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Briefing Note

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To	Adele Metcalfe
	Peak District National Park Authority
From	Colin Robinson

Subject **Peak District National Park Authority: new standard methodology for calculating housing need**

1.0 Introduction

1.1 In April 2023 Lichfields produced a *Population Projection Update and Housing Needs Assessment* [HNA] on behalf of the Peak District National Park Authority [PDNPA]. The study provided the housing evidence base to support policy development as the PDNPA reviews its Local Plan. There is a requirement on the PDNPA to assess its housing need and to plan for appropriate levels of development in line with national park purposes, the guidance and the PDNPA's duty to foster the economic and social well-being of its local communities.

1.2 The HNA was intended to assist the PDNPA in understanding the housing picture of the Peak District National Park [the Peak District] and the implications of population growth on housing requirements. A key element of the work involved determining overall housing need using a range of scenarios to understand local housing needs with a focus on meeting local affordable housing requirements.

1.3 Unlike other local planning authorities [LPAs], National Parks are acknowledged as being significantly constrained, and are not set their own housing requirement. They are tasked with focusing on meeting needs for affordable housing within the National Park, and working with their constituent authorities to meet needs outside their boundaries. The PDNPA is thereby required to understand its housing needs and to focus on meeting local affordable housing requirements.

1.4 Since the HNA was produced, the planning policy landscape has changed significantly at a national level, with the new Labour Government publishing its updated National Planning Policy Framework [NPPF] in December 2024.

1.5 A central tenant of the new NPPF is a comprehensive revision to the standard method [SM3] for calculating local housing need. The new method is much more ambitious than its predecessor, targeting 370,408 homes per year. This is up 21% from 305,223 dwellings previously.

1.6 The previous standard methodology approach [SM2] was modelled in the 2023 HNA for the PDNPA. This came to a figure of 100 dwellings per annum [dpa], split 20 dpa in the

Dark Peak sub-area of the PDNP; 71 dpa in the White Peak; and the remaining 9 dpa in the South West Peak.

1.7   This briefing note summarises the findings of the new SM3 housing need calculation when applied to the PDNPA area, and how it relates to the Local Housing Need [LHN] range previously identified in the 2023 HNA. It does not revisit the remainder of the HNA analysis, such as the affordable housing needs assessment or the needs of other household types.

2.0   The New December 2024 NPPF and PPG Updates

2.1   The new December 2024 National Planning Policy Framework [NPPF] states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner [§7].

2.2   The NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need [LHN] assessment, conducted using SM3 set out in national planning practice guidance [PPG] [§62]. It goes on to state that the housing requirement may be higher than the identified housing need if it reflects growth ambitions linked to economic development or infrastructure investment [§69].

2.3   The NPPF provides a renewed emphasis on strategic planning and a clear recognition that this crosses LPA boundaries, implying that joined up working between authorities is imperative.

2.4   Paragraph 24 states that effective strategic planning across LPA boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience. LPAs and county councils (in two-tier areas) continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

2.5   Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans [§25]. Notably, strategic plans and policies should provide for development needs that cannot be met within neighbouring areas and should demonstrate this through statements of common ground [SoCG]. Paragraph 27 requires policies to be consistent with bodies where a strategic relationship exists "*unless there is a clear justification to the contrary*". Item b) to paragraph 27 requires plans to ensure that "*unmet development needs from neighbouring areas are accommodated in accordance with paragraph 11b*".

2.6   In this context, the NPPF states that to ensure local plans deliver a sufficient supply of homes, strategic policy-making authorities should establish a housing requirement for their whole area.

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2.7 The NPPF confirms that:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." [NPPF, paragraph 62].

2.8 The new SM3 aims to boost housing numbers by pinning targets to existing housing stock, rather than household projections as per the former method, and then uplifting needs - and the target - based on affordability (using a five-year average). It no longer includes a 35% uplift for urban areas and also removes the 'cap'.

