

# Housing Topic Paper

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**Supporting evidence for Development Management Policies.**

**(Part 2 of the Local Plan for the Peak District National Park)**

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## Introduction

- 1) This paper outlines the policy approach to housing provision in the National Park. It explains how the National Park Authority understands the housing needs of the area and how its policies provide a sustainable response to addressing those needs. It shows how the Authority has arrived at its indicative figures for housing delivery and the steps it has taken to agree contributions towards meeting the Objectively Assessed Needs (OAN) of its constituent authorities who are the housing authorities for the whole of their area. It considers the performance of its Core Strategy housing policies and the extent to which these are fit for purpose for the remainder of the plan period and therefore the logic of adopting development management policies to supplement the core strategy policies.

## National planning guidance

- 2) The NPPF requires Local Planning Authorities (LPAs) to deliver sustainable development. The PDNPA (the Authority) considers that in order to deliver sustainable development the NPPF has to be read as whole. It considers that the specific requirements of parts of the NPPF could only be considered to apply equally across all LPAs if there was no difference in terms of what the government expects LPAs to achieve inside and outside protected landscapes such as national parks. This is clearly not the case, because governments and acts of parliament have granted the planning powers to National Park Authorities to conserve and enhance national parks and promote opportunities for their enjoyment by the public<sup>1</sup>. This requirement does not apply outside of protected areas.
- 3) However, the PDNPA also recognises the national crisis in levels of housebuilding and the need to facilitate economic growth and National Park Authorities have a duty to foster the social and economic well-being of its resident communities. However the Environment Act is clear that this is a duty that is to be exercised **in pursuing the purposes**, as opposed to a duty to be exercised as an end in itself<sup>2</sup>. Furthermore, National Park Authorities are not housing authorities: a fact that underpins the NPA's understanding of its role with regard to housing delivery.
- 4) It is clear therefore from legislation that the purposes of land use planning in a national park have to differ from the purposes that apply for most other LPAs in order for the designation to be meaningful. The NPPF supports this assertion. It makes it clear in Paragraph 14 and footnote 9 that objectively assessed needs (OAN) should be met **unless specific policies in the Framework indicate development should be restricted**. Paragraph 115 makes it clear that great weight should be given to conserving landscape and scenic beauty in National Parks and that the conservation of cultural heritage is an important consideration and should be given great weight. The footnote 25 to this paragraph refers to the English National Parks and the Broads UK Government Vision and Circular 2010. This Circular remains planning guidance and outlines Government's expectations for housing provision in National Parks. It states that the National Parks are not suitable locations for unrestricted

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1 Section 61 Environment Act 1995: <http://www.legislation.gov.uk/ukpga/1995/25/section/61>

2 Section 62 Environment Act 1995: <http://www.legislation.gov.uk/ukpga/1995/25/section/62>

housing and that general housing targets are inappropriate. It goes on to state that new housing should be focussed on meeting affordable housing requirements and supporting local employment opportunities and key services.

- 5) The Authority considers that these different expectations can only be delivered if development is restricted to levels below that which would otherwise be acceptable were the area not a protected landscape. Clearly it is illogical to consider that paragraph 47 should be read in isolation of paragraph 14, footnote 9 and paragraph 115 and footnote 25 since these last two paragraphs are included specifically to cover the expectations for delivery in National Parks. They create the flexibility within the National Framework to enable NPAs to achieve their statutory purposes. The Authority considers that these are specific policies that mean it is not justified to require the Authority to meet OAN in the way envisaged by NPPF paragraph 47.
- 6) The most recent consultation into assessing housing need proposed a changed methodology for assessing objectively assessed need. The consultation document acknowledges that there will be areas of the country such as National Parks where it is not possible to reach an OAN figure and that a local figure should be produced instead. The approach taken at a Peak District National Park level to produce a local figure is outlined in the rest of this paper.

