

Objection — NP/CEC/0323/0337 — Lyme Hall: Relocation of car park, restoration of swine ground, visitor access improvements and new hall and garden entrance.

I strongly oppose this development on the grounds that it would, overall, be detrimental to conserving and enhancing the natural beauty of the National Park, be detrimental to its public enjoyment and show disregard to local communities (Core Strategy Policy **GS1**).

Capacity and traffic issues, existing and future

Crucially this is not, as described, merely a car park “relocation”, given that the proposed new car park bears no relation to the size, layout or materials of the largely adequate existing facility. In truth, total spaces on permanent hard materials would be increased 2.5 times over, from 395 to over 1,000. As the Landscape & Visual Impact Assessment concedes, it “includes the change of use of land from parkland/agricultural use to a series of parking areas.”

The applicant claims existing parking spaces total 1,065, yet at the same time that only 400 of these are “usable”, ie. year-round. No detailed plans are provided to evidence the counting of this supposed existing capacity, of which well over half would be on unmarked grass overflow. To build a new, replacement car park totalling 1,065 permanently-defined spaces is therefore a significant expansion, contrary to PDNPA policy which seeks to restrict non-residential parking to discourage car use (Policy **T7 C**).

Lyme’s traffic generation already has a detrimental impact locally, causing significant queues and slow-moving traffic for over a mile along the A6 on peak days (most recently on Easter holiday weekends, 2023). The application includes no complementary measures to improve vehicle access into the site nor enable sustainable travel as an alternative.

Even if the admissions kiosk were relocated, delays will still be caused on busy days both by right-turning traffic, since most traffic likely arrives from the urban area and motorway network to the north, and the pure volume of traffic. The park will still suffer from unsuitable access off a notoriously dangerous 40mph section of the A6, including an incredibly sharp turn from the south and pinch points in the access road. It is completely unacceptable to increase permanent parking capacity, which will only induce more traffic and increase negative impacts on local communities of High Lane and Disley. This capacity, scale and intensity of use is unjustified (Policy **RT1 B**) and would deliver no local benefit (Policy **DMT7**).

It is claimed in Supporting Statement point 2.1.4 visitors are sometimes having to be turned away, yet there is no evidence of this (Policy **DMC5 A**). In fact, Travel Plan 5.1 shows vehicle entries have dropped substantially from 199k in 2018-19 to 115k in 2022-23. This suggests significant unused capacity must now exist, and could be better utilised should Lyme make efforts to even-out demand. Covid measures proved that online pre-booking can work and that the National Trust have these systems available to manage demand on expected peak days and avoid the negative impacts of exceptional spikes in visitors, yet it chooses not to use them (Policy **T1 G**).

Appendix B, Design & Access Statement shows existing car park use is hugely seasonal with less than the existing 395 permanent capacity required for the majority of the year and even less than 200 spaces required in some months (Policy **DMT7**, no demonstrable need proven). Peak day potential of over 1,000 is only noted in four months, and even here no detail about the frequency of these exceptional spikes is provided, nor the attraction’s justification for their need in its business model.

It is clear that anything over the existing 400 permanent hard spaces would be unjustified and, besides efforts to iron-out spikes in demand, additional demand could easily be provided by tracked spaces on grass as at present or other less intrusive methods. The Transport Design Guide states: “10.13 Where car parks have very distinct surges in use, for example seasonal or event driven, a core area can achieve a desired standard for normal operation, while the overflow area could be as simple as a grassed area, opened at the busiest times of operation.” This

proposal claims to offer “primary” and “overflow” sections, but these will be largely indistinguishable, except for asphalt access roads in the primary sections (in the current primary car park, these too are gravel). This proposal risks a severe blight of hundreds of unused gravel parking spaces for the vast majority of the year — also constituting an inefficient and unsustainable use of resources (Policy **CC1**; **T3 B**, using minimum infrastructure necessary).

The suggestion that vastly increased permanent car parking will ensure urban populations of South Manchester and Stockport have access to “breathing space” is both disturbingly ironic and discriminatory. Greater Manchester already includes large swathes of Air Quality Management Areas, including on the A6 out to High Lane. Disley likewise has a declared AQMA less than a mile from Lyme’s main gate. In 2014, illegal levels of air pollution were measured a mile away in High Lane (Policy **DMC14 A, (i), (ii)**). Furthermore, the proposal completely ignores that 31% of households in Greater Manchester have no access to a car or van (GM TRADS 2017-19), and does nothing to enable visits by other, more sustainable means. Sitting on the border of the urban area and National Park, with frequent nearby bus and rail services, Lyme is far better placed than most other comparable destinations to action this and embrace it in their business model, yet the destination remains utterly reliant on private motor car visitors.

