PDNPA Local Plan Consultation Oct-Nov 2024

Response from Castleton Parish Council

A Our starting point

Castleton has been visited for hundreds of years and tourism as a business is a key part of its economy.

However the village and surrounding area has reached saturation point, change has accelerated since the pandemic and we are at a tipping point. Residents are choosing to leave because of erosion of quality of life.

Residents have expressed concerns for many years on the residential vs holiday home balance and this is only getting worse. The local school has suffered because the rising house prices are unaffordable for most first-time buyers.

The village has a strong community but we need real residents to maintain it, of all ages.

Since September 2023 CPC has run three surveys:

- 1. October 2023 Village Survey some Qs resonate with the Local Plan attached as Appendix 1.
- 2. Also more recently DCC consulted with CPC ahead of starting a TRO for Castleton. In turn, CPC consulted the village. The results of this are attached as Appendix 2.
- 3. Transport survey, a draft report attached as Appendix 3.

B Advertising the Local Plan Consultation to the community and issues with this

We realise that conveying this Local Plan Consultation to communities is not an easy task, and are grateful for the drop-ins organised from 10 October, but we have found getting the project out the community difficult for the following reasons:

- 1. Access to the documents at the link provided is not straightforward if you are not very comfortable with navigating websites.
- 2. Filling the form in online is difficult (perhaps due to patchy broadband in our area, but also because of the way the survey is displayed on-screen) a number of residents tried and gave up.
- 3. Although the document is well written, it is also very long and too big to send around as a pdf by email. For the convenience of those of our residents who can access the internet, CPC provided instructions via the Village website and the Village email group and advised downloading the document in order to visualise the questions and their context.
- 4. It could be argued that the consultation discriminates against those in the community who cannot readily or don't regularly use the internet. We have tried to address this by taking the information to our once a month community café, but there is too much information to convey everything.
- 5. The drop-in events are only useful if you have read the document first.

We would like to suggest some ways to make the job of eliciting community feedback a little easier for the parish councils, and ultimately for you.

1. A summary of the Local Plan and its objectives suitable for all members of the community to be conveyed well ahead of the consultation period – if you are keen to hear back from more individual residents.

- 2. Plenty of prior warning of the consultation period and the deadline so that the community can be forewarned.
- 3. Providing a short (and small byte size) version of the Local Plan for many people hard copy is still the easiest to access and 200 pages is way too much to print.
- C Answers to specific questions in the Local Plan Consultation (CPC answers are underneath each proposed objective, in bold). We have selected questions that at the moment are highest on our priority list.

Question 4 Settlement tiers

The current two-tier system appears to work for Castleton and the suggested five-tier system looks unnecessarily complex.

Question 17 Conversion of isolated traditional buildings

Yes, there should be a specific policy relating to isolated traditional buildings such as field barns, for the purpose of dealing effectively with all possible damaging scenarios including environmentally damaging conversions, risk of future inappropriate development, poor access etc.

Question 23 Proposed local plan spatial objectives for recreation and tourism

- a Do you agree with the proposed Local Plan spatial objectives for recreation and tourism? **No.**
- b What is the reason for your answer?

 This question falls into five parts we have answered these separately, below.
- To direct recreation development towards settlements and certain existing recreation attractions and hubs. At these places development will be focussed on new or improved facilities that promote understanding and enjoyment of the National Park, sustainable travel and significant enhancement of the National Park's special qualities.

The question requires more definition. We understand from this Local Plan document that Castleton is defined as both a settlement and a recreational hub. We know it is a major visitor destination. What "developments.... focused on new or improved facilities...." are inferred here? Castleton already has a Visitor Centre, refurbished in only 2017, that has functioned very well due to its excellent location, staff and facilities (display area, museum, café, toilets), is strongly supported by the community (see Appendix 1) and should be retained. Is the proposed development aimed at attracting yet more visitors to the area? Rather than increasing the gross overcrowding efforts should be made to disperse the visiting public to other less well-known Peak Park destinations that could benefit economically. Castleton village and its surrounding landscape are losing their special qualities due to over-promotion – they are at saturation point and the balance has gone too far in favour of business economy vs conservation of the landscape and of a "thriving and sustainable" community.