#### Understanding and meeting housing need

- 7) Derbyshire Dales District, High Peak Borough and Staffordshire Moorlands District Councils' population within the National Park make up about 90% of the National Park's population. By working with these LPAs to establish local figures the housing needs of about 90% of the Park population is addressed.
- 8) The PDNPA methodology for establishing local figures is outlined within the Core Strategy and its evidence base and is supported in the examination report. In the lead up to the Development Management Policies Document the PDNPA has engaged with all constituent councils on duty to co-operate matters, but particularly those for whom housing delivery to meet general demands is the most pressing and difficult challenge. (Derbyshire Dales, High Peak and Staffordshire Moorlands)<sup>3</sup>
- 9) For Derbyshire Dales the evidence points to a complex set of relationships between parts of Derbyshire Dales and surrounding areas, with the report concluding that the southern part of Derbyshire Dales District, including Ashbourne and Wirksworth, falls within a Derby-focused HMA and FEMA; whilst the northern part of the District (including Bakewell and Hathersage) falls within a Sheffield-focused HMA/ FEMA. The central part of the District, including Matlock, it suggests should reasonably be seen as falling within an area of overlap between Housing and Functional Economic Market Areas; with influences from Sheffield; Chesterfield; and Derby.
- 10) High Peak Borough was identified as being within 3 separate local HMAs – Hyde, Buxton, and Sheffield (North and South) - which includes wards in Stockport, Tameside, Cheshire

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<sup>3</sup> SD15 Duty to Co-operate Submission Version

East and Derbyshire Dales. The Buxton HMA includes a significant proportion of High Peak Borough, as well as parts of Cheshire East and Derbyshire Dales. High Peak forms part of the wider 'Manchester' strategic HMA, and also the 'Sheffield' strategic HMA to the east.

- 11) Staffordshire Moorlands: Staffordshire Moorlands has a clear relationship with Stoke on Trent, with the 2010 CLG analysis suggesting that the District is split between three separate Local HMAs (Leek, Stoke on Trent South and Stoke on Trent North), and at a more strategic scale, the wider HMA of Stoke on Trent.
- 12) The Authority therefore understands the jigsaw of housing market areas that make up the National Park<sup>4</sup>, and has taken steps to assist those constituent housing authorities in delivering OAN in a sustainable way over the plan period up to 2026 and beyond.
- 13) In terms of how housing is delivered in the National Park, all new build housing is delivered as an exception via exception sites, or by redevelopment of sites. Other new dwelling units come into being through conversions. All housing delivered inside the National Park can be counted towards the identified housing need and targets in the constituent councils' plans, though not all choose to include an allowance in explaining how they will meet OAN.
- 14) Derbyshire Dales, High Peak and Staffordshire Moorlands all have indicative figures for delivery from National Park parts of their areas. High Peak's figure was adopted in 2016. Derbyshire Dales figure was adopted in 2017, and Staffordshire Moorlands figure is part of their evidence work leading toward preferred options. None of the other constituent authorities choose to include a figure for delivery from the national park parts of their council areas for which they are the housing but not the planning authority.
- 15) The process of offering figures to constituent housing authorities is informed by trend of delivery over previous plan periods taking into account peaks and troughs; SHMA and SHELAA work by constituent councils that includes the National Park area<sup>5</sup>; and known potential opportunities for housing delivery that have been identified through carefully managed capacity work in settlements for which the National Park planning policies provide a presumption in favour of affordable housing on exception sites. This work has been undertaken for Bakewell (via neighbourhood plan) Bamford, Bradwell (via neighbourhood plan) Baslow, Beeley (through DDDC SHLAA refresh 2016), Castleton, Edale, Hartington, Hathersage, Hayfield, Monyash, Rowsley, Taddington, Tideswell, Youlgrave, The work gives a reasonable indication of capacity to delivery housing for the remainder of the plan period to 2026.