While some roads around Lyme experience minor parking issues as a result of the site’s attraction, there is no evidence whatsoever that this is due to a lack of on-site capacity nor that it would be alleviated by expanded permanent parking. Given that this parking occurs even on quiet visitor days, it is clearly due solely to visitors seeking to avoid the site’s entry/parking fees. The PDNPA Transport Design Guide itself states “10.54 In some cases, whilst there may be a plentiful supply of parking provision, with spaces available, visitors may choose to park on the road or verges within the surrounding area to avoid paying parking charges.” The proposal does nothing to counteract this issue of on-street parking, against requirements (Policy **DMT7 B**).

Proposed car parking

No visualisations of the proposed car parking are included, contravening the need to provide adequate information, thus it has been incredibly hard for the public to truly assess its appearance or impact in the landscape. Policy **DMC5 E** states: “If applicants fail to provide adequate or accurate detailed information to show the effect of the development on the significance, character and appearance of the heritage asset and its setting, the application will be refused.” **DMC7 A (ii)** likewise states the same for the effect on Listed Buildings and/or their setting.

The use of the Knott area for overflow parking on exceptional days is already intrusive on the landscape, detrimental to biodiversity and problematic for other park users, visitor and vehicle flow. It should be noted the proposed car park is vastly bigger than the existing space used as overflow, extending to both sides of the current access road, far into each corner, surrounding the visually spectacular cluster of mature trees along the road and pushing up against the green hill at the rear. Despite much of this current grassland actually being uneven ridges and clumps with very damp spaces in between, leading to the possibility of significant and damaging fast run-off from even “permeable” hard materials, there is no clear statement on how ground water and drainage will be managed or offset (Policy **CC5 C**).

The importance of the West entry route from Hase Bank Wood for existing recreation activities, particularly foot and cycle access into and across the estate, as well as its amenity and tranquility, has been completely ignored (Policy **DMC14 A, (ii), (iii)**). New footpaths are proposed only to service the parking rows, with no clear or protected through route to help non-motorised users contend with massively increased vehicle traffic.

People walking and cycling usually easily outnumber vehicles and enjoy the full width of this roughly 5-6 metre wide lane, which will be given over completely to car park access; cycling up the steep hill will become notably unpleasant and potentially dangerous with such increased traffic (Policy **RT1 D**). The proposed single 2.5 metre footpath is inadequate for the potential volume of car park users, does not link adequately onwards to Hase Bank Wood for existing or potential users and does not provide a protected route for cycling.

Even for its projected users, the proposed car park is incredibly poorly sited. Being further into the parkland, up a steep hill from the existing, it will make access significantly more difficult to the key visitor attraction of the Hall and Gardens. Walking distance will be increased to almost half a mile from the primary car park, including a steep hill in both directions.

The nearest toilets will be a considerable walk of around half a mile, double the distance away from parking than at present; an important consideration given car visitors (a large proportion being children) would be expected to have travelled some distance. There is potential for this to lead to pollution and littering of the surrounding grassland, and certainly discomfort and difficulty for visitors with disabilities. Toilet capacity is already constrained at times and will not be increased in line with parking spaces, an important consideration in environmental capacity.

The provision of a minibus service is noted, but there is no clear statement on the size or capacity, frequency of service, hours of operation nor propulsion method; Lyme's current site minibus service is electric but with less than 10 seats, cannot accommodate wheelchair users and arrives only on demand. Waiting for and boarding the minibus will add time and difficulty to access without any appreciable benefit in terms of actually reducing motor vehicle impact on the parkland. The minibus will only add additional traffic to the Knott and Swine Ground access road and may even struggle to operate at peak times, when vehicles are entering in large numbers.

No electric vehicle charging points are included, with the application conceding this is especially difficult given with the isolated nature of the site and lack of any available supply. This would likewise make retrofitting charging points difficult, disruptive and expensive, and the presence of such devices in this environment, even if provided, would make the development even more incongruous in an Open Space Conservation Area. The proposal is therefore completely out of step with modern requirements for private vehicle travel, and the proposed location would in fact be particularly detrimental to future provision of these basic requirements.