Sustainable transport developments would however be welcomed (see results of our survey in Appendix 3).

• To support the change of use of traditional buildings (heritage assets) for visitor accommodation, primarily on farmsteads.

Why should traditional buildings only be directed to visitor accommodation? In Castleton we need long-term residents who will contribute to the community rather than more short-term lets.

- To support temporary overnight tourist accommodation that is well-suited to its location. It depends on the nature of this accommodation and where it is, and how much pressure is already placed on that recreation hub. Castleton already has enough. The PDNPA should not continue to support more development in response to demand, whether this is holiday lets, caravan or campervan sites, or O/N parking on roads (NB see Appendix 1, Village Survey results).
- To support work that maintains and enhances the rights of way network.

 Yes, agree, to promote responsible enjoyment of the countryside in areas that are not vulnerable to continuing erosion.
- To safeguard the multi-user recreational trails, and to expand this network. Yes, with the same caveats as above.

A tourist tax should be considered that would go directly into sustainability measures to address visitor impact in the PDNP.

Question 24 Recreation attractions and hubs

- a Do you think that the new local plan should define 'Recreation Attractions' and 'Recreation Hubs' on a map and develop specific planning policies for those areas? It depends on whether the planning policies become more restrictive for the areas under pressure or more relaxed.
- b What is the reason for your answer?

Because there is a potential risk of "recreation hubs" being abandoned as places of thriving communities, in favour of over-development for recreation. The Castleton community is already under pressure. This suggested definition for planning policy would risk further degradation of communities with more visitor car parks, less resident parking space, more relaxation of policy for visitor-pointing businesses and visitor accommodation as well as loss of landscape and its special quality.

c Which areas/sites do you consider to be Recreation Attractions and Hubs? Castleton is one, as stated in this document. There should be a distinction between those attractions and hubs such as Castleton that are already over-developed, and others that could perhaps be usefully and sensitively developed to counter the pressures of more recent popularity.

Question 25 Temporary camp sites

- a Do you think that we should apply for an Article 4 Direction to remove permitted development rights for temporary camping and caravan sites?

 Yes
- b If yes, should the permitted development right be removed entirely or revert to 28 days as previously?

Revert to 28 days, but only IF it is believed that monitoring the campsites can be effective. 28 days would equate to 7 or 8 weekends per year (Friday, Saturday, Sunday, Monday). IF monitoring cannot be done effectively (and this job cannot be

left to residents on a permanent basis and many of the campsites are quite isolated) then the Article 4 Direction objective should be to remove the PDR completely.

c If yes, what areas should they be removed from?

Any areas where a planning application is unlikely to be successful if the normal criteria were to be applied.

- d What problems are being caused by the 60 day permitted development right?
- Peak District landscape quality is being eroded, for example in Castleton where iconic views are being lost to rows of campervans both in short views and long views
- Too much traffic on narrow roads and lanes, now popular walking routes, that were never designed for anything other than occasional agricultural traffic and private transport to farms.
- Abuse of the 60-day limit which places an unacceptable burden of responsibility on the PDNP and residents to monitor and is effectively a free license to operate all year round without planning permission.
- Abuse of the PDR conditions on provision of refuse disposal points, leading to disposal of camping rubbish in village and overloading of HPBC refuse facilities.
- Potentially with the 60 day PDR many more of these sites could set up where does this lack of planning restriction end?

Question 29 Holiday homes and permanent homes

a Which is your preferred option?

Option 2 – park-wide permanent residency clause

b What is the reason for your answer?

The only logical reason for new builds is to support those who will live in them on a permanent basis and with whom there is a high chance of supporting the traditions and culture of the national park. New builds should never become holiday homes and a permanent residency clause should apply to them.

We would strongly support a registration scheme for short-term lets including AirBnBs that would deliver greater clarity on their impact on the availability of permanent homes in our village and the wider Peak District. We also urge the PDNPA to support any disincentives for the use of viable accommodation for short-term lets rather than permanent homes. For example, Derbyshire Dales DC have recently voted to increase council tax on furnished second homes. HPBC have voted to increase tax on a sliding scale on properties left empty, but more disincentives could be applied.