2.9 The mechanics of the new SM3 are set out in the updated *Housing and Economic Need* PPG chapter, which was updated on 12th December 2024. The SM3 identifies a minimum annual housing need figure in order to ensure that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. The PPG is clear that this does not produce a 'housing requirement' figure, which is the minimum number of homes that a plan seeks to provide during the plan period. Once local housing need has been assessed, this should be justified by authorities' evidence on land availability, constraints on development and any other relevant matters[1].

2.10 The PPG also confirms that National Parks may continue to use a locally determined method for identifying housing need, taking into consideration:

"…the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability."

2.11 Paragraph 189 of the NPPF sets out the great weight to be given to conserving and enhancing landscape and scenic beauty in National Parks. The NPPF references the '*English National Parks and the Broads: UK Government Vision and Circular 2010*' for further guidance.

2.12 The revised SM3 calculates a minimum annual local housing need figure as follows[2]:

1 ***Step 1 - Setting the baseline – 0.8% of existing housing stock for the area***

Set the baseline using the value of existing housing stock for the area of the local authority (Dwelling stock (including vacants), Table 125: dwelling stock estimates by local authority district). The baseline is 0.8% of the existing housing stock for the area, and the most recent data published at the time should be used.

2 ***Step 2 - An adjustment to take account of affordability***

The housing stock baseline figure (as calculated in step 1) is then adjusted based on the affordability of the area.

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[1] PPG Paragraph: 040 Reference ID:2a-040-20241212

[2] PPG Paragraph: 004 Reference ID:2a-004-20241212

The affordability data used is the median workplace-based affordability ratios, published by ONS at a local authority level. The mean average affordability over the five most recent years for which data is available should be used.

No adjustment is applied where the ratio is 5 or below. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. An authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline.

2.13   The new SM3 results in the following housing need figures for the nine districts that contain some of the PDNPA within their boundaries:

Table 2.1 SM3 Housing Need Calculations for PDNPA consituent authorities

Associated Planning Authority	0.8% Stock	5yr Average AR	SM3	SM2	Change
Barnsley Metropolitan Borough Council	919	5.1	**944**	831	**113 (+14%)**
Cheshire East Borough Council	1,510	8.3	**2,461**	977	**1,484 (+152%)**
Derbyshire Dales District Council	288	10.3	**580**	216	**364 (+169%)**
High Peak Borough Council	352	8.0	**553**	243	**310 (+128%)**
Kirklees Council	1,518	6.1	**1,840**	1,595	**245 (+15%)**
North East Derbyshire District Council	389	7.7	**591**	224	**367 (+164%)**
Oldham Council	790	5.8	**910**	690	**220 (+32%)**
Sheffield City Council	1,993	6.1	**2,390**	3,036	**-646 (-21%)**
Staffordshire Moorlands District Council	362	6.3	**454**	159	**295 (+186%)**

Source: MHCLG December 2024 / Lichfields analysis

2.14   In total, the nine districts would see an increase of 2,752 dpa over and above SM2, an increase of 34.5%. The three districts that encompass the bulk of the PDNP would see their LHN figures increase to 580 dpa in Derbyshire Dales District; to 553 dpa in High Peak Borough; and to 454 dpa in Staffordshire Moorlands District.

2.15   No specific figure is provided for National Parks in isolation. However, the revised PPG provides advice on how National Park authorities could go about calculating one:

"Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small, an alternative approach may have to be used.

*Such authorities may continue to identify a housing need figure using a method determined locally. In doing so **authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability**. In the absence of other robust affordability data, authorities should*

consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s).

For local authorities whose boundaries cross National Parks or Broads Authority areas, the proportion of the local authority area that falls within and outside the National Park or Broads Authority area should also be considered – for example where only a minimal proportion of the existing housing stock of a local authority falls within the National Park or Broads Authority area it may be appropriate to continue to use the local housing need figure derived by the standard method for the local authority area."[3] (Lichfields' emphasis)

2.16   It is clear therefore, that National Parks may continue to identify a housing need figure using a method determined locally; however, any alternative approach that is used to understand housing need will be tested at examination and the evidence must be 'robust'. As with the SM3 more generally, the PPG suggests that this should make use of existing stock data with an adjustment for affordability.

