbance of nesting birds, particularly ground nesting species, or eutrophication of low nutrient 	Avoidance measures have been put forward in Table 9.1 below with regards to urban effects and the integrity of the South Pennine Moors (Phase 1) SPA / SAC and the Peak District Dales SAC. The urban effects

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation			
Local Plan Policies / relevant site allocations	European site/s	Summary of Likely Significant Effects (LSEs) identified through screening	Conclusions of the Appropriate Assessment
<ul style="list-style-type: none"> • Policy S6 Central area; Sub area Strategy • Policy S7 Buxton Sub area Strategy • Policy EQ3 Countryside and Greenbelt Development • Policy E4 Change of use on existing business land and premises • Policy E6 Promoting Peak District Tourism and Culture • Policy E7 Chalet accommodation, caravan and camp site developments • Policy H1 Location of housing development • Policy H6 Rural Exception Sites • Policy H7 Gypsies, Travellers and Travelling Show People 	<ul style="list-style-type: none"> • Peak District Dales SAC. 	habitats) <ul style="list-style-type: none"> • disturbing grazing animals (effects on habitat structure), or • fire setting. Fires can have significant effects, both on vegetation (particularly summer fires) and on ground nesting birds (particularly spring fires). They also have the potential to affect large areas of land. 	are principally from indirect effects of dogs worrying grazing animals and from fire-setting.
<p>Sites allocated for residential use within 1.6 km of European sites and sites no longer allocated in the plan but which will be available for development in the plan period:</p> <p>Former car showroom on junction of Leek Road / Macclesfield Road, Buxton</p> <p>Site B5, Ambulance Station, The Glade, Buxton</p> <p>Site C2, New Mills Road, Hayfield</p> <p>Site G13, Hawkshead Mill, Old Glossop</p> <p>Site G16, Woods Mill, High Street East, Glossop</p> <p>Site G31, Charlestown Works, Glossop</p>	<ul style="list-style-type: none"> • Peak District Moors (South Pennine Moors Phase 1) SPA; and • South Pennine Moors SAC. 	Fire setting (effects on habitats and on ground nesting birds)	Avoidance measures have been put forward in Table 9.1 below with regards to urban effects and the integrity of the South Pennine Moors (Phase 1) SPA / SAC and the Peak District Dales SAC.

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation			
Local Plan Policies / relevant site allocations	European site/s	Summary of Likely Significant Effects (LSEs) identified through screening	Conclusions of the Appropriate Assessment
<p>Sites allocated for residential use within 1.6 km of European sites:</p> <ul style="list-style-type: none"> • Policy DS13 Land west of Tongue Lane, Fairfield, Buxton (Site B8) • Policy DS12 Land at Hogshaw, (Sites B3 and B4) • Policy DS14 Land off Dukes Drive (Sites B9 and B10) 	Peak District SAC.	<p>Urban effects resulting in fire setting.</p> <p>Fires can have significant effects, on vegetation (particularly summer fires). They also have the potential to affect large areas of land.</p>	Avoidance measures have been put forward in Table 9.1 below with regards to urban effects and the integrity of the South Pennine Moors (Phase 1) SPA / SAC and the Peak District Dales SAC.
<p>All policies with residential / tourism development in uncertain locations:</p> <ul style="list-style-type: none"> • Policy S2 Settlement Hierarchy • Policy S3 Strategic Housing Development • Policy S5 Glossopdale Sub area Strategy • Policy S6 Central area; Sub area Strategy • Policy S7 Buxton Sub area Strategy • Policy EQ3 Countryside and Greenbelt Development • Policy E4 Change of use on existing business land and premises • Policy E6 Promoting Peak District Tourism and Culture • Policy E7 Chalet accommodation, caravan and camp site developments • Policy H1 Location of housing development • Policy H6 Rural Exception Sites • Policy H7 Gypsies, Travellers and Travelling 	Peak District Moors (South Pennine Moors Phase 1) SPA.	<p>Pet predation of birds which are qualifying features:</p> <ul style="list-style-type: none"> • <i>Pluvialis apricaria</i> Golden Plover; • <i>Flaco peregrinus</i> Merlin; • <i>Asio flammeus</i> Short-eared Owl; and • <i>Caldris alpina schinzii</i> Dunlin (during the breeding season) 	Following analysis of this issue, it has been concluded that it is a 'minor' issue and unlikely to result in an adverse effect on the site integrity of the SPA alone. To be precautionary, mitigation has been proposed in Table 9.1 regarding the combined results of all the urban effects considered.

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation			
Local Plan Policies / relevant site allocations	European site/s	Summary of Likely Significant Effects (LSEs) identified through screening	Conclusions of the Appropriate Assessment
Show People			
<p>Employment policies:</p> <ul style="list-style-type: none"> • Policy S4 Maintaining and Enhancing an Economic Base • Policy E1 New Employment Development 	<ul style="list-style-type: none"> • Peak District Moors (South Pennine Moors Phase 1) SPA; • South Pennine Moors SAC; and • Peak District Dales SAC. 	Possible direct effects of operation of the employment use on air quality at development close to a European site which could have effects on habitats vulnerable to acid and nitrogen deposition which are qualifying features.	Avoidance measures have been put forward for this issue in Table 9.1 below.
Policy EQ1 Climate Change	Peak District Moors (South Pennine Moors Phase 1) SPA	<p>Effects of wind turbines on bird species which are qualifying features:</p> <ul style="list-style-type: none"> • <i>Pluvialis apricaria</i> Golden Plover; • <i>Flaco peregrinus</i> Merlin; • <i>Asio flammeus</i> Short-eared Owl; and • <i>Caldris alpina schinzii</i> Dunlin (during the breeding season). 	Avoidance measures have been put forward in Table 9.1 below in order to address potential effects with regards to this issue.
<p>Policies relating to housing development in Buxton:</p> <ul style="list-style-type: none"> • Policy S2 Settlement Hierarchy; • Policy S3 Strategic Housing Development; • Policy S7 Buxton Sub Area; • Housing Policy H3 • Strategic Development Site policies DS 15-18 	Peak District Dales SAC (Wye Valley SSSI component site)	<p>Possible effects on water quality in River Wye of increased phosphate from Buxton STW. With effects on qualifying features:</p> <ul style="list-style-type: none"> • <i>Austropotamobius pallipes</i>; White-clawed (or Atlantic 	Avoidance measures have been put forward in Table 9.1 below in order to address potential effects with regards to this issue.

Table 3.1: Summary of likely significant effects from High Peak Local Plan before mitigation			
Local Plan Policies / relevant site allocations	European site/s	Summary of Likely Significant Effects (LSEs) identified through screening	Conclusions of the Appropriate Assessment
inclusive and DS20		stream) crayfish; <ul style="list-style-type: none"> • <i>Lampetra planeri</i>; Brook lamprey; • <i>Cottus gobio</i>; Bullhead. 	
Policy DS 19 –Tongue Lane (land south of Tongue Lane Industrial Estate, Buxton). (Business / industrial site of 2 ha)	Peak District Dales SAC.	Possible direct effects of operation of the employment use on air quality with subsequent effects on habitats vulnerable to air pollution.	Avoidance measures have been put forward for this issue in Table 9.1 below.

4 Assessment of air quality

4.1 Background

The Strategic Transport Issues Report³ used 2001 census data of journeys to work to identify the main destinations for residents of High Peak. The major outflows from High Peak are to the Greater Manchester area, which is in the opposite direction to the Peak District Dales SAC component sites. The main destinations are: the Greater Manchester area (including Stockport and Tameside); Macclesfield (east Cheshire); Derbyshire Dales; and the main towns within High Peak itself. As the proportion of the Peak District Dales SAC that could potentially be affected was high, combined with the fact that a small, but measurable percentage of commuter traffic (3.4% of car driver trips) is to Derbyshire Dales (which would be via A roads within 200 m of parts of this European site), the submission HRA Report on the Preferred Options Local Plan concluded that further work on this issue was required. Furthermore, the Fairfield Link Road was noted as having the potential for adverse effects on the Peak District Dales SAC. Appropriate assessment has therefore been carried out of the potential impacts of increased traffic from a number of existing roads, and also of potential impacts from the Fairfield Link Road, on air quality on the Peak District Dales SAC and the full assessment is presented within the submission HRA Report.

The Local Plan could potentially cause an adverse effect on the Peak District Dales SAC where traffic, and therefore emissions to air, is expected to increase between the settlements in the Plan Area or beyond the Plan Area as a result of trips to access employment or other facilities such as cultural or retail. This could result in an increase in nitrogen deposition, which could have an effect on those habitats sensitive to additional nitrogen through eutrophication (i.e. fertilisation). This can result in effects such as a change in species composition. In terms of employment developments, certain business uses have the potential to have direct impacts on air quality, including emissions of nitrogen compounds.

The Air Pollution Information System (APIS) website (<http://www.apis.ac.uk/>) was consulted to review the likely sensitivities of designated interest features on these sites to air pollution and to confirm the sites' critical loads for acid and nitrogen deposition. The results are summarised in Annex D of the submission HRA Report. The Peak District Dales SAC is already exceeding its critical load for nitrogen deposition.

4.2 Addressing Comments from Natural England

Natural England has advised that emissions from road sources more than 200 m from the boundary of a site can be considered negligible (this does not mean that there is not the possibility of impacts due to increasing emissions from diffuse sources). A GIS exercise was undertaken to identify any European sites within 200 m of an A road within the Peak District region. This analysis was based on the assumption that only traffic on A roads is significant. Natural England suggested (see Annex A) that all major roads (defined as those with an Annual Average Daily Traffic (AADT) count of 10,000 or more should be considered. The most up to date Updated Screening Assessment (USA) obtained from High Peak Borough on 14/07/14 confirmed that there are no other 'major roads' within the High Peak Borough,

³ Scott Wilson (march 2010) North Derbyshire Local Development Frameworks: High Peak and Derbyshire Dales

and therefore there are no other major roads other than the A roads already considered, which pass within 200m of the Peak District Dales SAC (see Annex C). Approximately 12% (about 296 ha) of the SAC lies within 200 m of the A roads shown on Figure A2 in Annex A of the submission HRA report. The roads are as follows:

- A623 between Chesterfield and Chapel-en-le-Frith passing through Baslow (Cressbrook Dale SSSI);
- The A6 between Bakewell and Buxton (Topley Pike and Deep Dale SSSI and the Wye Valley SSSI) and between Matlock and Cromford (Matlock Woods SSSI);
- The A515 between Buxton and Ashbourne (Topley Pike and Deep Dale SSSI); and
- The A5012 between Buxton and Cromford (leading to Matlock and Wirksworth) (Long Dale and Gratton Dale SSSI and Via Gellia Woodlands SSSI).

The submission HRA Report presents an assessment of the increase in nitrogen deposition that could result from traffic flow increases on the relevant sections of roads with predicted increases of 1000 AADT or more: the A623; A6; and A515.

Air quality is an issue that could result from the combined effects of more than one land use plan. Therefore, to be precautionary, an estimate has been made of the potential in-combination effects on traffic levels on these roads with other Local Plans. From data in the Housing Requirement Technical Note⁴, the predicted population increase for High Peak over the Plan period 2011 – 2031 is 14,773, which was suggested in the Technical Note to result in a housing need of 9,020 dwellings over this period (at a ratio of 1.64 population per dwelling). High Peak Borough Council used this evidence when reviewing its assessed needs in December 2013, and agreed a housing target of 7,280 houses over the Plan Period. This housing target is predicted to accommodate a population increase of 11,939 (using the 1.64 population per dwelling ratio), which is an increase of 13.1% over the current population. It has been assumed that the population increase from neighbouring Plan Areas would be a similar figure. It has also been assumed that the increase in numbers of cars, and also the increase in traffic, might be approximately twice the increase in population, which would generate an increase in traffic of 26.2% between 2011-2031 (see Annex D of the submission HRA report for details of the air quality assessment methodology used). It has been assumed that this would also include traffic increases from tourism. This traffic increase is taken as the in-combination effect from all neighbouring Local Plan Areas that use the roads studied, and is therefore a precautionary approach.

The conclusion of the air quality assessment was that the estimated traffic increase of 26.2% is calculated to result in a maximum increase in nitrogen deposition of 0.75% of the Critical Load at the boundary of the SSSI sites closest to the A roads. Below a threshold of 1%, it can be concluded that increased nitrogen deposition as a result of increased traffic will not have an adverse effect on the habitat and therefore on site integrity.

Although Natural England has accepted the conclusion of the air quality assessment, it has noted that the air quality impacts have been assessed as part of an in combination assessment and has commented that it would be helpful if the HRA could explain what the effects of the plan alone would be.

⁴ Nathaniel Lichfield & Partners (2013). Housing Requirement Technical Note, published on High Peak Borough Council's website

Whilst the submission HRA report was being prepared, work has been ongoing on behalf of Derbyshire County Council⁵ to determine the effect of the development proposed within the High Peak Local Plan on the local road network. As a part of this work, it has been possible to obtain predictions of AADT for the roads in question (listed above) as a result of the development proposed for 2031. Traffic counts have also been supplied for 2013⁶. It has therefore been possible to recalculate the effects on air quality from predicted increases in traffic, from the High Peak Local Plan alone.

The findings of the recalculation are presented in tables 4.1 and 4.2.

⁵ High Peak Local Plan Transport Study draft (Issue 2) (URS, April 2014)

⁶ Personal communication from Derbyshire County Council, dated 21/07/14

Table 4.1 Traffic flows on A roads that pass within 200 m of a component of Peak District Dales SAC						
Component SSSI	Road	Relevant habitat for air quality analysis¹	Critical Load² (kg N ha⁻¹ yr⁻¹)	Baseline AADT 2013³	2031 AADT with Local Plan growth⁴	Increase in AADT⁵
Cressbrook Dale SSSI	A623	Sub-Atlantic semi-dry calcareous grassland	15	6340	7500	1160
Long Dale & Gratton Dale SSSI	A5012	Sub-Atlantic semi-dry calcareous grassland	15	3,740	4,413	673
Matlock Woods SSSI	A6	Meso- and eutrophic Quercus woodland	15	10,000	11,800	1,800
Topley Pike and Deep Dale SSSI	A515	Sub-Atlantic semi-dry calcareous grassland	15	6,500	7,670	1170
	A6	Sub-Atlantic semi-dry calcareous grassland	15	5,400	6,372	972
Via Gellia Woodlands SSSI	A5012	Sub-Atlantic semi-dry calcareous grassland	15	3,740	4,413	673
		Meso- and eutrophic Quercus woodland	15			
Wye Valley SSSI	A6 (section 1)	Sub-Atlantic semi-dry calcareous grassland	15	5,400	6,372	972
		Meso- and eutrophic Quercus woodland	15			
	A6 (section 2)	Sub-Atlantic semi-dry calcareous grassland	15	5,400	6,372	972
		Meso- and eutrophic Quercus woodland	15			

Notes
¹ Habitats are those given by the APIS website for air quality assessment, based on the designated habitats of the SAC
² Critical Load values taken from APIS. In all cases the recommended number, at the bottom of the range of values, was used.
³ Traffic counts were obtained from Derbyshire County Council
⁴ Provided by Derbyshire County Council
⁵ Increases in AADT of 1000 or more are considered potentially significant, and are shown in **bold**

According to the Design Manual for Roads and Bridges⁷, in terms of nitrogen deposition from traffic emissions, only increases in Annual Average Daily Traffic (AADT) of 1000 AADT or more are considered significant. When the effects of the Local Plan development is considered alone, only 3 of the A roads show an increase in AADT of 1,000 or more.

It is therefore possible to conclude that there will not be adverse effects from increased traffic on air quality from the A5012, which passes close to Long Dale & Gratton Dale SSSI and Via Gellia Woodlands SSSI, the A6 which passes close to Topley Pike and Deep Dale SSSI and the A6 parts 1 and 2 passing close to the Wye Valley SSSI, as predicted traffic increases on these roads are below 1000 AADT.

As previously, an assessment has been made of the increase in nitrogen deposition that could result from traffic flow increases on the relevant sections of roads with predicted increases of 1000 AADT or more: the A623; A6; and A515. The results are presented in Table 4.2 below. The estimated traffic increases provided by Derbyshire County Council are calculated to result in a maximum increase in nitrogen deposition of 0.36% of the Critical Load at the boundary of the SSSI sites closest to the A roads (see Table 4.2). Below a threshold of 1%, it can be concluded that increased nitrogen deposition as a result of increased traffic resulting from the High Peak Local Plan growth **alone** will not have an adverse effect on the habitat and therefore on site integrity⁸ of the Peak District Dales SAC.

⁷ DMRB Volume 11 Section 3 Part 1 HA207/07 <http://www.dft.gov.uk/ha/standards/DMRB/vol11/index.htm>

⁸ Confirmed by Natural England within a personal communication dated 17/01/14

Table 4.2 Effect of estimated increased traffic on A roads that pass within 200 m of a component of Peak District Dales

Component SSSI	Road	<u>Critical Load for relevant habitat for air quality analysis</u> ¹	Baseline AADT 2013 ²	2031 AADT with Local Plan growth ³	Background NO ₂ (µg m ⁻³)	Total NO ₂ with baseline AADT (µg m ⁻³)	Total NO ₂ with increased AADT (µg m ⁻³)	Total N deposition with baseline AADT (kgN ha ⁻¹ yr ⁻¹)	Total N deposition with increased AADT (kgN ha ⁻¹ yr ⁻¹)	Difference in N deposition due to increased traffic (kgN ha ⁻¹ yr ⁻¹)	Difference as % of critical load
Cressbrook Dale SSSI	A623	15 kg N ha ⁻¹ yr ⁻¹	6340	7500	10.3	13.34	13.88	1.334	1.388	0.054	0.36%
Matlock Woods SSSI	A6	-15 kg N ha ⁻¹ yr ⁻¹	10,000	11,800	12.22	15.2	15.73	1.52	1.573	0.053	0.35%
Topley Pike and Deep Dale SSSI	A515	15 kg N ha ⁻¹ yr ⁻¹	6500	7670	9.55	10	10.08	1	1.008	0.008	0.05%

Notes

¹ Habitats are those given by the APIS website for air quality assessment, based on the designated habitats of the SAC. Critical Load values taken from APIS.

² Traffic counts were obtained from Derbyshire County Council

³ Provided by Derbyshire County Council

4.3 Avoidance measures

An avoidance measure was included in the submission HRA Report to address uncertainty around final uses of employment sites near to European sites which could lead to possible effects on air quality. This measure was to insert the red underlined text into this wording in Policy EQ9: Pollution Control and Unstable Land:

“only if the potential adverse effects are mitigated to an acceptable level by other environmental controls or by measures included in the proposals. This should include any adverse effects identified on European sites. This may be achieved by...”

Natural England has recommended that the policy wording is amended because the term ‘acceptable’ does not give a risk based approach to ensuring there are no impacts on the integrity of any European sites.

The following wording is therefore put forward for inclusion within Policy EQ9: Pollution Control and Unstable Land in order to address the comment from Natural England:

“Any proposal that adversely affects a European site will not be given planning permission.”

In response, the Council proposes the following minor modifications to EQ9:

“Amend second paragraph as follows:

This will be achieved by:

- Ensuring developments avoid potential adverse effects and only permitting developments that are deemed (individually or cumulatively) to result in:”

And, amend third paragraph as follows:

if the any remaining potential adverse effects are mitigated to an acceptable level by other environmental controls or by measures included in the proposals. This may be achieved by the imposition of planning conditions or through a planning obligation. The Council will not permit any proposal that has an adverse effect on a European site.”

Natural England has also recommended that policy wording should be inserted into the plan to address impacts on the Peak District Dales SAC via Air Quality pathways. This could be achieved through encouraging employment proposals to be located close to residential sites and providing adequate criteria led policies for proposals which could lead to air quality impacts etc. In terms of traffic flows they have suggested policy wording along the following lines:

“Any increase in traffic flows resulting from proposed development may lead to increases in atmospheric pollutants at levels which could cause adverse impacts upon the European designated sites in the area. Such development should therefore be subject to assessment under the Habitats Regulations. Where traffic increases acidity and/or nitrogen deposition by greater than 1% of the site’s critical load, this is considered a likely significant effect and requires an Appropriate Assessment.

The Air Pollution Information System (APIS) provides comprehensive information regarding this issue: <http://www.apis.ac.uk/>.”

It is suggested that this wording is included within the supporting text to Policy EQ9: Pollution Control and Unstable Land.

The Council has agreed to amend the list of minor modifications to include this as a new paragraph to follow Para 5.93.

5 Tongue Lane Allocations

5.1 Addressing Comments from Natural England

Natural England identified some confusion within the submission HRA Report with regards to some site allocations in the Buxton area. It can be confirmed that all of the allocation sites within Buxton have been considered within the HRA. The submission HRA Report incorrectly labelled Policy DS19 Tongue Lane (land south of Tongue Lane Industrial Estate, Buxton) as Policy DS16. This was an error which is corrected in this addendum report.

Policy DS19 allocates land for business and industrial use and the HRA has identified potential direct effect of operation of the employment use on air quality (see Table 9.1). The avoidance measure put forward for this potential effects is as follows:

“The Tongue Lane employment site DS 19 will require project-level HRA once the details of the site (employment uses, site layout etc.). Add to the list of requirements in the policy text box:

“Project-level Habitats Regulations Assessment in order to address potential air quality effects”

5.2 Avoidance measure

Natural England has suggested that the avoidance measure should be amended in order to avoid uncertainty over whether adverse impacts can be ruled out once a detailed project is submitted. Additional policy wording is therefore put forward to address this comment from Natural England. The following wording should be inserted into Policy DS19 Tongue Lane (land south of Tongue Lane Industrial Estate, Buxton):

“The end employment uses will only be suitable if adverse effects on the Peak District Dales SAC can be avoided and/or mitigated. Such mitigation could include:

- the design and layout of development to optimise separation distances from sources of air pollution;*
- using green infrastructure, in particular trees, to absorb dust and other pollutants;*
- means of ventilation; and*
- controlling dust and emissions from construction, operation and demolition.”*

The Council has agreed to insert the above wording into Policy DS19.

6 Assessment of urban effects

6.1 Background

For the full assessment of this issue, please see the submission HRA Report. The submission HRA Report identified a number of potential 'urban effects', as follows:

- Predation of bird or animal species (mainly by cats);
- Effects of dogs – disturbance of birds, eutrophication (mainly through faeces) and disturbance of grazing livestock;
- Localised recreational pressure (from people walking directly from their home to the European site),
- Fires; and
- Fly tipping / Litter.

Based on available research evidence, avoidance measures were put forward. The key measure was to amend the wording of Policy EQ4 – Biodiversity and its supporting text, as follows:

“Edit text of Policy EQ 4 – Biodiversity as follows:

“Requiring a project level Habitats Regulations Assessment (HRA) where new development is proposed within 1.6 km of the boundary of the South Pennine Moors Phase 2 SPA; Peak District Moors (South Pennine Moors Phase 1) SPA; Peak District Dales SAC and South Pennine Moors SAC, in order to satisfy the Council that there will be no significant adverse effects on the ecological integrity of the sites”.

And

“Include in the supporting text of Policy EQ 4 – Biodiversity:

“The HRA report, which is available as a supporting document, has identified the potential for adverse effects from development within the Peak District Moors (South Pennine Moors Phase 1) SPA, the South Pennine Moors SAC, and the Peak District Dales SAC from residential or tourist development within 1.6 km of their boundaries. Such adverse effects could be the result of fire setting or disturbance of grazing animals used for site management. Policy EQ 4 therefore requires project-level HRA for developments proposed within 1.6 km of a European site to consider urban effects as a minimum scope.””

6.2 Addressing Comments from Natural England

Natural England does not agree with the application of a 1.6km zone of influence where an appropriate assessment which demonstrates that there will be no adverse effects on site integrity from the identified urban effects must be submitted with all planning applications (see Annex A).

HRA is a sequential process and each step should be progressed in order. The test of LSE is a coarse filter to determine which projects require a more detailed assessment. Natural England would therefore expect High Peak Local Authority to undertake a screening exercise when assessing future planning applications, which could have an LSE on a European site in view of the implications of the designated site's conservation objectives.

6.3 Avoidance measure

In response to Natural England's comments, the avoidance measures for this issues have been revised. Policy EQ4 – Biodiversity should be amended so that it states that “any proposal that adversely effects a European site will not be given planning permission”. The first bullet point of the policy, which refers to the 1.6km zone of influence, should be deleted.

The Council has agreed to delete the first bullet point of EQ4 and in its place insert the following:

- “Conserving and enhancing sites of international, European, and national importance. The Council will not permit any development proposal that has an adverse effect on the integrity of a European site (or wildlife site given the same protection as European sites under the NPPF) either alone or in-combination with other plans or projects.”

In addition the Council will amend paragraphs 5.43 and 5.44 to the supporting text for EQ4 as follows:

~~“The draft Local Plan Habitats Regulations Assessment (HRA) report, which is available as a supporting document, has identified the potential for adverse effects from development within on the integrity of the Peak District Moors (South Pennine Moors Phase 1) SPA, the South Pennine Moors SAC, and the Peak District Dales SAC from residential or tourist development within 1.6 km of their boundaries. Such adverse effects could be the result of increased emissions to air from expected traffic increases, presence of dogs, pet predation, fire setting, or disturbance of grazing animals used for site management. Policy EQ 4 therefore requires project level HRA for developments proposed within 1.6 km of a nature conservation site of international importance.~~

~~In addition, If a development proposal beyond 1.6 km from a European site is capable of affecting one or more of the European sites: South Pennine Moors Phase 2 SPA; Peak District Moors (South Pennine Moors Phase 1) SPA; Peak District Dales SAC and South Pennine Moors SAC, it will be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required. This requirement is likely to vary, according to the size of development site, the "in-combination" effects and its distance from the SPA and or SAC. Advice on this should be sought from the Council and Natural England at the earliest opportunity. The Council's HRA Report includes guidance on the approach to be taken by the Council when assessing those planning applications that could have an Likely Significant Effect on a European site in view of the implications of the designated site's conservation objectives.”~~

In order to provide some guidance for development management staff at High Peak Borough Council, a summary of the key points of the HRA has been prepared. This can be found in Annex E.

7 Assessment of water quality

7.1 Background

For the full assessment of this issue, please see the submission HRA Report. A potential adverse effect on the Peak District Dales SAC was identified in relation to the policies within the Local Plan which direct housing growth to Buxton (see Table 3.1).

The potential effects on water quality are specifically on the levels of phosphates in the River Wye within the Peak District. Particular sections of this river form part of the Wye Valley SSSI, which in turn is a component site of the Peak District Dales SAC. The relevant qualifying features of this SAC to the issue of phosphate levels in the River Wye are:

- 1092 *Austropotamobius pallipes*; White-clawed (or Atlantic stream) crayfish;
- 1096 *Lampetra planeri*; Brook lamprey;
- 1163 *Cottus gobio*; Bullhead.

For completeness, it should be noted that the remaining qualifying features of the SAC⁹ have been scoped out of the appropriate assessment. This is because they are either terrestrial habitats and/or are not present in this component of the SAC, and therefore there is no conceivable pathway of effect on them from increased phosphate discharge into the River Wye as a result of housing growth.

The submission HRA Report concluded that, based on the currently available information, it was not possible to conclude that the Local Plan as currently worded would not have an adverse effect on the integrity of the Peak District Dales SAC, as a result of increasing the total phosphate load to the River Wye via discharges from the Buxton Sewage Treatment Works (STW).

7.2 Addressing Consultee Comments

Natural England has highlighted (Annex A) that mitigation for this issue has since been developed between High Peak Borough Council, the Environment Agency, Severn Trent Water and Natural England. Derbyshire Wildlife Trust (Annex A) also expressed concerns that the Trust would question whether the Local Plan is sound until a Memorandum of Understanding between all four parties has been signed and that clear mechanisms to control phosphate levels either at source (within allocations using appropriate techniques) or at outfall have been identified.

A meeting was held March 17th 2014 between High Peak Borough Council, the Environment Agency and Natural England. The outcome from this meeting concluded that all three parties are satisfied that the proposed housing developments within the borough, as identified in the High Peak Local Plan, are unlikely to have a significant impact upon the Peak District SAC as a result of additional discharges to the River Wye.

The draft Wye Valley SSSI Water Pollution Plan is currently being prepared jointly by Natural England and the Environment Agency. In the event that phosphate levels in the Wye

⁹ Semi- natural dry grasslands and scrubland facies on calcareous substrates; Tilio-Acerion forests of slopes, screes and ravines; European Dry Heaths; Calaminarian grasslands; Alkaline Fens; Calcareous and calcshist screes of the montane to alpine levels; and Calcareous rocky slopes with chasmophytic vegetation

increase, or the Water Framework Directive or Habitats Regulations targets become more stringent, existing regulatory mechanisms, identified in the Water Pollution Plan for the Wye, will ensure that continued achievement of the appropriate phosphate targets in the Wye will not be compromised.. An exchange of letters between High Peak Borough Council, the Environment Agency, Natural England and Severn Trent Water in relation to this issue are included as Annex D to this addendum report.

The submission version of Policy S7 Buxton Sub Area Strategy within the High Peak Local Plan includes the following text:

“Working with partner organisations through the river Wye Water Pollution Plan to protect water quality on the River Wye SSSI which is a component of the Peak District Dales Special Area of Conservation (SAC).”

And

“Ensuring that residential development avoids adverse impact on the integrity of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area and the Peak District Dales Special Area of Conservation.”

8 In-combination effects

8.1 Background

The potential for in-combination effects from activities within neighbouring areas to the Plan Area has been considered within the AA. Specific neighbouring authority plans have been considered including those prepared by the Peak District National Park Authority, Greater Nottingham Councils, Derbyshire Dales District Council and Stockport Council. The issues of air quality (see Section 5 of the submission HRA Report and Section 4 of this Addendum) and recreational pressure (see Section 6 of the submission HRA Report) considered in-combination effects by assuming increases in people / traffic across the region, rather than increases only from the Plan Area.

8.2 Addressing Consultee Comments

Stockport Core Strategy DPD Habitats Regulations Assessment Screening Report (June 2010)

In a consultation response to the High Peak Local Plan Draft HRA Report (February 2013), Stockport Council suggested that their Local Plan HRA should be reviewed. This has been undertaken and no cross-boundary issues have been identified that required further consideration.

In their consultation response to the draft HRA Report (see Annex A), Natural England requested that the Staffordshire Moorlands Core Strategy should specifically be considered for potential in combination effects with the High Peak Local Plan. They also suggested that Derbyshire Dales development plans should be considered.

Derbyshire Dales Submission Local Plan (May 2014)

Potential in combination effects with development plans in the Derbyshire Dales have already been considered in the HRA but this was not clear due to a typographical error within Section 3 of the draft HRA Report. This has been addressed within the paragraphs above.

Potential in combination effects of development within the Derbyshire Dales and the High Peak Local Plan have been considered throughout the course of the HRA. The HRA began originally by assessing a joint Core Strategy between High Peak Borough Council and Derbyshire Dales District Council. Potential in combination effects have specifically been considered with regards to recreational pressure and air quality. No potential in combination effects have been identified.

Staffordshire Moorlands Core Strategy (March 2014)

At the request of Natural England, possible in-combination effects of the High Peak Local Plan and the recently adopted Staffordshire Moorlands Core Strategy (March 2014) have been considered.

The HRA of the Staffordshire Moorlands Core Strategy¹⁰ identified possible likely significant effects resulting from increased tourism and recreation, and through the generation of

¹⁰ Consisting of two reports: Natural Capital, Staffordshire Moorlands District Council Local Development Framework:

additional traffic, alone and in combination with the plans of other local authorities in the area¹¹. Potential in combination effects between Staffs Moorlands and High Peak Local Plans relate to recreation and air quality impacts on:

- South Pennine Moors (SAC);
- Peak District Moors (South Pennine Moors Phase 1) SPA; and
- Peak District Dales (SAC).