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<sup>4</sup> [http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local\\_Plan\\_Advisory/Exec\\_Summary\\_16.09.15.pdf](http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local_Plan_Advisory/Exec_Summary_16.09.15.pdf)

[https://www.highpeak.gov.uk/media/1064/High-Peak-SHMA/pdf/High\\_Peak\\_SHMA.pdf](https://www.highpeak.gov.uk/media/1064/High-Peak-SHMA/pdf/High_Peak_SHMA.pdf)

[https://www.staffsmoorlands.gov.uk/media/1657/SHMA-June-2014/pdf/SHMA\\_June\\_2014.pdf](https://www.staffsmoorlands.gov.uk/media/1657/SHMA-June-2014/pdf/SHMA_June_2014.pdf)

<sup>5</sup> Derbyshire Dales District Council Strategic Housing and Employment Land Availability Assessment August 2016  
[http://www.derbyshiredales.gov.uk/images/documents/L/Local%20Plan%20evidence%20base%20docs%20July%202016/SHELAA\\_Report\\_August\\_16.pdf](http://www.derbyshiredales.gov.uk/images/documents/L/Local%20Plan%20evidence%20base%20docs%20July%202016/SHELAA_Report_August_16.pdf)

- 16) This approach means that the identified housing need is understood across the National Park but is addressed in a sustainable way that reflects national park purposes in the National Park parts of the constituent council areas. The approach demonstrates a positive contribution to target driven planning delivery of housing, in line with OAN, but without creating target driven pressure to deliver levels of housing that would damage the valued character of the built environments and landscape of the National Park.
- 17) The Authority has responded positively to government requirements to leave no stone unturned in terms of identifying suitable land for housing. In late 2017 the Authority created a Brownfield Register to understand the potential of brownfield sites to address housing need. This yielded four sites covering an area of approximately 6ha. All of these four sites have already come forward for development and permission has been granted for around 100 homes most of which is market housing which addresses general housing needs. So, whilst the NPA has complied with the requirement to produce a Brownfield Land Register, the call for sites did not reveal additional capacity for housing over and above that already known by the Authority.
- 18) In late 2017 the Authority participated in a jointly commissioned Strategic Housing and Employment Land Availability Assessment (SHELAA) alongside High Peak and Staffordshire Moorlands District Council. Whilst this commission is primarily to inform review of the development strategy in the Core Strategy (policy DS1) it will provide a useful indication of potential for housing across the National Park for the remainder of the Core Strategy period and beyond. It also demonstrates that the Authority is positive about finding ways to help constituent councils meet the housing needs of the area.
- 19) The result of all this work is that High Peak Borough Council, Derbyshire Dales District Council and Staffordshire Moorlands District Council have all constructed plans to address all of their OAN, and have agreed an evidence based allowance that can reasonably be expected to be delivered from the National Park parts of those council areas<sup>6</sup>
- 20) The following sections provide more details for each of the three largest constituent authorities by population in the National Park.

#### Relationship with Derbyshire Dales District Council

- 21) The figure of 95 specified in Figure 209 of the Derbyshire Dales Housing & Economic Development Needs Assessment below is a 'policy off' figure, with paragraph 17.67 of that document advising Derbyshire Dales District Council to discuss and agree conclusions with the PDNPA. This advice was taken.

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<sup>6</sup> [http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local\\_Plan\\_Advisory/Exec\\_Summary\\_16.09.15.pdf](http://www.derbyshiredales.gov.uk/images/documents/C/Committee/Local_Plan_Advisory/Exec_Summary_16.09.15.pdf)

**Figure 209: Distribution of Housing Need between Plan Area and National Park**

	Homes per Annum	Within PDNP	Plan Area
Demographic Need	244	88	156
Supporting Employment Growth	57		57
Improving Affordability	21	8	13
<b>Total</b>	<b>322</b>	<b>95</b>	<b>227</b>

17.67 We would advise the Council to discuss and agree conclusions with the PDNPA, and to consider the likely supply (and by association any unmet need arising) in the National Park. The capacity to meet any unmet need will need to be tested through the plan-making process.

22) Derbyshire Dales District Council subsequently agreed an allowance of 358 from the National Park (based on a jointly agreed SHLAA). The allowance is shown in the table below and has been factored into their housing trajectory.