2.17   This Note therefore revisits the starting point for calculating housing need in Section 7.0 of the 2023 HNA and updates this based on the PPG's recommended SM3 based approach rather than SM2.

3.0   The Stock-Based Starting Point

3.1   As Table 125[4] referred to in the PPG on dwelling stock does not provide a figure for National Parks such as the Peak District, Lichfields obtained a full breakdown of the total number of dwellings for each output area (inside and outside the PDNP), from the Office for National Statistics [ONS] for the most recent data available, which relates to the 2021 Census. The data indicates that as of 2021, there are currently 18,424 dwellings (both occupied and unoccupied) in the National Park, with two thirds located in Derbyshire Dales as set out in Table 3.1 overleaf.

3.2   As SM3 uses the MHCLG's LT100 data for 2023 as its baseline, we have increased the 2021 figure slightly to reflect the actual number of completions seen in the PDNP for each of the constituent districts between 2021 and 2023. This has the effect of increasing the total number of dwellings in the PDNP by 77 dwellings, to 18,501 in 2023. The vast majority of these new dwellings (68 of the 77 completions) have been constructed in the Derbyshire Dales area of the PDNP:

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[3] PPG Paragraph: 014 Reference ID: 2a-014-20241212
[4] MHCLG (2025): Live tables on dwelling stock (including vacants): LT125 Dwelling Stock Estimates by local authority district

Table 3.1 Dwellings located within the Peak District National Park Authority's Adminsitrative Boundaries

Associated Planning Authority	Inside PDNP (Census 2021)	Inside PDNP (adjusted to 2023)	0.8%
North East Derbyshire District Council	40	40	0.3
Barnsley Metropolitan Borough Council	50	50	0.4
Kirklees Council	109	109	0.9
Oldham Council	41	41	0.3
High Peak Borough Council	3,032	3,034	24.3
Sheffield City Council	418	418	3.3
Dark Peak and Moorlands Fringes	**3,690**	**3,692**	**29.5**
Derbyshire Dales District Council	12,226	12,294	98.4
White Peak and Derwent Valley	**12,226**	**12,294**	**98.4**
Cheshire East Borough Council	635	636	5.1
Staffordshire Moorlands District Council	1,873	1,879	15.0
South West Peak	**2,508**	**2,515**	**20.1**
Peak District TOTAL	**18,424**	**18,501**	**148.0**

Source: ONS (2025) / LT100 / Lichfields Analysis / PDNPA. Note: due to rounding errors, sums may not add.

3.3   Step 1 of the new SM3 - setting the baseline – requires us to calculate 0.8% of existing housing stock for the area, using the most recent data published at the time of the assessment. As can be seen in Table 3.1, 0.8% of 18,501 dwellings equates to **148.0 dwellings** annually, of which 98.4 would be located in the White Peak and Derwent Valley sub area; 29.5 dpa in the Dark Peak and Moorlands Fringe; and the remaining 20.1 dpa in the South West Peak.

4.0   Calculating the Median Workplace-Based Affordability Ratio

4.1   A more challenging analysis involves calculating the median workplace-based affordability ratio for the area. The affordability data used by MHCLG is the median workplace-based affordability ratios, published by ONS at a local authority level. The mean average affordability over the five most recent years (i.e. 2019-2023) should be used.

4.2   As with the dwelling stock, the house price to workplace-based earnings ratio data is not available for National Parks; nor is it available at a sub-district level. The median house price element of this can be unpacked from the source data however, which relates to 'price paid' dataset available from HM Land Registry[5].

4.3   Lichfields analysed all transactions that took place in the 9 PDNP districts year-on-year, ending on 30th September (as per the MHCLG calculations). As can be seen in Table 4.1, the median house price averaged £364,945 in the five years to 2023, with the level highest in the South West Peak at £404,335, followed by two very similar figures in the White Peak (£354,844) and the Dark Peak (£354,650). The Table also demonstrates the extent to which houses attract a significant price premium in the PDNP, with median prices almost

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[5] https://landregistry.data.gov.uk/app/ppd/?relative_url_root=%2Fapp%2Fppd

double the typical prices seen elsewhere in Staffordshire Moorlands District in particular.