The HRA considered development in High Peak in its in combination assessment but did not identify any in combination effects. The report acknowledged that in term of effects relating to tourism and recreation that: *“At [the] present time [2008] these effects are likely to be diffuse and cumulative and so the Appropriate Assessment is unable to quantify them with any accuracy.”*¹² The HRA of the High Peak Local Plan has also concluded that there will not be any effects on the above-mentioned sites from the Local Plan alone and in combination with neighbouring plans.

Based on this information and the HRA of the High Peak Local Plan, no in combination effects between the High Peak Local Plan and the Staffordshire Moorlands Core Strategy have been identified.

Chapel-en-le-Frith Neighbourhood Plan

The draft Chapel-en-le-Frith Neighbourhood Plan has recently been screened for LSEs. In a letter to High Peak Borough Council, Natural England has agreed with the conclusions of the HRA screening *“that there are unlikely to be any significant effects on any European Sites from the Chapel en le Frith Neighbourhood Plan.”*¹³

In this letter, Natural England has queried whether potential traffic increases from the Neighbourhood Plan have been considered in combination with the High Peak Local Plan. Given the precautionary approach adopted to the air quality assessment in the HRA of the Local Plan (see the submission HRA Report and Section 4 of this addendum report), it is considered that the in combination effect of the proposed further 42 dwellings to be allocated within Chapel-en-le-Frith is included within the existing air quality assessment and that the in combination effect of both plans has been considered.

Information to Inform the Appropriate Assessment of the Core Strategy (May 2008); and Staffordshire Moorlands District Council, Core Strategy Development Plan Document: Habitats Regulations Assessment – Update Report to Reflect Revised Submission Version Core Strategy (August 2011).

¹¹ Natural Capital, Staffordshire Moorlands District Council Local Development Framework: Information to Inform the Appropriate Assessment of the Core Strategy (May 2008).

¹² Natural Capital, Staffordshire Moorlands District Council Local Development Framework: Information to Inform the Appropriate Assessment of the Core Strategy (May 2008).

¹³ letter from Natural England to High Peak Borough Council dated 07/07/14 ref 122609

9 Conclusions

Table 9.1 presents the potential effects of the High Peak Local Plan and the measures put forward and incorporated into the wording of the plan in order to avoid these potential effects. Table 9.1 includes revised avoidance measures set out in the previous sections of this addendum report.

Natural England has been consulted on a draft HRA Report and their comments have been taken on board within this addendum report and within the wording of the Submission Local Plan. It is therefore possible to conclude that the **High Peak Local Plan would not result in adverse effects on European designated sites, both alone and in combination with other plans.**

Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
All policies with residential / tourism development in uncertain locations: <ul style="list-style-type: none"> • Policy S2 Settlement Hierarchy • Policy S3 Strategic Housing Development • Policy S5 Glossopdale Sub area Strategy • Policy S6 Central area; Sub area 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC; Peak District Dales SAC;	Potential urban effects (including dogs disturbing grazing animals, or fire setting)	Revised avoidance measure: Policy EQ4 – Biodiversity should be amended so that it states that “ <u>any proposal that adversely affects a European site will not be given planning permission</u> ”. The first bullet point of the policy, which refers to the 1.6km zone of influence, should be deleted.	The Council has agreed to delete the first bullet point of EQ4 and in its place insert the following: <ul style="list-style-type: none"> • <u>“Conserving and enhancing sites of international, European, and national importance. The Council will not permit any development proposal that has an adverse effect on the integrity of a European site (or wildlife site given the same protection as European sites under the NPPF) either alone or in-combination with other plans or projects.”</u>

¹⁴ Any text which has been suggested for inclusion within the Local Plan is shown in red underlined text.

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures ¹⁴	How taken on board in Local Plan Submission version
Strategy <ul style="list-style-type: none"> • Policy S7 Buxton Sub area Strategy • Policy EQ3 Countryside and Greenbelt Development • Policy E4 Change of use on existing business land and premises • Policy E6 Promoting Peak District Tourism and Culture • Policy E7 Chalet accommodation, caravan and camp site developments • Policy H1 Location of housing development • Policy H6 Rural Exception Sites • Policy H7 Gypsies, Travellers and Travelling Show People 				Also to amend paragraphs 5.43 and 5.44 as follows: <i>“The draft <u>Local Plan Habitats Regulations Assessment</u> (HRA) report, which is available as a supporting document, has identified the potential for adverse effects from development within <u>on the integrity of</u> the Peak District Moors (South Pennine Moors Phase 1) SPA, the South Pennine Moors SAC, and the Peak District Dales SAC from residential or tourist development within 1.6 km of their boundaries. Such adverse effects could be the result of <u>increased emissions to air from expected traffic increases, presence of dogs,</u> pet predation, fire setting, or disturbance of grazing animals used for site management. Policy EQ 4 therefore requires project level HRA for developments proposed within 1.6 km of a nature conservation site of international importance. In addition, if a development proposal beyond 1.6 km from a European site is capable of affecting one or more of the European sites: South Pennine Moors Phase 2 SPA; Peak District </i>

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
				<i>Moors (South Pennine Moors Phase 1) SPA; Peak District Dales SAC and South Pennine Moors SAC, it will be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required. This requirement is likely to vary, according to the size of development site, the "in-combination" effects and its distance from the SPA and or SAC. Advice on this should be sought from the Council and Natural England at the earliest opportunity. <u>The Council's HRA Report includes guidance on the approach to be taken by the Council when assessing those planning applications that could have an Likely Significant Effect on a European site in view of the implications of the designated site's conservation objectives.</u></i>
Policy with residential / tourism development in uncertain locations: <ul style="list-style-type: none"> • Policy S5 Glossopdale Sub area Strategy 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC;	Potential urban effects	Add the following text in a suitable place in the list of protected sites in the first bullet point: <u>"European sites."</u>	"European wildlife sites" has been added to first bullet point of point 1 within Policy S5.

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
Policy with residential / tourism development in uncertain locations: <ul style="list-style-type: none"> • Policy S6 Central area; Sub area Strategy 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC;	Potential urban effects	Add the following text in a suitable place in the list of protected sites in the second bullet point: <i><u>“European sites.”</u></i>	“European wildlife sites” has been added to second bullet point of point 1 within Policy S6.
Policy with residential / tourism development in uncertain locations: <ul style="list-style-type: none"> • Policy S7 Buxton Sub area Strategy 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC; Peak District Dales SAC;	Potential urban effects	Add the following text in a suitable place in the list of protected sites in the fourth bullet point: <i><u>“European sites.”</u></i>	“European wildlife sites” has been added to sixth bullet point of point 1 within Policy S7.
Policy with residential / tourism development in uncertain locations: <ul style="list-style-type: none"> • Policy H6 Rural Exception Sites 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC; Peak District Dales SAC;	Potential urban effects	Edit text of Policy H6 as follows: <i>“The development takes full account of environmental considerations, <u>including European sites.</u>”</i>	This text has been added to the fifth bullet point of Policy H6.
Policy with residential / tourism development in uncertain locations: <ul style="list-style-type: none"> • Policy H7 Gypsies, Travellers and Travelling Show 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC;	Potential urban effects	Edit text of Policy H7 as follows: <i>“The development does not have an adverse impact upon the character or appearance of the landscape of sites/areas of nature conservation value, <u>including European sites.</u>”</i>	This text has been added to the first bullet point of Policy H7.

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
People	Peak District Dales SAC.			
Employment policies: <ul style="list-style-type: none"> • Policy S4 Maintaining and Enhancing an Economic Base • Policy E1 New Employment Development 	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC; Peak District Dales SAC;	Possible direct effects of operation of the employment use at development close to a European site on air quality.	Edit text of Policy EQ9 Pollution Control and Unstable Land to include: <u>“Any proposal that adversely affects a European site will not be given planning permission.”</u> Also: Edit text of Policy E1 New Employment Development as follows: “Supporting business development within the countryside that accords with Local Plan Policy EQ3 – Countryside Development <u>and Policy EQ4 Biodiversity.</u> ” Also, add to the supporting text of Policy EQ9: <u>“Any increase in traffic flows resulting from proposed development may lead to increases in atmospheric pollutants at levels which could cause adverse impacts upon the European designated sites in the area. Such development should therefore be subject to assessment under the Habitats Regulations. Where traffic increases acidity and/or nitrogen deposition by greater than 1% of the site’s critical load, this is considered a likely significant effect and requires an Appropriate Assessment. The Air Pollution Information System (APIS) provides comprehensive information regarding this issue: http://www.apis.ac.uk/.”</u>	The Council has amended Policy EQ9 as follows: “Amend second paragraph as follows: This will be achieved by: <ul style="list-style-type: none"> • <u>Ensuring developments avoid potential adverse effects and only permitting developments that are deemed (individually or cumulatively) to result in:”</u> And, amend third paragraph as follows: <u>if the any remaining potential adverse effects are mitigated to an acceptable level by other environmental controls or by measures included in the proposals. This may be achieved by the imposition of planning conditions or through a planning obligation. The Council will not permit any proposal that has an adverse effect on a European site.”</u> This text has been added to Policy E1.

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
				The Council has agreed to amend the list of minor modifications to include this as a new paragraph to follow Para 5.93.
Policy EQ1 Climate Change	Peak District Moors (South Pennine Moors Phase 1) SPA	Effects of wind turbines on bird species	<p>Include in text of policy EQ1:</p> <p><i><u>“Ensuring that any wind turbine developments demonstrate that they will not have an adverse effect on the integrity of any European sites, including project-level HRA where appropriate.”</u></i></p> <p>Include in supporting text for policy EQ1:</p> <p><i><u>“Where a wind turbine development scheme, alone or in combination with other plans and projects, has the potential to have an impact on a European site, developers must carry out a project-level Habitats Regulations Assessment of the likely significant effect(s) of the scheme, in accordance with the Habitats Regulations. In order to gain planning permission, wind turbine developments must demonstrate that they will not have an adverse effect on the integrity of any European sites.”</u></i></p>	This has been included in Policy EQ1 and in the supporting text.
<p>Policies relating to housing development in Buxton:</p> <ul style="list-style-type: none"> • Strategic Policies S2,3,7 • Housing Policy H3 • Strategic Development Site policies DS 15-17 	Peak District Dales SAC (Wye Valley SSSI component site)	Possible effects on water quality in River Wye of increased phosphate from Buxton STW	Avoidance measure has been developed by High Peak Borough Council with Natural England, the Environment Agency and Severn Trent Water. See right hand column.	<p>The submission version of Policy S7 Buxton Sub Area Strategy within the High Peak Local Plan includes the following text:</p> <p><i><u>“Working with partner organisations through the river Wye Water Pollution Plan to protect water quality on the River Wye SSSI which is a component of the Peak</u></i></p>

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
inclusive and DS 20				<p><u><i>District Dales Special Area of Conservation (SAC).</i></u></p> <p>And</p> <p><u><i>“Ensuring that residential development avoids adverse impact on the integrity of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area and the Peak District Dales Special Area of Conservation.”</i></u></p>
Policy DS 3 – Charlestown works (mixed use site, with business use and residential development of approximately 76 dwellings)	Peak District Moors (South Pennine Moors Phase 1) SPA; South Pennine Moors SAC	Possible urban effects (including pet predation, fire setting, dog eutrophication / effects on grazing animals, localised recreational impacts), as there is no open space for recreation close to the site.	<p>Site DS 3 will require project-level HRA once the details of the site (employment uses, site layout etc.).</p> <p>Add to the list of requirements in the policy text box: <u><i>“Project-level Habitats Regulations Assessment in order to address potential urban effects”</i></u></p> <p>With regards to the potential effect of increased localised recreation on the Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors SAC, High Peak BC is invited to propose a suitable text edit to include this requirement.</p> <p>The HRA has concluded at this stage that it is not</p>	See Annex B. Wording has been included in Policy DS 3. This site has been removed as an allocation from the Local Plan because it has been given approval. It does, however, remain in the Local Plan as a commitment.

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
			considered likely that new residents of this site would frequently use the footpath to access the edge of the SAC/SPA and Shaw Moor, however, an alternative area of natural greenspace is not available in this part of Glossop. Should the Local Plan require that a suitable area of greenspace is delivered as a part of this redevelopment, the HRA could conclude that no adverse effects on the SPA/SAC would result from this policy. Suitable alternative natural greenspace could be provided either on site or via contributions for off-site provision in the vicinity of the site.	
Policy DS 4619 – Tongue Lane (land south of Tongue Lane Industrial Estate, Buxton). (Business / industrial site of 4.32 ha (size to be confirmed))	Peak District Dales SAC	Possible direct effects of operation of the employment use on air quality.	The Tongue Lane employment site DS 4619 will require project-level HRA once the details of the site (employment uses, site layout etc.). Add to the list of requirements in the policy text box: <u>“Project-level Habitats Regulations Assessment in order to address potential air quality effects”</u> In addition, in order to address a comment from Natural England, add the following text to Policy DS19: <u>“The end employment uses will only be suitable if adverse effects on the Peak District Dales SAC can be avoided and/or mitigated. Such mitigation could include:</u> • <u>the design and layout of development to optimise</u>	This text has been added to Policy DS19: <u>“Project-level Habitats Regulations Assessment in order to address potential air quality effects on the Peak Dales Special Area of Conservation.”</u> And; <u>“The end employment uses will only be suitable if adverse effects on the Peak District Dales SAC can be avoided and/or mitigated. Such mitigation could include:</u> • <u>the design and layout of development to optimise separation distances from</u>

Table 9.1: Record of potential adverse effects of the High Peak Local Plan on European sites and measures adopted to avoid effects				
Policy	European site/s	Effect	Avoidance measures¹⁴	How taken on board in Local Plan Submission version
			<p><u>separation distances from sources of air pollution;</u></p> <ul style="list-style-type: none"> • <u>using green infrastructure, in particular trees, to absorb dust and other pollutants;</u> • <u>means of ventilation; and</u> • <u>controlling dust and emissions from construction, operation and demolition.”</u> 	<p><u>sources of air pollution;</u></p> <ul style="list-style-type: none"> • <u>using green infrastructure, in particular trees, to absorb dust and other pollutants;</u> • <u>means of ventilation; and</u> • <u>controlling dust and emissions from construction, operation and demolition.”</u>

Annex A: Consultation responses

Date:23/06/2014
Our ref:119109



Jo Bagnall
Regeneration Service
By e-mail: ldf@highpeak.gov.uk

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
CW1 6GJ

T: 0300 060 4276

Dear Sir/Madam

High Peak Local Plan Submission Version

Thank you for consulting us on the above which was received by Natural England on 23/04/2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Soundness and Legal Compliance

Natural England has highlighted a number of potential environmental impacts from the Local plan in terms of, loss of priority habitat, impacts on designated sites and protected landscapes. We therefore have concerns over the **soundness of the plan**, in terms of its deliverability, compliance with the NPPF and **legal compliance** in meeting the requirements of Regulation 102 of the Conservation of Habitats and Species Regulations 2010. However, we consider our concerns can be overcome by additional policy wording and/or supplementary detail, which we have highlighted in further detail below.

If the sensitive site allocations referenced below under section 4 go forward to the Local Plan stage, we strongly advise that sufficient evidence is used to demonstrate that land of poorer quality has been assessed as an alternative, through the SEA process and that the plan has allocated land with the least environmental value. If this cannot be demonstrated, the Plan will run the risk of being **unsound**, due to being noncompliant with paragraph 110 of the NPPF, which states that 'Plans should allocate land with the least environmental or amenity value'.

Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH

www.naturalengland.org.uk

1.0 Key Characteristics and Issues

High Peak contains two National Character Areas. Natural England suggests that the White Peak and the Dark Peak National Character Area (NCA) profiles be referred to in the Vision and Spatial priorities. NCA profiles provide an invaluable resource for understanding wider landscape context, and highlighting opportunities for enhancement of the natural environment. The profiles can be found following link below;

http://www.naturalengland.org.uk/publications/nca/dark_peak.aspx
http://www.naturalengland.org.uk/publications/nca/white_peak.aspx

The Dark Peak Nature Improvement Area (NIA) falls within High Peak boundary. NIAs are fundamental to the step-change that is needed to establish a coherent and resilient ecological network. Paragraph 157 of the NPPF states that Local plans should contain a clear strategy for enhancing the natural, built and historic environment and supporting Nature Improvement Areas where they have been identified. Please find attached the NIA Key Objective for your information.

2.0 Sub Area Strategies

2.1 Policy S5 Glossopdale Sub- area Strategy

Natural England welcomes that this policy seeks to protect sites designated for environmental value. However, as mentioned in our previous response of 25 October 2012, Glossopdale is adjacent to the Peak District National Park. Natural England therefore seeks reassurance that the landscape setting is protected and that this section of the policy is expanded upon to highlight this. This policy should also seek to 'protect and enhance' sites designated for environmental value in line with paragraph 157 of the NPPF. Unless these changes are made the plan in our view runs the **risk of being found unsound**.

Natural England notes that this policy refers to the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA). However, it should be noted that this site also comprises the South Pennine Moors Special Area of Conservation (SAC). It should also be cited that the Dark Peak Site of Special Scientific Interest (SSSI) is a component part of this European site.

Natural England would also encourage all three Sub Area Strategies to promote Green Infrastructure by having more join up with Policy EQ7.

2.2 Policy S6 Central Sub Area Strategy

We reiterate our comments above relating to the Peak District National Park and South Pennine Moors Phase 1 SPA /SAC.

2.3 Policy S7 Buxton Sub Area Strategy

Natural England are pleased that this policy has considered our previous concerns on the impacts of water quality within the River Wye SSSI catchment area. It is important to note that the River Wye is a Site of Special Scientific Interest (SSSI), which is a component of the Peak District Dales SAC. We note that the River Wye Water Pollution Plan is referenced. This section could be strengthened if it stated that development must comply with the plan. This should be referenced within the policy. We welcome that you have mentioned that residential development should avoid any adverse impacts on the integrity of the Peak District Moors (South Pennine Moors Phase 1) SPA. However, under section 2 we advise that this extends to the Peak District Dales SAC as well, to ensure the plan is compliant with the Habitat Regulations. Please see further detail on this issue below under the Habitat Regulations section.

3.0 Development Management Policies

3.1 Policy EQ1: Climate Change

Natural England are pleased that this policy has taken account of European sites and the Peak District National Park. However, this policy could be improved if it referred to all levels of designated sites ie national and local sites. The policy could also be extended to cover wider ecological impacts, including protected species/habitats.

3.2 Policy EQ2: Landscape Character

Natural England notes that this policy sets out to 'protect or enhance 'the character, appearance and local distinctiveness of the landscape and landscape setting of the Peak District National Park. We advise that this policy seeks to 'protect **and** enhance the Peak District National Park'. The policy could also go further with regards to protecting the National Park. For example the policy could ensure that development proposals comply with the Peak District National Park Management Plan. We are in receipt of the latest landscape impact assessment (LIA); we advise that the policy sets out that development proposals should be in conformity with the LIA.

3.4 Policy EQ4: Biodiversity

Natural England advises that the requirement for development to have a project level HRA within 1.6km of a European site should be taken out of the policy. Please see our reasons set out below under the Habitat Regulations Assessment heading – Urban effects. This policy should set out that any development proposals that could adversely affect a European site will not be granted planning permission.

This policy could be improved if it made reference to the need to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species population, in line with paragraph 117 of the NPPF.

3.5 Policy EQ5: Design and Place making

Natural England are pleased that this policy takes account of landscape quality and promotes cycle usage, however it would benefit from having more join up with policy EQ7, to ensure Green Infrastructure is integrated into the design process.

3.6 Policy EQ9: Pollution Control and Unstable Land

Please see comments below in the Habitat Regulations Assessment section.

3.7 Policy CF 4 Open Space: Sports and Recreation Facilities

Natural England are pleased that the Peak Sub Region Open Space, Sport and Recreation Study has been referenced within this policy. This policy could be improved if it was better linked in Policy EQ7: Green Infrastructure, in order to ensure that the wider functionality benefits from open space provision can be sought.

3.8 Policy E 2: Employment Land Allocations

Natural England notes that the section under Tongue Lane Extension (Policy DS 19) states that *'the developer will be required to undertake an Environmental Assessment to show that any proposals will not affect the integrity of the Peak District Dales Special Area of Conservation'*. We believe that there has been some confusion over the Regulations in this policy. Although we agree that an assessment needs to be undertaken to ensure that the proposal will not affect the integrity of the SAC, this should be an assessment under the Habitat Regulations. We have made some detailed comments below with regards to the assessment of this site and its impacts on nearby European sites. An Environmental Assessment is undertaken under the Environmental Impact Assessment EIA Regulations. It is important to note that although the EIA and HRA regulation are closely related they are different types of regulation processes.

4.0 Site allocations

4.1 Policy DS 16 Land west of Tongue Lane, Fairfield, Buxton

Policy DS 19 Tongue Lane (land south of Tongue Lane Industrial Estate), Buxton

Natural England notes that Policy DS 16 refers to the need for a project level HRA, we strongly advise that policy DS 19 should also make reference for the need to avoid any adverse impacts on the integrity of the Peak District Dales SAC. We have made some detailed comments below with regards to these policies having the need to go through the HRA process.

We note that the LIA states that 'Existing vegetation on the boundary should be retained and enhanced in order to further reduce visual prominence and an appropriate landscape framework will need to be created. Natural England strongly advise that this is mentioned within the policy to ensure the plan is sound and in compliance with the NPPF.

4.2 Policy DS 2 and H3: Former Railway Museum and land off Dinting Road, Glossop

This site is within an area of deciduous woodland and open mosaic habitat, and is also adjacent to Dinting Vale Reservoirs and Brook Local site. These are habitats listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. Paragraph 118 of the NPPF states that *'when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused....'*

The Sustainability Appraisal states that there is habitat of medium ecological value on site. It is not clear however if alternative sites have been reviewed to avoid harm to this protected habitat. If this site was to go forward it would run the risk of being undeliverable because it would not be compliant with NPPF and consequently **unsound**.

Policy H3: Housing Allocations

Glossopdale;

Site Allocation: North Road (150 dwellings)

Natural England has made previous comments with regards to this allocation in terms of landscape impacts. We are also aware that the SA states that the lower

part of the site should only be developed. We have been in receipt of the latest LIA to accompany the Local plan which states the following for this site;

'Site has significant landscape impacts and detailed and extensive landscape master planning would be required to address the issues of visibility, loss of vegetation and the impact on the National Park, the character of the surrounding development and the nearby Howard Park Conservation Area.'

To ensure this policy is sound and is compliant with paragraph 115 of the NPPF Natural England strongly advise that this site should have a bespoke policy, to ensure that the impacts on the National Park are fully accounted for and is in full accordance with the LIA.

Site Allocation: Hawkshead Mill Old Glossop Dinting Lane: Glossop

The LIA suggests that the above sites should have an appropriate landscape framework. Natural England therefore advises that this policy sets this out clearly.

Policy DS 4 Adderley Place, Glossop

This site is adjacent to Gamesley Sidings Local Wildlife Site and we are aware that Derbyshire Wildlife Trust have recommended that a buffer zone between the site and Gamesley Sidings Local Wildlife Site be considered. Natural England advises that your Authority work closely with the Wildlife Trust in ensuring that there is an appropriate criterion within the policy to give sufficient weight to the Wildlife Site. We also note from the Sustainability Appraisal that there is potential for protected species to be present.

Natural England have published [Standing Advice](#) which is available on our website. It helps local planning authorities better understand the impact of development on protected or priority species should they be identified as an issue at particular developments. This also sets out when, following receipt of survey information, the authority should undertake further consultation with Natural England.

Policy DS 6 Land at Woodhead Road, Glossop

Natural England previously commented on this site in October 2012. We reiterate our comments relating to the National Park. Please refer to paragraph 115 from the NPPF which states that "*great weight should be given to conserving landscape and scenic beauty in National Parks*". We have concerns that as currently written the policy is unsound as it doesn't currently go far enough in identifying the mitigation measures necessary to reduce the impact of the development on the National Park.

We welcome that you have required the following within the policy;
'Provision of a comprehensive landscaping plan, to address the issues of viability, loss of vegetation and impact on the National Park.'

However, due to the significance of the issues raised in the LIA, the policy should expand on this matter and require the following as advised in the LIA.

'detailed and extensive landscape master planning would be required to address the issues of visibility, loss of vegetation and the impact on the National Park, the character of the surrounding development and the nearby Old Glossop Conservation Area.'

Policy DS 9 Britannia Mill, Buxworth

Natural England are pleased that this policy seeks 'the preparation of a comprehensive masterplan, including a landscape plan and phasing programme.'

However, this policy should go further and incorporate the suggestions from the LIA as set out below;

- Screening vegetation on periphery of site should be retained.
- Woodland corridors within the site which provide linking habitats to the adjacent Local Wildlife Site should be retained.
- An appropriate landscape framework will need to be created.

Policy DS 10 / E5 Bingswood Whaley Bridge

There is **Ancient Woodland** in Whibbings Wood to the south of this site, it borders the site to the east. As mentioned in our previous response, Natural England would want reassurance that any development will not cause any adverse impact on the habitat, during construction and operational phases. Paragraph 118 from the NPPF states that:

'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'.

The [Standing Advice on ancient woodlands and veteran trees: \(238kb\)](#) has been revised in partnership with the Forestry Commission and has been published for use by Local Planning Authorities throughout England. It sets out a series of checks that will guide planners when assessing the impact of any proposed development on ancient woodland.

Deciduous woodland, listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006 also falls within the site. Paragraph 117 from the NPPF states that *"to minimise impacts on biodiversity and geodiversity, planning policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations..."*. Paragraph 118 also states that *'when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.'*

Natural England would like to be assured that there will be no conflicts with Policy EQ8: Trees, Woodland and Hedgerows within the Local Plan. This could run the risk of the site being undeliverable due to it being refused at planning application stage and lead to the plan being **unsound**.

The Roosedyche Local site also abuts this allocation; Natural England would like to be reassured that any development will not cause any adverse effect on this site.

We note that this site has not been assessed within the Sustainability Appraisal.

Policy DS 11 Furness Vale Business Park, Calico Lane, Furness Vale

Natural England reiterates our previous comments regarding this site regarding the site's close proximity to Goytside meadows LNR (which is notified for its important habitat and species). We also suggest that this policy should go further and incorporate the suggestions from the LIA as set out below;

'Woodland block to the south contains mature trees and should be retained to maintain low visual prominence.'

Policy DS 13 Newtown, New Mills

The LIA states that the site has significant landscape impacts and detailed and extensive landscape master planning would be required to address the issues of visibility and the effect on the settlement boundary. Natural England strongly advise that this is mentioned within the policy.

Policy DS 14 Birch Vale Industrial Estate

Natural England are pleased that this policy seeks to protect and enhance the adjacent wildlife features of the River Sett and reservoir. However we strongly advise that the policy reflects the advice in the LIA for an appropriate landscape framework to be created.

5.0 Habitats Regulations Assessment

5.1.1 In – Combination Assessment

Natural England notes from paragraph 3.1.2 of the Draft HRA that the Derbyshire Dales and Staffordshire Moorlands Local Plans have not been considered as part of the in - combination assessment.

Natural England is concerned about this because Derbyshire Dales and Staffordshire Moorlands are Neighbouring Authorities and share some of the European sites which are potentially affected by the High Peak Local plan. Natural England recommends dialogue with both authorities to discuss the potential in-combination effects of development. We therefore advise that where there is no likely significant effect or adverse effect alone that these plans are included in an in-combination assessment.

5.1.2 Introduction to the HRA section 4.1

This section of the HRA could be improved if a table was inserted, summarising the policies within the plan which have Likely Significant Effects (LSE) identified, and the N2K sites affected and with reason for the effect. Currently this information is given as separate lists, which makes it quite difficult to follow which policies affects which sites.

Peak District Dales Special Areas of Conservation SAC – Impacts from Air Quality

Natural England has a number of concerns with respect to the assessment of air quality impacts, the majority of which are detailed below. In addition to those listed below we also have concerns that:

- a) The air quality impacts have been assessed as part of an in-combination assessment, before assessing the impacts of the plan alone. It is therefore difficult to apportion the air pollution impacts to the High Peak Plan. An in-combination assessment is only required at the screening stage if the plan alone would not have a likely significant effect or have an adverse effect at the appropriate assessment stage. However, given that the in combination assessment predicts an increase in nitrogen deposition of less than 1% of the critical load it is unlikely that a different conclusion would be reached. However, for clarity it would be helpful if the HRA could explain what the effects of the plan alone would be.
- b) Secondly, the HRA doesn't mention that Peak District Dales SAC is already exceeding its critical load for Nitrogen deposition. This needs to be mentioned in the HRA.

5.1.3 Potential impacts from traffic;

We note from Figure A 2 that the A roads have been assessed that pass within 200m of a component of Peak District Dales SAC. Natural England would like to see **all major roads** assessed that pass within 200m of a component of Peak

District SACs. Major roads are those with an Annual Average Daily Traffic AADT count of 10,000 or more. Natural England notes that paragraph 5.3.3 from the draft HRA document states employment policies S4 and E1 from the Local plan could result in adverse impacts on European sites.

Mitigation from 'Policy EQ9: Pollution Control and Unstable Land' is noted from table 10.1 from the HRA which states that;

"only if the potential adverse effects are acceptable to an acceptable level by other environmental controls or by measures included in the proposals"

Natural England advises that this be reworded because the term 'acceptable' does not give a risk based approach to ensuring there are no adverse impacts on the integrity of any European sites.

Natural England believes that policy wording should be inserted into the plan to address impacts on the Peak District Dales SAC via Air Quality pathways. This could be achieved through encouraging employment proposals to be located close to residential sites and providing adequate criteria led policies for proposals which could lead to air quality impacts etc. In terms of traffic flows we suggest policy wording along the following lines:

"Any increase in traffic flows resulting from proposed development may lead to increases in atmospheric pollutants at levels which could cause adverse impacts upon the European designated sites in the area. Such development should therefore be subject to assessment under the Habitats Regulations. Where traffic increases acidity and/or nitrogen deposition by greater than 1% of the site's critical load, this is considered a likely significant effect and requires an Appropriate Assessment."

The Air Pollution Information System (APIS) provides comprehensive information regarding this issue: <http://www.apis.ac.uk/>."

5.1.4 Tongue Lane Allocations

We believe there is some confusion over the reference to site allocations in the HRA. There is reference to Policy DS16 Tongue Lane (land south of tongue lane industrial Estate Buxton), which allocates land for business and industrial use. The Local Plan however states that this policy allocates land for Housing. Policy DS 19 Tongue Lane Land west of Tongue Lane) does allocate land for business and industrial use. Both of these policies should therefore have been covered under the HRA process.

Natural England notes that site DS19 is 170m, (for the revised site) from the Peak District Dales SAC. The component site is Wye Valley SSSI, the relevant habitats for air quality analysis are set out below;

- Sub-Atlantic semi dry calcareous grassland
- Meso and eutrophic Quercus woodland

This habitat has a critical load of 15 kg N ha yr , the estimated traffic increase for the A6 is 26.2% which results in a nitrogen deposition of 0.75% . **Natural England agrees with your conclusion that increased nitrogen deposition as a result of increased traffic will not have an adverse effect on the habitat and therefore on site integrity.**

Natural England notes the mitigation in table 10.1 of the HRA for these sites, which refers to policy DS 16 containing a caveat for a HRA to be carried out at project stage. This means that there will be uncertainty over whether adverse impacts can be ruled out once a detailed project is submitted. We believe a more precautionary approach should be adopted which is embedded in the Directive and Regulations.

Natural England advises therefore that the policy wording/supporting text for these policies are amended to provide clarity that the end employment uses will only be

suitable if adverse effects on the SACs can be avoided and/or mitigated at the project stage.

The NPPG sets out some examples of mitigation which include:

- the design and layout of development to increase separation distances from sources of air pollution;
- using green infrastructure, in particular trees, to absorb dust and other pollutants;
- means of ventilation;
- promoting infrastructure to promote modes of transport with low impact on air quality;
- controlling dust and emissions from construction, operation and demolition; and
- contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development.