The PDNPA Transport Design Guide welcomes coach parking, but it states parking spaces "should also be located in close proximity to pedestrian routes providing level access to and from the town or village centre, or visitor attraction." Although the proposal provides a dedicated drop-off facility, this is shared with the property's own minibus services, thus constrained in size, and in fact requires a steep hill to then access the key visitor attraction on foot. Coaches are known to sometimes currently park directly beside the gates of the Hall to avoid this, conflicting with access for other pedestrians and presenting a negative visual intrusion.

The proposed coach parking at "the Knott" is at the absolute furthest extent of the proposed parking, 2 miles from the main gate and a considerable distance for drivers to then access facilities or visitors to return to the vehicle early, especially those with reduced mobility. There is no proposed pedestrian route along the existing, narrow asphalt lane to this massively expanded car park. The use of this lane by coaches will conflict substantially and dangerously with its existing popular use for walking and cycling. This 107-space expanded parking area sits immediately adjacent to the National Park Natural Zone (Hase Bank Wood), thus large coaches will be overwhelmingly visible from this protected woodland. The proposed coach parking is unfit for purpose and significantly detrimental to both existing park users and coach visitors.

In terms of visual impact, the applicant's own assessment concludes "that the combined proposals would have an overall Minor/Moderate adverse effect on landscape and visual receptors," however much of the 7.2 Visual Receptor Sensitivity section seems to seriously and intentionally underestimate the visibility of the site (Policy **DMC5 E**; **DMC7 A (ii)**), which will present as either a glinting mass of car windows or a blot of empty hard surfacing.

VP06 for example states "Partial views of the car parking areas are shown from this viewpoint with the Knott area visible in the background" as Medium sensitivity value, when in fact visibility of such a vast car park from this location will be high and hugely damaging to the continuous nature of green space around the Hall and out towards the urban fringe of Greater Manchester.

Likewise VP09 states "no direct views of the parking areas" from The Cage due to existing woodland screening, however this is simply not the case in winter. And, walking south from the Cage towards the row of hawthorn trees approaching the hall, the parking areas will be hugely

visible and jarring due to a gap in this tree cover, where the existing car park is almost invisible even in winter.

Tree planting will not and cannot adequately screen such an elevated, widely-visible site year-round, from the Natural Zone surrounding the park core in particular — not in future and especially not in its early years of operation. Thus this development will in fact have a Major adverse impact on the setting of the Listed Building, Registered Park and Garden, and Conservation Area including its Open Spaces (Policy **DMC8 A**; **DMC7 D (ix)**).

The objection is therefore strongly not just to the quantity, materials or imposition of the proposed car parking but to this completely inappropriate location for both the wider landscape and visitor amenity.

Proposed site gains

It is recognised that such a heritage asset must ensure it is operationally and environmentally resilient to risks such as flooding and climate change, however it is bewildering how an organisation with the land assets and objectives of the National Trust cannot see the direct connection between the over-provision for high-pollution transport methods and the resulting climate emergency threatening our existence. Opening up the culverted stream will certainly result in an improved visual amenity, but there is no evidence that the entire car park must be moved and massively expanded for this to happen — indeed, Appendix B of the Design & Access Statement shows an option with parking re-sited more sympathetically around the stream.

Furthermore, it should be made clear that opening up the culverted stream, while welcomed, would only help prevent the existing lower car park area from flooding, not the more important heritage asset of the Gardens above, which requires actions further up the hillside to prevent a repeat of the exceptional 2019 incident. Ultimately, it simply cannot be ignored by the PDNPA that actions such as huge expansion of car parking capacity, increased private vehicle traffic generation and complete lack of sustainable access actions combine to contribute significantly to the climate emergency which both the National Park and National Trust state they are fighting to reverse. The framing of this proposal as if Lyme is solely a victim of climate change, rather than a major local contributor, is spurious and must be rejected.

Policy **DMC11 A** states: “Proposals should aim to achieve net gains to biodiversity or geodiversity.” This proposal will lead to a net loss, being that the proposed new hard-surfaced car park will comprise approximately 2.8 hectares of existing grassland while the re-landscaped existing car park area comprises only 1.7 hectares in total. While the proposal attempts to claim this will see lower quality grassland replaced with higher quality, the Ecological Statement itself suggests the “lower quality” grassland is only considered such because of Lyme’s own management policies and the occasional use of a small section for overflow parking.