Table 4.1 Median House Prices within the National Park Authority's Adminsitrative Boundaries, 2019-2023

Associated Planning Authority	5yr average Median House Price (2019-2023)		
	Inside the PDNP	District-wide	% Increase in the PDNP
North East Derbyshire District Council	n/a*	£214,299	-
Barnsley Metropolitan Borough Council	n/a*	£146,960	-
Kirklees Council	n/a*	£172,181	-
Oldham Council	n/a*	£161,300	-
High Peak Borough Council	£347,000	£219,899	+58%
Sheffield City Council	n/a*	£181,390	-
Dark Peak and Moorlands Fringes	**£354,650**	**-**	
Derbyshire Dales District Council	£354,844	£296,940	+19.5%
White Peak and Derwent Valley	**£354,844**	**-**	
Cheshire East Borough Council	£504,200	£259,000	+94.7%
Staffordshire Moorlands District Council	£382,058	£192,000	+99.0%
South West Peak	**£404,335**	**-**	**-**
Peak District TOTAL	**£364,945**	**-**	**-**

Source: ONS (2025) *Insufficient transactions to draw a robust figure

4.4   Figure 4.1 demonstrates that there has been a gradual increase in median house prices over the past 5 years in the National Park, with the Dark Peak and White Peak sub-areas tracking one another quite closely, with the South West Peak seeing consistently higher house prices. As of 2022/23, the median house price of a property in the PDNP as a whole was £424,000.

Figure 4.1 Median Price Paid for Housing in the Peak District National Park, 2018/19 – 2022/23
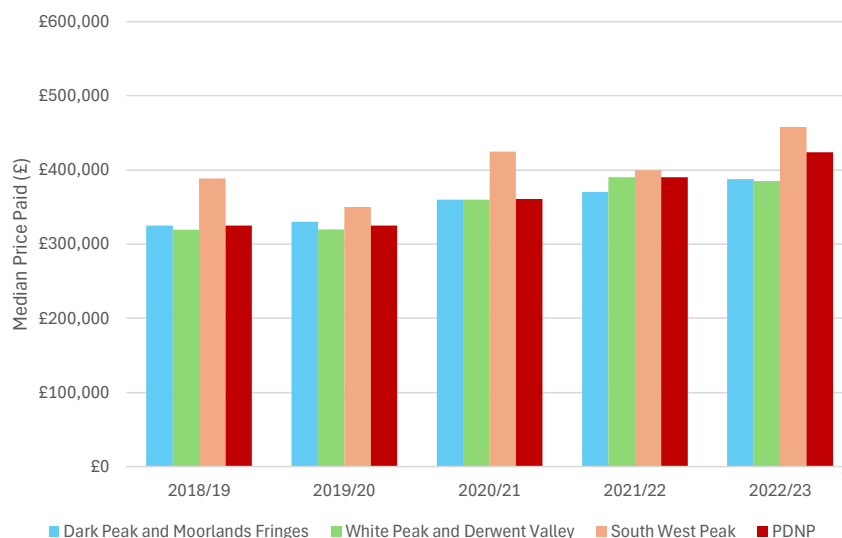
Source: HM Land Registry Price Paid Data / Lichfields' analysis

4.5 As noted above, the data source used by MHCLG to calculate wages is the Annual Survey of Hours and Earnings [ASHE]. This is an important annual survey from ONS that provides a detailed picture of employees' wages, obtained from employers, sampling around 1% of all National Insurance numbers being paid through HMRC's Pay As You Earn [PAYE] system. However, estimates are only available for local authorities, parliamentary constituencies, regions and countries. ASHE estimates are not available below local authority or constituency level i.e. there is no ward or super output area data[6]. ASHE data is also not produced for National Parks.