Natural England advises that pollution footprint maps are included with future proposals for this site to show the extent of the likely pollution footprint. This would ideally take account of wind direction and topography etc, this will allow your Authority to assess the likelihood of any pollutants reaching the designated site, and which part of the designated site (and which interest features) are most likely to be affected.

5.2 Urban effects

The HRA has concluded that it is not possible to conclude there will be no adverse effects on Peak District Dales SAC because it is possible that future developments could be close to the North West access point to Cunning Dale.

Natural England notes from the mitigation table that Policy EQ 4 Biodiversity. Sets out a 1.6km 'Zone of Influence' which suggests a project level HRA should be required for assessing 'urban effects'. We strongly disagree with this proposal for the reasons set out below.

Natural England notes that the Zone of Influence of 1.6km is for assessing 'urban effects' from future development proposals and your definition of urban effects includes;

- Predation of bird or animal species
- Effects of dogs-eutrophication and disturbance of grazing livestock
- Localised recreational pressure
- Fires; and
- Fly tipping

This definition could lead to confusion with taking a planning application through the process of the Habitat Regulations Assessment. The issues which have been encapsulated under urban effects above are not wide ranging and this could lead to possible effects on the features on the European sites being missed. For example, water flow/quality and bird disturbance through dog walking etc. It is also important to note that different types of development can have the potential to impact on designated sites through a variety of pathways depending on scale/use etc. The issues defined under the 'urban effects' umbrella will therefore not give flexibility for planning proposals to be appropriately assessed under the HRA process.

Throughout the plan period it would be difficult to accurately predict the alterations in human-related disturbance that may occur as a result of the development proposals, and the sensitivities of the interest features of the designated sites. It is therefore not appropriate to set a zone of influence particularly of this small size for the duration of the plan period, without a substantial evidence base to justify it.

HRA is a sequential process and each step should be progressed in order. The test of Likely Significant Effects (LSE) is a course filter to determine which projects require a more detailed assessment. The term HRA is general term referring to an assessment under the Habitat Regulations. Natural England would therefore expect High Peak Local Authority to undertake this screening exercise when assessing future planning applications, which could have a 'LSE' on a European site in view of the implications of the designated site's conservation objectives.

5.3 Water Quality

The conclusion of this chapter states that 'it is not possible to conclude that the Local Plan as currently worded will not have an adverse effect on the integrity of the Peak District Dales SAC, as a result of increased phosphate load to the River Wye via discharges from Buxton Sewage Treatment Works (STW). The HRA states that mitigation is required but does not recommend what this will be.

It is important to note that there was a meeting held March 17, 2014 between ourselves, your Authority and the EA. The outcome from this meeting concluded that we are satisfied that the proposed housing developments within the borough, as identified in the forthcoming High Peak Local Plan, are unlikely to have a significant impact upon the Peak District SAC as a result of additional discharges to the River Wye.

The draft Wye Valley SSSI Water Pollution Plan is currently being prepared jointly by Natural England and the Environment Agency. It is proposed that the Memorandum or Statement acts as a formal commitment to deliver this Water Pollution Plan such that implementation of the Plan will ensure the favourable conservation status of the SAC in respect of phosphate levels within a given timetable and the Plan identifies actions that will enable planned growth in Buxton to proceed during the period 2014 to 2031. Natural England suggests that the exchange of letters between ourselves and your Authority, in relation to this issue are attached to the HRA as an appendix, in order to give a clear audit trail.

Please also see comments above relating to 'Policy S7 Buxton Sub Area Strategy' regarding the River Wye Valley SSSI Water Pollution Plan. Once the amendments are taken account of, this policy can be used as part of mitigation for the Local plan in terms of water quality impacts.

5.4 Recreational Disturbance

Natural England agrees with the conclusion that the policies within the Local Plan will not cause adverse impacts on the Peak District Moors (South Pennine Moors Phase 1) SPA and SAC, in terms of recreational disturbance.

6.0 Sustainability Appraisal

Question 1

Do you support the overall approach taken to the appraisal of the development strategy and Local Plan policies?

Natural England considers that all the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633), which incorporates the European SEA Directive (Directive 2001/42/EC), have been met. However, Natural England has highlighted above

that some of the proposed development sites could have significant effects on the environment. There are some instances where mitigation has not been suggested or taken forward to the Local Plan. The outcomes from the SA should feed into the Local Plan and there should be clear linkages between the two, they should not be done in isolation. Natural England would therefore like to see the recommendations from the Sustainably Appraisal being fed into the policy formation. The SA could be improved by making it easier to follow, for example, the policies within the Local Plan do not match up with the allocation titles within the SA.

We note that Objective 9 refers to 'Protecting and enhancing the character and appearance of the landscape.' However, due to the potential for development within the High Peak to have severe impacts on the setting of the Peak District National Park this objective should make direct reference to National Park in addition to general landscape character.

Question 2

Have we correctly identified the main significant effects and potential mitigation measures?

A number of allocations have been identified as having significant landscape impacts and the landscape impact assessment has highlighted potential impacts on the setting of the National Park. The SA has not really examined any potential mitigation measures in some instances, specifically site G6 regarding impacts on the setting of the National Park.

Natural England have concerns with regards to the 'Former Railway Museum and land off Dinting Road, Glossop'. It is not clear however if alternative sites have been reviewed to avoid harm to this protected habitat.

Question 3

Do you wish to make a comment on the appraisal of the development strategy and / or any specific Local Plan policy(ies)?

Natural England have concerns that policy Policy DS 10 / E5 Bingswood Whaley Bridge has not been assessed under the SEA process.

Question 4

Do you support the overall approach taken to the appraisal of options for housing and / or employment site allocations?

Please see answer to question 1.

Question 5

Do you wish to make a comment on the scores given to any specific option(s) for a housing or employment site allocation?

Natural England agrees with the scorings given to the options for housing and employment allocations.

Question 6

Does this Report, taken together with the SA Scoping Reports and interim SA Reports provide sufficient information to evidence that an appropriate SA / SEA has been carried out of the High Peak Local Plan?

Provided that our concerns raised in questions 1-5 above are addressed then Natural England would agree that the SA/SEA was appropriate.

For any queries relating to the specific advice in this letter only please contact Sally Maguire on 03000602110. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

If I can provide any further advice relating to this consultation, please do not hesitate to contact me. For all other correspondence, please contact the address above.

Yours sincerely

A handwritten signature in black ink that reads "S. Fraser". The signature is written in a cursive style with a long, sweeping underline.

Sarah Fraser
On behalf of East Midlands team
Sally.maguire@naturalengland.org.uk

Derbyshire Wildlife Trust - Comments on Local Plan Submission April 2014

Derbyshire Wildlife Trust welcome the opportunity to comment on the Local Plan Submission. We recognise that the consultation relates to soundness and compliance of the document.

DWT have submitted comments to the strategic planning department throughout the Plan's development;
2009 – desk based assessment of SHLAA
2013 – Preferred Option
2014 – Additional Consultation

In general terms DWT are of the opinion that given the requirements and assessments for housing figures across the Borough it is difficult to maintain a truly sustainable approach to development as advocated within the NPPF of no net loss of biodiversity. In a highly environmentally constrained borough losses to biodiversity and the ecological network will inevitably result from proposals as presented within the Plan, as the recent Public Inquiry decision at North Road (G6) clearly demonstrates. DWT will continue to work with Local Authorities to reduce these impacts and will work at a higher strategic level nationally to try to achieve changes in England's policy approach.

In the case of the High Peak Local Plan DWT have highlighted throughout the Plan's development process, where it is considered biodiversity losses will occur within individual policy allocations and the Trust has strongly urged that other mechanisms such as changes to allocation boundaries and/or development briefs are used to further define the extent of development design prior to proposals coming forward.

The allocations where DWT have raised concerns regarding impacts on biodiversity are;

- G23 Dinting Railway Museum
- G32 Adderley Place
- B4/B3 Hogshaw, Buxton
- B10 Dukes Drive, Buxton
- G11 Woodhead Road
- G12/G13 Bude Street
- G17 Cliffe Road note now included in Built-Up Area Boundary (BUAB)
- G18 Bank Street note now included in Built-Up Area Boundary (BUAB)
- C9 south of Macclesfield Road
- C15 Shirecroft Reservoir Road, Whaley Bridge – note now included in Built-Up Area Boundary (BUAB). This site is close to the Todbrook Reservoir SSSI, Natural England's views should be sought
- PEZ New Mills Road, Hayfield
- Kinder Road deletion from Green Belt issues in relation to the SPA/SAC as raised in the HRA.
- Foxlow Farm the area should be subject to HRA impact assessment
- Policy S7 Land off Green Lane, Buxton for playing fields – Key issue the proximity of the site to Poole's Cavern and Grin Low Wood SSSI. Natural England's views need to be sought on this allocation.

Habitats Regulation Assessment

DWT have considered the HRA (Habitats Regulation Assessment draft March 2014), which indicates that a number of factors relating to impacts on European Sites (SACs and SPAs) could constrain the growth of housing and built development within High Peak. These include;

- Atmospheric pollution from increased car movements and CO₂ emissions.
- Water quality and the ability of Buxton Sewage Treatment Works to accommodate the increased phosphate loads in-line with the requirements of Natural England and the Environment Agency.
- Increased recreational pressures and urbanisation as a result of increased population levels

A number of studies and consultation with appropriate external bodies eg Severn Trent, Peak District National Park have been undertaken to further inform the HRA process since the previous draft (February 2013). However issues still remain unresolved as to increased housing levels relating to phosphate load in the River Wye SSSI (Part of the Peak Dales SAC) and are specifically identified relating to all allocations within Buxton. ***DWT would question whether the Local Plan is sound until the Memorandum of Understanding has been signed and that clear mechanisms to control phosphate levels either at source (within allocations using appropriate techniques) or at outfall have been identified.***

Changes from previous Local Plan drafts

DWT note that a number of changes have occurred within the Submission version which do reflect issues including biodiversity and these are to be welcomed;

Adjustments to allocations

- Tong Lane estate – DWT welcome the increase in distance from the SAC and the Cuningdale North Local Wildlife Site.
- Hoffman Quarry – DWT welcome the allocation of Open Countryside to protect part of the site

Removal of allocations -

- B11 Sherbrook Lodge
- C14 rear of Laneside Road New Mills
- land opposite Tesco Whaley Bridge
- Cavendish Golf Club Manchester Road

Date: 31 July 2014
Our ref: 127365
Your ref: HRA Addendum



Emma Jones
Environ, on behalf of
High Peak Borough Council
BY EMAIL ONLY ejones@environcorp.com
cc Jo Bagnall ldf@highpeak.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Jones

Planning consultation: High Peak HRA Addendum report

Thank you for your consultation on the above dated 24 July 2014, which includes an addendum to the Habitat Regulations of the High Peak Local Plan following concerns raised by Natural England in our consultation response dated 23 July 2014 (ref 119109).

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England are pleased that many of our comments have been taken on board with regards to the Habitat Regulation Assessment which accompanies High Peak Local plan.

In our previous response we suggested amendments to the *Policy EQ9: Pollution Control and Unstable Land*, which is used as a mitigation tool to avoid adverse impacts on European sites in terms of Air Quality pathways.

Natural England are pleased that you have inserted the following wording;

"The Council will not permit any proposal that has an adverse effect on a European site."

However we still believe that this policy could take a more risk based approach in accordance with the Habitat Directive. We note the following paragraph;

*"if the potential adverse effects are **mitigated to an acceptable** level by other environmental controls or by measures included in the proposals. This may be achieved by the imposition of planning conditions or through a planning obligation"*

Natural England advises that this policy seeks to 'avoid' adverse effects, before considering mitigation. This is also in line with the 'avoidance –mitigation' hierarchy approach set out in par 118 of the NPPF. The policy could read along the following "This will be achieved by ensuring developments avoid potential adverse effects and only permitting developments

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.



For any queries relating to the specific advice in this letter only please contact Sally Maguire on 03000602110. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Sally Maguire MRTPI
Lead Adviser
On behalf of East Midlands team

Annex B: Screening of Minor Modifications

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M1	4	1.2	<i>Amend 2nd sentence as follows:</i> The High Peak Local Plan also needs to be consistent with the Government's planning principles and policies as set out in the National Planning Policy Framework(ii), see section 4-22 <u>1.17</u> .	To correct reference	No
M2	4	1.4	This submission document is accompanied by a draft Sustainability Appraisal <u>Report Statement</u> , (the full report of which will incorporate an Equalities Impact Assessment to be published at the Submission stage), a Habitat Regulations Assessment Report and Policies Maps.	To correct references to documents	No
M3	5	1.8	Reports of the consultation feedback received by the Council <u>are</u> is available on the Borough Council web-site. This feedback and other evidence was used as a basis for <u>in</u> the preparation of the Local Plan - the publication of this Submission document.	Grammatical correction	No
M4	5	After 1.8	<i>Insert following new section:</i> The Development Plan in High Peak The Development Plan comprises of those adopted statutory planning documents which set out the policies and proposals for the development and use of land and buildings in the authority's area. Decisions on planning applications are required to be made in accordance with the policies in the Development Plan unless material considerations indicate otherwise. The material considerations could include national planning policy or significant local issues that have arisen since the Development Plan was prepared. The Development Plan for High Peak Borough consists of the following:	To reflect comments from Coal Authority and to clarify the status and implications of other development plan documents	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p><u>High Peak Local Plan</u></p> <p>The High Peak Local Plan sets out the development strategy, strategic and development management policies and land designations for the parts of High Peak that lie outside of the Peak District National Park. The 'saved policies' in the adopted Local Plan (March 2005) form part of the Development Plan until such time as they are replaced by the policies in this Local Plan for the period 2011 to 2031 (Map 1). The Local Plan relates to a wide range of planning issues including; housing, business, the environment, health and well being, infrastructure and design. Dependant on the location and type of development, other Development Plans in High Peak Borough may be applicable during the determination of planning applications.</p> <p><u>Peak District National Park</u></p> <p>The Peak District National Park Authority is the planning authority with responsibility for plans and proposals within the National Park. The Peak District National Park Core Strategy was adopted in 2011. It provides the spatial strategy and strategic policies for the National Park up to the year 2026. A Development Management Policies Development Plan Document for the Peak District National Park is under preparation.</p> <p>Development proposals within the High Peak Local Plan area must also have regarding to the National Park. High Peak Borough Council has a duty to have regard to the purposes of the National Park as specified in the Environment Act 1995, namely;</p>		

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p>(i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and</p> <p>(ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.</p> <p>Accordingly, the vision, objectives, spatial strategy, and policies of the High Peak Local Plan support the purposes of the National Park. In particular, policies of the High Peak Local Plan require proposals in the plan area to protect the setting and character of the National Park.</p> <p><u>Waste and Minerals</u></p> <p>Derbyshire County Council and Derby City County are responsible for waste and minerals plan preparation in Derbyshire, excluding the Peak District National Park. Waste and minerals planning applications in High Peak (excluding the Peak District National Park) are determined by Derbyshire County Council.</p> <p>As such, within the High Peak Local Plan area the issue of minerals is covered by the Derby and Derbyshire Minerals Plan (adopted April 2000 and amended November 2002). The issue of waste is contained in the Derby and Derbyshire Waste Plan (adopted March 2005). The 'saved policies' in those two plans also form part of the development plan for High Peak. They include saved policies relating to Minerals Consultation Areas (MCA's) and procedures to ensure that the County Council is consulted on non-minerals development in those areas. These policies</p>		

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p>should be taken into account during the consideration of development proposals. In addition, there are policies in the adopted Minerals Local Plan covering minerals safeguarding and prior extraction which may also be applicable to non-minerals applications in High Peak.</p> <p>In due course the new Derbyshire and Derby Minerals local Plan will review the Mineral Safeguarding Areas (MSAs) and Mineral Consultation Areas (MCAs) to prevent the unnecessary sterilisation of surface mineral resources in the Plan area. This is likely to include mineral resources within High Peak.</p> <p>Within the defined MSAs and MCAs, defined by the Derbyshire and Derby Minerals Local Plan the presence of the mineral resource will be considered by High Peak Borough Council in development management processes. National Planning Policy requires Authorities to ensure that minerals of local and national importance are not needlessly sterilised by non-mineral development. It also requires the prior extraction of minerals to be considered in these areas where practicable and feasible, if it is necessary for non-mineral development to take place. In the Derbyshire County Council area decisions will take into account the policies of the Derbyshire and Derby Minerals Local Plan. The revised MSAs and MCAs once adopted by the Derbyshire and Derby Minerals Local Plan will be illustrated on the Policies Map accompanying the High Peak Local Plan.</p> <p>In addition, consideration will be given to the policy and advice set out in the National Planning Policy Framework and the National Planning Practice Guide. This includes the need to safeguard existing, planned</p>		

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p>and potential minerals storage, handling and transport sites to ensure that sites for these purposes are available should they be needed and prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes. The Borough Council is working with Derbyshire County Council to develop a joint approach to identify and safeguard such sites.</p> <p><u>Neighbourhood Plans</u></p> <p><i>As paras. 1.9 to 1.11</i></p>		
M5	6	1.16	<p><i>Add following sentence:</i></p> <p><u>In order to demonstrate effective and on-going cooperation, the Borough Council is also working on agreements with other adjacent authorities which will set out a framework for cooperation and future collaboration on key strategic cross-boundary issues.</u></p>	To clarify how the authority is meeting its Duty to Cooperate	No
M6	7	1.19	The new Planning Policy Guidance (PPG), <u>which accompanies and elaborates on the NPPF</u> , is also a material consideration in planning decisions.	For clarification	No
M7	7 & 8	1.20	Update study list with dates and correct titles	To update evidence	No
M8	11	2.15	Update with findings of 2014 ELR	To update evidence	No
M9	12	2.17 – 2.20	Update with findings from 2014 SHMA	To update evidence	No
M10	12	2.22	Update with findings from Transport Study	To update evidence	No
M11	17	Figure 2	<p>Add notation to Key Diagram for Peak District National Park Area (light blue)</p> <p>Add following larger villages: Charlesworth, Furness Vale, Peak Dale, Tintwhistle</p>	For consistency with Local Plan hierarchy	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Change 'Village' to 'Larger Village' Add smaller villages on map and in notation		
M12	24	Policy S1	<i>Amend 4th and 5th bullet point as follows</i> <ul style="list-style-type: none"> • Taking account of the distinct Peak District character, <u>landscape, townscape, roles and setting of different areas and settlements in the High Peak;</u> • Protecting and enhancing the natural and historic environment of the High Peak and its surrounding areas <u>including the Peak District National Park ;</u> 	To strengthen protection for the Peak District National Park in response to concerns from the PDNPA	No
M13	25	Policy S1	<i>Amend 1st sentence of 2nd paragraph from top of page as follows:</i> In all cases development should not conflict with the local planning <u>relevant policies in this Local Plan</u> , particularly the environmental policies.	Clarification	No
M14	27	4.14 – Alternative Development Approaches	<i>Amend 1st sentence as follows:</i> A number of alternative development approaches have been considered, assessed and consulted on at various stages prior to the preparation of the preferred option <u>submission Local Plan</u> .	Correction	No
M15	28	4.19	<i>Amend paragraph as follows:</i> <u>High Peak Borough Council has a duty to have regard to the purposes of the National Park in terms of conserving and enhancing the natural beauty, wildlife and cultural heritage of the national park. This needs to be reflected across all aspects of the Local Plan.</u> The need to protect the Peak District National Park is a strategic issue which is also recognised by neighbouring authorities.	To reinforce the importance of protecting the National Park.	No
M16	32	S2	<i>Amend 1st paragraph under 'Other Rural Areas' as follows:</i> In all other areas outside of the settlement boundary of settlements, including those villages, hamlets and isolated groups of buildings in the Green Belt and the Open <u>Countryside</u> which do not have a settlement	For consistency with the references to 'Countryside' elsewhere in the Local	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			boundary as defined on the Policies Maps, development will be strictly limited to that which has an essential need to be located in the countryside or comprises affordable housing in accordance with policies EQ3 and H6.	Plan	
M17	32	S2	<i>Amend 3rd paragraph under 'Other Rural Areas' as follows:</i> The general extent of the Green Belt and the area defined as Open Countryside as defined in the Policies Map will be protected and maintained for the plan period.	To clarify that the whole extent of the green belt will be protected and for consistency with the references to 'Countryside' elsewhere in the Local Plan	No
M18	35	4.48	<i>Add following sentence at beginning of paragraph:</i> <u>The NPPF requires that local authorities use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework. The Local Plan therefore seeks to meet assessed needs as far as possible having regard to any significant environmental and infrastructure constraints.</u>	For consistency with the NPPF.	No
M19	35	4.52	<i>Amend 3rd sentence as follows:</i> The significant environmental constraints to development in High Peak are the Peak District National Park and any impacts on the National Park and its setting from the development of land outside it; the Green Belt taking account of potential areas which could be removed (see para. 4.53 4.47);	To correct reference	No
M20	36	4.54	<i>Amend 2nd sentence as follows:</i>	For clarification	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Table 2 below shows the net requirement to be identified in the plan on new sites after taking account of past completions <u>and</u> current commitments (<u>see Appendix 4 for details</u>), the shortfall since 2006 and the Peak District National Park contribution.		
M21	36	Table 2 – Net Housing Requirement	<p>Housing Target (2011 - 2031) 7,200 dwellings</p> <p>Completions (2011 - 2013) - 309 <u>345</u> dwellings</p> <p>Commitments (as at March <u>June</u> 2014) - 2,022 <u>2,394</u> dwellings</p> <p>Peak District National Park contribution (2011 - 2031) dwellings - 110</p> <p>Shortfall in housing provision since 2006 dwellings + 80</p> <p>Net housing requirement 4,839 dwellings</p> <p><u>4,431</u> dwellings</p>	To reflect latest housing land supply	No
M22	36	4.56	<p><i>Amend 4th sentence as follows:</i></p> <p>In accordance with government guidance, the Council has been engaging constructively, actively and on an ongoing basis with these neighbouring authorities with regard to addressing any shortfall to ensure the full objectively assessed needs of High Peak can be met (see para. 4.75 <u>4.64</u> below for further information).</p>	To correct reference	No
M23	37	4.59	<p><i>Amend 4th sentence as follows:</i></p> <p>The purpose of the Housing Trajectory is to highlight the robustness and soundness of the overall housing strategy in the Core Strategy <u>Local Plan</u> and how it is likely to perform in relation to the housing requirements.</p>	To correct typographic error	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?			
M24	37	4.60	<p><i>Amend paragraph as follows:</i></p> <p>The distribution of housing between the sub-areas is based on the strategy of growth spread between all market towns and larger villages, taking account of infrastructure constraints in Glossop and Buxton and meeting household projections in the Central area. A number of alternative distribution options have been considered, assessed and consulted <u>on</u> during the early stages of preparation of the Local Plan. This <u>has</u> informed the proportion of the plan area's housing for each sub-area. A range is given for each sub-area in order to provide flexibility in the delivery of housing over the plan area.</p>	To correct typographic error	No			
M25	37	4.62	<p><i>Add following additional sentence:</i></p> <p>If the Chapel Neighbourhood Plan is not forthcoming or is significantly delayed, the Council may consider producing an Area Action Plan Development Plan Document to deliver the growth identified in this Local Plan.</p>	To clarify how the Council will respond in the event that the Chapel Neighbourhood Plan cannot be adopted.	No			
M26	38	4.67	<p><i>Add following sentence:</i></p> <p>The Council is also engaged in preparing and agreeing Memorandum of Understandings with Stockport MBC, Tameside MBC, Peak District National Park and the Association of greater Manchester Authorities.</p>	To update the situation with regard to the MoUs	No			
M27	38	S3	<p><i>Amend 2nd sentence as follows:</i></p> <p>In order to meet this requirement sufficient land will be identified to accommodate up to 4,839 <u>4,431</u> additional dwellings on new site. This will be distributed across the Borough broadly as follows:</p>	To reflect latest housing land supply	No			
M28	38	S3	<p><i>Amend Table 3 as follows:</i></p> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Glossopdale</td> <td style="width: 30%; text-align: center;">27-35%</td> <td style="width: 30%; text-align: right;">1,307 <u>1,694</u></td> </tr> </table>	Glossopdale	27-35%	1,307 <u>1,694</u>	To reflect latest housing land supply	No
Glossopdale	27-35%	1,307 <u>1,694</u>						

