

APPENDIX

TADDINGTON & PRIESTCLIFFE PARISH COUNCIL

RESPONSE TO THE SUBMISSION VERSION OF THE PEAK DISTRICT NATIONAL PARK CORE STRATEGY

1. INTRODUCTION

- 1.1 The Parish Council has concerns about the submission version of the National Park Core Strategy surrounding:
- a) The gap between the stated vision and objectives on the one hand and delivery on the other;
 - b) Sustainability and what it means for individual communities;
 - c) Housing policy and how local, particularly younger, people are to be allowed to live locally; and
 - d) Conservation and enhancement of the built environment and how that will be achieved.
- 1.2 The issue for the Parish Council is how to sustain the local community and, in so doing, to retain important local services, such as the school, village hall and public houses. We see a vibrant local community as essential not just for the social well-being of the village itself but as a means of meeting the key statutory purpose of a National Park, namely the conservation of its natural and cultural heritage.

2. TADDINGTON

Setting the scene

- 2.1 The Parish of Taddington and Priestcliffe has a population of around 470. The village lies about 1000 feet above sea level and is therefore one of the highest in England. It has a school, church and two public houses as well as other rural businesses.
- 2.2 The Core Strategy recognises the aging population of the National Park as an issue. This is certainly the case in Taddington where younger people with strong associations with the village often cannot find housing locally. The result is that it is increasingly difficult to continue doing the things that make a viable and sustainable community.
- 2.3 The National Park Authority's stewardship of the village of Taddington has been weak. The village is in part characterised by the number of derelict buildings and sites within it. The TransPeak bus drivers refer to it as "the derelict village". In 2002, Taddington conducted a village opinion survey in conjunction with the Peak Park Planning Authority under an initiative called "Discovering Villages". An overwhelming 80% of the village said that they wanted to see the derelict buildings and eyesores in the village dealt with.
- 2.4 In its previous representations, the Parish Council has said that it was looking for policies that will:
- a) Take a positive and enabling approach towards regenerating and enhancing the valued characteristics of the parish and, therefore, the National Park, (ie address the problems of dereliction);

- b) Ensure the vibrancy of the village in the interests of its long term sustainability (ie to support the school and community activities and sustain facilities such as the doctor's surgery and public houses);
 - c) Respond to the problems of an aging population;
 - d) Help local people to fulfil their housing needs locally (ie remain in or return to their community);
 - e) Provide incentives/mechanisms for (a) to (d) and, equally, remove disincentives.
- 2.5 The Parish Council is greatly concerned that the effect of the proposed policies will be to leave Taddington with little hope of significant change over the period of the plan.

Appendix 2 of the Core Strategy (Settlement Matrix)

- 2.6 Appendix 2 is wrong (Page 134). Taddington has a playground and public open space and has available a playing field out of school hours. It has weekly surgeries in the village hall. "Industrial Units" are not defined in the matrix but there are two sets of commercial vehicle repair buildings (one currently unused and one at Priestcliffe), a former coal yard with a building on site and a farm/haulage yard with garage/repair unit. There is also a recently built small office unit.
- 2.7 Appendix 2 says that the potential in Taddington to develop "without harm to the valued characteristics " of the village is limited. There must be some preconceived criteria that would enable this conclusion to be reached which are not explained. The Parish Council would question this conclusion, which it has not as far as it knows been consulted upon, but in any event argues that a strategy that does nothing significant to sustain the community may do even more harm (see below).

3. VISION AND OBJECTIVES OF THE CORE STRATEGY

- 3.1 The Parish Council particularly draws attention to the following extracts from the vision for the National Park (Para.3.7),:
- "enhanced Peak District wherecultural heritage and the settlements within it continue to be valued for their richness";
 - "A livingPeak District , that contributes positively to vibrant communities.....whilst.....enhancing the special qualities of the National Park".
- 3.2 The "spatial outcomes" envisage that "communities will be more sustainable and resilient, with improved access to services" (Para 5.3).
- 3.3 "Vibrant", "sustainable" and "resilient" are key words suggesting a strong theme which the Parish Council supports. They appear, however to be "full of sound and fury signifying nothing". The Parish Council does not see how the policies of the Core Strategy match up to the expectations raised.
- 3.4 The Parish Council would also argue that the vision has one major missing element: it should recognise the importance of local people in achieving the vision and seek to ensure that the vision is one that is owned locally. It questions whether the dialogue has taken place to enable this to happen.

4. SUSTAINABILITY

The environment

- 4.1 The Core Strategy rightly places weight on environmental sustainability, an emphasis the Taddington and Priestcliffe Parish Council supports. However, there needs to be clearer recognition of the potential role of the community as custodians of the environment in their everyday lives, not just as volunteers for National Park activities.