4.6 This means that it is difficult to precisely replicate MHCLG's SM3 approach to calculate median gross annual workplace-based earnings for the Peak District National Park. One approach would be to take the earnings data for the local authority that accommodates the most dwellings for each sub-area and use that to calculate the Affordability Ratio.

4.7 As can be seen in Table 4.2, using High Peak as a proxy for the Dark Peak Sub-area; Derbyshire Dales for the White Peak sub-area, and Staffordshire Moorlands for the South West Peak, would involve the use of 5yr average median workplace-based earnings data of £27,398, £28,686 and £30,266 respectively.

Table 4.2 Median House Prices within the National Park Authority's Administrative Boundaries, 2019-2023

Associated Planning Authority	Median gross annual workplace-based earnings					
	2018/19	2019/20	2020/21	2021/22	2022/23	5yr average
North East Derbyshire District Council	£25,811	£26,676	£26,829	£29,773	£29,249	**£27,668**
Barnsley Metropolitan Borough Council	£27,734	£26,686	£28,621	£27,798	£32,232	**£28,614**
Kirklees Council	£26,526	£27,471	£26,620	£30,115	£30,112	**£28,169**
Oldham Council	£25,168	£27,626	£27,556	£28,442	£29,844	**£27,727**
High Peak Borough Council	**£25,609**	**£26,750**	**£26,473**	**£28,898**	**£29,261**	**£27,398**
Sheffield City Council	£28,312	£29,141	£29,607	£30,000	£32,603	**£29,933**
Derbyshire Dales District Council	**£27,749**	**£25,940**	**£27,761**	**£31,457**	**£30,523**	**£28,686**
Cheshire East Borough Council	£29,607	£30,240	£30,121	£31,527	£34,350	**£31,169**
Staffordshire Moorlands District Council	**£29,211**	**£28,071**	**£30,202**	**£30,560**	**£33,288**	**£30,266**

Source: ONS ASHE (2024): Table 5b - Median gross annual workplace-based earnings by LPA, England and Wales, 1997 to 2023

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[6] Annual Survey of Hours and Earnings - Nomis - Official Census and Labour Market Statistics

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4.8   Alternatively, the PDNPA could apply the fallback recommended in the PPG[7], which states that:

"In the absence of other robust affordability data, authorities should consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s)."

4.9   This would discard the earlier analysis on median house prices and rely on MHCLG's existing Affordability Ratios[8] for High Peak / Dark Peak (8.01), Derbyshire Dales / White Peak (10.34) and Staffordshire Moorlands / South West Peak (6.34).

4.10   The two approaches are summarised in Table 4.3 overleaf.

Table 4.3 5yr Average Median Workplace Based Affordability Ratios in the PDNP

Proxy LPA / Sub-Area	Method #1			Method #2
	5yr Average House Prices	5yr Average Earnings	**Affordability Ratio**	**Affordability Ratio**
High Peak / Dark Peak and Moorlands Fringes	£354,650	£27,398	**12.94**	**8.01**
Derbyshire Dales / White Peak and Derwent Valley	£354,844	£28,686	**12.37**	**10.34**
Staffordshire Moorlands / South West Peak	£404,335	£30,266	**13.36**	**6.34**

Sources: HM Land Registry Price Paid Data / Lichfields' analysis

ONS ASHE (2024): Table 5b - Median gross annual workplace-based earnings by LPA, England and Wales, 1997 to 2023

ONS ASHE (2024): Table 5c - Ratio of median house price to median gross annual workplace-based earnings by LPA

4.11   The Table demonstrates the extent to which the application of the higher median house prices within the PDNP to the ASHE wage data would result in an affordability ratio that is significantly higher than the equivalent district-wide rate. In the case of Staffordshire Moorlands, the median workplace-based AR could more than double, from 6.34 for the Peak District as a whole, to 13.36 for the South West Peak sub-area.