Part (v) further states: “in rare cases, as a last resort, compensation measures to offset loss” can be considered. While the “restoration” of the Swine Ground would partly offset loss, this should not be a situation the National Park nor the National Trust finds itself in, when the demonstrable need for the volume of permanent car parking and its need to be sited in this location has not been proven. This is not a “last resort” situation. Having vehicles driving up to 2 miles across the parkland to a parking space can only be detrimental to its wider biodiversity.

Given that it will be surrounded on all sides by busy vehicle access roads and footpaths, it cannot be conceived that the “restored Swine Ground” will be particularly high quality in its biodiversity, compared to the potential of the much quieter, isolated Knott area. The footpaths running around the area, unless fenced in intrusively (there is no suggestion of this), will likely see significant desire lines emerge across the grassland, and the stream will be a magnet for visitors to stray towards, thus likely diminishing and damaging the supposed biodiversity of the space further.

It is agreed that the existing car park design, being directly next to the Grade I Hall, is far from ideal and has some detrimental impact on its setting, yet this is largely due to its lacklustre and rudimentary design, which has not been adequately addressed in over 50 years of operation. It could easily be redesigned with additional small tree cover and planting to soften its impact, while

opening up the culverted stream as proposed. Likewise there is scope to reposition some parking spaces most harmful to key views, but keeping within the same general area (from the south east corner immediately below the Gardens to the mature tree cover in the north west). Possibilities are even shown in Design & Access Appendix B, Feasibility Concept Options.

Nevertheless, the location of the existing car park does have important advantages for visitor amenity and visibility, given that (unlike the proposed location) it is close to the key attractions and facilities and, being almost sunken in the landscape, is largely invisible from all of the surrounding parkland, moorland and Natural Zone. Even where it can be briefly seen, it arguably now forms part of the ongoing human impact of the Lyme built environment, forming a “hub” of visitor activity which is successfully constrained and largely prevented from spilling into the wider parkland by the surrounding terrain.

While the existing car park impacts on the Italian Garden, this could be prevented by more successful planting or re-siting of some spaces as suggested above. Across the wider garden it is successfully sunken and shielded by the gradually rising landscape forming a “shelf” to the view. By contrast, the proposed car park, elevated on a level similar to the Garden, would in fact be highly visible during reduced winter tree cover — a fact which the Visual Impact Assessment fails to adequately address. Likewise, the access road to the Knott is highly visible from the Garden but only lightly used at present. Requiring all vehicle traffic to use this road would lead to significant noise and visual intrusion on the setting and amenity of the listed Garden, again ignored by the application’s assessments.

Great emphasis has been placed on claiming visitors will now enjoy the original intended entry sequence and view of the Hall from the west, yet this is already possible by exploring on foot or cycle. With the sole vehicle access being from the north, this plan requires visitors to unnecessarily drive up to 2 miles into the parkland — blighting this very view — only to then double back on foot or minibus; a completely inefficient and unsustainable use of land (Policy **CC1 A**).

In fact, the proposed footpath to the north of the main access road won’t even provide the key view of the hall claimed, as this will be obscured by trees from the path and is best seen from the south side of the existing road, which will now be less accessible given increased traffic. The historic West entry route must be considered as a whole and under these proposals its narrative would, unnecessarily, be substantially damaged by both the vast expanse of car parking at its middle and the massively increased vehicle traffic being detrimental to both its enjoyment and conservation (Policy **DMC7 D**).

So, while relocating part of the existing car park in some way could be welcomed, it should not be at the expense of simply destroying a different, and far more widely visible, swathe of parkland, resulting in a net loss to the overall setting of this Grade II* Park and Garden. Since Lyme already has a functioning car park, there is no overall net public benefit, no demonstrable need and in fact the inducement of additional motor traffic, further into the park would be a significant negative.

Assessment of options

The application does not adequately nor comprehensively assess other options for location (Policy **DMT7 C**): in particular, no options closer to the A6 access are assessed whatsoever. It is not made clear why the proposed location is the only suitable option (Policy **RT1 B**) nor why the option of redesigning the existing car park around part of the re-opened stream was considered unsuitable. Only the former Kitchen Garden above the Hall was otherwise considered and this is quite obviously unsuitable, as it would bring all vehicle traffic directly past the Hall and destroy the setting of the Grade II Gardeners Cottage.