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p><u>1,196 – 1,551</u></p> <p>Central 30-33% 1,452 – 1,597</p> <p><u>1,329 – 1,462</u></p> <p>Buxton 32-43% 1,548 – 2,081</p> <p><u>1,418 – 1,905</u></p>		
M29	39	S3	<p><i>Amend Table 4 for Glossopdale as follows:</i></p> <p>- Allocations 907 – 1,294</p> <p><u>796 – 1,151</u></p> <p>TOTAL TARGET PROVISION 1,307 – 1,694</p> <p><u>1,196 – 1,551</u></p>	To reflect latest housing land supply	No
M30	39	S3	<p><i>Amend Table 4 for Central Area as follows:</i></p> <p>- Allocations 1,052 – 1,197</p> <p><u>929 – 1,062</u></p> <p>TOTAL TARGET PROVISION 1,452 – 1,597</p> <p><u>1,329 – 1,462</u></p>	To reflect latest housing land supply	No
M31	39	S3	<p><i>Amend Table 4 for Buxton as follows:</i></p> <p>- Allocations 1,148 – 1,681</p> <p><u>1,018 – 1,105</u></p> <p>TOTAL TARGET PROVISION 1,548 – 2,081</p> <p><u>1,418 – 1,905</u></p>	To reflect latest housing land supply	No
M32	40	S3 Neighbourhood Plans	<p><i>Amend paragraph as follows:</i></p> <p>In order to assist in meeting the full objectively assessed housing need of the plan area Neighbourhood Plans should maximise opportunities for housing growth in sustainable locations and, where appropriate, make</p>	To clarify that sufficient provision should be made equivalent to that identified in the Local	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			allocations in their plan <u>to provide at least the same amount of housing land as identified in the Local Plan for the relevant parish or Neighbourhood Area.</u>	Plan.	
M33	40	4.68	<i>Add following new paragraph:</i> Table 5 indicates the forecasted change in numbers of jobs over the plan period for each sector. These are trend based projections only and do not reflect the implications of policies and strategies intended to address these trends. The level of employment land provision identified in Policy S4 plans for a greater number of jobs as it takes account of a wide range of factors other than forecasted change.	To clarify the status of the figures in table 5.	No
M34	42	4.75	<i>Amend 2nd sentence as follows:</i> This included plots current allocations, vacant plots on existing industrial estates, land with scope for redevelopment and additional sites identified through consultation.	Typographical correction	No
M35	43	4.77	<i>Amend paragraph as follows:</i> On the basis of the broad range of employment land requirements, the availability of potentially suitable employment land and completions since the start of the plan period (2011) the Local Plan proposes to accommodate at least 45.216ha <u>gross of employment land</u> over the plan period. A further breakdown of the nature of employment land supply proposed is provided in Table 40 <u>9</u> .	For clarification	No
M36	44	S4	<i>Amend top bullet point as follows:</i> <ul style="list-style-type: none"> Encouraging and making provision for office development within, particularly within the Main Market Towns 	Grammatical correction	No
M37	44	S4	<i>Delete final bullet point and replace with:</i> <ul style="list-style-type: none"> <u>Supporting new agricultural development, farm diversification and other development related to the rural economy that accords with</u> 	In response to representation to recognise the locational	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>Policy EQ3 (Countryside and Green Belt Development)</u>	needs of new agricultural buildings	
M38	44	S4 Supporting Guidance & Evidence	Include reference to Employment Land Review Site Assessment	Additional supporting evidence	No
M39	47	4.84	<p><i>Add following additional text to end of paragraph:</i></p> <p><u>This includes the ongoing Trans-Pennine Feasibility Study which is being developed by the Department for Transport in conjunction with the Highways Agency. The study is informed by a stakeholder reference group which includes High Peak Borough Council and has taken into account development proposals put forward in the Local Plan.</u></p> <p><u>The aim of Trans-Pennine Feasibility Study is to identify the opportunities and understand the case for future investment solutions on trans-Pennine routes that will improve connectivity between Manchester and Sheffield, and that are deliverable, affordable and offer value for money. This includes the consideration of A57 and A628 in Glossopdale. Final recommendations are expected in Autumn 2014.</u></p> <p><u>Development in the Glossopdale area may need to be phased to reflect the delivery timescales of transport improvements identified by the Trans-Pennine Feasibility Study that would support growth in the Sub-Area through the mitigation of its impacts. Policy H2 (Phasing Housing Development) provides a policy mechanism to ensure that housing development accords with the delivery of necessary supporting infrastructure. The Borough Council will work with partners, including the Highways Agency and Derbyshire County Council to determine the possible phasing implications of the Trans-Pennine Feasibility Study once</u></p>	To make reference to the Trans-Pennine Study and its implications In response to representations from the Highways Agency	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			it is finalised. Developments in the Glossopdale that require a Transport Assessment should consider the A57/A628 junction in order to further <u>identify impacts and highlight further possible improvements.</u>		
M40	50	S5 (1)	<p><i>Amend 1st bullet point as follows:</i></p> <ul style="list-style-type: none"> Protecting <u>and enhancing</u> sites designated for environmental value, including Manor Park, Howard Park and Bankswood Park, public open spaces, <u>playing fields and outdoor sports facilities</u>, local and European wildlife sites, recreation areas and allotments 	In response to representation from Sport England and Natural England	No
M41	50	S5 (1)	<p><i>Amend 3rd bullet point as follows:</i></p> <ul style="list-style-type: none"> Maintaining a strategic gap between Glossop and Hadfield, <u>as identified on the Policies Map.</u> 	For clarification	No
M42	50	S5 (1)	<p><i>Amend 4th bullet point as follows:</i></p> <ul style="list-style-type: none"> Identifying Local Green Spaces at George Street, Glossop and Padfield, <u>as identified on the Policies Map.</u> <p>Extent of strategic gap to be amended to exclude area off Dinting Road and Shaw Lane which now has planning permission.</p>	For clarification and to reflect recent allowed appeal	No
M43	50	S5 (1)	<p><i>Add following new bullet point:</i></p> <p><u>Ensuring that development protects and / or enhances landscape character and the setting of the Peak District National Park.</u></p>	In response to representation from Natural England	No
M44	51	S5 (2)	<p><i>Amend 4th bullet point as follows:</i></p> <p>Ensuring that residential development avoids adverse impact on the integrity of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area, <u>South Pennine Moors Special Area of Conservation (SAC) and Dark Peak Site of Special Scientific Interest (SSSI).</u></p>	In response to representation from Natural England	No
M45	51	S5 (4)	<p><i>Amend 1st bullet point as follows:</i></p> <ul style="list-style-type: none"> Working with partner organisations to enable improvements to 	For clarification	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			school capacity in the area. In particular the following sites will be safeguarded for educational purposes, <u>as identified on the Policies Map.</u>		
M46	51	S5 (4)	<p><i>Amend 2nd bullet point as follows:</i></p> <ul style="list-style-type: none"> Working with partner organisations and developers to address congestion along the A57 and <u>A628</u>, to improve transport links to surrounding areas and to enable transport improvements and mitigation measures identified <u>in the High Peak Transport Study and Trans-Pennine Feasibility Study.</u> <u>Under the provisions of Policy H2, development in the Glossopdale area may be phased to coincide with the delivery of any relevant transport improvements identified in the emerging Trans-Pennine Feasibility Study that will be necessary to support development.</u> <u>Developments in the Glossopdale that require a Transport Assessment should assess the A57/A628 junction in order to further identify impacts and highlight further possible improvements</u> 	To make reference to the Trans-Pennine Study and its implications In response to representations from the Highways Agency	No
M47	51	S5 (4)	<p><i>Add following additional bullet point:</i></p> <ul style="list-style-type: none"> <u>Supporting the provision of indoor and outdoor sports facilities in line with the Councils Sport and Recreation Strategies.</u> 	In response to representation from Sport England	No
M48	53	4.105	<p><i>Add following additional sentence:</i></p> <p><u>New Mills also has a variety of visitor attractions including the Heritage & Information Centre Museum, the Art Theatre and Spring Bank Arts Centre, the Hydro Electric scheme in the Torrs, the Millennium Bridge, and The Sett Valley Trail.</u></p>	In response to representation to provide fuller description of New Mills	No
M49	55	S6 (1)	<p><i>Amend 2nd bullet point as follows:</i></p> <ul style="list-style-type: none"> Protecting <u>and enhancing</u> sites designated for environmental value, including Memorial Park, Whaley Bridge and High Lea Park, New Mills, public open spaces, <u>playing fields and outdoor sports facilities</u>, Local Nature Reserves, local and European wildlife sites, recreation areas and allotments 	In response to representation from Sport England and Natural England	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M50	55	S6 (1)	<i>Amend 4th bullet point as follows:</i> Working with partner organisations to develop the Peak Forest tramway as a multiuser trail <u>and supporting the development of other Green Infrastructure in accordance with Local Plan Policy EQ7</u>	In response to representation from Natural England	No
M51	55	S6 (1)	<i>Add following new bullet point:</i> <u>Ensuring that development protects and / or enhances landscape character and the setting of the Peak District National Park.</u>	In response to representation from Natural England	No
M52	55	S6 (2)	<i>Amend 4th bullet point as follows:</i> Ensuring that residential development avoids adverse impact on the integrity of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area, <u>the South Pennine Moors Special Area of Conservation (SAC) and the Dark Peak Site of Special Scientific Interest (SSSI) - a component part of this European site</u>	In response to representation from Natural England	No
M53	56	S6 (4)	<i>Amend 4th bullet point as follows:</i> <ul style="list-style-type: none"> Working with partner organisations to enable improvements to school capacity in the area. In particular the following sites will be safeguarded for educational purposes, <u>as identified on the Policies Map:</u> 	For clarification	No
M54	56	S6 (4)	<i>Add following additional bullet point:</i> <ul style="list-style-type: none"> <u>Supporting the provision of indoor and outdoor sports facilities in line with the Councils Sport and Recreation Strategies.</u> 	In response to representation from Sport England	No
M55	56	S6 Supporting Guidance and Evidence	Add 'Strategic Housing Market Assessment :2014'	Additional supporting evidence	No
M56		4.127	<i>Add following additional sentence:</i> <u>The mineral water sources in the Buxton area may present future economic opportunities for water bottling plants, including Rockhead</u>	In response to representations that the Local Plan does not	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>Spring and Buxton Mineral Water.</u>	recognise other opportunities.	
M57	59	4.128	<i>Amend 2nd sentence as follows:</i> There are substantial areas of land within <u>and around the edge</u> of the town which can accommodate new development and contribute to sustainable economic growth within the town and support the regeneration of certain areas.	Typographical correction and to clarify that it also includes sites on the edge of the built up area.	No
M58	60	S7 (1)	<i>Amend 3rd bullet point as follows:</i> <ul style="list-style-type: none"> Protecting the quality and supply of natural mineral water. Development, including proposals for Sustainable Drainage Systems (SuDS) should have regard to the Buxton Mineral Water Catchment Area, and Nitrate Vulnerable and Groundwater Source Protection Zones <u>in terms of their impact on water quality and quantity.</u> 	To ensure that proper consideration is given to the impact of development on water quality and quantity.	No
M59	60	S7 (1)	<i>Amend 3rd bullet point from top of page as follows:</i> <ul style="list-style-type: none"> Designating two Green Wedges between Harpur Hill and Buxton to prevent coalescence and maintain the environmental and amenity value of the land, <u>as identified on the Policies Map</u>: check that these are identified 	For clarification	No
M60	60	S7 (1)	<i>Amend 5th bullet point as follows:</i> M61 Working with partner organisations through the river Wye Water Pollution Plan to protect water quality on the River Wye <u>SSSI which is a component of</u> within the Peak District Dales Special Area of Conservation (SAC)	In response to representation from Natural England	No
M61	60	S7 (1)	<i>Amend 6th bullet point as follows:</i> Protecting and improving <u>enhancing</u> sites designated for their environmental value, including Ashwood Park, Pavilion Gardens, Buxton Country Park, Local Nature Reserves, local and European wildlife sites, public open spaces, recreation areas, <u>playing fields and outdoor sports</u>	In response to representation from Sport England and Natural England	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>facilities</u> and allotments. Developer contributions will be sought towards improvements where appropriate		
M62	61	S7 (1)	<i>Add following new bullet point:</i> <u>Ensuring that development protects and / or enhances landscape character and the setting of the Peak District National Park.</u>	In response to representation from Natural England	No
M63	61	S7 (2)	<i>Amend 3rd bullet point as follows:</i> Ensuring that residential development avoids adverse impact on the integrity of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area <u>and the Peak District Dales Special Area of Conservation</u>	In response to representation from Natural England	No
M64	61	S7 (3)	<i>Amend 3rd bullet point as follows:</i> <ul style="list-style-type: none"> Encouraging the growth of tourism including the provision of additional visitor accommodation and facilities that reflect Buxton's status <u>as</u> a spa town at the heart of the Peak District 	Grammatical correction	No
M65	61	S7 (4)	<i>Amend 2nd bullet point as follows:</i> <ul style="list-style-type: none"> Working with partner organisations to enable improvements to school capacity in Buxton. In particular, land will be safeguarded off Green Lane, Buxton to accommodate the re-location of outdoor sports pitches from the existing Buxton Community School site, <u>as identified on the Policies Map</u>. This will enable the development of additional capacity on the school site. 	For clarification	No
M66	62	S7 (4)	<i>Add following additional bullet point:</i> <ul style="list-style-type: none"> <u>Supporting the provision of indoor and outdoor sports facilities in line with the Councils Sport and Recreation Strategies.</u> 	In response to representation from Sport England	No
M67	62	S7 (4)	<i>Amend 2nd bullet point as follows:</i> Working with partner organisations to enable improvements to school capacity in Buxton. In particular, land will be safeguarded off Green Lane, Buxton to accommodate the re-location of outdoor sports pitches from the	In order to ensure protection of nature conservation assets.	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			existing Buxton Community School site. This will enable the development of additional capacity on the school site. <u>Any scheme should include a detailed landscape and nature conservation strategy together with an ecological survey.</u>		
M68	62	4.128	<i>Add following additional sentence:</i> <u>A new Local Centre is proposed to serve new housing development and the existing Harpur Hill community within the Ashbourne Road and Foxlowe Farm allocation as set out in policies CF1 and DS18.</u>	For clarification and in response to representation	No
M69	62	S7 Supporting Guidance and Evidence	Add 'Strategic Housing Market Assessment :2014'	Additional supporting evidence	No
M70	64	5.9	<i>Add following additional sentence at end of paragraph:</i> <u>All proposals for renewable / low carbon energy developments will require a Design Statement in accordance with policy EQ1.</u>	For clarification	No
M71	65	5.18	<i>Amend 2nd sentence as follows:</i> In the event that the CSH is superceded, the Council will expect equivalent high standards of environmental performance to be met, <u>based on any nationally described standards at the time of any application</u> , details to of which will be provided in an updated version of the current Residential Design Guide Supplementary Planning Document.	For clarification	No
M72	66	EQ1	<i>Amend 2nd bullet point as follows:</i> Ensuring that renewable energy installations do not have an adverse impact <u>on wildlife sites, protected species or habitats</u> or the integrity of any the landscape and landscape setting of the Peak District National Park and that any wind turbine developments demonstrate that they will not have any adverse effect on the integrity of any European sites,	In response to representation from Natural England	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			including project-level HRA where appropriate.		
M73	71	5.30	<i>Add following sentence at end of paragraph:</i> <u>These should be incorporated where appropriate.</u>	In response to representation from Natural England	No
M74	71	EQ2	<i>Amend 1st bullet point as follows:</i> Requiring that development has particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, such as trees and woodlands, hedgerows, walls, streams, ponds, rivers, <u>ecological networks</u> or other topographical features	In response to representation	No
M75	71	EQ2	<i>Amend 3rd bullet point as follows:</i> Requiring that development proposals protect <u>and/or</u> enhance the character, appearance and local distinctiveness of the landscape and landscape setting of the Peak District National Park	In response to representation from Natural England	No
M76	72	5.34	The detailed boundaries of the Green Belt around High Peak - as marked on the policies map - were laid down in the North West Derbyshire Green Belt Local Plan, adopted in December 1990. The Green Belt boundary has been subject to a review as part of the work undertaken to prepare this High Peak Local Plan. The <u>Green Belt</u> is defined as the area northwards from Whaley Bridge between the boundaries of the Peak District National Park, Cheshire, Stockport and Tameside. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. <u>In order to ensure that the Green Belt will endure for and beyond the plan period, the Green Belt boundary around the towns and the larger villages has been subject to a review as part of the work undertaken to prepare this High Peak Local Plan. This has resulted in the removal of some land at Furness Vale from the Green</u>	For clarification	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>Belt.</u>		
M77	72	5.36	<i>Amend paragraph as follows:</i> In the event that there is an identified need for pitch provision for gypsies, travellers or travelling show people within the Plan Area, potential sites will be assessed against the criteria set out in Policy H7 and will need to be in accordance with Policy EQ3. <u>Any planning application for gypsy and traveller pitches will also be assessed against the criteria set out in Policy H7 and will need to be in accordance with Policy EQ3.</u>	For clarification that gypsy and traveller sites may be an appropriate use in the countryside.	No
M78	73	EQ3	<i>Amend 1st paragraph as follows:</i> The Council will seek to ensure that new development in the open countryside and the Green Belt is strictly controlled.....	To ensure consistency with terminology used elsewhere in the plan and on the policies maps	No
M79	73	EQ3	<i>Amend 1st sentence of 1st bullet point as follows:</i> Supporting the conversion and re-use of appropriately located <u>redundant</u> buildings of a permanent and substantial construction without extensive alteration, rebuilding or extension for commercial use, unless it can be demonstrated that such a use would not be viable or suitable.	To ensure consistency with NPPF	No
M80	73	EQ3	<i>Amend 4th bullet point as follows:</i> Resisting new buildings in the countryside unless required in conjunction with an existing tourism facility or constitute development that is associated with supporting a rural workforce such as agriculture, or other rural based enterprise that can justify a countryside location where a <u>countryside location is essential.</u>	To ensure consistency with NPPF and in response to representation	No
M81	73	EQ3	<i>Amend 5th bullet point as follows:</i> Allowing only the following forms of new residential development: <ul style="list-style-type: none"> • a replacement dwelling provided it does not have a significantly 	To ensure consistency with para. 5.36 and	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p>greater impact on the existing character of the rural area than the original dwelling nor result in the loss of a building which is intrinsic to the character of the area</p> <ul style="list-style-type: none"> • affordable housing in accordance with Local Plan Policy H6 • <u>a gypsy and traveller site in the countryside in accordance with Local Plan Policy EQ3</u> 	planning guidance which allows for gypsy and traveller pitch provision in the countryside	
M82	74	EQ3	<p><i>Replace last bullet point with following:</i> <u>Supporting appropriate development in the Green Belt that is in accordance with policies in the National Planning Policy Framework on protecting Green Belt land.</u></p>	To ensure consistency with NPPF and in response to representation	No
M83	77	5.52	<p><i>Amend paragraph as follows:</i> There is the opportunity for new development on the edge of settlements to improve the urban / countryside interface. <u>This is particularly vital in areas where development may impact on the setting of the Peak District National Park which adjoins large parts of the plan area in Buxton, the Central Area and Glossopdale. Development here will be required to consider this interface reflect this in its design and to protect and enhance landscape character. As such, applicants will be required to engage with the Borough Council and the Peak District National Park Authority where relevant in the early stages of drafting proposals to discuss and agree appropriate designs, layouts, boundary treatments and other measures to mitigate landscape impacts and protect the setting and character of the countryside and National Park. When applicable, such matters should be discussed at the pre-application stage.</u></p>	To strengthen protection for the Peak District National Park in response to concerns from the PDNPA	No
M84	79	EQ5	<p><i>Amend 1st bullet point as follows:</i></p> <ul style="list-style-type: none"> • Requiring that development on the edge of settlement is of high quality design that protects, enhances and / or restores landscape character, <u>particularly in relation to the setting and character of the</u> 	To strengthen protection for the Peak District National Park in response to concerns	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>Peak District National Park.</u>	from the PDNPA	
M85	82	EQ6	<i>Amend 1st bullet point as follows:</i> Requiring all works <u>that could impact on a heritage asset or its setting or proposed to heritage assets</u> , or sites with the potential to include assets, to be informed by a level of historical, architectural and archaeological evidence proportionate to their significance and sufficient to understand the potential impact of a proposal. Where appropriate, the Council may also require historical research and archaeological recording to be undertaken before works to a heritage asset commence		No
M86	82	EQ6	<i>Amend 2nd bullet point as follows:</i> Preventing the loss of buildings and features which make a positive contribution to the character or heritage of an area through <u>preservation or appropriate reuse and sensitive development</u> , including enabling development, unless their retention is not viable or there would be substantial planning benefits to outweigh the loss <u>unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or other relevant provisions of the NPPF apply.</u>	For consistency with NPPF and in response to representations from English Heritage and National Trust	No
M87	82	EQ6	<i>Combine last bullet point regarding Area of Archaeological Interest with 3^d bullet point on Buxton Area of Archaeological Interest as follows:</i> Ensuring that development within the Area of Archaeological Interest as identified on the Policies Map does not have a significant adverse impact on any known or yet to be discovered heritage assets. Planning conditions and/or obligations will be agreed to ensure that archaeological or heritage features and recorded and retained intact in situ. Where this is impractical, such features will be appropriately excavated and recorded prior to destruction. Within the Buxton Area of Archaeological Interest are	For consistency and to keep requirements relating to Areas of Archaeological Potential together.	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>development proposals should be informed by desk-based assessment / field evaluation as appropriate to assess the potential for impacts on Roman archaeology in accordance with sub-area strategy S7.</u>		
M88	82	EQ6	<i>Amend 4th bullet point as follows:</i> Requiring proposed developments that affect a heritage asset and / or its setting, including alterations and extensions to existing buildings, to demonstrate how the proposal has taken account of design, form, scale, mass, use of traditional materials and detailing, siting and views away from and towards the heritage asset <u>in order to ensure that the design is sympathetic and minimises harm to the asset.</u>	In response to representation from National Trust	No
M89	82	EQ6	<i>Amend 5th bullet point as follows:</i> Requiring proposals for the change of use of heritage assets, including listed buildings and buildings in Conservation Areas to demonstrate that the proposal is considered to be the optimum <u>sustainable and viable</u> use that involves the least change to the fabric, interior and setting of the building.	In response to representation from National Trust	No
M90	82	EQ6	<i>Amend 10th bullet point as follows:</i> Using Article 4 Directions to control permitted development in the Central, College, Hardwick, and Buxton Park Conservation Areas <u>in Buxton and the Old Glossop, Higher Chisworth and New Mills Conservation Areas</u>	To include other Conservation Areas which have Article 4 Directions	No
M91	83	EQ6 Supporting Guidance and Evidence	Update Heritage At Risk Register from 2012 to 2013 and the Counting Our Heritage project and Local Heritage Register (under preparation) to be added.	In response to representation from English Heritage	No
M92	87	EQ7 Supporting Guidance and Evidence	Include the High Peak Sport and Active Recreation Strategy 2014-2017	For clarification	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M93	91	5.96	<i>Amend 3rd sentence as follows:</i> A <u>Viability Assessment: Level 2 SFRA</u> has <u>also</u> been undertaken of <u>specific proposed allocations</u> to help ensure that where development is necessary within Flood Zones 2 or 3, it is safe and will not increase flood risk elsewhere.	To clarify the nature of the level 2 SFRA	No
M94	92	5.107	<i>Add following additional text:</i> <u>Surface water from new development should be discharged in the following order of priority: 1. An adequate soakaway or some other form of infiltration system.</u> <u>2. An attenuated discharge to watercourse.</u> <u>3. An attenuated discharge to public surface water sewer.</u> <u>4. An attenuated discharge to public combined sewer.</u> <u>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.</u> <u>Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction.</u>	To clarify surface water discharge requirements In response to representation from United Utilities	No
M95	94	EQ10: Supporting Evidence & Guidance	<i>Amend as follows:</i> <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment, Level 2;</u> 2014	To clarify the nature of the level 2 SFRA	No
M96	96	5.120	<i>Amend 3rd sentence as follows:</i> The Council will work collaboratively with applicants and shareholders <u>stakeholders</u> to ensure that the aims of the charter are achieved for	Typographical correction	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			relevant proposals.		
M97	96	E1	<p><i>Amend 2nd bullet point as follows:</i></p> <ul style="list-style-type: none"> Encouraging the redevelopment, intensification and more efficient use of Primary Employment Zones where they are either not fully utilised or unsuited to modern employment requirements, particularly those sites located within the main towns and those with good access by a variety of transport modes provided that they accord with <u>Local Plan policy E3 and the wider Local Plan policies</u> 	For consistency	No
M98	97	E1 Supporting Guidance & Evidence	Include reference to Employment Land Review Site Assessment (date?)	Additional supporting evidence	No
M99	97	5.122	<p>Insert following additional text:</p> <p><u>The Council acknowledges the importance of the mineral water bottling sector and supports its continued growth in Buxton. Any further expansion beyond the area identified in the Local Plan should be supported by evidence to justify the extent of any expansion and to deal with highway, landscape and amenity impacts.</u></p>	To clarify the Council's support for growth of this sector and how any further expansion may be considered.	No
M100	97	5.123	Redevelopment opportunities within Primary Employment Zones are identified in the Employment Land Review <u>Site Assessments</u> which will be monitored and updated on an annual basis.	Correction to title of document	No
M101	97	E2 (Glossopdale & Buxton)	<p><i>Number sites as follows:</i></p> <p><u>G1 - Land off Wrens Nest Road, Glossop</u> <u>B1 – Staden Lane extension, Buxton</u> <u>B2 – Tongue Lane extension, Buxton</u> <u>B3 – Waterswallows extension, Buxton</u></p>		No
M102	98	E2 (Central Area)	No employment land allocations are made by the High Peak Local Plan in the Central Area. An allowance <u>is made</u> for employment development to come forward on Industrial Legacy sites (Policy E5) and Primary		No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Employment Zones (Policy E3).		
M103	98	E2 (Waterswallows extension)	The Public Right of Way that crosses <u>the</u> site to the south should be safeguarded and improved as appropriate		No
M104	99	E2 Supporting Guidance & Evidence	Include reference to Employment Land Review Site Assessment	Additional supporting evidence	No
M105	99	5.127	<i>Amend paragraph as follows:</i> The proposed Primary Employment Zones are currently designated as such in <u>taken forward</u> from the adopted Local Plan Saved Policies (2008). To reflect proposals in the Local Plan Proposed Options, <u>These have been reviewed,</u> in the light of which changes to the Primary Employment Zone boundary at Turnlee Road / Charlestown Road, Glossop, Newtown, New Mills and Furness Vale Industrial Estate will be <u>are</u> made. The former employment land allocation adjoining Thornsett Industrial Estate will <u>has</u> also be re-designated to form part of the Primary Employment Zone and reflect its planning history.	For clarification	No
M106	100	E3	Number all sites	For clarification	No
M107	101	5.129	<i>Amend paragraph as follows:</i> <u>There may also be circumstances where the land or building is no longer suitable for continuation of in employment use, for example where</u> the business or industrial use may also no longer be compatible with neighbouring properties or uses such as housing in terms of its impact on the local environment or amenity for example.	For clarification	No
M108	102	5.131	<i>Add following additional sentence:</i> <u>This policy does not apply to any business or industrial land or buildings</u>	To clarify that the policy is only for those	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>which are allocated for an alternative use as these will have already been assessed through the plan making process.</u>	existing sites which are not allocated for an alternative use.	
M109	103	E5 Central Area	Change order of site allocations in Central Area	Correction to order	No
M110	104	E5 Supporting Guidance & Evidence	Include reference to Employment Land Review Site Assessment (date?)	For completeness	No
M111	104	5.134	<i>Amend 1st sentence as follows:</i> Table 8 <u>9</u> below outlines the supply of employment land as proposed in the High Peak Local Plan	Correction	No
M112	105	5.137	<i>Amend first 3 sentences as follows:</i> Much of <u>the</u> existing visitor spending in High Peak is within the National Park. However, the main towns outside of the National Park are destinations in their own right through the provision of facilities and attractions such as theatres, museums, visitor centres, historic parks, sports and recreation. should <u>These</u> also support the wider Peak District tourism industry by acting as service centres through the provision of complementary accommodation, services and other facilities.	Grammatical correction.	No
M113	106	5.139	<i>Add following additional text to paragraph:</i> <u>Hotel development in other areas could be supported subject to compliance with Policy E6. The other market towns of High Peak, namely Whaley Bridge, New Mills and Chapel-en-le-Frith offer a range of services and facilities that would support new tourist accommodation developments and therefore offer many opportunities for sustainable development.</u>	To acknowledge that hotel development could be accommodated in other market towns in response to representation.	No
M114	107	E6	<i>Amend top bullet point as follows:</i> <ul style="list-style-type: none"> <u>Encouraging</u> the provision of new visitor and cultural attractions 	For clarity	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has struck through , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			and facilities that expand the breadth and quality of the tourism offer without prejudice to the character of the Peak District		
M115	107	E6	<p><i>Amend 6th bullet point from top of page as follows:</i></p> <ul style="list-style-type: none"> Requiring that caravan, camping and chalet sites are sited in locations so as not to be prominent in the landscape and can be accommodated without adverse impact upon the character or appearance of the landscape <u>in accordance with policy E7</u> 	To ensure consistency with policy E7	No
M116	109	5.143	<p><i>Move heading 'Location of Housing Development' to follow para. 5.144 and insert following new paragraph below heading:</i></p> <p><u>The Local Plan seeks to deliver a wide choice of high quality housing in appropriate locations to meet the needs of all residents in the Borough. This will be achieved through a range of measures to promote housing development on suitable sites and to ensure that there is a continuous supply of land to meet the needs identified in the Local Plan.</u></p>	To clarify the aims of policy H1	No
M117	110	5.146	<p><i>Add following additional paragraph:</i></p> <p><u>The phasing of sites is indicative and can be changed to allow for their earlier development if circumstances change and there are no overriding infrastructure constraints to development taking place. In order to ensure that the necessary infrastructure is in place to support development in High Peak, it may also be possible that development is re-phased during the plan period to take account of forthcoming infrastructure related evidence. This may include transport evidence such as the forthcoming Trans-Pennine Feasibility Study or education requirements in light of adjustments to pupil numbers and capacity over the plan period.</u></p>	In response to representations from the Highways Agency and other representations	No
M118	111	H2	<p>Note : 'Annual' should not be struck through.</p> <p>Delete last sentence referring to 5 yearly reviews.</p>	<p>Typographical correction</p> <p>5 yearly reviews are</p>	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
				not necessary as the phasing will be reviewed annually through the AMR	
M119	111	5.149	<p><i>Amend 3rd sentence as follows:</i></p> <p>The allocated sites will give a total indicative provision for the plan area of 3,147 <u>2,850</u> additional dwellings over the plan period based on an average density of 30 dwellings per hectare.</p>	To reflect correction of error in published Local Plan and planning commitments for North Road and Charlestown Works sites.	No
M120	111	5.149	<p><i>Add additional sentence as follows:</i></p> <p><u>In addition to the allocations in policy H3, there are 1,200 dwellings identified to come forward on small sites in policy S3, a further 42 dwellings allocated in the consultation draft of the Chapel Neighbourhood Plan and potential housing on allocated industrial legacy sites at Ferro Alloys, Bingswood Industrial Estate and Torr Vale which may further increase the provision for the Borough.</u></p>	To clarify that additional provision may be forthcoming from small sites and other allocated sites.	No. Natural England has been consulted on a the Chapel-en-le-Frith Neighbourhood Plan SA and HRA screening in June 2014. Natural England have agreed with the conclusions of the HRA screening "that there are unlikely to be any significant effects on any European Sites from the