Source of housing supply	Deliverable Sites					Total
	2013-2016	0-5 Years 2016-2021	6.10 Years 2021-2026	11-15 Years 2026-2031	15 years + 2031-2033	
Completions at 1 <sup>st</sup> April 2016 (including National Park)	402					402
Commitments		1320	285	150	30	1785
Resolution to Grant		300	150	127		577
Local Plan Allocations		1265	886	721	316	3188
Peak District National Park Contribution		105	105	105	43	358
Windfall Allowance		75	75	75	36	261
<b>Total</b>	<b>402</b>	<b>3065</b>	<b>1501</b>	<b>1178</b>	<b>425</b>	<b>6571</b>

Table 5 - Derbyshire Dales Housing Supply 2016-2033

23) The following table shows that between 2006 and 2010 a total of 241 new dwelling units was created in the National Park, of which 203 new dwelling units were completed in the Derbyshire Dales part of the Park (50 per annum), of which 101 (25 per annum) were affordable. This shows that the figure of 358 (or 21 per annum), shown above for the period of 2016 – 2033 (Derbyshire Dales’ plan period) is realistic.

24) It would be wrong however to suggest that 50 completions per annum in the Derbyshire Dales area is a realistic average annual figure across a twenty year plan period or that the national park should contribute such an annual figure towards the targets set by constituent authorities. The reason is that delivery across the National Park reduced after 2010 and there was a marked drop off in the level of affordable homes secured in the years 2010 to 2014. 113 dwelling units were created (excluding holiday accommodation) compared with an estimate of between 198 and 213. So delivery fell short of plan expectations in that period.

25) The average figure anticipated for the years 2014 to 2026 is between 38 and 62 dwellings per annum with delivery of 40 dwellings per annum showing between 2014 and 2017. So there has been some pick up in the past few years and delivery is now at the lower end of the range expected.

26) There are reasons to believe delivery rates will continue to improve. A look at the schemes in the pipeline from 2017/18 indicate 93 dwelling units from multi-unit schemes alone, with many more single unit permissions likely to come through conversions. These figures exclude any holiday accommodation that may be delivered. It is not known when these schemes will be delivered, but it presents a healthier picture than the period 2010 – 2014.

figure.

<b>A) Housing Delivery in Whole Park and Districts<sup>[1]</sup></b>				
<b>Period<sup>[3]</sup></b>	<b>Completions<sup>[2]</sup></b>	<b>Estimated Delivery</b>		<b>TOTAL</b>
	<b>2006-10</b>	<b>2010-14</b>	<b>2014-26</b>	<b>2006-26</b>
<b>National Park</b>	<b>241</b>	<b>198 - 213</b>	<b>460 - 746</b>	<b>899 - 1200<sup>[4]</sup></b>
Affordable housing <sup>[5]</sup> <i>(cf. amount required to meet identified need)</i>	121 (109)	160 (130)	377 (389)	693 (658)
Open market housing <sup>[6]</sup>	113	40	334	497
Agricultural, forestry and other key rural worker housing <sup>[7]</sup>	7	13	35	60
<b>High Peak</b>	<b>20</b>	<b>33</b>	<b>73 - 78</b>	<b>126 - 131</b>
Affordable housing <i>(cf. amount required to meet identified need)</i>	11 (7)	24 (22)	47 (66)	88 (100)
Open market housing	9	6	20	37
Agricultural, forestry and other key rural worker housing	0	3	11	15
<b>Derbyshire Dales</b>	<b>203</b>	<b>127</b>	<b>358 - 508</b>	<b>688 - 838</b>
Affordable housing <i>(cf. amount required to meet identified need)</i>	101 (95)	97 (66)	210 (198)	427 (374)
Open market housing	97	26	292	421
Agricultural, forestry and other key rural worker housing	5	4	6	17
<b>Staffordshire Moorlands</b>	<b>8</b>	<b>24 - 36</b>	<b>16 - 109</b>	<b>48 - 153</b>
Affordable housing <i>(cf. amount required to meet identified need)</i>	4 (5)	30 (33)	93 (99)	135 (145)
Open market housing	5	4	11	21
Agricultural, forestry and other key rural worker housing	-1	2	5	7
<b>Other Districts</b>	<b>10</b>	<b>14 - 17</b>	<b>25 - 51</b>	<b>49 - 78</b>
Affordable housing <i>(cf. amount required to meet identified need)</i>	5 (2)	9 (9)	27 (26)	43 (39)
Open market housing	2	4	11	18
Agricultural, forestry and other key rural worker housing	3	4	13	21

### Relationship with High Peak Borough Council

27) Only 7% of High Peak's residents live in the National Park despite it being a large part of that Borough by area. The Council's assessment of housing needs is based on the Borough as a whole.