There are instead areas of grassland directly off the main drive north of the Hall, particularly immediately east and north east of the Timber Yard, which should have been considered and could be eminently more suitable: being slightly closer to the A6, closer to visitor amenities, lacking the steep inclines of both the existing and proposed visitor entry and naturally shielded — from both the key heritage buildings and surrounding Natural Zone, by both land and tree cover. This would allow the proposed Swine Yard and the existing Knott to become largely car-free

spaces — significantly more beneficial to visitors, recreational use and biodiversity — and for the historic West entry sequence to be properly conserved and correctly interpreted in its entirety.

Developers are expected to have assessed the possibility of Park and Ride to address parking needs (Policy **DMT7 C**) and the Core Strategy actively encourages Park and Ride to main visitor areas (Policy **T7**), yet the Supporting Statement 4.3.24 merely concludes without evidence that Park and Ride “as an alternative to car parking on site is not considered viable, given the amount of visitors to Lyme, and the lack of suitable land available to the Trust for such a purpose.” This appears to mistakenly and dismissively consider Park and Ride can only operate as a complete replacement of on-site parking, rather than a supplementary measure to alleviate pressure on the site at exceptional peak times — precisely what Lyme needs.

Lyme has itself coordinated to provide an hourly shuttle bus service from a nearby off-site Park and Ride facility, on Sundays and some other peak days for several summer seasons up to and including 2019. During Heritage Open Days, this was even extended to Stockport’s central Mersey Square. The venture with Stagecoach Buses used accessible, hybrid-engine double decker buses from the Stockport Council-owned, 400-space Hazel Grove Park and Ride site, approximately 3 miles east of Lyme. This appeared to be a reasonable success, given its very limited promotion and operating days, yet has not returned despite Lyme’s supposed visitor parking difficulties. Clearly, given a more permanent and more frequent operating schedule, and better promotion including local road signage, there is significant opportunity for this site to completely alleviate any need for permanent parking capacity increase — especially if combined with measures such as pre-booking of on-site parking for non-members on peak days.

It is particularly notable that the Park and Ride site is owned by Stockport Council, who still contribute financially to Lyme, while providing residents with a free entry ticket each year, and who as a Highways Authority would most benefit from the reduced traffic impact — therefore it is highly likely they would be open to further options. Often underused, the site is ideally placed to capture car travellers from both the A6 and A555, the two key signposted routes to Lyme, and is least used by commuters precisely when Lyme is busiest. Future plans by Greater Manchester to take bus services back into public control will also make planning and operating services easier. The proposed development would be a significant backwards step in the National Park’s key aims of limiting the need to travel where possible and encouraging sustainable access. Such an over-supply if on-site parking would be completely detrimental to the start-up of any other, more sustainable initiatives, which would in turn negatively impact the ease of access for households with no access to a car.

Non-motorised travel

The PDNPA is clear that “The importance of access to developments ... applies to all modes, including pedestrians, cyclists and equestrians in addition to motor vehicles.” The Authority strongly encourages modal shift to sustainable transport (Policy **T1 C**) and is clear developments should promote sustainable access “for the quiet enjoyment of the National Park” (Policy **T1 F**). This application does nothing to satisfy these key objectives and policies, while actively making non-motorised travel into and through the destination worse through the imposition of inappropriate car parking location, design and size as detailed above.

No new paths or routes for cycling are proposed whatsoever, despite the proposal inevitably leading to a significant overall increase in traffic on the park’s roads, which cycles must share with cars. In particular, there is still no adequate protected cycle route provided from the main A6 gate.

Despite the considerable increase in permanent car parking capacity, the applicant fails to propose any increase in the already minimal cycle parking provision. Worse, the details contained within the Transport Statement are inaccurate and deceptive. Pictures 3-24 to 3-27 show the current cycle parking facilities, but the first is a completely unusable wooden ornament which does not allow a cycle to be easily secured with a standard lock and is thus unfit for purpose. 3-27 is a staff parking facility and thus completely irrelevant to this application, given that no changes to staff parking are proposed. Despite this, both are included in the Transport Statement’s overall count of “29 cycle parking spaces pre and post development”. The true figure is only 16 usable public spaces, comprising 4 Sheffield stands in the Timber Yard and 4 beside

the main car park information kiosk. Versus the proposed car parking capacity, this would be startlingly poor: only 1 cycle parking stand for every 133 car parking spaces.