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
					Chapel en le Frith Neighbourhood Plan.” (letter from Natural England to High Peak Borough Council dated 07/07/14 ref 122609)
M121	112	5.150	The phasing is indicative and will be dependent on viability study to be undertaken which will inform the submission version of the plan has been <u>informed by evidence from the Plan and Site Viability Study.</u> In the policy below the sites have been categorised as either early (E), middle (M) or late (L) phases. These correspond with 5 year periods 2016-2021, 2021-2026, 2026-2031 as described in Policy S3. The trajectory in appendix 2 is based on this indicative phasing.	For clarification	No
M122	112	5.150	<i>Add following additional paragraph:</i> <u>Development of these sites should meet the requirements of the other policies within the plan, particularly in relation to heritage assets</u>	For clarification and in response to representation from English Heritage	No
M123	112	H3	Amend location description of site allocations to include full town details and ensure consistency with description in DS policies	For consistency and to avoid confusion	No
M124	112	H3 – North Road, Glossop (G6)	Retain site as an allocation but with an indicative provision of 0 dwellings and a footnote to explain that it now has outline planning permission for up to 150 dwellings (which has been included in the number of dwellings committed).	Site is now a commitment following appeal allowed 12 th June 2014 but needs to be retained as an allocation to ensure its	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
				provision in the event that permission lapses	
M125	112	H3 – Charlestown Works , Glossop (G31)	Retain site as an allocation but with an indicative provision of 0 dwellings and a footnote to explain that it now has outline planning permission for up to 100 dwellings (which has been included in the number of dwellings committed).	Site is now a commitment following approval in March 2014 but needs to be retained as an allocation to ensure its provision in the event that permission lapses	No but the HRA should be amended to reflect this change.
M126	112	H3 (Glossop)	Amend total provision on allocated sites to 822	To reflect deletion of sites G6 and G31 which are now commitments	No
M127	113	H3 – Rear of Laneside Road, New Mills (C14)	Delete site as an allocation	Correction of error in published Local Plan	No
M128	113	H3 (Central)	Amend total provision on allocated sites to 697	To reflect deletion of site C14 which had been included in error	No
M129	113	H3 (Buxton)	Amend boundary of site to include small parcel of additional land fronting onto Dukes Drive (see map) and to delete reference to playing fields on map.	To ensure whole of the area is comprehensively addressed and to correct mapping error.	No
M130	115	H4	<i>Amend sub-paragraph (e) as follows:</i>	To accord with NPPF	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Requiring Encouraging dwellings, including small dwellings, to be designed to provide flexible accommodation which is capable of future adaptation to meet the criteria in Lifetime Homes or successor documents.		
M131	116	5.159	<i>Amend 1st sentence as follows:</i> There are several types of affordable housing, however the predominant tenures are either <u>being</u> social rented, affordable rent or intermediate housing.	Grammatical correction	No
M132	116	H5	In order to address the need for affordable housing, residential developments should seek to achieve the following proportions of residential units are provided as affordable housing as follows: 30% affordable housing on sites of 25 units (<u>0.83ha</u>) or more 20% affordable housing on sites of <u>between 5 -24 units (0.16ha or larger) and 24 units</u>	Grammatical correction and to improve clarity on the thresholds	No
M133	117	5.161	<i>Amend 1st sentence as follows:</i> The past delivery of affordable housing across the plan area has occurred by negotiation with private sector housing developers, and <u>also</u> by way of "rural exceptions", whereby.....	For clarity	No
M134	118	H6	<i>Amend 2nd bullet point as follows:</i> <ul style="list-style-type: none"> The affordable housing would meet a genuine local need as defined in the Local Plan <u>Affordable Housing Supplementary Planning Document</u> 	To clarify that the SPD will define local need	No
M135	119	H7	<i>Amend first paragraph of policy as follows:</i> Where there is the an identified <u>the Gypsy and Traveller Needs Assessment identifies</u> a need for pitch provision for gypsies, travellers and travelling show people within the Plan Area, the Council will work with the Peak District National Park Authority, Derbyshire County Council,	For clarification in response to representations	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Derbyshire Gypsy Liaison Group and other stakeholders to ensure that the need is met.		
M136	119	H7	<i>Amend first bullet point as follows:</i> The development does not have a significant adverse impact upon the character or appearance of the landscape, or sites/areas of nature conservation value, including European sites, <u>or heritage assets.</u>	In response to representations from English Heritage	No
M137	121	5.171	<i>Add following sentence to paragraph:</i> <u>A further review of retail needs will be undertaken during the plan period which will be informed by annual monitoring data of vacancy rates in Glossop town centre.</u>	For clarification and in response to representation.	No
M138	124	5.188	<i>Add following new paragraph:</i> <u>Tables 10 and 11 identify the convenience and comparison retail capacity for the relevant market town catchment areas within the District up to 2031 derived from the Retail Study Update. These are indicative only of the amount of floorspace required in order to address identified qualitative and quantitative deficiencies in retail floorspace.</u>	In order to clarify the intentions of tables 10 and 11.	No
M139	125	Tables 10 and 11	Change date of '2018' to <u>'2013'</u>	Typographical correction	No
M140	125	CF1	<i>Amend 2nd bullet point reference to New Mills as follows:</i> New Mills - proposals for a new A1 foodstore commensurate with the type and scale of identified needs will be supported in order to address the lack of provision within the town. No town centre or edge of centre site has been identified. Out-of-centre proposals will therefore be supported in accessible locations that are well connected to New Mills town centre by public transport <u>and which comply with the impact and sequential tests set out in this Policy.</u> New Mills East will be the first priority for the location	To accord with the NPPF. Reference to New Mills East being a suitable location is retained within the supporting text for guidance.	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			of a new store to support planned housing growth and existing communities.		
M141	126	CF1	<p><i>Amend 6th bullet point – Harpur Hill – as follows:</i></p> <ul style="list-style-type: none"> Proposals for small scale A1 retail convenience development (less than 200m² net sales) and wider uses including business, non-residential institutions and leisure within the Local Centre as defined in the Policies Map will be supported subject to their accordance with other relevant Local Plan policies. <u>The total floorspace for the Local Centre will shall be less than 2500m². The A1 floorspace shall not be occupied until 50% of the residential development of the site is occupied.</u> Policy DS18 specifies further policy requirements for this site. Town centre proposals above these thresholds must be supported by an appropriate impact and sequential site assessment that consider Buxton's centre. 	Clarification of intention and for consistency with latest planning application.	No
M142	128	5.189	<p><i>Amend 1st sentence as follows:</i></p> <p>As the two main town centres in High Peak, Glossop and Buxton provide <u>a</u> greater range of shops, services and other complementary uses.</p>	Grammatical correction	No
M143	128	5.190	In Glossop, the Primary Shopping Frontages include sections of High Street, West High Street, East George Street, Henry Street, Norfolk Square and Victoria Street. In Buxton, the Primary Shopping Frontages lie wholly within the defined Primary Shopping Area which is centred around the retail cluster at Spring Gardens.	Grammatical correction	No
M144	129	5.193	<p><i>Add additional paragraph as follows:</i></p> <p><u>Once more details are known on development sites, for example the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements. At larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for</u></p>	In response to representation from United Utilities	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.</u>		
M145	129	CF3	<i>Add following sentence at beginning of 1st paragraph:</i> <u>The Council supports investment in infrastructure as it is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough.</u>	In response to representation from United Utilities and to reflect NPPF	No
M146	129	CF3	<i>Add following additional bullet point:</i> <ul style="list-style-type: none"> <u>supporting the provision of sports related infrastructure in accordance with policy CF4</u> 	In response to representations from Sport England	No
M147	130	CF3	<i>Amend last sentence of 2nd paragraph as follows:</i> Funding from the levy will also be allocated to communities in <u>to</u> support local infrastructure improvements.	Grammatical correction	No
M148	130	CF3 Supporting Guidance and Evidence	Add 'High Peak Community Infrastructure Levy (CIL) Viability Study (2013)'	Additional supporting evidence	No
M149	130	5.194	<i>Add following additional sentence to paragraph:</i> <u>Where possible opportunities should be taken to make a positive contribution to the Green Infrastructure of the Borough by linking to existing networks of biodiversity and Green Infrastructure in accordance with Local Plan Policy EQ7.</u>	For consistency	No
M150	131	5.199	<i>Amend final sentence as follows:</i> Details will be set out in a Developer Contributions SPD and will be subject to viability appraisal <u>to ensure development is not made undeliverable as a result of the requirements of the SPD.</u>	To clarify that any requirements arising from the SPD must not make sites undeliverable	No
M151	132	CF4	<i>Amend 1st bullet point as follows:</i>	In response to	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Resisting any development that involves the loss of a sport, recreation, play facility or amenity green-space except where it can be demonstrated that alternative facilities of equal or better quality will be provided in an equally accessible location as part of the development or the loss would be outweighed by the public benefits of the development <u>is associated with an alternative sports provision that would deliver benefits that would clearly outweigh the loss</u> , or an assessment has been undertaken to demonstrate the facility is surplus to requirements and imposing conditions or negotiating a section 106 Obligation to ensure that replacement provision is provided at the earliest possible opportunity	representation from Sport England. Last part unnecessary as already a requirement of NPPF.	
M152	133	CF4	<i>Amend top bullet point as follows:</i> <ul style="list-style-type: none"> Collecting financial contributions towards the delivery, improvement and management of off-site provision of open space and recreation facilities will be through Section 106 agreement or via the Community Infrastructure Levy if this is adopted 	Grammatical correction	No
M153	133	CF4	<i>Amend 3rd bullet point from top as follows:</i> <ul style="list-style-type: none"> Designating land as Local Green Space in accordance with the Local Plan sub-area strategies, Policies S3 S5 <u>S5 S7</u>. 	Correction to policy references	No
M154	134	CF5	<i>Amend 3rd bullet point as follows:</i> <ul style="list-style-type: none"> Resisting proposals involving the loss of community assets and facilities (including land in community use, community/village halls, village shops and post offices, schools, nurseries, places of worship, health services, care homes, convenience stores, libraries, public houses, museums, performing arts venues and other community facilities) unless it can be demonstrated that the existing use is no longer financially or commercially viable and there are no other means of maintaining the facility, or an alternative facility of the same type is available or can be provided in an accessible location. 	Grammatical correction	No
M155	134	5.209	<i>Amend last sentence as follows:</i>	Typographical	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			Public transport, highways and other complementary improvements are have been identified by these studies to help address identified issues.	correction	
M156	136	CF6	<p><i>Amend 4th bullet point under 'Supporting transport infrastructure and services' as follows:</i></p> <ul style="list-style-type: none"> • Encourage<u>ing</u> and promote<u>ing</u> improvements to public transport networks in association with the Local Highway Authority, Network Rail and other providers 	Grammatical correction	No
M157	137	CF6 Supporting Guidance and Evidence	Add 'High Peak Local Plan Transport Study' (2014)'	Additional supporting evidence	No
M158	137	5.214	<p><i>Add following at end of paragraph:</i></p> <p><u>A Developer Contributions SPD will provide detail of how contributions will be calculated. This will be subject to a viability appraisal to ensure that any requirements do not undermine development viability.</u></p>	For clarification and to accord with NPPF.	No
M159	138	CF7 Supporting Guidance and Evidence	Add 'High Peak Community Infrastructure Levy (CIL) Viability Study (2013)'	Additional supporting evidence	No
M160	139	6.3	<p><i>Amend 1st sentence as follows:</i></p> <p>Woods Mill (<u>Policies H3(G16) and E5</u>) is one of the last areas in Glossop requiring extensive regeneration.</p>	For clarification of related policies	No
M161	141	6.14	<p><i>Amend 2nd sentence as follows:</i></p> <p>The impact assessment should draw on information in the latest retail study to in order to ensure that it is undertaken on a consistent basis as far as possible.</p>	Typographical error	No
M162	141	6.17	<p><i>Amend 2nd sentence as follows:</i></p> <p>Significant works <u>are</u> likely to be required to provide a suitable access to the site from High Street East.</p>	Typographical error	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M163	142	DS1	<i>Amend 1st sentence of 2nd paragraph as follows:</i> Development will be in <u>subject to</u> compliance with adopted <u>other relevant</u> Local Plan policies....	To clarify the intention of the policy requirement to comply with other relevant policies in this Local Plan	No
M164	143	6.21	<i>Amend 1st sentence as follows:</i> This elevated site (<u>Policy H3(G23)</u>) was formerly the site of the Dinting Railway Museum.	For clarification of related policy	No
M165	143	6.23	<i>Amend 1st sentence as follows:</i> Site G20 Land off <u>Dinting Road (Policy H3(G20))</u> is adjacent to this site which could be developed to provide an alternative access.	For clarification of related policy	No
M166	144 - 166	DS2, DS3, DS4, DS5, DS6, DS7, DS8, DS9, DS11, DS12, DS15, DS16, DS17, DS18	<i>Amend following phrase within each policy:</i> Development will be subject to compliance with adopted <u>other relevant</u> Local Plan policies....	To clarify the intention of the policy requirement to comply with other relevant policies in this Local Plan	No
M167	144	DS2	<i>Add following additional bullet point:</i> <ul style="list-style-type: none"> <u>A wildlife survey should be undertaken following consultation with Derbyshire Wildlife Trust</u> 	In response to representation from Natural England	No
M168	144	6.27	<i>Amend 1st and 2nd sentence as follows:</i> This 3.9ha brownfield site (<u>Policies H3(G31) and E5</u>) contains a large number of redundant mill buildings. It lies on either side of Charlestown Road within <u>the</u> current built-up area boundary of Glossop, and forms a key 'gateway' site to the town.	For clarification of related policies and to correct typographical error	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M169	144	6.28	<p><i>Amend paragraph as follows:</i></p> <p>The site is now considered to be unsuited to modern employment use in its present form.</p> <p>An <u>outline</u> planning application for new residential and business development (ref. HPK/2013/0597 - Proposed demolition of existing structures and erection of up to 100 dwellings including 14 in the conversion of the former office building, 1660sm of B1 commercial floor space, and including restoration of the former mill pond to create public open space) is currently pending <u>was approved in March 2014.</u></p>	To reflect the recent permission.	No
M170	145	DS3	<p><i>Amend last bullet point as follows:</i></p> <ul style="list-style-type: none"> • A Transport Appraisal <u>Assessment</u> 	To correct the terminology	No
M171	145	6.31	<p><i>Amend 1st and 4th sentence as follows:</i></p> <p>This 6.3ha greenfield site (<u>Policy H3(G32)</u>) adjoins existing housing development at Simmondley and is close to the Gamesley Sidings Wildlife site.</p> <p>Access to the site is <u>currently</u> via an unadopted road off Simmondley Lane which <u>which</u> is currently <u>currently</u> serves a limited number of houses, and formerly served a tip which is part of the site and which would require remediation in any development. The 2014 <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment (SFRA2)</u> indicates culverts which would need further investigation.</p>	For clarification of related site allocation policy and to clarify the current access arrangement and to clarify the nature of the level 2 SFRA.	No
M172	145	DS4	<p><i>Amend 4th bullet point as follows:</i></p> <p>Contamination and ground condition survey and site specific Flood Risk Assessment in accordance with the findings of the High Peak <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment level 2;</u></p>	To clarify the nature of the level 2 SFRA	No
M173	145	DS4	<p><i>Add following additional bullet point:</i></p> <ul style="list-style-type: none"> • <u>A wildlife survey should be undertaken following consultation with</u> 	In response to representation from	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>Derbyshire Wildfie Trust</u>	Natural England	
M174	146	6.33	<i>Amend 1st sentence as follows:</i> The former Ferro Alloys site on Surrey Street (<u>Policy E5</u>) is a derelict area of some 0.85ha.	For clarification of related site allocation policy	No
M175	147	6.40	<i>Amend 1st sentence as follows:</i> This 7.87ha greenfield site (<u>Policy H3(G8,9,10,11)</u>) <u>lies</u> on the edge of Old Glossop. It slopes steeply from <u>the</u> northern boundary down towards Old Glossop.	For clarification of related site allocation policy and grammatical correction	No
M176	147	6.40	<i>Amend 4th sentence as follows:</i> Appropriate landscaping <u>including the retention of the existing tree belt to the north and east of G8 and the hedged footpaths through the site to lessen the impact of the development</u> will be required.	To strengthen protection for the Peak District National Park in response to concerns from the PDNPA	No
M177	147	6.42	<i>Amend 1st sentence as follows:</i> This relatively flat substantially <u>undeveloped</u> greenfield site (<u>Policy H3(C3)</u>) is currently used for open grazing.	For clarification of related site allocation policy and grammatical correction	No
M178	147	Policy DS6	<i>Amend 5th bullet point as follows:</i> <ul style="list-style-type: none"> Provision of a comprehensive landscaping plan <u>to include the retention of the existing tree belt and hedged footpaths and to address the issues of viability, loss of vegetation and impact on the Peak District National Park</u> 	To strengthen protection for the Peak District National Park in response to concerns from the PDNPA	No
M179	148	6.44	<i>Amend 1st sentence as follows:</i> The site is relatively remote from New Mills centre, but being undeveloped may have archaeological potential. It is close to existing residential areas <u>although</u> with limited local services.	For clarification of the issues	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M180	148	6.45	There are a number of constraints to development. The capacity of site is likely to be reduced by the presence of pylons, and further investigation is needed to assess this. However, if a gap of 25m is left between the line of the pylons and any new housing (this is the same gap as between the pylons and existing housing curtilages), site size is reduced to 3.2ha. In addition, Thornsett Primary School cannot expand further, and can accommodate only limited development of up to 100 dwellings. The developer will need to agree with the power company the need for any gap between the pylons and any housing. In addition, the site may have archaeological potential requiring investigation.	For clarification of the issues and in response to representation from Western Power.	No
M181	148	DS7	<i>Add following bullet point:</i> <ul style="list-style-type: none"> • <u>A landscaping plan including details of boundary treatment</u> 	In response to representation from National Trust	No
M182	148	6.47	The site is believed to be in single, private ownership with a willing owner, but further investigation is required to confirm capacity.	To confirm that the site is in single ownership.	No
M183	148	DS7	<i>Amend 3rd bullet point as follows:</i> <ul style="list-style-type: none"> • <u>A Traffic Transport Assessment</u> 	To correct the terminology	No
M184	148	6.48	<i>Amend 1st sentence as follows:</i> This substantial undeveloped greenfield site (9 hectares <u>Policy H3(C5,6,17,18)</u>) is adjacent to existing housing, including Ollersett Hall Farm, a Grade II listed building.	For clarification of related site allocation policy	No
M185	149	6.50	This is a substantial development site, and the Highways Authority has advised that development of the site could cause an adverse impact on the surrounding highway network. <u>It will be necessary therefore to undertake a Transport Assessment to determine the full impact of any proposals and identify appropriate mitigation measures.</u>	For clarification of transport requirements.	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M186	149	DS8	Amend 3 rd bullet point as follows: <ul style="list-style-type: none"> A Traffic <u>Transport</u> Assessment 	To correct the terminology	No
M187	150	6.54	Amend 1 st sentence as follows: The site (<u>Policies H3(C15) and E5</u>) comprises the former Britannia Mill buildings, brownfield land, container storage and woodland, and lies north and west of the Peak Forest Canal and Buxworth Basin.	For clarification of related site allocation policies	No
M188	150	6.58	Add following sentence: The mill buildings were largely destroyed by fire some time ago. The remnants that remain of the former mill buildings are in very poor condition.	To clarify the status of the buildings on the site in response to representation from English Heritage	No
M189	151	DS9	Amend 1 st bullet point as follows: Preparation of a comprehensive masterplan, including a landscape plan and phasing programme. <u>Screening vegetation on the periphery of the site should be retained. Woodland corridors within the site which provide linking habitats to the adjacent Local Wildlife Site should also be retained. The design should reflect the setting and character of the locality. Opportunities to improve pedestrian access to the canal basin and tow path should also be explored;</u>	In response to representation from Natural England and Chinley, Buxworth & Brownside Parish Council	No
M190	151	DS9	Amend 5 th bullet point as follows: A site specific Flood Risk Assessment in accordance with the findings of the High Peak <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment level 2;</u>	To clarify the nature of the level 2 SFRA	No
M191	151	DS9	Add following additional bullet points: <ul style="list-style-type: none"> <u>Any scheme proposing the whole or partial demolition of the existing mill buildings will be subject to a heritage assessment and independent viability assessment.</u> 	In response to representations from English Heritage and	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<ul style="list-style-type: none"> Recreational development on the greenfield land should be <u>compliant with the NPPF as well as Policy EQ3.</u> 	Natural England	
M192	151	DS9	Insert the following additional development requirement: <u>Redevelopment of the previously developed land shall not have a greater impact on the openness of the Green Belt than the existing development.</u>	In order to comply with Green Belt policy in the NPPF	No
M193	151	6.62	<i>Amend 1st sentence as follows:</i> The site (<u>Policy E5</u>) comprises the Bingswood Industrial Estate and vacant land to the south and east of the river, and undeveloped land known as Hogs Yard to the north and west of the River Goyt.	For clarification of related site allocation policy	No
M194	153	DS10	<i>Amend first 2 paragraphs as follows:</i> Land amounting to 6.8ha is allocated for business and mixed use development subject to compliance with adopted Local Plan policies. The majority of the area to the south and east of the River Goyt, comprising the existing industrial estate and undeveloped brownfield area to the north of the estate, should be developed for business use. Residential development of approximately 75 dwellings may be permitted on 2.5ha within the site subject to: <u>Development will be subject to compliance with other relevant Local Plan policies, and:</u>	To clarify and improve the intention of the policy requirement to comply with other relevant policies in this Local Plan	No
M195	153	DS10	<i>Delete following paragraph:</i> Development is also subject to provision of flood mitigation measures in consultation with the Environment Agency. <i>Amend 7th bullet point as follows:</i> <u>A site specific Flood Risk Assessment in accordance with the findings of</u>	This requirement is already covered elsewhere in the policy and to clarify the need for a site specific flood risk assessment	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			the High Peak Viability Assessment: Level 2 Strategic Flood Risk Assessment and provision of flood mitigation measures in consultation with the Environment Agency;		
M196	153	6.71	<i>Amend 1st sentence as follows:</i> This 3.1ha site (C16) (Policies H3(C19) and E5) lies between the River Goyt and Peak Forest canal.	To correct the reference to the related site allocation policies	No
M197	154	6.75	<i>Add following text:</i> <u>Additional housing and / or live/work units may be permitted subject to the submission of an appropriate viability assessment at the time of an application to demonstrate that it is required and that it is sustainable. This would also be subject to the development overall still providing improvements to the industrial estate as originally intended.</u>	In order to reflect the Viability Study and to provide flexibility.	No
M198	154	DS11	<i>Amend 1st sentence as follows:</i> Land amounting to 3.1 hectares is allocated for business, tourism and leisure uses, and residential development of up to <u>approximately 26</u> dwellings.	In order to reflect the Viability Study and to be consistent with the supporting text.	No
M199	154	DS11	<i>Amend 5th bullet point as follows:</i> Provision of a comprehensive landscaping plan, including the retention of mature trees <u>to maintain low visual prominence of the site;</u>	In response to representation from Natural England	No
M200	154	DS11	<i>Amend 6th bullet point as follows:</i> A site specific Flood Risk Assessment in accordance with the findings of the High Peak <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment level 2;</u>	To clarify the nature of the level 2 SFRA	No
M201	155	DS11	<i>Add following additional bullet point:</i> <ul style="list-style-type: none"> <u>An ecological assessment of the site to include consideration of the impact of the site on the Goytside Meadows LNR</u> 	Response to representation from Natural England	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M201	155	6.77	<i>Amend 1st sentence as follows:</i> Torr Vale Mill (<u>Policy E5</u>) is currently designated as a Regeneration Area which encourages a comprehensive redevelopment of the area to provide education, office and business use, leisure and tourism facilities and residential development necessary to enable the conversion if the mill to mixed use.	For clarification of related site allocation policy	No
M203	155	6.82	<i>Amend 1st sentence as follows:</i> Any proposals for residential development within the mill or on associated <u>land</u> should be justified in line with English Heritage guidance	Correct omission	No
M204	155	6.83	<i>Add following sentence to end of paragraph:</i> <u>The restoration of the mill is the priority for the site and any developer contribution requirements will be reduced or removed where a viability assessment confirms that this would be necessary to ensure the restoration of the mill.</u>	To reflect representation from English Heritage	No
M205	156	DS12	<i>Amend 1st paragraph as follows:</i> Torr Vale Mill and associated land is allocated for a <u>heritage-led mixed used redevelopment scheme which will facilitate the repair and secure the long term future, of the Grade II* Listed Mill. This will include:</u>	To reflect representation from English Heritage	No
M206	156	DS12	<i>Amend 5th bullet point in 2nd section as follows:</i> A site specific Flood Risk Assessment in accordance with the findings of the High Peak <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment level 2;</u>	To clarify the nature of the level 2 SFRA	No
M207	156	DS12	<i>Amend 6th bullet point in 2nd section as follows:</i> <ul style="list-style-type: none"> Buildings appraisal. <u>Preparation of detailed heritage assessment in relation to the significance of heritage assets. This should be used to inform a heritage led strategy for the conservation of the Grade II* listed Torr Vale Mill and its future management, and take into account</u> 	To reflect representation from English Heritage	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>other associated development within its setting (including any enabling development). A detailed assessment of the condition of the buildings is required.</u>		
M208	156	6.85	<i>Amend 1st sentence as follows:</i> This policy relates to the two proposed allocations in the Newtown area of New Mills, namely the proposed housing allocation off Woodside Street (Policy H3(C7)) and the Newtown Industrial Legacy site (Policy E5).	For clarification of related site allocation policy	No
M209	157	DS13	<i>Amend following phrase within policy:</i> Development will be subject to compliance with wider <u>other relevant</u> Local Plan policies, and:	For clarification and consistency	No
M210	158	6.88	<i>Amend 1st sentence as follows:</i> The former Birch Vale Industrial Estate is designated <u>under Policy H3(C21) and</u> as an Industrial Legacy site under Policy E5.	For clarification of related site allocation policy	No
M211	158	DS14	<i>Amend following phrase within policy:</i> Development will be subject to compliance with wider <u>other relevant</u> Local Plan policies, and:	To clarify and improve the intention of the policy requirement to comply with other relevant policies in this Local Plan	No
M212	158	DS14	<i>Amend 3rd bullet point as follows:</i> <ul style="list-style-type: none"> Preparation of a comprehensive masterplan that seeks to minimise any conflicts between residential and employment premises in terms of amenity and safety, maximises opportunities to utilise the reservoir for recreational use <u>and includes a landscape framework.</u> The design and layout should look to buffer/protect and enhance the adjacent wildlife features of the River Sett and reservoir.	In response to representations from Natural England	No
M213	158	DS14	<i>Amend 4th bullet point as follows:</i> <ul style="list-style-type: none"> Archaeological desk-based assessment and buildings appraisal <u>and a contamination survey</u> 	In response to representation	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M214	158	DS14	<p><i>Amend 5th bullet point as follows:</i></p> <ul style="list-style-type: none"> A site specific Flood Risk Assessment in accordance with the findings of the High Peak <u>Viability Assessment: Level 2 Strategic Flood Risk Assessment level 2</u>; 	To clarify the nature of the level 2 SFRA	No
M215	158	6.89	<p><i>Amend 1st sentence as follows:</i></p> <p>This site (<u>Policy H3(B3 & B4)</u>) contains the only significant area of brownfield land adjacent to the urban area in Buxton, comprising former railway sidings and a refuse tip to the north of the site.</p>	For clarification of related site allocation policy	No
M216	161	6.107	This large greenfield site (<u>Policy H3(B8)</u>) lies to the east of a site on Granby Road formerly with planning consent (HPK/2010/0452) for housing <u>which has now expired</u> .	For clarification of related site allocation policy and latest status of site	No
M217	162	6.114	<p><i>Add following text to paragraph:</i></p> <p>Work is currently underway to explore alternatives and update the Sustainability Appraisal of site B8 to recognise and address the environmental impacts of locating housing in proximity to the quarry following receipt of Environmental Impact Assessment data from Omya.</p>	To clarify the nature of on-going work as set out in the policy.	No
M218	163	DS16	<p><i>Amend last bullet point as follows:</i></p> <ul style="list-style-type: none"> Project-level Habitats Regulations Assessment in order to address potential air quality <u>urban effects on the Peak Dales Special Area of Conservation</u>. 	For further clarification as recommended in the HRA	No. This is a correction in line with the submission HRA Report and Addendum Report.
M219	163	6.115	<p><i>Amend 1st sentence as follows:</i></p> <p>This large greenfield site (<u>Policy H3(B10)</u>) is currently designated as Countryside.</p>	For clarification of related site allocation policy	No
M220	163	6.119	<p><i>Add following additional text:</i></p> <p><u>Any alternative solution should be agreed with Network Rail.</u></p>	To enable alternative solutions to be	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
				explored.	
M221	163	6.121	<i>Add following additional text:</i> <u>Potential accesses serving agricultural uses and a barn are also available from Dukes Drive</u>	In response to representation	No
M222	164	6.125	<i>Amend paragraph as follows:</i> The site is considered to be deliverable in the long term. There is strong land-owner (Chatsworth Settlement Trustees) support. However, a full highways design study is required to demonstrate that access can be achieved to the standard required.	In response to representation indicating that the site may be deliverable sooner.	No
M223	164	6.126	<i>Amend 1st sentence as follows:</i> This site (<u>Policy H3(B20,21,22)</u>) comprises 21.5ha of farmland on the slopes of Fox Low, a scheduled monument, to the south east of the town.	For clarification of related site allocation policy	No
M224	164	6.127	<i>Amend 2nd sentence as follows:</i> <u>The total floorspace for the Local Centre will be less than 2500m2 for town centre uses.</u>	To clarify that this limit relates to town centre uses only.	No
M225	166	6.135	Update status in the light of any decision on current application	Clariification	No
M226	166	DS18	<i>Amend 5th bullet point as follows:</i> <ul style="list-style-type: none"> Preparation of a comprehensive landscape masterplan, to include new planting and retention of existing planting, new open space, and consideration of the setting of the National Park and <u>mitigating of any impact on the</u> scheduled ancient monument, and the safeguarding of up to 1.9ha from development along the frontage to Ashbourne Road 	In response to representations from English Heritage	No
M227	166	DS18	<i>Amend 3rd bullet point as follows:</i> <ul style="list-style-type: none"> Provision of a new Local Centre <u>comprising of</u> small scale A1 retail convenience development (less than 200m2 net sales) and wider uses including business, non-residential institutions and leisure within the Local Centre as defined in the Policies Map will be supported subject to their accordance with other relevant Local Plan policies. <u>The total floorspace for the Local Centre will shall be less</u> 	For clarification and consistency with policy CF1 and the recent planning application.	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			than 2500m ² . Town centre proposals above these thresholds must be supported by an appropriate impact and sequential site assessment that consider Buxton's centre. The A1 floorspace shall not be occupied until 50% of the residential development of the site is occupied.		
M228	166	DS18	Amend 3 rd bullet point as follows: <ul style="list-style-type: none"> • Traffic <u>Transport</u> Assessment, including full highways design and phasing scheme 	Correction to terminology	No
M229	166	6.137	This 2 ha site lies to the south of the Tongue Lane Industrial Estate and is currently allocated as an extension to this estate (<u>Policy E2</u>).	For clarification of related site allocation policy	No
M230	167	DS19	Amend 3 rd bullet point as follows: <ul style="list-style-type: none"> • Provision of a comprehensive landscaping plan. <u>Existing vegetation on the boundary should be retained and enhanced in order to further reduce visual prominence and an appropriate landscape framework will need to be created</u> 	In response to representation from Natural England	No
M231	167	DS19	Add following additional bullet point: <ul style="list-style-type: none"> • <u>Project-level Habitats Regulations Assessment in order to address potential air quality effects on the Peak Dales Special Area of Conservation.</u> 	For further clarification as recommended in the HRA and in response to representation from Natural England	No. This is a correction in line with the submission HRA Report and Addendum Report.
M232	168	6.149	Amend 3 rd and 4 th sentences as follows: The White Peak Loop Cycle project proposes to link Buxton Station with cycle trails through Buxton and out into the Peak District National Park. Develop . Development proposals within the regeneration should not prohibit the project from being implemented and should look to support it.	Correction of typographic error	No
M233	168	6.150	Amend 2 nd sentence as follows: Here to pedestrian access is vital. <u>Suitable pedestrian access to the site</u>	Correction of grammatical error.	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>from the town centre is vital.</u>		
M234	168	6.151	<i>Amend 1st sentence to read:</i> <u>The southern part of the site falls within the Conservation Area boundary and there are two listed buildings (Winster Place and Grove Hotel and Parade) which also fall within the boundary.</u>	In response to representations from English Heritage	No
M235	168	6.151	<i>Add following additional sentence to paragraph:</i> <u>The Peak Rail Light Railway Order (1990) grants the company rights to make and maintain a railway on their land which the company has an aspiration to implement.</u>	In response to representation from Peak Rail plc	No
M236	169	6.153	<i>Amend paragraph as follows:</i> Buxton is a historic Spa town and Buxton mineral water is a key part of the local economy. The River Wye also provides a habitat for a protected species, the native crayfish. The <u>Appropriate</u> measures to control pollution etc. will <u>therefore</u> be required.	Grammatical correction	No
M237	169	DS20	<i>Amend 3rd sentence as follows:</i> Development will be subject to compliance with adopted <u>other relevant</u> Local Plan policies, and in particular with the Buxton Design and Place Making Strategy SPD and Station Road Design Framework SPD, and <u>subject to:</u>	To clarify and improve the intention of the policy requirement to comply with other relevant policies in this Local Plan	No
M238	170	DS21	Add following new Strategic Development Sites policy and supporting text: <u>Roughfields, Glossop</u> <u>Land amounting to 4.7 hectares is allocated for residential development</u>	See response to representations	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<p><u>of approximately 102 dwellings. Development will be subject to compliance with other relevant Local Plan policies and:</u></p> <ul style="list-style-type: none"> • <u>A transport assessment</u> • <u>Safeguarding of a site for a new County Primary School and Nursery</u> • <u>Protection of the existing public open space</u> • <u>Preparation of a masterplan to include a landscape plan and measures to reduce impact on National Park</u> • <u>A wildlife and nature conservation assessment</u> • <u>Contributions towards infrastructure</u> • <u>Provision of the required proportion of affordable housing provision (currently 30%)</u> • <u>A site specific flood risk assessment</u> 		
M239	170	DS22	<p>Add following new Strategic Development Sites policy and supporting text:</p> <p><u>North Road, Glossop</u></p> <p><u>Land amounting to 8.8 hectares is allocated for residential development of approximately 150 dwellings. Development will be subject to compliance with other relevant Local Plan policies and:</u></p> <ul style="list-style-type: none"> • <u>A transport assessment</u> • <u>Preparation of a masterplan to include a landscape plan and measures to reduce impact on National Park</u> • <u>A wildlife and nature conservation assessment</u> • <u>Contributions towards infrastructure</u> • <u>Provision of the required proportion of affordable housing provision (currently 30%)</u> • <u>A site specific flood risk assessment</u> 	In response to representations and recent appeal decision	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M240	170	DS23	<p>Add following new Strategic Development Sites policy and supporting text:</p> <p><u>South of Macclesfield Road, Whaley Bridge</u></p> <p><u>Land amounting to 11 hectares is allocated for residential development of approximately 83 dwellings. Development will be subject to compliance with other relevant Local Plan policies and:</u></p> <ul style="list-style-type: none"> • <u>A transport assessment</u> • <u>Preparation of a masterplan to include a landscape plan and measures to reduce impact on National Park</u> • <u>A wildlife and nature conservation assessment</u> • <u>Contributions towards infrastructure</u> • <u>Provision of the required proportion of affordable housing provision (currently 30%)</u> 	In response to representations	No
M241	170	DS24	<p>Add following new Strategic Development Sites policy and supporting text:</p> <p><u>Market Street Deport, Buxton</u></p> <p><u>Land amounting to 0.8 hectares is allocated for residential development of approximately 24 dwellings. Development will be subject to compliance with other relevant Local Plan policies and:</u></p> <ul style="list-style-type: none"> • <u>A transport assessment</u> • <u>Retention of public car parking within the site</u> • <u>Consideration of impact on the adjacent Conservation Area</u> • <u>Contamination Assessment</u> • <u>Archaeological Assessment</u> 	In response to representation	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<ul style="list-style-type: none"> • <u>Contributions towards infrastructure</u> • <u>Provision of the required proportion of affordable housing provision (currently 30%)</u> 		
M242	174	Table 12 Implementation of Local Plan Policies	Policy EQ3 Countryside and Green Belt Development	To accord with full title of policy	No
	176		Policy EQ9 Pollution and Flood Risk <u>Control and Unstable Land</u> Principal outcomes: Pollution and flood risk impact mitigation <u>and avoidance of unstable land</u>	To reflect changes made to policy EQ9 and new policy EQ10	No
	176		Add following new section: <u>Policy EQ10 Flood Risk Management</u> Principal outcomes: <u>Flood risk impact mitigation</u> <u>Implementation mechanism: Determination of planning application, S106 and conditions, support for measures in all relevant Catchment Flood Management Plans</u> <u>Delivery body: HPBC, Developers, Environment Agency</u>		No
	179		Policy CF2 Primary Shopping Areas and Frontages	To accord with full title of policy	No
	180		Policy CF4 Open Space, <u>Sports and Recreation Facilities</u>	To accord with full title of policy	No
	182		Delete following : Policy DS6 Land off High Hill Road, New Mills	Delete – now DS7 Land off Derby Road, New Mills	No
	182		Add following: <u>Policy DS6 Land at Woodhead Road, Glossop</u> Principal outcomes: <u>Secure an appropriate residential development of the site, mitigation of identified impacts</u> <u>Implementation mechanism: Designation of site in Local Plan, determination of planning applications, S106 and conditions</u>	To reflect allocation in submission Local Plan	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>Delivery Body: HPBC, developers</u>		
	182		Add following: <u>Policy DS7 Land off Derby Road, New Mills</u> <u>Principal outcomes: Secure an appropriate residential development of the site, mitigation of identified impacts</u> <u>Implementation mechanism: Designation of site in Local Plan, determination of planning applications, S106 and conditions</u> <u>Delivery Body: HPBC, developers</u>	To reflect allocation in submission Local Plan	No
	182		Policy DS7 <u>DS8</u> Land at Ollersett Lane/Pingot Road, New Mills	Correction of policy reference	No
	182		Policy DS8 <u>DS9</u> Britannia Mill, Buxworth	Correction of policy reference	No
	182		Policy DS9 <u>DS10</u> Bingswood, Whaley Bridge	Correction of policy reference	No
	183		Policy DS10 <u>DS11</u> Furness Vale Industrial Estate Business Park , Calico Lane, Furness Vale	Correction of policy reference and title	No
	183		Policy DS14 <u>DS12</u> Torr Vale Mill, New Mills	Correction of policy reference	No
	183		Add following: <u>Policy DS13 Newtown and Woodside Street New Mills</u> <u>Principal outcomes: Secure an appropriate mixed use development of the site including residential, mitigation of identified impacts</u> <u>Implementation mechanism: Designation of site in Local Plan, determination of planning applications, S106 and conditions</u> <u>Delivery Body: HPBC, developers</u>	To reflect allocation in submission Local Plan	No
	183		Add following: <u>Policy DS14 Birch Vale Industrial Estate</u> <u>Principal outcomes: Secure an appropriate residential development of the site including retention of employment land, mitigation of identified</u>	To reflect allocation in submission Local Plan	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
			<u>impacts</u> <u>Implementation mechanism: Designation of site in Local Plan, determination of planning applications, S106 and conditions</u> <u>Delivery Body: HPBC, developers</u>		
	183		CS42 <u>DS15</u> Land at Hogshaw, Buxton	Correction of policy reference	No
	183		DS43 <u>DS16</u> Land west of Tongue Lane, Fairfield, Buxton	Correction of policy reference	No
	183		DS44 <u>DS17</u> Land off Dukes Drive, Buxton	Correction of policy reference	No
	184		DS45 <u>DS18</u> Land off Ashbourne Road and Foxloew Farm, Buxton	Correction of policy reference	No
	184		DS46 <u>DS19</u> Tongue Lane (and south of Tongue Lane Industrial Estate), Buxton	Correction of policy reference	No
	184		DS47 <u>DS20</u> Station Road and Spring Gardens Regeneration Area, Buxton	Correction of policy reference	No
M243	185	7.6	In accordance with the Localism Act 2011 and <u>the</u> Town and Country Planning (Local Planning)(England) Regulations 2012, the Council is required to prepare <u>and publish</u> a monitoring report with up-to-date information as soon as possible after it become available <u>annually</u> .	To provide the correct information	No
M244	189	Table 13 Monitoring of	Policy EQ3 Countryside <u>and Green Belt</u> Development	To accord with full title of policy	No
M245	190	Local Plan Policies	Policy EQ9 Pollution and Flood Risk Control and Unstable Land Monitoring Indicator: Number of planning permissions granted contrary to Environment Agency <u>advice on flooding</u> <u>land stability</u> and water quality <u>pollution</u> grounds	To reflect changes made to policy EQ9 and new policy EQ10	No

Mod. No.	Page	Para./ Policy No.	Proposed Modification (deleted text has strikethrough , new text is <u>underlined</u>)	Reason	Change could result in a likely significant effect?
M246	190		Target: No permissions granted contrary to Environment Agency advice Add following new section: <u>Policy EQ10 Flood Risk Management</u> <u>Monitoring Indicator: Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds</u> Target: <u>No permissions granted contrary to Environment Agency advice</u> Data Source: <u>Development Control</u>		No
M247	193		Policy CF2 Primary Shopping Areas and Frontages	To accord with full title of policy	No
M248	194		Policy CF4 Open Space, <u>Sports</u> and Recreation <u>Facilities</u>	To accord with full title of policy	No
M249	195	7.9	In preparing the Local Plan, the Council worked jointly with the neighbouring authorities of Derbyshire Dales District Council, the Peak District National Park Authority, <u>Tameside Metropolitan Borough Council</u> , <u>Stockport Metropolitan Borough Council</u> , <u>Cheshire East Council</u> and <u>Derbyshire County Council</u> to gather evidence, including the identification of infrastructure needs.	To reflect work undertaken under the Duty to Cooperate	No
M250	209	Appendix 2 – Housing Trajectory	Update to reflect housing land supply as at end of March 2014 Ensure completions are from 2011 and that figures match those in table 2 (updated)	To reflect latest housing land supply	No
M251	214	Appendix 4 – Housing Supply	Update to reflect housing land supply as at end of March 2014 Ensure completions are from 2011 and that figures match those in table 2 (updated)	To reflect latest housing land supply	No
M252			Add new Appendix 5 – Glossary	To help explain the terminology used	No

Annex C: 2012 Updated Screening Assessment



2011 Air Quality Updating and Screening Assessment for High Peak Borough Council

In fulfillment of Part IV of the
Environment Act 1995
Local Air Quality Management

January 2012

Local Authority Officers	Prepared by; Matthew Holford
	Reviewed by; Mike Towers
Department	Environmental Health
Address	Council Offices Hayfield Road Chapel-en-le-Frith High Peak SK23 0QJ
Telephone	0845 129 7777
e-mail	matthew.holford@south-derbys.gov.uk Mike.Towers@highpeak.gov.uk
Report Reference number	LAQM.USA.2012.v1
Date	14th January 2013

Executive Summary

This Updating and Screening Assessment has been undertaken in accordance with statutory guidance ^(3,4). It is based on a review of the 2011 full calendar year of air quality monitoring results from monitoring locations operated by High Peak District Council. It is also based on a review of potential sources of emissions and their likely impact on receptor locations sensitive to air pollution based on current knowledge and experience obtained over the past 10 years of air quality assessments.