- 28) Their Plan as submitted<sup>7</sup> does not make sufficient provision to meet the Borough's full objectively assessed housing needs (OAN) as identified in the April 2014 Strategic Housing Market Assessment and Housing Needs Study: Final Report (SHMA) produced by Nathaniel Lichfield and Partners (NLP).
- 29) The Peak District National Park Authority entered into a signed Memorandum of Understanding whereby, based on past delivery rates, there would be an estimated contribution of 110 dwellings from permissions granted for the part of the Borough within the National Park.
- 30) The previous table show that 20 dwellings were delivered in the High Peak part of the National Park between 2006 and 2010 (5 per annum) which, projected over a plan period of 20 years, would add 100 dwellings to High Peak Borough's housing stock. The estimate, based on trend of past delivery and permissions in the system, is for between 126 and 131 which, given performance so far, is a realistic expectation. High Peak's plan expresses the National Park dwellings as a contribution and sets it in the context of their target. (See table below)

**Table 2 Net Housing Requirement**

Housing Target (2011 - 2031) 7,000 dwellings  
 Completions (2011 - 2014) - 445 dwellings  
 Commitments (as at December 2014) - 2,976 dwellings  
 Peak District National Park contribution (2011 - 2031) - 110 dwellings  
 Shortfall in housing provision since 2006 + 80 dwellings  
 Net housing requirement 3,549 dwellings

**Relationship with Staffordshire Moorlands District Council**

- 31) The Staffordshire Moorlands District Council updated their OAN evidence using Sub National Housing Population Projections produced in January 2016. This was a result of an Inspector's requirement that evidence should be updated following the adoption of the Core Strategy in 2015. Staffordshire Moorlands' Plan evidence suggested a range within which to deliver OAN and advocated that the upper end of the range would be deliverable in the event that the economy was able to sustain higher levels of housebuilding. It also suggested that the evidence of need for affordable housing was such that it might require significant uplift in the housing target overall in order to deliver the affordable housing needed.(cross subsidy) However it also recognised that supply side factors such as environmental constraints should also influence the eventual target set. This inevitably includes the environmental constraints imposed by virtue of the fact that part of the Staffordshire Moorlands District is National Park. In light of this, Staffordshire Moorlands District Council

<sup>7</sup> High Peak Local Plan adopted April 2016  
<http://www.highpeak.gov.uk/sites/default/files/documents/pages/High%20Peak%20Local%20Plan%20Adopted%20April%202016.pdf>

has worked with the Authority to agree an indicative figure of 100 new dwelling units to be delivered over their revised plan period of 2012 – 2031. This reflects past trend of delivery over the last 25 years, moderated by the slowdown in delivery in recent years.

- 32) The Authority's Core Strategy expectation was that between 60 and 160 houses would be added to the Staffordshire Moorlands and other constituent councils housing stock in the South West Peak spatial area between 2006 and 2026. Between 2006 and 2017 a total of 93 dwellings was delivered of which 16 were affordable houses, 9 were agricultural worker dwellings and 17 were ancillary accommodation. The core strategy indicated that between 18 and 78 affordable houses would be delivered between 2006 and 2026.
- 33) The delivery of affordable houses across the Park reflects the impetus given by the constituent councils, with Derbyshire Dales providing funding alongside the HCA (soon to be re-branded Homes England) to make it more attractive to housing associations to build houses in the area. This is essential where the small scale of the schemes and the 'per unit' costs may otherwise discourage investment. Similar funding is not forthcoming from High Peak Borough or Staffordshire Moorlands District Councils and the lower level of affordable house building in those areas of the National Park reflects that fact. Whilst the Derbyshire Dales has invested 'buy to let' money back into their area inside the Park, this reflects the largely rural nature of that District as a whole, and their greater understanding of the issues involved in providing affordable homes for communities. Other constituent councils such as High Peak have bigger urban populations than the Derbyshire Dales so their priority is largely the urban areas. Irrespective of the differences in geography however, at a political level all of these three councils have requested that the Authority policies permit cross subsidy to bring in extra money for affordable housing in the Park. This request was explored and rejected at Core Strategy examination and the logic for refusing their requests is explained in the Inspector's report.
- 34) The housing need of the National Park is therefore understood and is addressed both by the constituent councils as housing authorities, and by the National Park Authority as the planning authority for a protected area. High Peak Borough Council and Derbyshire Dales have up to date and adopted plans agreeing its approach with regards to assessing and addressing OAN. Staffordshire Moorlands is expecting to adopt its plan in 2018 and has agreed an indicative figure for delivery from the National Park.