Point 4.1.4 of the Transport Statement notes: “As part of the relocation scheme, the cycle parking currently available within the main car park will be relocated to the timber yard to ensure sufficient parking is kept available during and post development.” This would represent a significantly worsened cycle parking offering, further from the main Hall and consolidated in one place, when it is considered good practice to distribute cycle parking evenly and in good proximity to destinations. Furthermore, the existing cycle stands in the Timber Yard are not accessible to all, given that they sit on coarse stone at the back of the outdoor seating area and require navigating a cycle through shop sales displays to access. There is nothing to suggest any provision will be made for disabled cycling — cycles are a significant mobility aid for many people and thus this application sadly discriminates strongly against these visitors.

The “provision of extensive cycle parking provision within the wider masterplan” is noted in the Design & Access Statement, but words and promises do not equal an actual physical measure of a current proposal. As such this proposal as a whole is completely incompatible with the National Park’s stated aims and policies. It is unclear why improved and expanded cycle parking, along with other complementary access measures, would not be combined into a single application, to make it a comprehensive and enforceable plan for improving access by all methods.

Considering the PDNPA’s specific noting of equestrians in importance of access, horse-riding has not been considered by the proposal at all; either in provision for parking of horse-boxes, facilities or simply improved access across the park, which has no published policy on horse riding and presents a considerable land block in the local rights of way network.

Planning advice, precedents and public opinion

It is noted the PDNPA offered pre-planning advice, which included support for fragmentation of parking areas to reduce impact. Quite the opposite, this proposal is for a huge, single expanse of car parking on a highly visible site which, though compartmentalised for operation, will appear as one huge gravel and tarmac blight on the landscape, with no new planting to fragment it whatsoever. The PDNPA also requested biodiversity gains be quantified and likewise for specific impacts on heritage assets. While there has been some attempt at this, it does not appear detailed enough for such a large and environmentally disruptive development nor does it place adequate weight on the loss of biodiversity and the impact on listed parkland settings.

At the time of the pre-planning advice, the proposals included an admissions hut and visitor welcome building. These have since been removed and, especially noting above objections regarding impact on local traffic and visitor amenity of the new car parking location, may render the Authority’s previous advice, and any support given, no longer relevant. The application must be determined only on what is now actively proposed, not promised as a future possibility.

In considering precedents set by similar applications, it is worth noting the proposal for improved car parking and new visitor access at Chatsworth (NP/DDD/1018/0911), granted conditionally in 2020 but yet to begin construction. This approved only a moderate increase in hard-surface parking capacity, from circa 675 unmarked spaces to 855 defined bays, plus 13 coach bays, with one condition being that visually intrusive overflow parking would be banned. However, it also includes a completely new access road off a major roundabout of the A619/A621, potentially removing a significant amount of traffic from nearby villages and reducing the distance travelled by vehicles into the National Park. It includes two electric vehicle chargers, with infrastructure to support more as demand grows, and the retention of 15 cycle storage racks immediately adjacent to the house and facilities. Smoother vehicle entry, reducing conflict with both pedestrians and other vehicles, would include no fewer than three ticket kiosks, positioned as far from the main vehicle entry point as possible, to alleviate queues and impact on local roads. The car park would only occupy a roughly similar boundary as previously, though still within sight of the House, but in doing so would ensure good visitor access, especially for disabled visitors.

It should be noted Chatsworth is much further from major settlements compared to Lyme’s location almost on the urban fringe, with no nearby railway station and much lower scope and

desirability for visitor access by other means. Yet the property already has several well-used regular public bus services, which deliver visitors directly to the entrance of the House, and it operates pre-bookable visitor entry on a timed system to effectively restrict and manage spikes in demand. Chatsworth is a much larger and arguably more nationally significant heritage asset and attraction, yet despite the above challenges seeks much lower permanent parking. Comparing the two, it is clear Lyme's proposals seek a completely unjustified and unsupported increase in permanent capacity, especially given its location, and fall well short on access arrangements, local impact and sustainable travel provision.