High Peak only monitors nitrogen dioxide levels within the District. All passive diffusion tube monitoring locations demonstrated that nitrogen dioxide levels in 2011 were below the annual average Air Quality Objective of 40 µg/m³. A newly installed automatic air quality monitor at Pegasus crossing in Tintwistle has been producing readings that indicate a potential exceedence of the Air Quality Objective for nitrogen dioxide. This has been the subject of Detailed Assessment which is contained in a separate report.

There is no evidence to suggest that any other air pollutants are at or near the short or long term Air Quality Objectives and therefore High Peak does not propose to extend the monitoring network to include other pollutant species.

The Updating and Screening Assessment has not identified any other recent changes in the Borough which lead to any reasonable concerns that the Objectives may be at risk.

Table of contents

1	Introduction	5
1.1	Description of Local Authority Area	5
1.2	Purpose of Report.....	6
1.3	Air Quality Objectives	7
1.4	Summary of Previous Review and Assessments.....	9
2	New Monitoring Data	10
2.1	Summary of Monitoring Undertaken.....	10
2.1.1	Automatic Monitoring Sites	10
2.1.2	Non-Automatic Monitoring Sites	11
2.2	Comparison of Monitoring Results with AQ Objectives.....	14
2.2.1	Nitrogen Dioxide	14
2.2.2	PM ₁₀	16
2.2.3	Sulphur Dioxide.....	16
2.2.4	Benzene.....	16
2.2.5	Summary of Compliance with AQS Objectives	16
3	Road Traffic Sources	17
3.1	Narrow Congested Streets with Residential Properties Close to the Kerb	17
3.2	Busy Streets Where People May Spend 1-hour or More Close to Traffic.....	18
3.3	Roads with a High Flow of Buses and/or HGVs.	18
3.4	Junctions.....	19
3.5	New Roads Constructed or Proposed Since the Last Round of Review and Assessment 20	
3.6	Roads with Significantly Changed Traffic Flows.....	21
3.7	Bus and Coach Stations	21
4	Other Transport Sources.....	23
4.1	Airports.....	23
4.2	Railways (Diesel and Steam Trains)	23
4.2.1	Stationary Trains.....	23
4.2.2	Moving Trains	24
4.3	Ports (Shipping)	24
5	Industrial Sources.....	25
5.1	Industrial Installations	25
5.1.1	New or Proposed Installations for which an Assessment has been carried out.....	25
5.1.2	Existing Installations where Emissions have increased substantially	25
5.1.3	New or Significantly Changed Installations with No Previous Air Quality Assessment...	26
5.2	Major Fuel (Petrol) Storage Depots.....	26
5.3	Petrol Stations.....	26
5.4	Poultry Farms.....	27

6	Commercial and Domestic Sources	28
6.1	Biomass Combustion – Individual Installations	28
6.2	Biomass Combustion – Combined Impacts.....	28
6.3	Domestic Solid-Fuel Burning	29
7	Fugitive or Uncontrolled Sources.....	30
8	Conclusions and Proposed Actions.....	32
8.1	Conclusions from New Monitoring Data	32
8.2	Conclusions from Assessment of Sources	32
8.3	Proposed Actions.....	32
9	References.....	33

List of Tables

Table 1.1	Air Quality Objectives for the Purposes of LAQM in England.
Table 2.1	Details of Non-automatic Monitoring Sites.
Table 2.2	Results of Automatic Monitoring of Nitrogen Dioxide.
Table 2.3	Results of Non-Automatic Monitoring of Nitrogen Dioxide and Comparison with Annual Average Objective.
Table 2.4	Junctions in High Peak Above 10,000 AADT and with Receptors Within 10m.
Table 7.1	Assessment of Fugitive Sources

List of Figures

Figure 1	Location of the Tintwistle Air Quality Monitoring Station
----------	---

Appendices

Appendix 1	QA/QC
Appendix 2	Traffic Data
Appendix 3	Installations Holding an A(1) Environmental Permit
Appendix 4	Planning Permissions with Potential Air Quality Impacts

1 Introduction

1.1 Description of Local Authority Area

High Peak is one of nine district authorities within Derbyshire. It is located in the north west of the County and abuts the Greater Manchester conurbation to the west. To the east of High Peak are the metropolitan areas of Sheffield and Barnsley. Listed below are some statistics relating to High Peak.

Area:	53,715 hectares
Population:	91,140
Population of main towns:-	
Buxton:	24,112
Chapel-en-le-Frith	6,416
Glossop:	32,428
New Mills:	8,139
Whaley Bridge:	6,228
Number of dwellings:	38,187

High Peak is crossed by the A6, the A628 and the A57. The A628 traverses the north of the area, from Hollingworth and through Tintwistle. The A6 enters High Peak at New Mills, follows an easterly and then a southerly direction, through Chapel-en-le-Frith and Buxton, crossing the borough boundary east of Buxton. The A57 runs from Glossop eastwards to Ladybower Reservoir.

Glossop and Chapel-en-le-Frith are joined by the A624. The A515 is a route from Buxton through one of the main quarrying areas. There are no motorways crossing High Peak.

Although many people may regard High Peak as being predominantly rural in character, the area in fact contains concentrations of industry. At the beginning of 2011 the Council regulated 62 processes under the Environmental Permitting Regulations 2010. A further 13 processes were regulated by the Environment Agency.

SOURCES OF POLLUTION

The main potential sources of pollution affecting the area are:-

- i) Emissions from industrial processes prescribed under the Environmental Permitting Regulations;
- ii) Emissions from other industrial processes and domestic chimneys;
- iii) Traffic;
- iv) Imported emissions from similar sources outside the district boundary.

Environmental Permits

According to the Environment Agencies online public register there are currently 13 installations permitted as A(1) regulated sites under the Environmental Permitting Regulations within High Peak. The Borough Council currently regulates a further 60 Part B processes and two A(2) installations.

Traffic Pollution

The main significant sources of traffic related pollution occurs on busy and congested roads. The roads which have been identified as creating the most pollution are sections of the A6, A628 and A57.

Other Industrial Sources

General industry as a whole contributes to air pollution levels within High Peak. Where any significant sources are identified, they will also be considered within the review and assessment procedures.

1.2 Purpose of Report

This report fulfils the requirements of the Local Air Quality Management process as set out in Part IV of the Environment Act (1995), the Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 and the relevant Policy and Technical Guidance documents. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives (AQO) are likely to be achieved. Where exceedences are considered likely, the local authority must then declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives.

The objective of this Updating and Screening Assessment (USA) is to identify any matters that have changed which may lead to risk of an air quality objective being exceeded. A checklist approach and screening tools are used to identify significant new sources or changes and whether there is a need for a Detailed Assessment.

The USA report provides an update of any outstanding information requested previously in Review and Assessment reports.

Section 2 of the report analyses recent air quality monitoring data to determine if there is empirical evidence of any exceedences of the Air Quality Objectives at monitoring locations.

Sections 3 to 7 of the report uses a checklist approach detailed in Local Air Quality Management Technical Guidance TG(09) to identify if there is any risk of the Air Quality Objectives being exceeded at locations where monitoring has not previously been undertaken.

1.3 Air Quality Objectives

The air quality objectives applicable to LAQM **in England** are set out in the Air Quality Standards Regulations 2010 and are shown in Table 1.1. This table shows the objectives in units of microgrammes per cubic metre $\mu\text{g}/\text{m}^3$ (milligrammes per cubic metre, mg/m^3 for carbon monoxide) with the number of exceedences in each year that are permitted (where applicable).

Table 1.1 Air Quality Objectives included in Regulations for the purpose of LAQM in England

Pollutant	Air Quality Objective		Date to be achieved by
	Concentration	Measured as	
Benzene	16.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2003
	5.00 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2010
1,3-Butadiene	2.25 $\mu\text{g}/\text{m}^3$	Running annual mean	31.12.2003
Carbon monoxide	10.0 mg/m^3	Running 8-hour mean	31.12.2003
Lead	0.5 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2004
	0.25 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2008
Nitrogen dioxide	200 $\mu\text{g}/\text{m}^3$ not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
	40 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2005
Particles (PM ₁₀) (gravimetric)	50 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 35 times a year	24-hour mean	31.12.2004
	40 $\mu\text{g}/\text{m}^3$	Annual mean	31.12.2004
Sulphur dioxide	350 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
	125 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
	266 $\mu\text{g}/\text{m}^3$, not to be exceeded more than 35 times a year	15-minute mean	31.12.2005

1.4 Summary of Previous Review and Assessments

All previous air quality reports have been summarised below, with any identified/predicted exceedences of air quality objective highlighted.

Report type	Exceedences identified/predicted	Area affected	AQMA declared	Action taken
Air Quality Stage 1 Report 1998	None	NA	No	None required
Air Quality Stage 2 Report 2000	None	NA	No	None required
Updating and Screening Assessment 2003	None	NA	No	None required
Progress Report 2004	None	NA	No	None required
Progress Report 2005	None	NA	No	None required
Updating and Screening Assessment 2006	None	NA	No	None required
Progress Report 2007	None	NA	No	None required
Progress Report 2008	None	NA	No	None required
Updating and Screening Assessment 2009	Evidence that the Annual Average Air Quality Objective for NO ₂ is being exceeded in Tintwistle	A628	No	Detailed Assessment identified as required
Progress Report 2010	None	NA	No	None required
Progress Report 2011	None	NA	No	None required
Updating and Screening Assessment 2012	This Report			

2 New Monitoring Data

2.1 Summary of Monitoring Undertaken

2.1.1 Automatic Monitoring Sites

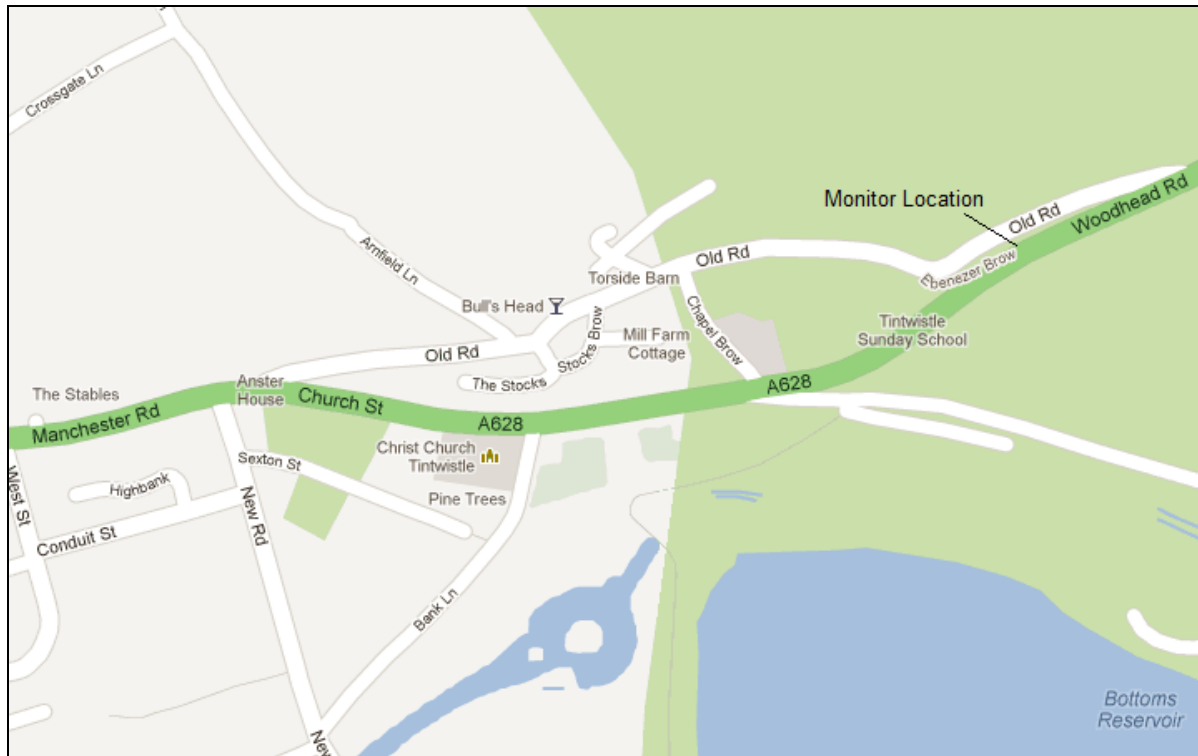
Following the completion of the 2009 Updating and Screening Assessment, High Peak Borough Council identified a potential risk of an air quality exceedance in Tintwistle along the A628 road corridor. A continuous air quality monitor was installed in Tintwistle in June 2011.

The equipment installed consists of a weatherproof enclosure provided by Casella Measurement and an ML 9841b NO_x analyser with internal zero and span (IZS). The monitor is positioned at a 'kerbside' location on the 'Pegasus crossing' of the A628 approximately 200m east of Tintwistle. The sampling head is at a height of 1.4m and 1m from the kerb of the A628. Although the monitor is positioned next to a pedestrian crossing, it is understood that this is generally only activated by users of a bridleway and therefore the results from the monitor are not considered likely to be significantly influenced by static vehicles idling next to the sampling position. The monitoring location is on the section of the A628 which is on the incline described above and therefore the sampling position is likely to be significantly affected by emissions from vehicles accelerating up the incline out of the village.

The equipment is inspected and calibrated by staff from High Peak Borough Council every two weeks in accordance with the manufacturer's instructions. The data is downloaded by SMS link every month by Casella Ltd on behalf of HPBC after which it is ratified in accordance with paragraphs A1.159 to A1.168 of TG(09). The data is then provided to HPBC in a standard report format.

The location of the monitor is illustrated in Figure 1 below;

Figure 1: Location of the Tintwistle air quality monitoring station



2.1.2 Non-Automatic Monitoring Sites

High Peak Borough Council monitors Nitrogen Dioxide (NO₂) in the district with Palmes type diffusion tubes. Diffusion tubes are small plastic tubes containing a media, which upon exposure to pollutants passively absorbs them. Once returned to a laboratory for analysis, a calculation can be made of the mean pollutant concentration in the location of the tube from the duration of exposure and amount of pollutants absorbed. The laboratory uses a 50% TEA (Triethanolamine) in acetone preparation method, and follows the procedures set out in the Harmonisation Practical Guidance as required by DEFRA and the Devolved Administrations. At 1 January 2012, the tubes were located at 11 points around the district and analysed monthly by ESG Laboratory (formerly Harwell Laboratories).

The results from the laboratory need to be 'bias adjusted' to correct for the inherent uncertainties that occur using this method. This can be done by comparing the results from either duplicate or ideally triplicate diffusion tubes co-located next to a local real-time NO₂ monitor, or from national figures derived by the laboratory supplying and analysing the tubes.

High Peak Borough Council

As the High Peak automatic monitor has one co-located diffusion tube and only has data from late June 2011 we have chosen to take the average bias adjustment value from all ESG 50% TEA diffusion tube surveys across the UK for 2011.

The Workplace Analysis Scheme for Proficiency (WASP) laboratory survey tests the proficiency of laboratories undertaking analysis of chemical pollutants in workplace and ambient air. The most recently published proficiency testing results (rounds 108-115) covering the period January 2010 to December 2011 rated all ESG analysis as 'satisfactory'.

The national bias correction factor for ESG 50% TEA for 2011 was **0.83** (see Appendix A).

An illustration of each of the diffusion tube monitoring locations is provided in Appendix E.

Table 2.1 Details of Non-Automatic Monitoring Sites

Site Name	Site Type	OS Grid Ref	LA Site Ref	Pollutants Monitored	In AQMA?	Is monitoring collocated with a Continuous Analyser (Y/N)	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
1. Fairfield Road, Buxton	Roadside	X 406390 Y 373752	HP9	NO ₂	No	No	Y (4 m)	1m	Y
2. Furness Vale Primary	Roadside	X 400837 Y 383479	HP6A	NO ₂	No	No	Y (0 m)	5m	Y
3. Hallsteads, Dove Holes	Roadside	X 407668 Y 378239	HP6B	NO ₂	No	No	Y (0 m)	5m	Y
5. Howard Town House, Glossop	Urban centre	X 403654 Y 394033	HP1	NO ₂	No	No	Y (0 m)	26m	Y
6. North Road, Glossop	Urban background	X 403243 Y 394543	HP2	NO ₂	No	No	Y (0 m)	21m	NA
7. 8 Granby Road, Buxton	Urban background	X 406581 Y 373419	HP10	NO ₂	No	No	Y (0 m)	12m	NA
8. Brookfield, Hadfield	Roadside	X 401107 Y 395322	HP12	NO ₂	No	No	Y (7 m)	2m	Y
10. Barmoor Clough, Dove Holes	Roadside	X 407629 Y 379482	HP14	NO ₂	No	No	Y (7 m)	2m	Y
11. Newtown lights, New Mills	Roadside	X 399362 Y 384566	HP13	NO ₂	No	No	Y (3 m)	2m	Y
12. Buxton Railway Station	Roadside	X 405884 Y 373715	HP15	NO ₂	No	No	Y (6 m)	2m	Y
13. Manchester Road, Tintwistle	Roadside	X 401956 Y 397279	HP16	NO ₂	No	No	Y (4 m)	1m	Y

2.2 Comparison of Monitoring Results with AQ Objectives

Only nitrogen dioxide is monitored within High Peak.

2.2.1 Nitrogen Dioxide

The 2011 annual monitoring results for the continuous monitoring location is summarised in Table 2.2.

Table 2.2 Results of Automatic Monitoring of Nitrogen Dioxide

Location	OS Ref	Data Capture for monitoring period (%)	Data Capture for the year (%)	Annual Mean 2011 ($\mu\text{g}/\text{m}^3$)	Number of Exceedences of the 1 hour AQO
Pegasus Crossing, Tintwistle	402636 397409	99.3	49.3	60.3	0

The monitoring results for the final six months of 2011 indicate that the annual average Air Quality Objective is being exceeded at the Pegasus Crossing monitoring location. The data indicates that the 1 hour Objective is being complied with.

The 2011 bias corrected annual monitoring results for the non-continuous monitoring locations are summarised in Table 2.3 along with historical annual monitoring results. Exceedences of the annual average Air Quality Objective for NO_2 are highlighted in the shaded cells.

Table 2.3 Results of Non-Automatic Monitoring of Nitrogen Dioxide: Comparison with Annual Mean Objective

Site Name	Site Type	Within AQMA?	Valid Data Capture for period of monitoring %	Valid Data Capture 2011 %	Annual Mean Concentration $\mu\text{g}/\text{m}^3$			
					2008*	2009*	2010*	2011*
1. Fairfield Road, Buxton	Roadside	No	100%	100%	31	36	34	39
2. Furness Vale Primary	Roadside	No	100%	100%	30	29	35	29
3. Hallsteads, Dove Holes	Roadside	No	100%	100%	24	28	34	25
5. Howard Town House, Glossop	Urban centre	No	100%	100%	19	20	20	17
6. North Road, Glossop	Urban background	No	100%	100%	13	10	13	9
7. 8 Granby Road, Buxton	Urban background	No	100%	100%	12	11	13	12
8. Brookfield, Hadfield	Roadside	No	100%	100%	32	36	36	32
10. Barmoor Clough, Dove Holes	Roadside	No	100%	100%	39	38	43	37
11. Newtown lights, New Mills	Roadside	No	92%	92%	28	31	30	31
12. Buxton Railway Station	Roadside	No	100%	100%	32	36	34	33
13. Manchester Road, Tintwistle	Roadside	No	100%	100%	38	36	35	37

*All data reported is based on a full calendar year of monitoring data.

The non continuous monitoring data indicates that the annual average Objective for NO₂ was met at all monitoring locations in 2011.

The Objective was exceeded at the Barmoor Clough, Dove Holes monitoring location in 2010 (site 10, LA ref HP14). However as evidenced in Table 2.1, this monitoring location is not fully representative of receptor exposure and therefore in the 2011 Progress Report a calculation was presented to determine the predicted exposure at the nearest receptor based on the distance drop-off calculation contained in Box 2.3 of TG(09). This calculation concluded that based on the 2010 monitoring data the nearest receptor was expected to have an annual average exposure of 34µg/m³, which is compliant with the Objective.

All non-continuous monitoring locations therefore demonstrate compliance with the AQO.

2.2.2 PM₁₀

No monitoring of respirable particulate is undertaken in High Peak.

2.2.3 Sulphur Dioxide

No monitoring of sulphur dioxide is undertaken in High Peak.

2.2.4 Benzene

No monitoring of benzene is undertaken in High Peak.

2.2.5 Summary of Compliance with AQS Objectives

High Peak Borough Council has examined the results from monitoring in the District during the year 2011 and has referred to historical monitoring data going back to 2008.

Concentrations of NO₂ at the Pegasus Crossing monitoring station are exceeding the annual average AQO and a separate Detailed Assessment Report has been prepared for this and to assess air quality along the A628 in Tintwistle.

Concentrations at all other monitoring locations are all below the Objectives, therefore there is no need to proceed to a Detailed Assessment.

3 Road Traffic Sources

The following sections use the framework of statutory guidance to assess the potential for road traffic emissions within High Peak to result in an exceedence of one of the Air Quality Objectives.

3.1 Narrow Congested Streets with Residential Properties Close to the Kerb

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when narrow congested streets with residential properties close to the kerb may be at risk of causing an exceedence of the Air Quality Objective for nitrogen dioxide.

In summary, the Guidance concludes that streets relevant to this part of the assessment are those which;

- i. Experience traffic flows greater than 5,000 as an annual average daily traffic flow (AADT), and;
- ii. Are occupied by slow moving traffic which frequently stops and starts due to pedestrian crossings, parked vehicles, etc for much of the day (and not just rush hours) and in which the average speed is less than about 15mph, and
- iii. Have buildings on either side of the road and residential buildings within 2 meters of the kerb.

The table in Appendix B provides estimated traffic flows (in AADT) for all of the key roads in High Peak.

No roads in High Peak are considered to fall within the 'narrow, congested' definition within TG(09).

High Peak confirms that there are no narrow congested streets with residential receptors close to the kerb.

3.2 Busy Streets Where People May Spend 1-hour or More Close to Traffic

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when busy streets where people may spend 1 hour or more close to traffic may be at risk of causing an exceedence of the Air Quality Objective for nitrogen dioxide.

Relevant streets are those where there are many shops and outdoor cafes and bars in close proximity to high volumes of traffic movements. The Guidance suggests that streets relevant to this part of the assessment are;

- i. Where people may be within 5 meters of the kerbside for periods of more than 1 hour, and;
- ii. Where the traffic flows on the road is greater than 10,000 as an annual average daily traffic flow (AADT).

There are not deemed to be any streets in High Peak which meet these criteria.

High Peak confirms that there are no new/newly identified busy streets where people may spend 1 hour or more close to traffic.

3.3 Roads with a High Flow of Buses and/or HGVs.

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when roads with a high flow of buses and / or HGVs may be at risk of causing an exceedence of the Air Quality Objective for nitrogen dioxide.

The Guidance advises that there may be some roads where the traffic flows are not necessarily high, but that due to an unusually high proportion of buses or HGVs there is a risk of the Objective being exceeded. The Guidance advises that roads relevant to this part of the assessment;

- i. Have flows of buses / HGVs more than 20% of the AADT, and;
- ii. Have relevant receptors within 10 metres of the kerbside, and;

- iii. Have total bus and HGV flows greater than 2,500 AADT.

The data in Appendix B demonstrates that there are no roads in High Peak with a flow of buses / HGVs greater than 20% of the overall AADT.

High Peak confirms that there are no new/newly identified roads with high flows of buses/HGVs.

3.4 Junctions

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when traffic emissions at busy junctions may be at risk of causing an exceedence of the Air Quality Objective for nitrogen dioxide.

The Guidance advises that due to the cumulative effects of emissions from two or more roads and the effects of congestion, there may be some junctions where there is a risk of the Objective being exceeded.

The Guidance advises that junctions relevant to this part of the assessment;

- i. Have vehicle flows of more than 10,000 AADT, and;
- ii. Have relevant receptors within 10 meters of the kerbside.

Based on recent traffic flow data provided by Derbyshire County Council, the following junctions meet these criteria;

Table 2.4 Junctions in High Peak Above 10,000 AADT and with Receptors Within 10m.

Junction	Total AADT	Nearest Receptor from kerb (m)
A57 (Wooley Lane) / Wooley Bridge Road, Glossop	21,537	134 Wooley Bridge, Hadfield (5m)
A57 (High Street West) / A6016 (Primrose Lane), Glossop	23,136	The Junction Public House, High Street West, Glossop (3m)

A5004 (Buxton Road) / B5470 (Chapel Road and Lower Macclesfield Road), Whaley Bridge	15,551	145 Buxton Road, Whaley Bridge (7m)
A5004 (Market Street) / Reservoir Road, Whaley Bridge	14,117	Flats above 34-38 Market Street, Whaley Bridge (2m)
A6 (Bakewell Road) / B5059 (Dale Road), Buxton	22,503	135 Dale Road, Buxton (8m)
A6 (Bakewell Road and Fairfield Road) / A53 (Spring Gardens)	37,286	1 Brooklyn Place, Buxton (7m)

None of these are new junctions and all were included in previous review and assessment rounds. Existing diffusion tube monitoring locations are deemed representative of a number of these locations and, as evidenced in section 2, the annual average Objective for NO₂ is being met at all diffusion tube locations.

High Peak confirms that there are no new/newly identified busy junctions/busy roads.

3.5 New Roads Constructed or Proposed Since the Last Round of Review and Assessment

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when traffic emissions at busy junctions may be at risk of causing an exceedence of the Air Quality Objective for nitrogen dioxide and respirable particulates.

The Guidance advises that a new road may present a risk of causing an exceedence of the Air Quality Objectives where;

- i. The AADT on the new road is greater than 10,000, or
- ii. The new road has increased traffic flow along an existing road on which the annual average NO₂ has already been established to be above 36µg/m³, or

- iii. The new road has increased traffic flow along an existing road on which more than 30 exceedences of the 24 hour Objective for PM₁₀ (50µg/m³) has been predicted.

There have been no significant new roads constructed in High Peak since the last Updating and Screening Assessment.

High Peak Borough Council confirms that there are no new/proposed roads likely to result in an exceedence of the Air Quality Objectives.

3.6 Roads with Significantly Changed Traffic Flows

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when changes in traffic flow may cause a risk of resulting in an exceedence of the Air Quality Objective for nitrogen dioxide and respirable particulates.

The Guidance suggests that a road with significantly changed traffic flows is;

- i. A road where traffic flows have increased by more than 10,000 AADT or by more than 25% since the last USA, and;
- ii. A road where the annual average NO₂ has already been established to be above 36µg/m³

No roads in High Peak meet these criteria.

High Peak District Council confirms that there are no new/newly identified roads with significantly changed traffic flows.

3.7 Bus and Coach Stations

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on conditions when traffic emissions at bus and coach stations may cause a risk of causing an exceedence of the Air Quality Objective for nitrogen dioxide and respirable particulates.

The Guidance suggests that a bus or coach station which may create a risk of a potential exceedence of the Air Quality Objective is where;

- i. There is relevant exposure within 10m of any part of the bus station where buses are present, and;
- ii. There are predicted to be more than 2,500 bus movements per day through the station.

No bus stations in High Peak meet either of these criteria.

High Peak Borough Council confirms that there are no relevant bus stations in the Local Authority area.

4 Other Transport Sources

4.1 Airports

Local Air Quality Management Technical Guidance Note TG(09) provides guidance on criteria where emissions from airports may cause a risk of an exceedance of the Air Quality Objective for nitrogen dioxide. The Guidance states that there must be;

- i. a relevant receptor within 1000m of the airport boundary and;
- ii. A total equivalent passenger throughput of more than 10 million passengers per annum, and;
- iii. the existing background NO_x concentration must be above 25 µg/m³

There are no airports within High Peak nor are there any receptors in High Peak within 1000m of an airport.

High Peak Borough Council confirms that there are no airports in the Local Authority area and no airports which significantly influence air quality within the Local Authority Area.