#### Relationship with other constituent councils

- 35) The other constituent council housing authorities: Cheshire East, Sheffield, Barnsley, Kirklees, North East Derbyshire, collectively account for the remaining 10% of the Park population and there are no communities of any significant size, although Bradfield and Holme are listed in the Development Strategy DS1. Whilst the Authority has held duty to co-operate discussions with all these councils, no request has been made for the Authority to offer a figure towards meeting their objectively assessed need. Nevertheless, delivery figures show that there are modest additions to housing stock in every constituent authority area<sup>8</sup>.

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<sup>8</sup> PDNPA 2015/16 Annual Monitoring Report

Performance of the Core Strategy housing policies

36) The following tables show how the Peak District Core Strategy has performed in terms of housing delivery in the first 10 years of its anticipated 20 year life.

**Delivery of Housing in the Peak District National Park 2006 - 2016**

498 completions in the Derbyshire Dales area  
93 completions in the Staffordshire Moorlands area  
65 completions in the High Peak area  
31 completions in Cheshire East area  
6 completions in Kirklees area  
4 completions in Barnsley area  
2 completions in North East Derbyshire area  
1 completed in Sheffield area

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700 TOTAL

75% (525) by conversion or change of use,  
25% (175) by new build

**Ratio of market housing<sup>9</sup> to affordable housing across the National Park**

Whole Park	2.71 :1
White Peak and Derwent Valley	2.4 :1*
Dark Peak and Moorland fringes	10.5 :1
South West Peak	3.8 :1
Ratio of holiday lets to affordable housing added to stock since 2006	
National Park	1:07 :1**

\* 90% of the affordable housing is delivered in the White Peak and Derwent Valley.

\*\*50% of the holiday lets are delivered in the White Peak and Derwent Valley

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<sup>9</sup> including worker dwelling and ancillary dwellings but excluding dwelling with sole holiday occupancy use

<b>Figures for the three spatial areas of the Core Strategy 2006 – 2016</b>		
<b>Spatial area</b>	<b>Completions</b>	<b>Commentary</b>
White Peak and Derwent Valley	507 (402)	This figure is 50% of the figure at the top end of the range for the whole Core Strategy period (1015) and within 168 of the figure at the lower end of the range for the whole Plan period. (675)  The figure includes 105 holiday homes where the sole permitted use is holiday use*
Dark Peak and Moorland Fringes	72 (43)	This figure is 65% of the figure at the top end of the range for the whole Core Strategy plan period (110) and exceeds the figure at the lower end of the range (70)  The figure includes 29 holiday homes where the sole permitted use is holiday use
South West Peak	121 (57)	This figure is 75% of the figure at the upper end of the range for the whole Core Strategy plan period (160) and comfortably exceeds the figure at the lower end of the range (60)  The figure includes 64 holiday homes where the sole permitted use is holiday use

37) Whilst holiday home use is in Planning Use Class C, constituent authorities often choose to discount them because they do not offer permanent residential accommodation and therefore do not address OAN. If these figures are removed from the completions total for the spatial areas, the figure for the White Peak and Derwent Valley drops to 402. This represents 39% of the upper end figure for the core strategy plan period but 60% of the lower end figure. For the Dark Peak and Moorland fringes the figure drops to 43. This represents 39% of the upper figure for the core strategy period, but 61% of the lower figure. For the South West Peak the figure would drop to 57. This represents 36% of the upper figure for the core strategy period, but 95% of the lower figure.