The PDNP is currently formulating an updated Local Plan, with significantly more emphasis on climate change and sustainable access strategies, as stipulated by local surveys. In consultation for this (May 2021 Streamlined Survey), 74% of public responses agreed "we [PDNP] should do our best to help combat climate change". 81% agreed or strongly agreed "the Peak District's landscapes should be allowed to change only in a way that enables and promotes the recovery of nature and increases its biodiversity." Public feeling therefore weighs strongly against this proposal's net loss of green space and vast increase in hard-surfaced car parking, inducing additional motor traffic with no improvement to sustainable access.

Conclusion

The proposal would not only diminish overall public enjoyment and amenity but destroy natural beauty. Even so, assessing the conflicting purposes and effects of this application may ultimately fall to the Stanford Principle, Section 62 of the 1995 Environment Act, and in that case see that the National Park Authority "shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area" — and thus refuse outright this completely inappropriate development.

Appendix - Planning Policies

In full, the proposed development fails to align with the following PDNPA planning policies:

Core Strategy

Policy **GS1** states development will not normally be permitted where "It is incompatible with the twin statutory National Park purposes of conserving and enhancing the natural beauty of the National Park and promoting its public enjoyment, or with the Board's further statutory duty to have regard to the well being of local communities. Where there is an irreconcilable conflict between these aims, the conservation of the National Park will normally take precedence."

Chapter 15 of the Core Strategy sets out the strategic principles for accessibility, travel and traffic through a set of policies aimed at reducing the overall need to travel, whilst at the same time encouraging sustainable transport. This approach focuses on reducing the impact of the private car, whilst promoting wider access to facilities for public transport, walking, cycling and horse riding.

Policy **T2** sets out the aim of reducing and directing traffic, and in particular cross-Park traffic.

Development Management Policies

Lyme is a heritage asset, Listed, a Conservation Area and Registered Park and Garden. It also comprises significant Natural Zone areas, notably immediately adjacent to the Knott area of the proposed car park. The proposed new car park location is also classed as Open Spaces in a Conservation Area. While the Hall is the key feature, it should be noted the entire Park and Garden itself at Lyme is Grade II* listed, with numerous other heritage assets within listed additionally.

Policy **DMC5 A** states: “Planning applications for development affecting a heritage asset, including its setting must clearly demonstrate: (ii) why the proposed development and related works are desirable or necessary.”

Policy **DMC5 E** states: “If applicants fail to provide adequate or accurate detailed information to show the effect of the development on the significance, character and appearance of the heritage asset and its setting, the application will be refused.” **DMC7 A (ii)** likewise states the same for the effect on Listed Buildings and/or their setting.

Policy **DMC7 D** states: “development will not be permitted if it would directly, indirectly or cumulatively lead to: (ix) inappropriate impact on the setting of the Listed Building.”

Policy **DMC8 A** states “Applications for development in a Conservation Area, or for development that affects its setting or important views into, out of, across or through the area, should assess and clearly demonstrate how the character or appearance and significance of the Conservation Area will be preserved or enhanced.”

Policy **DMC11 A** states: “Proposals should aim to achieve net gains to biodiversity or geodiversity.”

DMC14 A regarding pollution and disturbance states: “Development that presents a risk of pollution or disturbance including soil, air, light, water or noise pollution, or odour that could adversely affect any of the following interests will not be permitted,” including “(i) the amenity of neighbours,” “(ii) the amenity, tranquillity, biodiversity or other valued characteristics of the area” and “(iii) existing recreation activities.”

The proposals would significantly worsen air and noise pollution in the immediate vicinity, destroying the amenity, tranquility and biodiversity of this space. Existing recreation activities of walking and cycling in particular would be significantly harmed by the pollution and disturbance of 1,065 parking spaces and vehicles continuously arriving and leaving this area, currently only very lightly used by a handful of vehicles on an average day. The pollution and disturbance of necessary car parking could have easily been lessened by proposing a location closer to the main A6 access, not even further away than existing.

Policy **DMT7 A** regarding visitor parking states: “New or enlarged car parks will not be permitted unless a clear, demonstrable need, delivering local benefit, can be shown.”

Policy **L3 B** regarding cultural heritage assets states: “Other than in exceptional circumstances development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset of archaeological, architectural, artistic or historic significance or its setting.”