4.2 Railways (Diesel and Steam Trains)

Stationary locomotives, both diesel and coal fired can give rise to high levels of sulphur dioxide close to the point of emission. Recent evidence also suggests that moving diesel locomotives in sufficient numbers can cause high levels of NO₂ close to the track.

4.2.1 Stationary Trains

TG(09) provides guidance on circumstances when stationary railway emissions cause a risk of an Air Quality Objective exceedance. The guidance recommends that the following circumstances create a potential risk;

- i. Relevant locations exist where diesel or steam locomotives are regularly stationary for periods of more than 15 minutes, and;

- ii. Relevant outdoor exposure may occur within 15m of the stationary locomotives.

High Peak Borough Council confirms that there are no locations where diesel or steam trains are regularly stationary for periods of 15 minutes or more, with potential for relevant exposure within 15m.

4.2.2 Moving Trains

TG(09) provides guidance on circumstances when moving railway emissions cause a risk of an Air Quality Objective exceedence. The guidance recommends that the following circumstances create a potential risk;

- i. Where a section of track described in Table 5.1 of TG(09) passes through the District, and;
- ii. Where background NO₂ levels are estimated to be above 25µg/m³, and;
- iii. Where a relevant receptor is located within 30m of trackside.

High Peak Borough Council confirms that there are no locations with a large number of movements of diesel locomotives, and potential long-term relevant exposure within 30m.

4.3 Ports (Shipping)

Large ships generally burn oils with high sulphur contents and if there sufficient movements of such ships there can be a risk of exceedences of the 15 minute Air Quality Objective for SO₂.

Shipping is considered to create a potential risk of an Objective exceedence where;

- i. There is relevant exposure within 1km of berths and main areas of manoeuvring, and more than 15,000 ship movements per year or;
- ii. There is relevant exposure within 250m of berths and main areas of manoeuvring, and more than 5,000 ship movements per year.

High Peak Borough Council confirms that there are no ports or shipping that meets the specified criteria within the Local Authority area.

5 Industrial Sources

5.1 Industrial Installations

Industrial installations have the potential to generate emissions which may cause exceedences of the Air Quality Objectives. A summary of all A(1) industrial installations (regulated by the Environment Agency) which have the potential to emit significant quantities of atmospheric emissions is contained in Appendix C.

Assessments of existing industrial installations which existed prior to 31/12/2008 have been undertaken in support of previous Review and Assessments. All of these Assessments concluded that there was no risk of any exceedences of the Air Quality Objectives.

A review has also been undertaken of all planning applications granted between 1/1/2009 and 31/12/2011 to determine if any permissions have been granted which are likely to result in new emissions sources, or to result in any new receptors being brought into locations which may be adversely affected by existing emissions sources. The permissions reviewed are summarised in Appendix D.

5.1.1 New or Proposed Installations for which an Air Quality Assessment has been carried out

High Peak Borough Council confirms that there are no new or proposed industrial installations for which planning approval has been granted within its area or nearby in a neighbouring authority which will adversely affect air quality.

5.1.2 Existing Installations where Emissions have increased substantially or New Relevant Exposure has been introduced

High Peak Borough Council confirms that there are no industrial installations with substantially increased emissions or new relevant exposure in their vicinity within its area or nearby in a neighbouring authority.

5.1.3 New or Significantly Changed Installations with No Previous Air Quality Assessment

The air quality implications of all of the planning applications identified in Appendix D have been considered. None of the applications are deemed likely to have a significant impact on local air quality.

High Peak Borough Council confirms that there are no new or proposed industrial installations for which planning approval has been granted within its area or nearby in a neighbouring authority.

5.2 Major Fuel (Petrol) Storage Depots

There is some evidence that major fuel petrol depots could emit benzene in such quantities that there may be a risk of emissions causing an exceedence of the benzene Air Quality Objective.

High Peak Borough Council can confirm that there are no major fuel (petrol) storage depots within the Local Authority area.

5.3 Petrol Stations

There is some evidence that petrol stations could emit benzene in such quantities that there may be a risk of emissions causing an exceedence of the benzene Air Quality Objective.

TG (09) identifies that there may be a risk of the Air Quality Objective being exceeded where the following criteria apply;

- i. A petrol station carries an annual throughput of more than 2000m³ of petrol, and;
- ii. The relevant station is located near to a busy road with an AADT of more than 30,000, and;

- iii. There are relevant receptors located within 10m of the pumps.

All petrol filling stations with a throughput of greater than 500m³ per annum of petrol are required to hold an environmental permit which is regulated by High Peak Borough Council. None of the petrol filling stations within High Peak meet all of the above criteria.

High Peak Borough Council confirms that there are no petrol stations meeting the specified criteria.

5.4 Poultry Farms

Evidence of exceedences of the Air Quality Objective for PM₁₀ has been identified from emissions from poultry farms.

TG(09) recommends that there may be a potential risk of the PM₁₀ Objective being exceeded where the following criteria apply;

- i. Where the poultry unit houses
 - a. 400,000 birds if mechanically ventilated, or
 - b. 200,000 birds if naturally ventilated, or
 - c. 100,000 birds for any turkey unit, and
- ii. There is relevant exposure within 100m of the poultry units.

There are no poultry units regulated by the Environment Agency within High Peak.

High Peak Borough Council confirms that there are no poultry farms meeting the specified criteria.

6 Commercial and Domestic Sources

6.1 Biomass Combustion – Individual Installations

Biomass burning can lead to an increase in PM₁₀ emissions and compared to conventional gas burning, biomass burning can result in an increase in the overall NO_x emissions.

TG(09) sets out criteria where biomass emissions may create a risk of an exceedence of an Air Quality Objective. Only biomass facilities in excess of 50kW are deemed likely to create a risk of an Objective exceedence.

There are no known biomass installations in High Peak and following a review of planning permissions granted over the past 3 years there are no permissions for new biomass installations.

High Peak Borough Council confirms that there are no biomass combustion plant in the Local Authority area which exceed the screening assessment criteria.

6.2 Biomass Combustion – Combined Impacts

There is the potential that many small biomass combustion installations (including domestic solid fuel burning), could in combination lead to unacceptably high PM₁₀ concentrations.

TG(09) provides a process for determining the risk of a potential exceedence of the Air Quality Objective from cumulative domestic and service sector emissions.

High Peak reported on biomass combustion in the 2004 Progress Report, in relation to domestic sources. This looked at the various Wards with the densest housing and calculated the maximum numbers of houses using solid fuel as the primary heating source. The data on fuel usage were obtained from a house condition survey which had recently been carried out. Since the 2004 report, there has been no

development of denser housing in High Peak nor are there any planning permissions which may generate denser housing.

When considering the densest Wards and taking into account land occupied by the service sector, in accordance with LAQM.TG(09), it is concluded that there is no need to progress to a Detailed Assessment.

High Peak Borough Council has assessed the biomass combustion plant, and concluded that it will not be necessary to proceed to a Detailed Assessment.

6.3 Domestic Solid-Fuel Burning

Significant amounts of domestic solid fuel burning can give rise to exceedences of the Objective for SO₂.

TG(09) provides a process for determining the risk of a potential exceedence of the Air Quality Objective for SO₂ from domestic solid fuel burning.

Domestic solid fuel emissions are only considered likely to be significant where the density of coal burning premises exceeds 100 per 500 by 500m square.

The review and assessment of air quality in 2003 concluded that the maximum number of solid fuel appliances per 500 by 500m area were below this threshold and there have been no further developments in the Borough which could have resulted in an exceedence of this threshold.

High Peak Borough Council confirms that there are no areas of significant domestic fuel use in the Local Authority area.

7 Fugitive or Uncontrolled Sources

Dust emissions from a range of fugitive and uncontrolled sources can give rise to elevated respirable particulate (known as PM₁₀) concentrations. Generally sources are associated with the passage of vehicles over unpaved ground, from the passage of vehicles over public roads onto which dust and dirt has been 'tracked out', from the handling of dusty materials and windblown dust from stockpiles or dusty surfaces.

Relevant sources of fugitive or uncontrolled dust are defined within TG(09) (p.5-52) as;

- Quarrying and mineral extraction site;
- Landfill sites;
- Coal and mineral stockyards, or materials handling;
- Major construction works, and;
- Waste management sites

TG(09) recommends that an assessment of the risk of an exceedence of the Objective for PM₁₀ consider the proximity of a receptor to a relevant source, the existing predicted background PM₁₀ concentration and evidence from either complaints or observations of significant fugitive dust emissions.

A review has been undertaken of all complaints made about dust to High Peak Borough Council over the period 1st January 2009 to 31st December 2011. Where any of the alleged sources of dust have fallen into the categories of sources above then a further screening assessment has been undertaken to determine the potential risk of an exceedence of the AQO for PM₁₀.

Table 7.1 below summarises the relevant sites which have been the subject of a dust complaint during the period 1st January 2009 to 31st December 2011;

Table 7.1 Assessment of Fugitive Sources

Source	Nature of Source	Number of Complaints	Distance to Nearest Receptor	Evidence of dust emissions or track out
Beesons waste disposal site, Hadfield	Dust from vehicular traffic on unsurfaced yard – hot, windy day	1	150m	None on investigation (but complaint not made until several days later, when weather had changed)
St Marys Road, Glossop	Grinders / shot blasting	1	20m	None on investigation – short term
Bridge Street, Buxton - roadworks	Grinders / tarmac cutters	1	1-5m (pedestrians)	None on investigation – short term
Lafarge Quarry	Dust conveyors – missing covers	1	> 250 m	Sporadic visible emission
CEMEX Quarry, Dove Holes	Water suppression failure to primary crusher (1), general quarry dust from vehicular traffic in dry weather (2)	3	~150 m	None on investigation
Barry Wood Mobile Plant	Dust from vehicular traffic on unmade road at Victory Quarry in dry weather	1	~ 150 m	Visible dust emission on DVD sent by complainant; none from direct observation

High Peak Borough Council confirms that there are no potential sources of fugitive particulate matter emissions in the Local Authority area.

8 Conclusions and Proposed Actions

8.1 Conclusions from New Monitoring Data

Data from a continuous monitor commissioned at the Pegasus Crossing in Tintwistle has shown that levels of NO₂ are above the annual average Air Quality Objective. A separate Detailed Assessment of air quality in Tintwistle has been prepared for submission to DEFRA.

Data from all other monitoring locations showed that the Objectives are being met.

8.2 Conclusions from Assessment of Sources

None of the existing sources of atmospheric emissions in High Peak are predicted to be causing a risk of an exceedence of any of the AQOs.

8.3 Proposed Actions

A Detailed Assessment of air quality in Tintwistle has been prepared and is presented in a separate Detailed Assessment report.

The Updating and Screening Assessment has identified that there is no need to progress to a Detailed Assessment of air quality in respect of anywhere else in High Peak.

9 References

1. The Environment Act 1995
2. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 1), DEFRA, 2007
3. Local Air Quality Management Technical Guidance LAQM.TG(09), DEFRA 2009
4. Design Manual For Roads and Bridges, Volume 11 Section 3 Part 1, HA207/07, Air Quality
5. Diffusion Tubes for Ambient NO₂ Monitoring: Practical Guidance for Laboratories and Users, Air Quality Consultants Ltd, 2008
6. Diffusion Tube Environmental Monitors Instruction Manual For Exposure and Location, Gradko International Ltd, undated

Appendices

Appendix A: QA/QC Data;

Appendix B: Traffic Data;

Appendix C: Installations Holding an A(1) Environmental Permit;

Appendix D: Planning Permissions with Potential Air Quality Impacts;

Appendix E: Air Quality Monitoring Locations

Appendix A: QA:QC Data

Factor from Local Co-location Studies (if available)

No co-location study was involved in the derivation of the Councils bias adjustment.

Diffusion Tube Bias Adjustment Factors

The bias adjustment factor for 2011 is based on the equivalent national studies reported on the DEFRA website for ESG 50% TEA diffusion tube surveys across the UK for 2011. The most recent output from the DEFRA website reporting this data is shown below.

Laboratory	Previous Number of Studies	New (09/12) Update			
		No. Studies Added	Total No. of Studies	Factor	Change in Factor
ESG Didcot	44	1	45	0.83	0.00

Appendix B: Traffic Data

Summary of traffic data from relevant traffic count points. Data has been provided courtesy of Derbyshire County Council in 2010.

Count Point Ref	Road	Easting	Northing	AADT	% HGV	Date	Location
1522	A6013	420770	383514	5443	3	06/07/2010	Bamford
2784		406476	372979	4742	0	13/07/2010	Buxton
2784	A6	406476	372979	13391	5	13/07/2010	Buxton
2784	A6	406476	372979	7941	4	13/07/2010	Buxton
2784	B5059	406476	372979	9112	6	13/07/2010	Buxton
2267	A53	404331	372754	7486	9	01/07/2009	Buxton
2457	A53	406298	373592	15525	1	29/08/2009	Buxton
cp36163	A6	407246	375123	12806	8	23/03/2010	Buxton
cp72244	A6	406410	373900	21761	6	17/09/2010	Buxton
cp77245	A6	406480	373300	11805	5	07/07/2009	Buxton
cp990054	B5059	405488	372914	4442	4	20/04/2009	Buxton
cp48616	A624	405456	382000	7494	5	24/03/2010	Chapel
cp58278	A624	406000	381400	6329	7	18/10/2010	Chapel
cp8547	A6	406406	381451	14340	11	09/09/2010	Chapel
1002	A6	407581	377935	11697	12	24/11/2009	Dove Holes
1002	A6	407581	377935	11831	10	24/11/2009	Dove Holes
cp46167	A6	400382	383939	12457	13	17/03/2010	Furness Vale
cp17700	A6016	403000	393400	5901	6	30/09/2010	Glossop
cp36587	A57	402000	394400	17235	4	22/03/2010	Glossop
cp931378	Unc	401430	395950	4302	1	03/07/2009	Glossop
2733	UC	401245	380639	6087	3	11/05/2010	Whaley Bridge
2750	UC	401106	381417	4653	1	07/05/2010	Whaley Bridge
cp58236	A5004	401109	381000	9464	2	08/07/2009	Whaley Bridge
cp951417	B5470	400591	380592	5052	2	11/05/2009	Whaley Bridge
cp57435	A628	409000	399830	12405	12	05/06/2009	Woodhead

Appendix C: Installations Holding an A(1) Environmental Permit.

Regulated by the Environment Agency

Name	Address
Selden Research Ltd	Staden Lane, Buxton
Plater Chemicals Ltd	High Street West, Glossop
Mastermelt Refining Services Ltd	Staden Lane Industrial Estate, Ashbourne Road, Buxton
Tarmac Ltd	Hindlow Works, Sterndale Moor, Buxton
Tarmac Ltd	Turnstead Quarry, Wormhill, Buxton
Tarmac Ltd	Dale Road, Dove Holes, Derby
LaFarge Cement UK Plc	Hope Works, Pindale Road, Hope Valley, Derbyshire
F Redfern and Sons Ltd	Haslin Aberttoir, Burlow Road, Buxton
Clover Chemicals Ltd	Clover House, Macclesfield Road, Whaley Bridge
Carpenter Ltd	Dinting Lodge Industrial Estate, Glossop
Lhoist UK Ltd	Main Building, Hindlow, Buxton
Federal Mogul Friction Products	Hayfield Road, Chapel-en-le-Frith
Hyperlast Ltd	Station Road, Birch Vale

Appendix D: Planning Permissions with Potential Air Quality Impacts

Ref	Location	Development Description
HPK/2009/0102	Fold Farm Higher Chisworth Chisworth Derbyshire SK13 5SA Glossop	Repositioning of balanced flue to oil fired boiler from rear elevation to side elevation
HPK/2009/	The Old Coachworks 7 Oak Street Glossop Derbyshire SK13 7AP Glossop	Extraction flue on roof of industrial unit
CON/2009/0009	Field Farm Batham Gate Road Fairfield Buxton Derbyshire SK17 7HS Buxton	Continuation of previously approved works to allow reclamation of former quarry workings to agricultural land
CON/2009/0012	Tarmac Central Cement Plant Tunstead Quarry Tunstead Buxton Derbyshire SK17 8TG Buxton	Proposed Development of K2 Cement Kiln
CON/2009/0016	Unit 14 Dinting Vale Business Park Dinting Glossop Derbyshire SK13 6LG Glossop	Construction of building within the industrial estate for the purpose of housing a waste transfer station
HPK/2009/0377	Unit 5 Bowden Hey Road Chapel-En-Le-Frith Derbyshire SK23 0JQ High Peak	Proposed change of use of general industrial unit to an MOT and vehicle service centre.
HPK/2009/0447	56 Berwick Road Harpur Hill Buxton Derbyshire SK17 9PE Buxton	Variation of condition 1 (HPK/2009/0131) to permit the retention of the chimney as shown on drawing A accompanying the application
CON/2009/0021	SITA, Waterswallows Road Industrial Estate Buxton Derbyshire	Construction and operation of an in-vessel composting facility
HPK/2009/0496	Carpenter Plc Dinting Lodge Industrial Estate Dinting Glossop Derbyshire SK13 6LE Glossop	Extension to the NE corner of the main industrial building to provide an additional 12160 sq metres of floorspace, associated engineering works, tree removal and landscaping works
CON/2009/0023	Land off Mellor Road New Mills High Peak	Variation of Conditions 3 and 10 re importation of inert waste soils
HPK/2009/0547	Alken Engineering Unit 3 Thornsett Trading Estate Birch Vale Derbyshire SK22 1AH High Peak	Change of use from warehouse to office and factory with extension to new factory
CON/2009/0032	Waste Transfer Station Melandra Road Gamesley Glossop Derbyshire SK13 6JQ Glossop	Proposed modifications to an existing waste transfer station, household waste recycling centre and the construction of a highways maintenance storage area
CON/2010/0002	Mouselow Quarry Dinting Road Glossop Derbyshire SK13 7DY Glossop	Scoping opinion for Environmental statement to accompany an application for determination of conditions to which the planning permission will be subject
CON/2010/0003	Birch Vale Quarry Ltd Oven Hill Road Birch Vale Derbyshire SK22 1BY High Peak	Change of use from existing quarry to recycling area
HPK/2010/0071	Carpenter Plc Dinting Lodge Industrial Estate Dinting Glossop Derbyshire SK13 6LE Glossop	Variation of condition 2 attached to planning consent HPK/2006/0630 for change to hazardous substances and quantity stored on site.

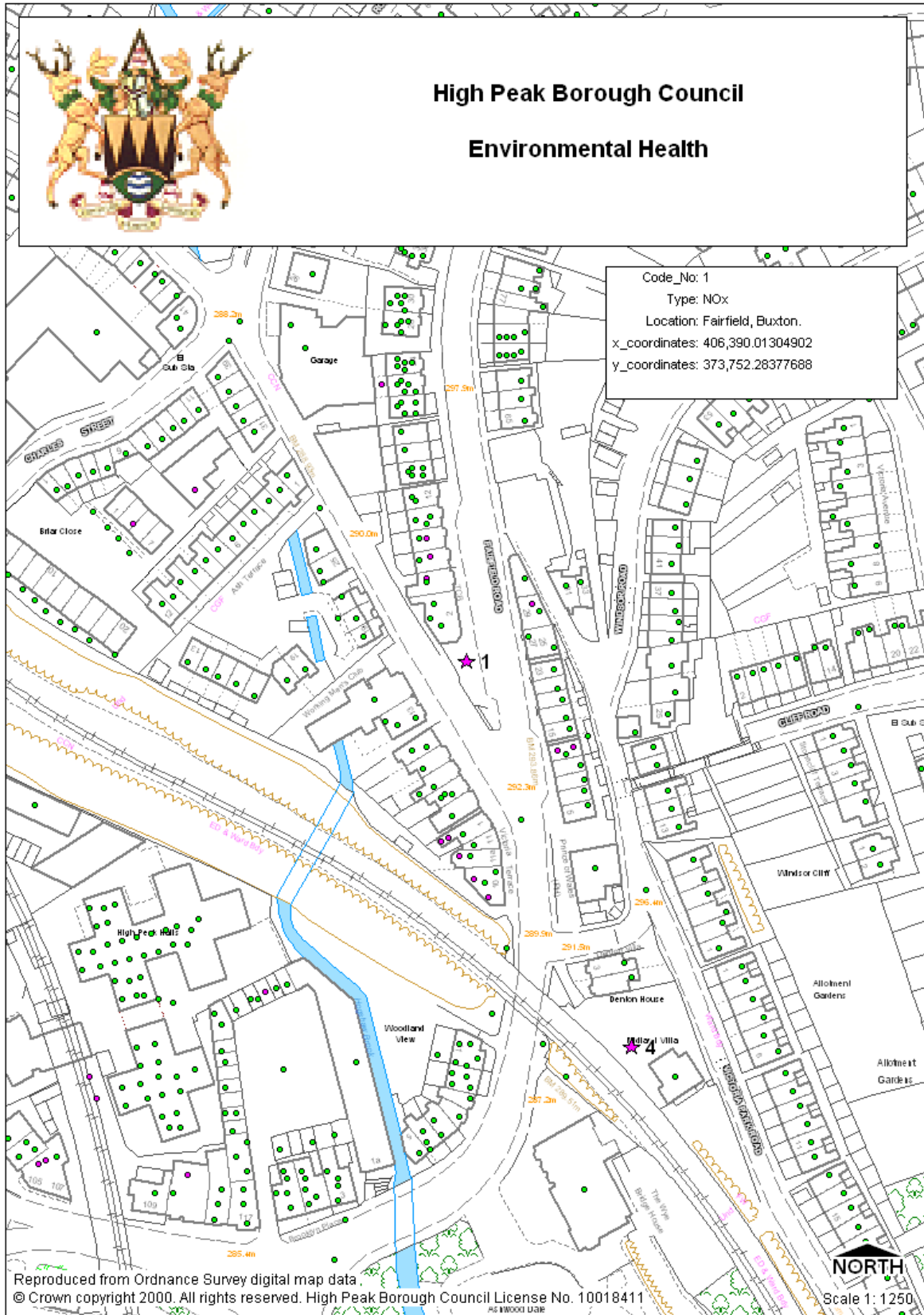
High Peak Borough Council

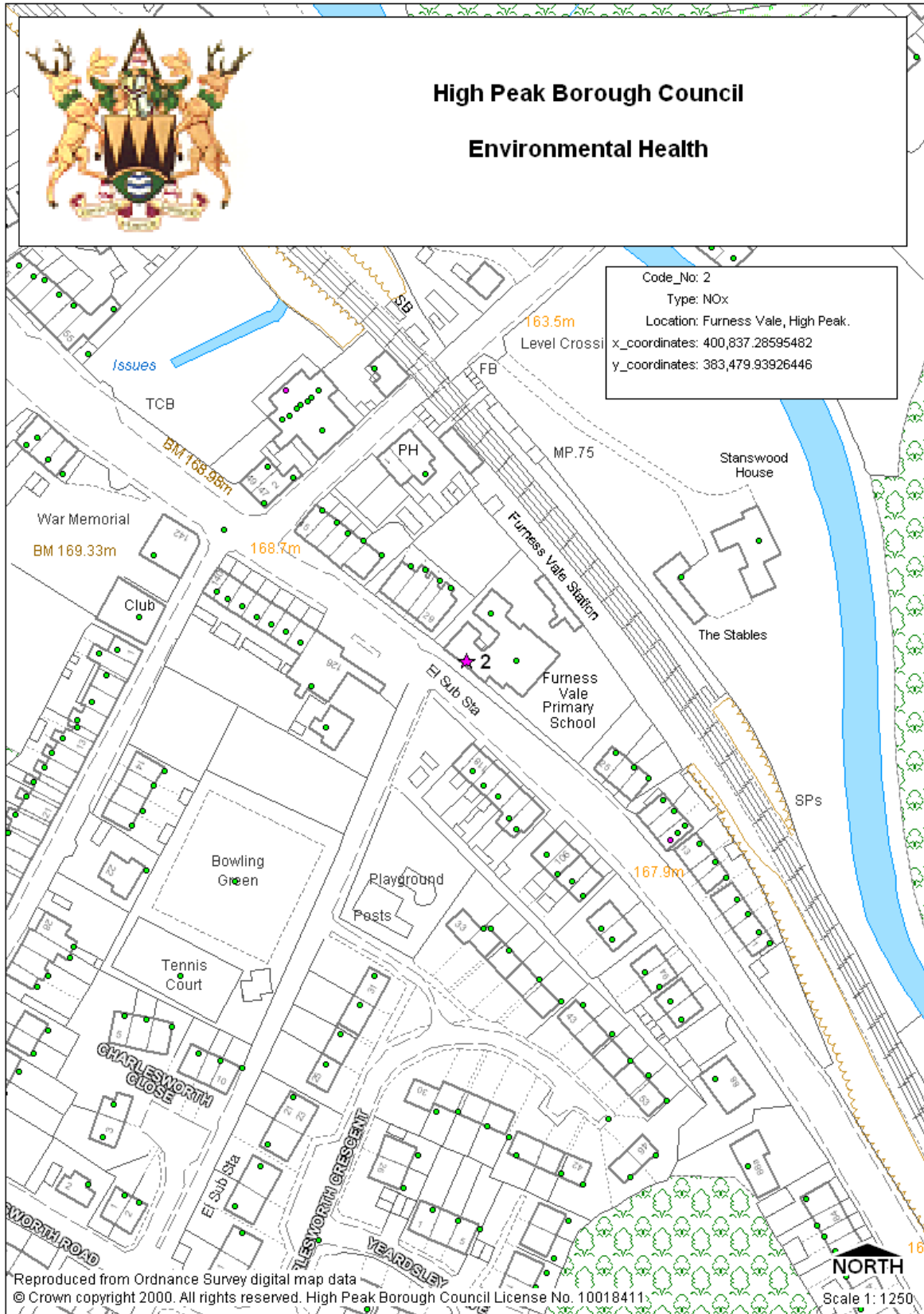
HPK/2010/0163	Heritage Trailers Brookfield Dinting Glossop Derbyshire SK13 6JF Glossop	Change of Use to a trailer fabrication workshop with showroom and sale area and hand car wash on forecourt.
CON/2010/0014	MOUSELOW QUARRY DINTING ROAD GLOSSOP DERBYSHIRE SK13 7DY GLOSSOP	Determination of conditions ref CMI/192/1 of 7-3-1994
HPK/2010/0172	Mastermelt Staden Business Park Staden Lane Buxton Derbyshire SK17 9RZ Buxton	Installation of a replacement scrubber and emission stack
HPK/2010/0202	Pearwalk Furness Vale Business Centre Calico Lane Furness Vale Derbyshire SK23 7SW High Peak	Single storey industrial building B2
HPK/2010/0254	Health And Safety Executive Harpur Hill Business Park Harpur Hill Buxton Derbyshire SK17 9JN Buxton	Erection of a new burn hall testing facility including control room, chimney and waste water holding tank
HPK/2010/0333	Harpur Hill Industrial Estate off Grinlow Road Harpur Hill Buxton Derbyshire SK17 9JL	Portal Frame Industrial Building for Car Body Repairs.
HPK/2010/0360	Land For Plot 4 Bowden Hey Road Chapel-En-Le-Frith Derbyshire SK23 0QZ	Proposed new build general industrial unit plus associated parking
HPK/2010/0531	Glossop Victorian Swimming Pool Dinting Road Glossop Derbyshire SK13 7DS Glossop	Remove existing gas-fired boilers and fan dilution system and replace with a new condensing boiler with external vertical flue on adjacent single-storey building
	unable to access applications from 1/11/2010 to 1/1/2011	
HPK/2011/0044	Hyperlast Ltd Birch Vale Industrial Estate Birch Vale Derbyshire SK22 1BR High Peak	Installation of LGV stack to existing building and installation of Steam Boiler and associated chimney
HPK/2011/0200	Central Station Yard Chapel-En-Le-Frith Derbyshire SK23 9RE High Peak	New industrial unit for the servicing and maintenance of HGVs
HPK/2011/0206	Unit 1 Tongue Lane Industrial Estate Dew Pond Lane Fairfield Buxton Derbyshire SK17 7LF Buxton	Resubmission of HPK/2011/0051 for installation of new storage container to house gas-fired steam boiler and associated equipment, amended to show changed container location
HPK/2011/0315	Charlestown Works Charlestown Glossop Derbyshire SK13 8LJ Glossop	Outline application for demolition of existing structures & erection of 105 dwellings including 14 in the conversion of the former officer building & restoration of former mill pond area to create public open space
CON/2011/0011	Unit 4 Watford Bridge Industrial Estate Watford Bridge Road New Mills Derbyshire	Waste transfer station. Per transfer 10 skips at 10 cubic meters in size will be delivered, filled and collected
HPK/2011/0493	Bridge Mills New Road Tintwistle Derbyshire SK13 1JN Glossop	Outline Application for mixed use redevelopment comprising 1,394 sq m of new business floorspace and up to 81 dwellings with all associated engineering operations, vehicle parking and landscaping

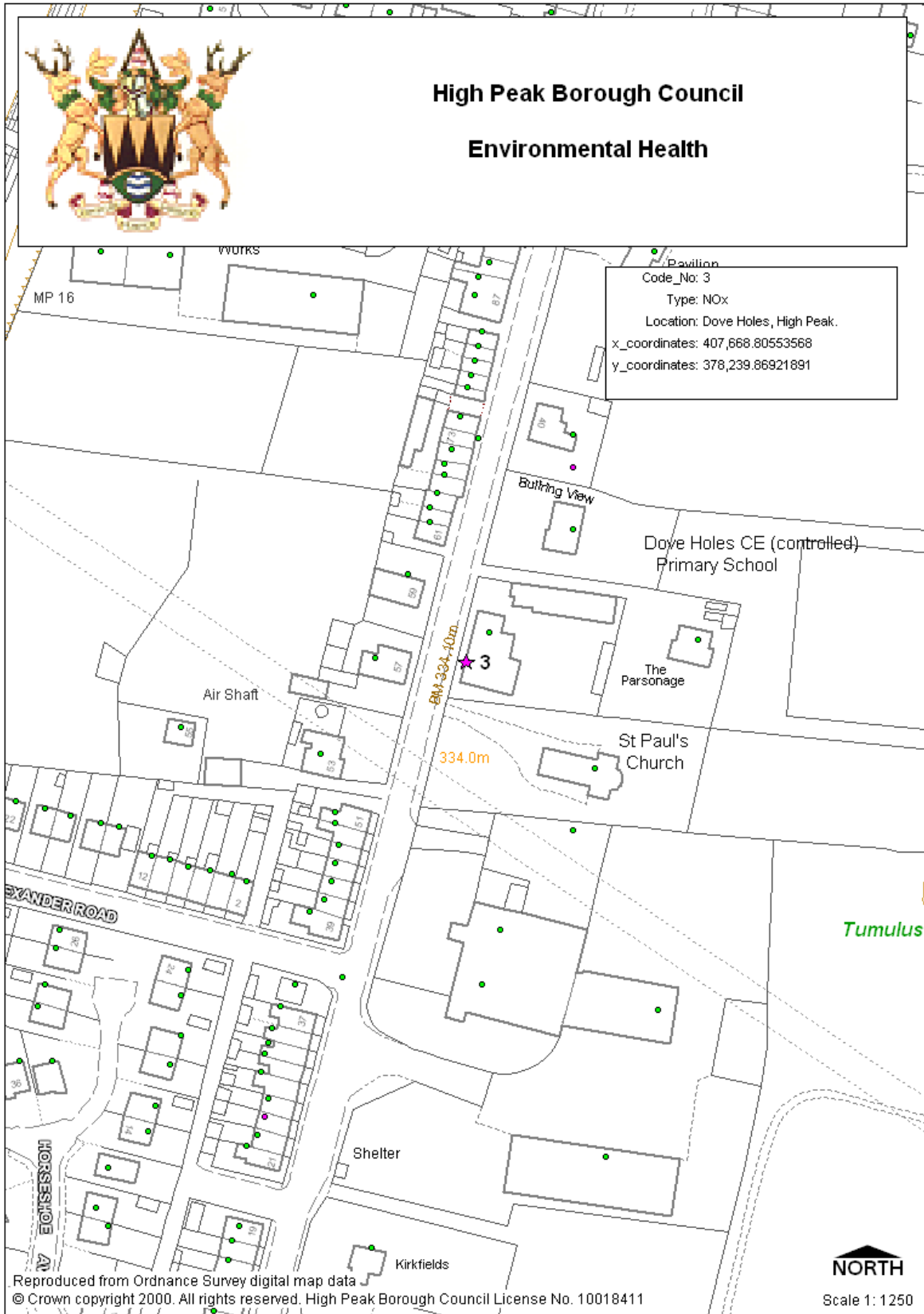
High Peak Borough Council

HPK/2011/0505	Fields Farm Long Lane Charlesworth Derbyshire SK13 5ET Glossop	Proposed change of use of redundant agricultural buildings to log storage processing and distribution
HPK/2011/0534	Nestle Spring Water Bottling Plant Station Road Buxton Derbyshire SK17 6AQ Buxton	Hybrid application for the demolition of existing structures and the construction of a class A1 retail foodstore with associated car and cycle parking and other associated works. Outline consent for the demolition and clearance of the existing built form and construction of buildings to accommodate flexible commercial uses (A3 / A4 / A1 / B1 / D2 / C1) and student accommodation.
HPK/2011/0557	Prestige Motor Bodies Brookfield Dinting Glossop Derbyshire SK13 6JF Glossop	Erection of New MOT Station
HPK/2011/0597	Garie Bevan Coatings Ltd Chunal Works Charlestown Glossop Derbyshire SK13 8LF Glossop	Single storey extension to existing Industrial Unit
HPK/2011/0683	Forge Works Forge Road Chinley High Peak SK23 6BW	Demolition of all remaining structures and redevelopment for up to 182 dwellings, up to 2,323 sq.m. business floorspace (Use Class B1) up to 325 sq.m. of non-residential institution floorspace (Use Class D1), community facilities and associated infrastructure.