The community

- 4.2 Sustainability is also therefore about the community. Planning Policy Statement 1 (PPS 1) stresses this but the Core Strategy makes little contribution to sustainable communities and does not explain how that objective, and the visionary objectives of vibrancy and resilience can be achieved.
- 4.3 The Core Strategy rightly draws out the problems of an aging population but seems to do little to address this issue. If anything, our observation is that the problem of an aging population has in Taddington become more severe since the 2001 census and the signs are that this will continue. We see it in our community activities, which increasingly rely on the more elderly to take the lead.
- 4.4 These activities support things such as the maintenance of the Grade 1 listed church (a worthwhile national park purpose in itself) and the school. The older the population the less likely it will be that there will be local children to fill the school or younger people with the energy to run local events or to customise the local public houses. It is a downward spiral.
- 4.5 If Peak District villages are not simply to become museum exhibits, policies are needed that will open opportunities to redress the balance in the population and truly support the vision of "vibrancy" and "resilience". Villages cannot be frozen in time. They have evolved over hundreds of years. The continuing organic development of villages (albeit to high standards of design) is sustainable in the context of changing social realities, and should be welcomed rather than, as the Core Strategy implies, merely tolerated when everything else fails.
- 4.6 Only nine of the villages listed in Policy DS1 are said to be able to accommodate more than "very limited" affordable housing. It is not explained how, in those circumstances, the policies will lead to "vibrant" and "resilient" communities for the many communities with "very limited" opportunities. If, on these policies, villages are to all but stand still, what will make them "vibrant"?
- 4.7 The Core Strategy places much emphasis on retaining local facilities such as village shops and community facilities. Such policies are important but they do not sustain communities: people do.

5. HOUSING POLICY

Housing need

- 5.1 The worthwhile provision of "very limited" affordable housing does not ensure sustainable communities. The Core Strategy appears to confuse a proper response to a very limited social need with what is actually required to sustain a community.
- 5.2 One of the difficulties with the Core Strategy document is that "affordable", "local" and especially "need" are not defined. Consequently, the full impact of housing policies on community sustainability is impossible to assess.

- 5.3 The criteria of “need” in the present local plan are in essence 10 years’ residential qualification and:
- a) That an individual needs a house because he/she cannot afford to buy one; and
 - He/she is living in unsatisfactory conditions (eg overcrowded or unfit); or
 - He/she is forming a household for the first time;
 - b) That a community requires housing to meet the results of strict survey criteria to meet proven needs (which are presumably tested under the criteria at (a) above but that is not clear);
 - c) That suitable accommodation cannot be found in an adjoining parish.
- 5.4 These criteria are discriminatory and make little contribution to sustainable communities . For example the newly retired local couple that wish to downsize or the young couple already in the village wanting a slightly larger but affordable house in which to start a family do not qualify.
- 5.5 Accommodation in an adjoining parish is no answer to those who have spent many years in one community or several generations of whose family are buried in the local churchyard.
- 5.6 It is apparently intended to leave the debate about definition of “need” to the more detailed stage of plan preparation. However, by that time the Core Strategy will have set criteria, particularly the assumptions about housing numbers, and there is a very real danger that further debate will be circumscribed by the Core Strategy as presently drafted.
- 5.7 PPS3 on Housing refers to housing needs and “demand” but does not clearly distinguish between them. In a National Park, where there are no housing targets, it is vital for a clear understanding to be reached at Core Strategy stage on the differences between “need” and “demand” when the strategy tries to control the housing market to the tight degree now proposed.

Market Housing

- 5.8 PPS3 recognises market housing as well as affordable housing can make an important contribution to sustainable development. However, the Core Strategy does not seem to acknowledge this contribution or, indeed, the contribution that it can make to “vibrancy” and “resilience”. This is not to argue for widespread new housing on green field land on the edge of villages (although that may be feasible in some cases). Market housing could however play an important role in addressing the National Park objectives of conservation and enhancement (see below) and, in so doing, can add to the vibrancy, resilience and sustainability of communities - all objectives of the Core Strategy that cannot obviously be met by other means.
- 5.9 Market housing at the lower end of the market can be crucial to sustaining the community. Taddington is fortunate in still retaining a number of families with long associations with the parish. However, many of these now live in the sort of dwellings that under present and proposed policies it will be no longer possible to provide.

Implementation

- 5.10 The Core Strategy envisages between 550 and 890 new homes over the plan period in the Limestone and Derwent Valley areas. This averages between 12 and 20 new homes per village mentioned of which 7 to 12 would be “affordable” and 5 to 8, presumably, market housing.