38) A further 311 dwelling units are permitted but not started or are under construction. 111 of these have permission for sole holiday use leaving 200 permanent residential units in addition to the 502 to give a figure of 703 in total. Even discounting those with sole holiday use, this represents 89% of the figure at the lower end of the range for the whole National Park (805) for the core strategy period and 56% of the figure at the top of the range (1285).

39) Measured against the average annual indicative figures for the main housing authorities, completions in the Derbyshire Dales part of the White Peak and Derwent Valley spatial area, average 50 dwellings per annum (dpa) <sup>10</sup> against an indicative figure for the Derbyshire

Dales Plan of 21dpa. The figure reduces to 40 dpa if holiday lets are excluded but this is still comfortably above the 21 dpa allowed for in the Derbyshire Dales Local Plan.

40) In the Dark Peak and Moorland fringes, completions are running at 6.5 dpa which is above the indicative figure of 5 dpa agreed for the High Peak Local Plan. However the figure reduces to 3.6 dpa if holiday lets are subtracted.

41) In the South West Peak, delivery is running at 9.3 dpa, which is comfortably above the 5 dpa anticipated, and the figure accepted by Staffordshire Moorlands District Council for their Local Plan period 2012 to 2031. However the figure reduces to 2.9 dpa if holiday lets are excluded.

### **Conclusions on housing delivery under the Core Strategy**

- The Authority is on target to deliver its indicative figures for housing delivery as a whole.
- The spread of housing is in line with the figures indicated for each spatial area.
- The demand for holiday lets in the White Peak and Derwent Valley has not prevented housing that help address the community's housing needs.
- There is a need for more permanently occupied houses in the Dark Peak and Moorland Fringes and the South West Peak,
- In High Peak there are a number of larger fringe towns which generally cater for most of the Park communities' needs.
- In Staffordshire Moorlands parts of the National Park there are a number of very small communities whose needs are generally not catered for by larger towns and villages around the edges of the National Park and this area's popularity with visitors, and the demand for visitor accommodation means that development demand currently caters more for the visitor than the resident population<sup>10</sup>.

### **Recognising and responding to changes to the external environment for housing delivery**

42) From evidence produced by Derbyshire Dales District Council and accepted by the Authority, the Authority acknowledges in its Part 2 Development Management Policies Document an ongoing need for around 100 affordable houses per year across the National Park. Therefore, in spite of the strong performance against the anticipated delivery of the Core Strategy, the Authority is aware that problems of affordability persist. However in light of the NPPF and NPVC, a target of 100 affordable houses per year is considered to be an unsustainable level of development for this protected landscape.

43) Constituent authorities have agreed with this policy position and are factoring this into their 'policy on' housing targets. Local Plan making and constituent local authorities across the National Park are therefore directing development and growth away from a protected landscape. This accepts the greater need for economic growth in areas around the National Park, and a need for sustainable development that protects the National Park itself as a high

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<sup>10</sup> The Authority is already responding to this reality, having suggested in the Core Strategy that different solutions should be explored for the South West Peak where the DS1 settlement strategy leaves some communities under provided for. Policies continue to encourage ancillary accommodation and greater flexibility to operate holiday accommodation as permanent tenancies.

quality environment, recognising that a high quality environment represents an economic benefit to the area. The Authority itself demonstrated this in its Core Strategy evidence base<sup>11</sup>.