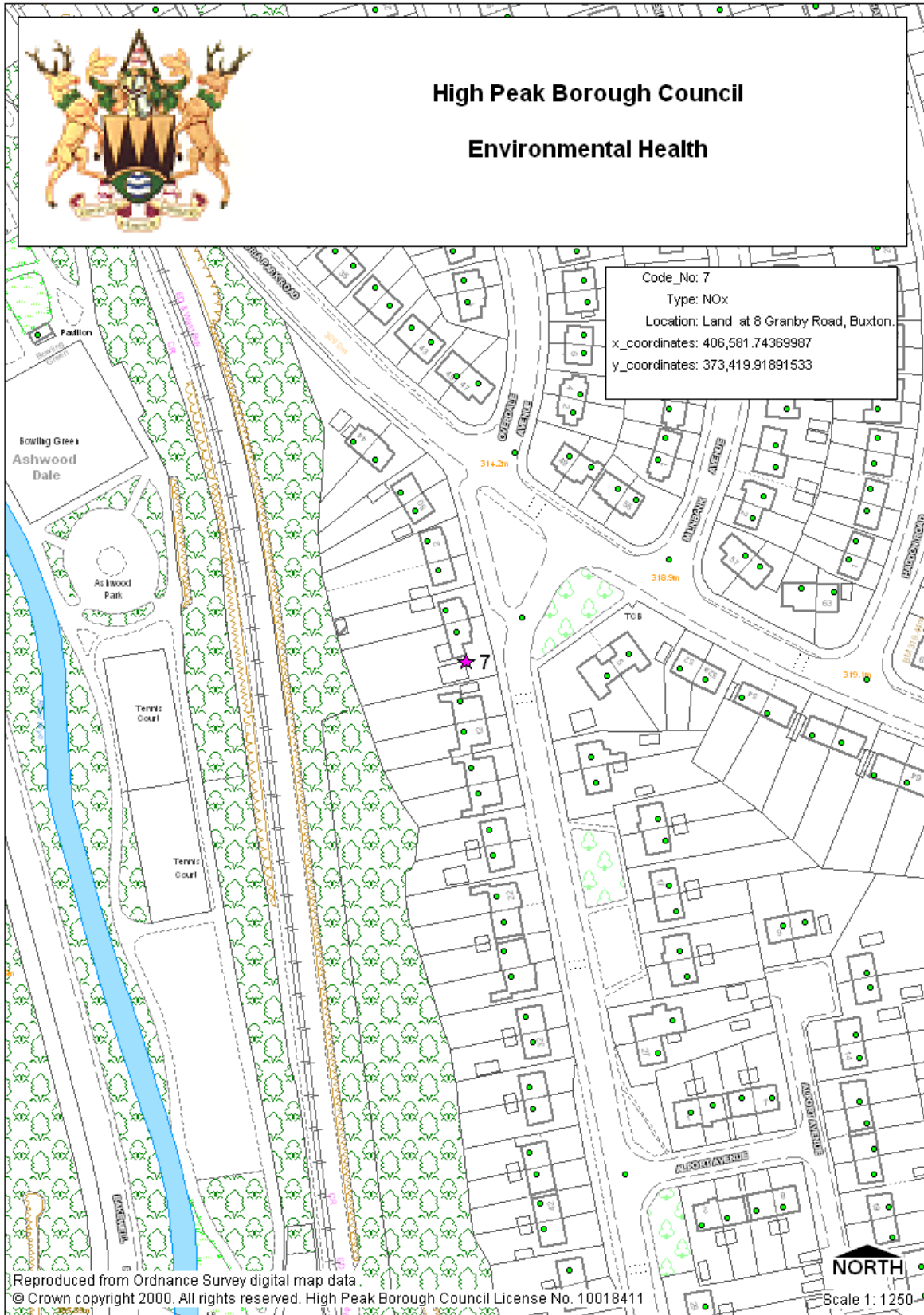
Appendix D: Air Quality Monitoring Locations

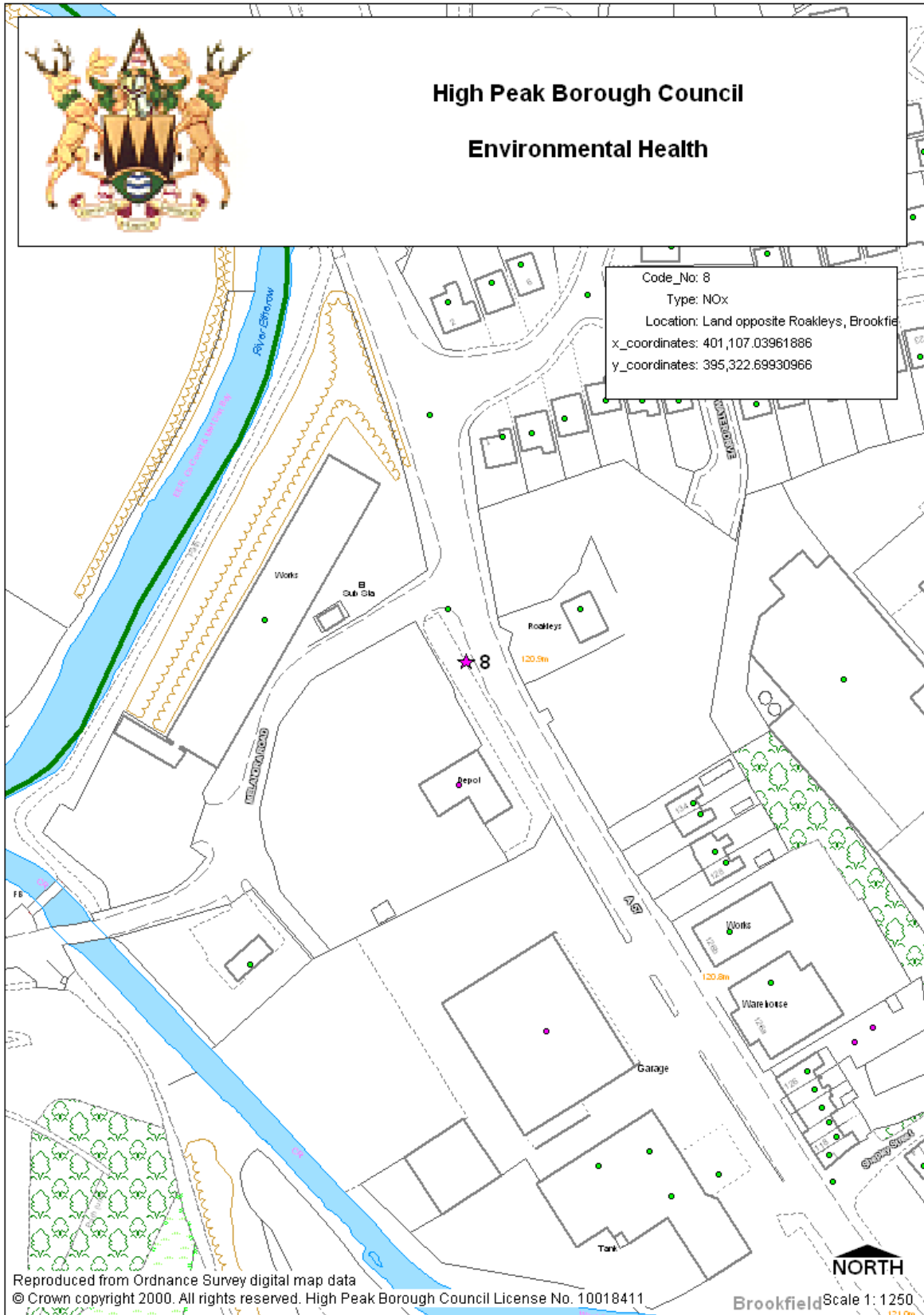


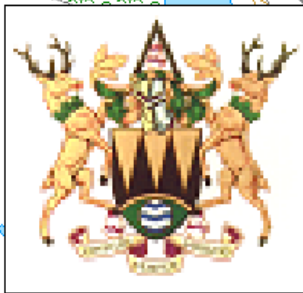






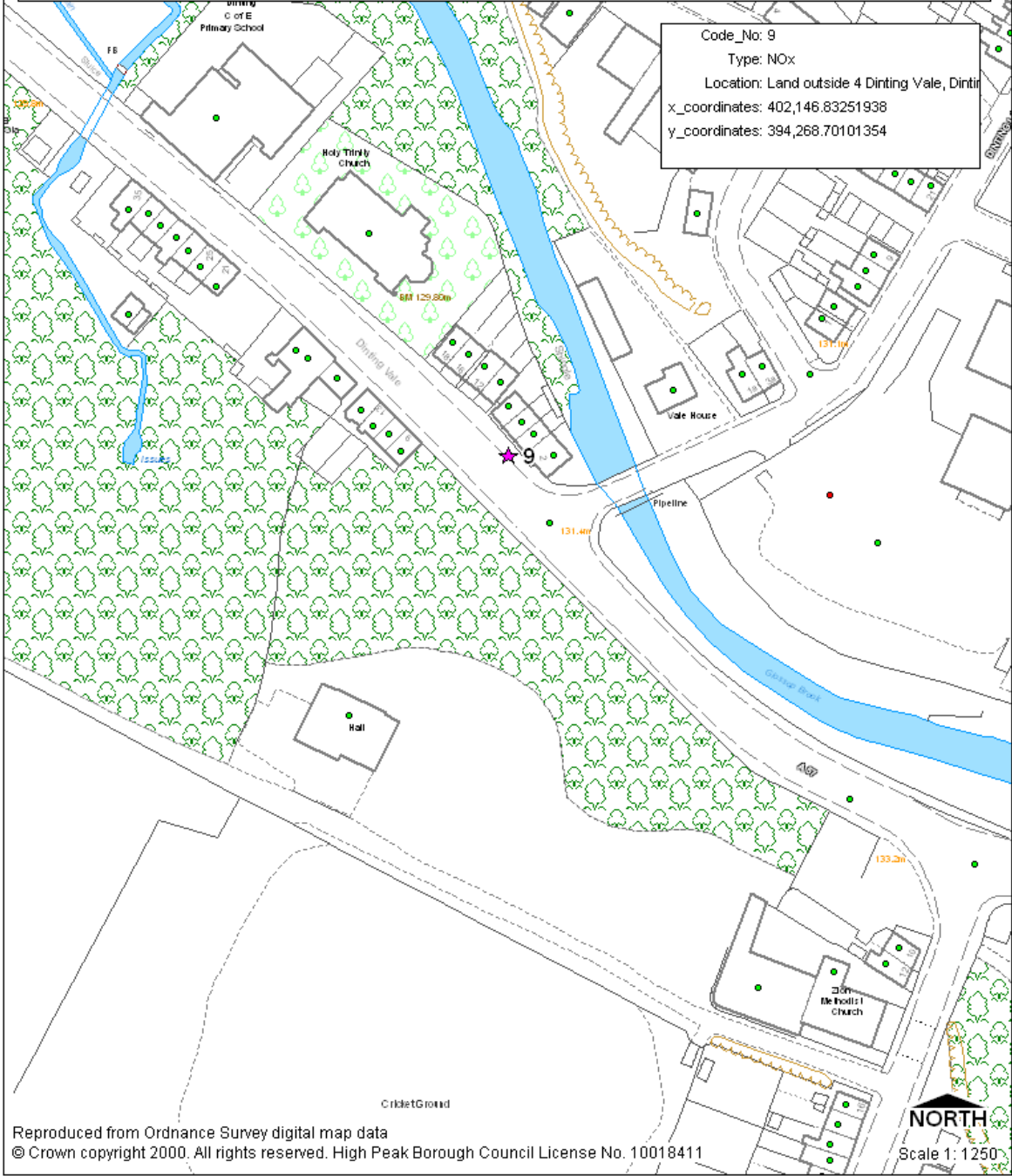






High Peak Borough Council

Environmental Health

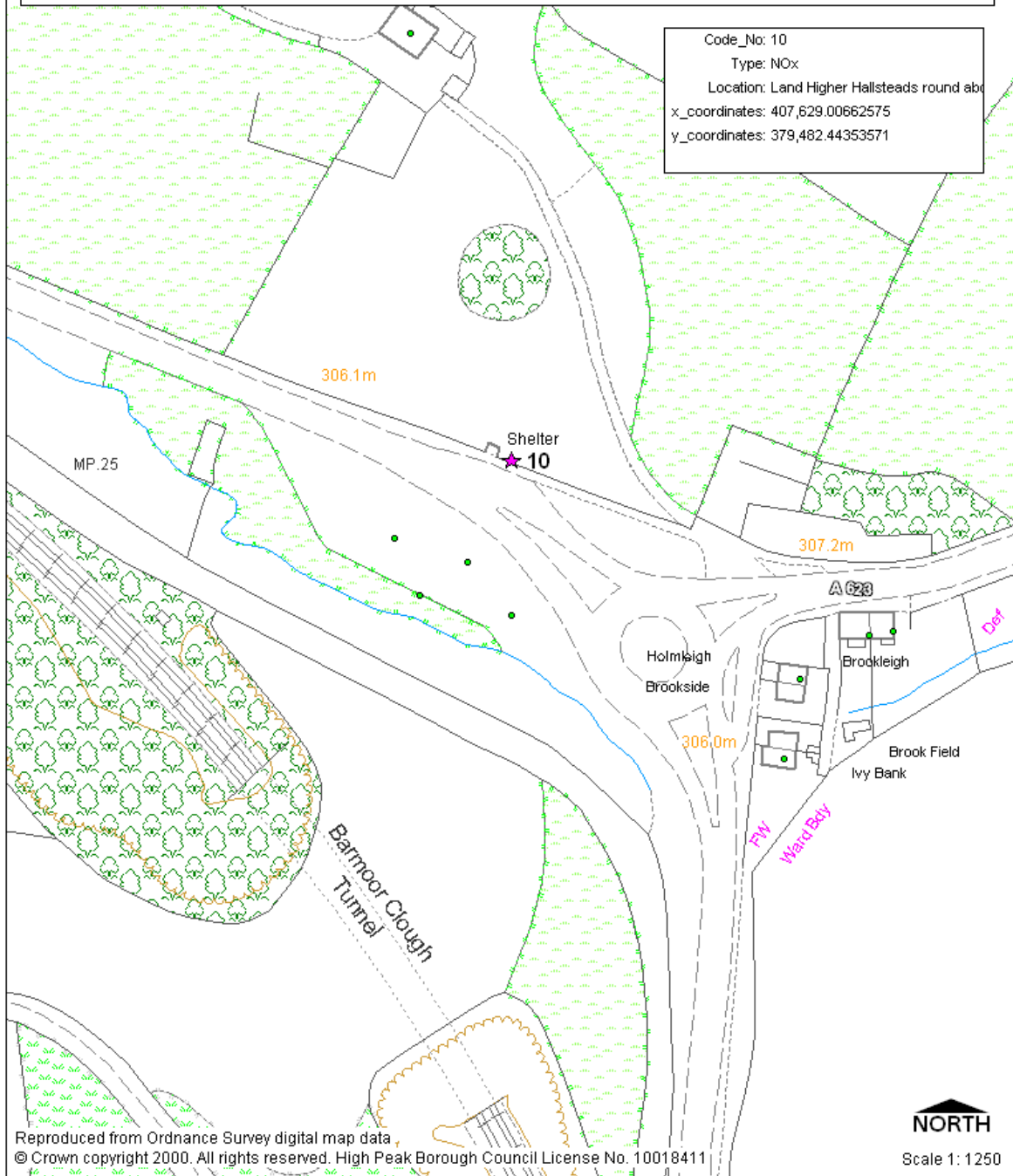




High Peak Borough Council

Environmental Health

Code_No: 10
Type: NOx
Location: Land Higher Hallsteads round about
X_coordinates: 407,629.00662575
Y_coordinates: 379,462.44353571







High Peak Borough Council

Environmental Health



Annex D: Correspondence regarding phosphates and the River Wye



High Peak Borough Council

working for our community

Mark Cunningham
Team Leader - Environment Management
Environment Agency
Trentside Offices
Scarrington Road
West Bridgford
Nottingham
Nottinghamshire NG2 5FA

7 April 2014

Dear Mr Cunningham,

Water Quality in Peak District Dales SAC

Thank you for attending a meeting with the Borough Council and representatives of Natural England at Buxton Town Hall on Monday 17th March. The meeting considered issues relating to water quality, and specifically the level of phosphates, in parts of the River Wye that form the Wye Valley SSSI – a component site of the Peak District Dales SAC. This issue is of particular concern to the Borough Council as one of the conclusions of the Habitats Regulations Assessment of the emerging High Peak Local Plan was that planned growth in Buxton risked an adverse impact on the integrity of the SAC, as a result of increasing the total phosphate load to the River Wye via discharges from the Buxton Sewage Treatment Works.

At the 17th March meeting it was agreed that:

1. Natural England is confident that the sewage treatment facility at Buxton has the ability to deliver the current water quality target for phosphate of 0.04 mg/l within the headroom in the existing Severn Trent Water licence. Any further increase in phosphates can be mitigated through existing regulatory mechanisms. This means that planned growth for Buxton as set out in the High Peak Local Plan will result in no adverse impacts on the integrity of the SAC whilst the current conservation target remains.
2. The Environment Agency will continue to engage positively with Natural England and Severn Trent Water with the aim of delivering the conservation target phosphate concentration for the Peak District Dales SAC – currently set at 0.04 mg/l.
3. The Environment Agency will work jointly with Natural England and other partners to finalise and adopt the draft Wye Valley SSSI Water Pollution Plan.

4. The final Wye Valley SSSI Water Pollution Plan will include identification of additional measures that will help to secure continuing improvement in the phosphate concentration in the Peak District Dales SAC, such that in the event of any tightening of the Water Framework Directive or Habitats Regulations phosphate target for this part of the River Wye, these conservation objectives for water quality will continue to be met.

I would be grateful if you could - by exchange of letters - confirm your agreement to the above by the end of April. I am writing in similar terms to Natural England and Severn Trent Water.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Perry Wardle', written in a cursive style.

Perry Wardle

Regeneration Manager
High Peak Borough Council

Mobile: 07766 160487
E-mail perry.wardle@highpeak.gov.uk



High Peak Borough Council

working for our community

Marion Andrews
East Midlands Sustainable Development Team
Natural England
Mail Hub Block B
Whittington Road
Worcester
WR5 2LQ

7 April 2014

Dear Marion,

Water Quality in Peak District Dales SAC

Thank you for attending a meeting with the Borough Council and representatives of the Environment Agency at Buxton Town Hall on Monday 17th March. The meeting considered issues relating to water quality, and specifically the level of phosphates, in parts of the River Wye that form the Wye Valley SSSI – a component site of the Peak District Dales SAC. This issue is of particular concern to the Borough Council as one of the conclusions of the Habitats Regulations Assessment of the emerging High Peak Local Plan was that planned growth in Buxton risked an adverse impact on the integrity of the SAC, as a result of increasing the total phosphate load to the River Wye via discharges from the Buxton Sewage Treatment Works.

At the 17th March meeting it was agreed that:

1. Natural England is confident that the sewage treatment facility at Buxton has the ability to deliver the current water quality target for phosphate of 0.04mg/l within the headroom in the existing Severn Trent Water licence. Any further increase in phosphates can be mitigated through existing regulatory mechanisms. This means that planned growth for Buxton as set out in the High Peak Local Plan will result in no adverse impacts on the integrity of the SAC whilst the current conservation target remains.
2. Natural England will continue to engage positively with the Environment Agency and Severn Trent Water with the aim of delivering the conservation target phosphate concentration for the Peak District Dales SAC – currently set at 0.04 mg/l.
3. Natural England will work jointly with the Environment Agency and other partners to finalise and adopt the draft Wye Valley SSSI Water Pollution Plan.

4. The final Wye Valley SSSI Water Pollution Plan will include identification of additional measures that will help to secure continuing improvement in the phosphate concentration in the Peak District Dales SAC, such that in the event of any tightening of the Water Framework Directive or Habitats Regulations phosphate target for this part of the River Wye, these conservation objectives for water quality will continue to be met.

I would be grateful if you could - by exchange of letters - confirm your agreement to the above by the end of April. I am writing in similar terms to the Environment Agency and Severn Trent Water.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Perry Wardle', with a long horizontal flourish extending to the right.

Perry Wardle

Regeneration Manager
High Peak Borough Council

Mobile: 07766 160487
E-mail perry.wardle@highpeak.gov.uk



High Peak Borough Council

working for our community

Mark Craig
Strategy Manager - Non-Infrastructure
Severn Trent Water Ltd
PO Box 5310
Coventry
CV3 9FJ

27 March 2014

Dear Mr Craig,

Water Quality in Peak District Dales SAC

A meeting was held between the Borough Council and representatives of the Environment Agency and Natural England on 17th March. The meeting considered issues relating to water quality, and specifically the level of phosphates, in parts of the River Wye that form the Wye Valley SSSI – a component site of the Peak District Dales SAC. This issue is of particular concern to the Borough Council as one of the conclusions of the Habitats Regulations Assessment (HRA) of the emerging High Peak Local Plan was that planned growth in Buxton risked an adverse impact on the integrity of the SAC, as a result of increasing the total phosphate load to the River Wye via discharges from the Buxton Sewage Treatment Works. I believe that you have had correspondence with our HRA Consultants ENVIRON over this issue.

At the 17th March meeting, Natural England confirmed that they had evidence demonstrating that all headroom in the existing Severn Trent Water licence at Buxton Sewage Treatment Works (STW) could be taken up without breaking the conservation target for phosphate concentration in the River Wye of 0.04 mg/l. This means that planned growth for Buxton as set out in the High Peak Local Plan will result in no adverse impacts on the integrity of the SAC whilst the current conservation target remains.

In order to assist the Borough Council take forward its emerging Local Plan and to help with the determination of planning applications in Buxton before adoption of the new Local Plan, it would be helpful if you were able to confirm the capacity available at Buxton STW to treat sewage from planned growth in Buxton to 2031 (total provision on allocated sites of 1,331 new dwellings). The Borough Council understands that there is confirmed capacity for 1,086 homes, with potential capacity for a further 500 new homes - we understand that this latter can be clarified once the flow data for the full year 2013 is available. Notwithstanding the information concerning available headroom, it is recognised that Severn Trent Water has a statutory duty to provide additional capacity as and when it may be required.

Also since I understand that meeting the conservation target for the SAC relies on Severn Trent Water continuing to over-treat to achieve a higher standard of discharge, it would be most helpful if you were able to confirm that the company intends to continue operating the plant such that current levels of performance are maintained,


Finally, I understand that Natural England may in the future recommend that the phosphate target for the River Wye within the SAC is reduced from 0.04 mg/l to 0.015 to 0.025 mg/l. At the 17th March meeting The Environment Agency agreed to continue to work jointly with Natural England to finalise and adopt the draft Wye Valley SSSI Water Pollution Plan that would in part help to address any tightening of the conservation objective.

It is proposed that a final Wye Valley SSSI Water Pollution Plan will include identification of additional measures that will help to secure continuing improvement in the phosphate concentration in the Peak District Dales SAC, such that given any tightening of the phosphate target for this part of the River Wye - conservation objectives will continue to be met.

It would be most helpful if you were able to comment on the view of Severn Trent Water relating to the participation of the company in the Wye Valley SSSI Water Pollution Plan preparation and adoption process.

I would be grateful if you could let me have your response to the issues raised in this letter by the end of April.

Yours sincerely,



ff

Perry Wardle

Regeneration Manager
High Peak Borough Council

Mobile: 07766 160487

E-mail perry.wardle@highpeak.gov.uk

Mr Perry Wardle
Regeneration Manger
Town Hall
Market Place
Buxton
Derbyshire
SK17 6EL

Our ref: MC/Wye/WPP

Date: 11 April 2014

Dear Mr Wardle

High Peak Local Plan HRA – Water Quality in the Peak District Dales SAC

Thank you for your letter of 7 April 2014, setting out the agreed position in relation to the above issue, following the meeting between the Environment Agency, Natural England and High Peak Borough Council in Buxton on 17 March 2014.

I am happy to confirm that the statements set out in your letter accurately reflect the commitment between the Environment Agency and Natural England to continuing to work toward ensuring that the water quality conservation targets for the Derbyshire River Wye are met, and the confidence that this is realistically achievable in the short term. We are therefore satisfied that the proposed housing developments within the borough, as identified in the forthcoming High Peak Local Plan, are unlikely to have a significant impact upon the SAC as a result of additional discharges to the Wye.

We are also confident that in the event that phosphate levels in the Wye increase or the Water Framework Directive or Habitats Regulations targets become more stringent, that existing regulatory mechanisms, which will be identified in the Water Pollution Plan for the Wye, will ensure that continued achievement of the appropriate phosphate targets in the Wye will not be compromised.

I hope this is now sufficient for you to conclude the matter positively but please don't hesitate to contact me if you require additional information.

Yours sincerely



Mark Cunningham
Environment Management Team Leader
Derwent & Erewash – Land and Water

Direct dial: 01427 729132

Page 1 of 1

Date: 10 April 2014
Our ref: 116415
Your ref: [Click here to enter text.](#)



Perry Wardle
High Peak Borough Council

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 01629 640006

Dear Perry

High Peak Local Plan HRA – water quality in the Peak District Dales SAC

Thank you for your letter of 7 April, setting out the agreed position in relation to the above issue, following the meeting between Natural England, Environment Agency and High Peak Borough Council in Buxton on 17th March 2014.

I am happy to confirm that the statements set out in your letter accurately reflect the commitment between Natural England and the Environment Agency to continuing to work toward ensuring that the water quality conservation targets for the river Wye are met, and the confidence that this is realistically achievable in the short term. We are therefore satisfied that the proposed housing developments within the borough, as identified in the forthcoming High Peak Local Plan, are unlikely to have a significant impact upon the SAC as a result of additional discharges to the river Wye.

We are also confident that in the event that phosphate levels in the Wye increase, or the Water Framework Directive or Habitats Regulations targets become more stringent, that existing regulatory mechanisms, which will be identified in the Water Pollution Plan for the Wye, will ensure that continued achievement of the appropriate phosphate targets in the Wye will not be compromised.

I hope this is now sufficient for you to conclude the matter positively.

Yours sincerely

Marion Andrews
East Midlands Sustainable Development Team

Mail Hub, Block B, Whittington Road, Worcester, WR5 2LQ

Email marion.andrews@naturalengland.org.uk

Severn Trent Water Ltd
2 John Street
Coventry
CV1 2LZ

Tel 07810 636540

Perry Wardle
Regeneration Manager
High Peak Borough Council
PO box 136
Buxton, Derbyshire, SK17 1AQ

14 April, 2014.

Dear Mr. Wardle,

Thank you for your letter dated 27 March, 2014, concerning river water in the River Wye SSSI.

With reference to your query, our analysis confirms that Buxton Sewage Treatment Works has the provision to treat sewage from an additional 1,086 homes, with a further potential capacity for 500 new homes which we will be in a position to confirm later this year. We can also confirm our intent to continue operating Buxton Sewage Treatment works such that the current levels of performance are maintained.

Severn Trent Water has been actively working to improve river water quality in a number of SSSIs and SACs and we would be happy to participate in the Wye Valley SSSI Water Pollution Plan preparation and adoption process.

Yours sincerely,



Mark Craig.
Wastewater Strategy Manager – Non Infrastructure

**Annex E Summary of HRA for use by Development Management
staff at High Peak Borough Council**

HRA Screening of Development Proposals

HRA is a sequential process and each step should be progressed in order. The test of Likely Significant Effect (LSE) is a coarse filter to determine which projects require a more detailed assessment. High Peak Borough Council has a duty to undertake a screening exercise when assessing planning applications, which could have an LSE on a European site in view of the implications of the designated site's conservation objectives.

It is recommended that the submission HRA Report and this addendum report are used by development management staff in order to guide the validation of planning applications. Figures showing the location of European sites in any in the vicinity of the Borough can be found within the annexes of the submission HRA Report.

The following text summarises the key points of the HRA of the High Peak Local Plan:

“Any proposal that adversely affects a European site will not be given planning permission. High Peak Borough Council has a duty, as a competent authority, to screen proposals for Likely Significant Effects (LSEs) to determine which projects require a more detailed assessment under the Habitat Regulations”.

Policy EQ4 requires that any proposals which could potentially result in adverse effects on European sites are assessed and mitigation is put in place to avoid adverse effects occurring. The HRA of the High Peak Local Plan has identified the potential for adverse effects on the Peak District Moors (South Pennine Moors Phase 1) SPA, the South Pennine Moors SAC and the Peak District Dales SAC from residential development which may be proposed within the vicinities of these sites. Such adverse effects could be the result of pet predation, fire setting, trampling of vegetation, disturbance of birds, eutrophication from dog walking and disturbance of grazing animals used for site management. The submission HRA Report (March 2014) discusses the currently available information about the potential for such effects to occur and this could be used to identify applications which could have a LSE on a European site in view of the implications of the designated site's conservation objectives.

The HRA has also identified potential air quality effects on the Peak District Dales, the Peak District Moors (South Pennine Moors Phase 1) SPA and the South Pennine Moors SAC from the operation of employment developments. Natural England has recommended the use of pollution footprint mapping to identify the likely pollution footprint of proposals.

Any increase in traffic flows resulting from proposed development may lead to increases in atmospheric pollutants at levels which could cause adverse impacts upon the European designated sites in the area. Such development should therefore be subject to assessment under the Habitats Regulations. Where traffic increases acidity and/or nitrogen deposition by greater than 1% of the site's critical load, this is considered a likely significant effect and requires an Appropriate Assessment. The Air Pollution Information System (APIS) provides comprehensive information regarding this issue: <http://www.apis.ac.uk/>

Where a wind turbine development scheme, alone or in combination with other plans and projects, has the potential to have an impact on a European site, developers must carry out a project-level Habitats Regulations Assessment of the likely significant effect(s) of the scheme, in accordance with the Habitats Regulations. In order to gain planning permission, wind turbine developments must demonstrate that they will not have an adverse effect on the integrity of any European sites.”