5.0   The SM3 Calculation for the PDNP

5.1   The final stage is to calculate the prescribed affordability uplift to the 0.8% stock baseline figure. According to the PPG[9], no adjustment is applied where the ratio is 5 or below. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. Therefore, an authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline:

Adjustment Factor = ((five year average affordability ratio-5)/5)×0.95 + 1

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[7] PPG: 014 Reference ID: 2a-014-20241212

[8] ONS (2024) House price to workplace-based earnings ratio: Table 5c - Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2023

[9] PPG: 004 Reference ID: 2a-004-20241212

5.2   The scale of uplift under the two approaches in summarised in Table 5.1:

Table 5.1 5yr Average Median Workplace Based Affordability Ratios in the PDNP

Proxy LPA / Sub-Area	Method #1		Method #2	
	Affordability Ratio	**AR Uplift**	Affordability Ratio	**AR Uplift**
High Peak / Dark Peak and Moorlands Fringes	12.94	**251%**	8.01	**157%**
Derbyshire Dales / White Peak and Derwent Valley	12.37	**240%**	10.34	**202%**
Staffordshire Moorlands / South West Peak	13.36	**259%**	6.34	**126%**

Sources: Lichfields' analysis

5.3   Applying the uplifts for each sub-area using the two methods summarised above, to 0.8% of the existing dwelling stock, results in a range of between 46 dpa and 74 dpa for the Dark Peak and Moorlands Fringe Sub-Area; between 198 dpa and 236 dpa for the White Peak and Derwent Valley Sub-Area; and between 25 dpa and 52 dpa for the South West Peak Sub-Area.

5.4   **For the PDNPA as a whole, this results in an LHN using the revised standard methodology of between 270 dpa and 362 dpa.**

Table 5.2 LHN for the PDNPA's Sub-Areas using the Standard Methodology Approach

Proxy LPA / Sub-Area	Method #1			Method #2		
	0.8% Stock	AR Uplift	**LHN**	0.8% Stock	AR Uplift	**LHN**
High Peak / Dark Peak and Moorlands Fringes	29.5	251%	74	29.5	157%	46
Derbyshire Dales / White Peak and Derwent Valley	98.4	240%	236	98.4	202%	198
Staffordshire Moorlands / South West Peak	20.1	259%	52	20.1	126%	25
PDNPA	**148.0**	**-**	**362**	**148.0**	**-**	**270**

Sources: Lichfields' analysis. Note rounding errors mean sums may not add.

6.0   Relationship with the LHN Range identified in the 2023 HNA

6.1   The 2023 Peak District HNA calculated an LHN for each of the three PDNP sub-areas using the previous (demographically driven) standard methodology [SM2]. This essentially calculated each sub-area's 'fair share' of the relevant district's LHN, based on the proportion of residents living within the National Park's boundaries.

6.2   As set out in Section 7.0 of the HNA, this resulted in an overall LHN of 100 dpa for the National Park as a whole, of which the majority would need to be located in the White Peak (71 dpa), followed by the Dark Peak (20 dpa) and then the South West Peak (9 dpa) sub areas.

6.3   Depending on which SM3 methodology is followed, the new LHN for the PDNPA could increase by between 170% and 262%. The distribution of the LHN across the three sub-areas broadly mirrors the concentration reported in the 2023 HNA, with the White Peak and Derwent Valley sub-area likely to need the majority of housing. This reflects the fact that the majority of the PDNP's towns and villages are located in Derbyshire Dales District Council's administrative area.