5.11 These figures are heavily dependent upon two factors :

- a) public funds to acquire land and develop it for “social housing”; and
- b) policies that will release either market housing or privately sponsored “affordable” housing.

5.12 The Parish Council would suggest that (a) is unlikely to produce a great deal given the national financial picture and the fact that the housing authorities will have planning targets to hit for the areas outside the national park but not within it. The Parish Council considers that (b) is unlikely for the reasons set out below.

5.13 Whilst the emphasis on meeting local affordable housing needs through existing sites and buildings is understandable, it is too simplistic. Such sites and buildings will often have existing use values that may be higher than what a social housing provider like a housing association is prepared to pay. Furthermore, the Parish Council's experience suggests that many landowners may be very reluctant to let a such a site go for affordable housing with so little financial benefit.

5.14 Also, the way the policies are structured, a housing association or other social housing provider is more likely to go for the green field option because it is likely to be both cheaper and easier.

5.15 Market housing will apparently only be permitted under these policies for:

- a) single dwellings to meet conservation/enhancement objectives (HC1 CIII);
- b) dwellings to meet conservation/enhancement objectives that are not viable for affordable housing or where there is no local need (whatever that means in this context) to be met (HC1 CIV and V);

The Parish Council questions whether the very limited circumstances in which market housing will now be permitted will produce any significant new housing to contribute towards sustainable or vibrant communities. Policies should acknowledge the role that market housing could play and provide a structure to enable that to happen in accordance with the need to protect the essential qualities of the National Park.

6. CONSERVATION AND ENHANCEMENT AND NATIONAL PARK PURPOSES

Present policy

6.1 The present Structure Plan Policy C3 is simple and effective. It creates a strong presumption in favour of development that enhances the valued characteristics of the area. This is reinforced by Structure Plan Policy HC1 that allows:

- a) The conversion of existing buildings; and
- b) Enhancements to the National Park

6.2 It is only when new housing does not fall within these categories that an exception is made for local affordable housing.

Proposed policy

6.3 The new policies will work very differently. They throw a heavy onus on the potential developer in future to prove that the development is unviable or he/she must accept a local occupancy condition which only some will wish to do. The preamble to Core Strategy Housing Policy HC1 shows just how complex and discouraging this process may prove.

- 6.4 The incentives that at present exist for developers to conserve and enhance the National Park will be considerably watered down. It is simply not in the nature of many local landowners to want to cope with the bureaucracy involved for the return they might expect. A recent application in Taddington to convert three buildings into five market houses to rent was, despite the efforts of the National Park officers, eventually approved by the Planning Committee. It would be naïve to believe that this sort of application would even have been made under the proposed policies.
- 6.5 Reference has already been made to the problem of existing use rights. Existing buildings, sites used for non-conforming uses and other land capable of enhancement will all have land valuations considerably in excess of agricultural land values. The easy option for many may well be to keep things as they are rather than to pursue the development of land at the reduced land prices that it is understood a housing association would hope to pay.
- 6.6 The position of the National Park Authority has been put to the Parish Council as follows (it would be helpful if this reasoning were to be more clearly set out in the Core Strategy):
- “The rigorous approach towards housing within the National Park has helped to restrict land prices to levels that are affordable by the associations, since there is little prospect for land owners to “hold-out” for open market values. Resources for social housing and rates of delivery are likely to be affected by the current Government spending review, but as yet there is little clarity about the impact of that and the period for which any reductions would apply. In High Peak and Derbyshire Dales Districts the National Park Authority and the Districts are working with the Homes and Communities Agency to deliver a continuing programme under the “Local Investment Partnership.” The Partnership is attempting to maintain a “supply chain” so that any resource that becomes available can be made use of quickly.”*
- 6.7 This approach and its impact on housing land prices would, if the Parish Council's views were adopted, continue to hold good for new housing on green field sites as the above quote indicates it has done up to now. Its impact on the availability of existing sites with existing use values, however, is largely untested.
- 6.8 The Parish Council considers that the existing Structure Plan Policies are the right ones to provide a framework within which landowners will be able to address the problem of derelict and unsightly sites and buildings and non-conforming uses. In so doing, they provide a small but valuable opportunity for new market housing that will help to sustain and add vibrancy to the community.
- 6.9 One possibility might be that the Core Strategy recognise that there are pockets within the National Park of unsightliness and dereliction, the need to address which overrides the general presumption in favour of affordable housing.

7. PROCEDURAL

- 7.1 The Parish Council would wish to be notified that:
- (i) the DPD has been submitted for independent examination under S20 of the Planning and Compulsory Purchase Act 2004;
 - (ii) the publication of the recommendations of any person appointed to carry out an independent examination of the DPD; and
 - (iii) the adoption of the DPD.