Q40 Proposed spatial objectives for travel and transport

There is a perception in our community that traffic volume has increased in the Hope Valley and through Castleton and this was a topic in our Village survey (Appendix 1). We strongly support developments that enable travel by sustainable means for both visitors and residents and reduce carbon emissions in the Peak Park.

We have an active group (Better Buses for Castleton) supported by the Parish Council that tries to improve the existing services. We welcome new initiatives including the 62 service running between Buxton and Edale but note this is only being subsidised by DCC for a year. We do have reservations about the open-top double-decker visitor bus that ran between May and October this year, because of congestion on Winnats Pass and safety concerns.

The Parish Council is very active in initiatives to improve public transport links for residents and visitors to the Hope Valley. Without greater reliability and convenience they will not have the impact required to make a difference to the volume of car use in the PDNP. You do not specifically mention development of Transport Hubs to e.g. enhance train and bus connectivity, potentially enabling much more accessible public transport (see our recent Public Transport survey, Appendix 3).

Question 41 Visitor car parking

a Which option do you prefer? **None of these.**

b What is the reason for your answer?

Issue 12.9 spells out the PDNPA strategy to maintain a stable 'net level' of visitor parking, which apparently includes the condition that any new off-street parking has been off-set by removing on-street parking (Q: is this a condition of PDNP Planning Authority or of DCC?). We are assuming that this condition stands in Option 1. A very high proportion of Castleton residents rely on on-street parking, and compete with visitors for this "privilege" on a daily basis. DCC have recently consulted Castleton PC regarding proposals for a TRO relating to parking and in turn CPC has consulted the village, as a result of which we have strong evidence of the need for residents to retain on-street parking in the village (see Appendix 2).

Therefore there should be an Option 4 which in the event of pressing need for a new car park recognises the need to retain on-street parking primarily for the use of residents even if they have to compete with visitors.

In the meantime, Castleton has two permanent car parks (one HPBC, one, for Peak cavern, privately run) three pop-up car parks (as well as the four registered 60-day camping sites), and extensive on-road parking both in the residential and central part of the village and outside it. The on-road parking on Buxton Road especially the area from the Peak Cavern car park up to Odin Mine and the bus turnaround is not being used properly because of its overnight and often much longer term use by campervans and motorhomes. Were this O/N camping to be controlled it would release many more spaces (80 or more) for cars, for those visitors wishing to walk. The strong opposition to the campervan parking amongst residents also results from lack of respect for the area with associated littering (including sanitary waste), vandalism and obstruction affecting nearby residents, farmers and access for HGVs using the turning circle. Also see Q44 answer below.

The area on the Blue John Cavern road has also become a campervan campsite but it is too distant to impact availability of car parking for the village.

A key question is how PDNPA and the community can work together with DCC to reach a satisfactory conclusion. This also applies to resolving Issue 44.

Question 44 Overnight parking for campervans

a Do you think we should create new policy to support the use of certain car parks for overnight stays in campervans and/or holiday homes? **No**

b What is the reason for your answer?

Because this would not meet the apparent demand. Covid and social media have created the situation at locations like Stanage Edge and the Lower Mam Tor Old road

at Castleton which have become widely known for wild, no-charge camping. Increased littering, including that of human excrement is now commonplace. Also see our answer to Q41 in which other reasons for the community opposition to overnight campervan parking is given. Castleton PC has responded to DCC (Traffic & Safety) on this issue in the context of their recent TRO proposal (Appendix 3) in which no restrictions would be placed on campervan parking and we are awaiting feedback from them.

A key question is how PDNPA and residents can work together with DCC to reach a satisfactory conclusion. This also applies to resolving Issue 41.

APPENDIX 1 CASTLETON VILLAGE SURVEY, CONDUCTED SEPT - OCT 2023

APPENDIX 2 PROPOSED FOR CASTLETON - COMMUNITY RESPONSE, SEP 2024

APPENDIX 3 PUBLIC TRANSPORT SURVEY 2024, DRAFT REPORT, OCT 2024