Figure 6.1 Comparison of the PDNP Sub-Area's LHN over time
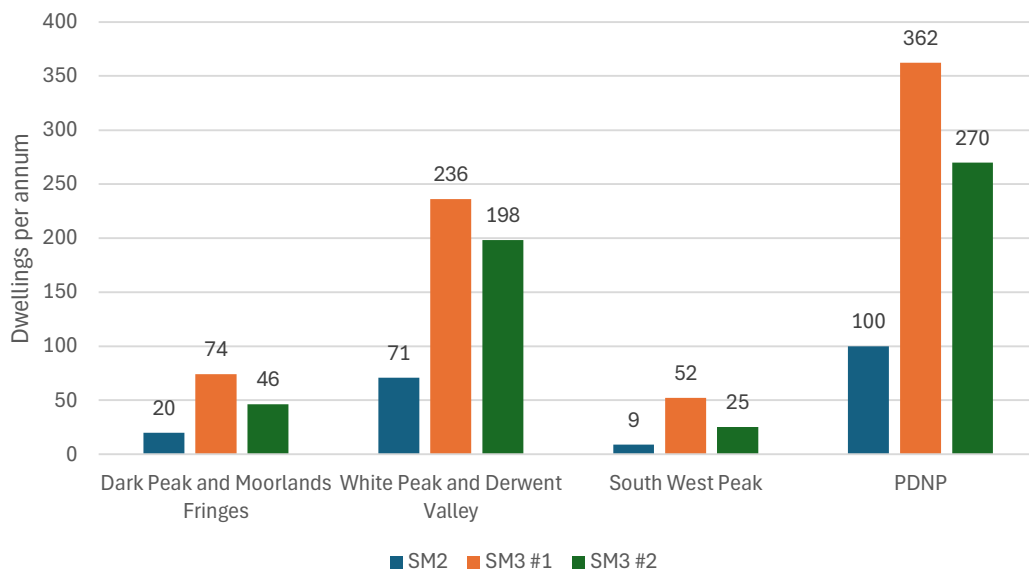
Source: Lichfields' analysis

6.4   The scale of the uplift is significant but unsurprising, given that this reflects the very substantial SM3 LHN uplift in each of the three authorities. They have collectively seen an increase from 618 dpa to 1,587 dpa - an increase of +157% (a rate of increase which, if applied to the 100 dpa figure, would generate an LHN of 257 dpa which is similar to the 270 dpa LHN generated under SM3#2).

6.5   Replacing the SM2 100 dpa figure with the latest SM3 approach(es), and comparing the resultant PDNPA housing need figures with the other modelling outputs in the 2023 HNA, results in the following:

Table 6.1 Summary of the Modelling outputs for the PDNPA

2021-2045	Dwellings over the 24-yr Plan period	Dwellings per annum
A1: SM3 #1	**8,688**	**362**
A2: SM3 #2	**6,480**	**270**
B: 2014-based SNPP	40	2
C: 2018-based SNPP	491	20
D: Balanced Flows	-3,474	-145
E: 15-year history	-2,490	-104
F: 6-year history	-2,606	-109
G: Zero Population Growth	382	16
H: Zero Dwellings	0	0
I: 48 dpa	1,152	48
J: 95 dpa	2,280	95
K: 150 dpa	3,600	150
L: Past Housing Delivery	1,762	73

Source: Lichfields Peak District HNA (2023) / Lichfields' analysis

6.6   National Parks are not set specific housing requirements and are not expected to meet all needs for housing. Nevertheless, the PDNPA is required to understand its housing needs and to focus on meeting local affordable housing requirements. In this regard, the new SM3 housing modelling would generate a level of housing need considerably greater than any of the other scenarios modelled in the 2023 HNA. It is an unconstrained assessment of the number of homes needed in the area and is not a housing requirement figure.

6.7   It is for the PDNPA to consider the evidence contained in this briefing note when identifying a local housing requirement figure which would support the strategy underpinning its emerging Local Plan, having considered whether an adjustment to meet affordable housing needs is appropriate. As set out in the PPG[10], this should be justified by evidence on land availability, constraints on development and any other relevant matters.

6.8   As for the other 9 LPAs whose boundaries cross the PDNPA area, the PPG[11] states that the proportion of the local authority area that falls within and outside the National Park area should be considered. For example, where only a minimal proportion of the existing housing stock of a local authority falls within the PDNP area (such as North East Derbyshire, Barnsley, Kirklees, Oldham, Sheffield and to a lesser extent, Cheshire East) it may be appropriate to continue to use the LHN figure derived by SM3 for that local authority area.

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[10] PPG: 040 Reference ID: 2a-040-20241212
[11] PPG: 014 Reference ID: 2a-014-20241212