Policy **RT1 B** regarding provision for recreation states: “New provision must justify its location in relation to environmental capacity, scale and intensity of use or activity, and be informed by the Landscape Strategy. Where appropriate, development should be focused in or on the edge of settlements. In the open countryside, clear demonstration of need for such a location will be necessary.”

Policy **RT1 D** further states: “Development must not on its own, or cumulatively with other development and uses, prejudice or disadvantage peoples’ enjoyment of other existing and appropriate recreation, environmental education or interpretation activities, including the informal quiet enjoyment of the National Park.”

Policy **C2** regarding development in countryside outside the Natural Zone states: “Development which would not respect, would adversely affect, or would lead to undesirable changes in the landscape or any other valued characteristic of the area will not normally be permitted.”

Climate Change

Policy CC1 A regarding climate change mitigation states all development must: “Make the most efficient and sustainable use of land, buildings and natural resources.”

Policy CC5 C regarding flood risk and water states: “Development which increases roof and hard surface area must include adequate measures such as Sustainable Drainage Systems to deal with the run-off of surface water. Such measures must not increase the risk of a local water course flooding.”

Transport Design Guide

The Transport Design Guide states as its key guiding principal: “i. Overall, take a minimalistic approach, recognising this is least likely to have impacts on the special qualities of the National Park.”

Design guidelines for the South West Peak Character Landscape area state: “For key visitor destinations related to recreational access, informal arrangements for car parking using geotextile grid structures or simply the existing underlying ground materials on site should be considered.”

Regarding parking, it also states: “10.8 Working within the Local Plan and the Peak District Parking Standards, designers should consider normal and peak use in determining car park capacity, and look to innovate to achieve the best outcomes that respond to user and National Park needs. Examples of this include ‘soft engineered’ overflow schemes” ... “Consideration should be given to the design and use of materials to reduce visual and other impacts.”

Regarding operation and capacity: “10.11 Well-designed car parks respond to a previously unmet need and deliver users to a designated space efficiently.”

Furthermore: “10.13 Where car parks have very distinct surges in use, for example seasonal or event driven, beneficial. A core area can achieve a desired standard for normal operation, while the overflow area could be as simple as a grassed area, opened at the busiest times of operation.”

Regarding parking management, “10.54 In some cases, whilst there may be a plentiful supply of parking provision, with spaces available, visitors may choose to park on the road or verges within the surrounding area to avoid paying parking charges.”

“Car parks with distributed peaks in demand should consider a ‘core’ and ‘overflow’ arrangement to allow a variation in treatment within the design.”

Updated Local Plan

The PDNP is currently formulating an updated Local Plan, with significantly more emphasis on climate change and sustainable access strategies, as stipulated by local surveys. In consultation for this (May 2021 Streamlined Survey), 74% of public responses agreed “we [PDNP] should do our best to help combat climate change”. 81% agreed or strongly agreed “the Peak District’s landscapes should be allowed to change only in a way that enables and promotes the recovery of nature and increases its biodiversity.” Public feeling therefore weighs strongly against this proposal’s net loss of grassland green space and vast increase in hard-surfaced car parking, with no improvement to sustainable access.

Even more specifically, 73% agreed or strongly agreed that new or enlarged car parks should only be permitted “as part of new businesses, or to remove dangerous or obstructive roadside parking.” The proposal is not a new business and there is no evidence submitted of dangerous or obstructive roadside parking, nor proof that this proposal would successfully eliminate such behaviour when it occurs.

74% agreed or strongly agreed “Larger recreation and tourism developments should be restricted to sites that are either: a) not reliant on being accessed by car; or b) can provide access by sustainable means of transport (e.g. public transport, bike, walking) as a condition of the development.” Again, no improvement to sustainable access is included in the proposal, and

rather than reduce reliance on access by car, the proposal makes this easier and only increases the site's already overwhelming reliance on it, to the detriment of other means and users. With the site's close proximity to good rail and bus services, rights of way and cycle routes, on the edge of the dense Greater Manchester urban area, it has the possibility of significantly reducing reliance on access by car - it is purely the operator's choice not to lead on this.

Just as current adopted policies already strongly counter this inappropriate development, these results therefore point towards the future Local Plan taking an even stronger stance against development with such outcomes. As such, granting permission — even conditionally — would be a backwards step, incompatible with both current and future policy, and set a dangerous precedent for the protection of the National Park's protected landscapes.