- 44) The Authority continuously monitors the external environment in which housing is delivered to consider whether other models of delivery would be more sustainable. The policy position on which the Part 2 document is built is considered to remain sound because in the light of evidence, alternative models of delivery would fail the test of delivering sustainable development in the context of national park purposes. For example most councils nationally in non-protected landscapes have proven to be unable to accommodate an uplift in overall housing numbers in order to fund (cross-subsidise) the level of affordable housing needed.
- 45) Aside from the issue of land supply, Government funding programmes administered through Homes England no longer make it straightforward for housing associations to plan ahead to build the affordable housing needed. The local specialist housing association (Peak District Rural Housing Association) still funds and develops small schemes of housing, but the uncertainty of core funding and the long lead in and delivery times for small rural schemes sites means delivery is neither quick nor guaranteed. The support of Derbyshire Dales District Council through money raised through 'right to buy' has proved essential. However, this isn't a sustainable source of funds for social housing long term and in any case, only Derbyshire Dales District Council provides such support. National Parks England has responded to such problems by requesting that housing authorities be allowed to spend Section 106 monies across their council area including to areas for which they are not the planning authority such as National Parks. This would enable an equalisation of investment in affordable housing across housing authority areas and overcome some of the problems of delivering affordable housing to high design standards and at a small scale in protected areas.
- 46) The private sector, whilst permitted to build social housing, has less interest in doing so unless a significant level of market housing is also permitted. Aside from using up scarce sites, market housing worsens overall affordability and there is no reasonable mechanism for ensuring market housing will be retained by the local community. Such housing may also end up as second or holiday homes. In terms of sensible land use and improving affordability of housing, market housing on green field sites makes little sense. This is substantiated through ongoing work with communities to understand capacity for development. In some of the largest villages in the National Park including Hathersage, Tideswell and Bakewell, and some of the smaller villages including Litton, Taddington and Youlgrave the work has shown that there are few sites that could be developed without harm to the built and natural environment. It is therefore more than simply speculation to say that the housing needs of the local community cannot be met in full. An earlier

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11 Contribution of the Peak District National Park to the Economy of the East Midlands SQW Consulting: Nov: 2008

[http://www.peakdistrict.gov.uk/\\_data/assets/pdf\\_file/0020/311735/contributiontotheeconomy2008.pdf](http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0020/311735/contributiontotheeconomy2008.pdf)

assessment of capacity was submitted as evidence to justify the Development Strategy policy DS1<sup>12</sup> and new work since then suggests this assessment is correct.<sup>13</sup>

47) Appeal decisions since the NPPF have generally supported the Authority's application of its own adopted housing policy and its interpretation of the NPPF in the context of protected landscape designation. Accordingly, Inspectors have generally agreed with the Authority's understanding of what is reasonable to expect of planning decisions in a National Park, in particular with regards to issue of housing numbers and types. This illustrates that government remains supportive of the general constraint on housing delivery exercised by National Park Authorities.

### **Conclusion**

48) The Authority understands its responsibility with regard to understanding the housing needs of its communities. The main constituent housing authorities have agreed indicative figures for delivery from the National Park area to help them to meet their targets. The other constituent authorities have not requested that any of their housing need be met in the National Park part of their housing market areas.

49) The affordable housing needs of National Park communities are being met in so far as is considered sustainable given capacity for development and the availability of funding for social housing. Delivery figures are considerably lower than the need for affordable housing however this situation is common across the constituent councils outside the National Park, none of whom are meeting affordable housing need in spite of using cross subsidy to finance affordable housing. (owing to viability of schemes downgrading the percentage of schemes that are affordable)

50) The Authority has confidence that its policies will deliver the indicative figures shown in the Core Strategy but is committed, through a review of its National Park Management Plan, to revisit its objectives for communities more generally, including clarifying what a vibrant, thriving community means; how that might drive demand for development of housing on the ground; and how that can be achieved whilst ensuring landscape protection. The Authority will then consider whether any more can reasonably be done through the planning system to improve the vibrancy of communities through delivery of housing across the National Park. The Authority will review its Core Strategy housing policies to accord with the NPMP and consider solutions to ease the tasks of planning authorities delivering housing to meet OAN.

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<sup>12</sup> The Core Strategy Appendix 3: Amended Settlement Matrix final column indicated, for each DS1 settlement, the potential to develop without harm to the valued characteristics of settlement and its landscape setting. Settlement summaries and recommendation for development strategy: This paper provides a snapshot of the settlements named in the development strategy (DS1) It pulls together the evidence and opinion and uses this to outline development expectations for each settlement [http://www.peakdistrict.gov.uk/\\_data/assets/pdf\\_file/0006/90159/settlement-summaries-and-recommendation.pdf](http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0006/90159/settlement-summaries-and-recommendation.pdf)

<sup>13</sup> Work to understand capacity for housing has been completed for many of the larger settlements including Ashford in the Water, Bakewell, Bamford, Bradwell, Castleton, Chelmorton, Edale, Grindleford, Hathersage, Hayfield, Litton, Monyash, Rowsley, Taddington, Tideswell, Youlgrave,