

Local Plan Review Topic Paper

Housing



April 2021

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Introduction

This topic paper has been prepared to inform the review of the Peak District National Park Local Plan. Its focus is *housing*.

Its purpose is to:

- assess the performance of existing policy
- examine the latest research, guidance and evidence that will impact on new policy
- highlight gaps in knowledge and generate areas of further research

Other topic papers in this series cover:

- Climate Change and Sustainable Buildings
- Economy
- Health and Well-being
- Heritage and Built Conservation
- Landscape, biodiversity and nature recovery
- Minerals (pending)
- Recreation and Tourism
- Shops and Community Facilities
- Spatial Strategy
- Sustainable Transport and Infrastructure
- Utilities

Summary

The National Park Authority has a duty to foster the social and economic well-being of residents. In this context, the issue of housing, and what is and isn't appropriate in the National Park, is one of the most contentious policy areas.

Under current Core Strategy policy HC1 and Development Management Policies policy DMH1, we permit new houses in the National Park for very specific reasons related to local need. We permit open-market dwellings where it is a good way to enhance a brownfield site or conserve a valued building. We permit ancillary and essential worker dwellings.

Annual Monitoring Reports suggest the policy approach is enabling housing delivery in line with the plan's indicative figures for the 2006 – 2026 plan period. However these are mostly open-market dwellings achieved by conversion, and often unaffordable to local people. The level of unmet housing need is reducing in some villages, but remains stubbornly high in others.

The strategic assessment of potential housing land, plus outstanding planning permissions (the SHELAA) reveal enough potential for a similar level of delivery over the next 20-year plan period. But it also shows that the sites are not in the villages with the greatest housing need. We work positively and proactively with local communities and partner organisations to assess development opportunities and constraints at a village scale (known as 'capacity assessments') and this confirms the SHELAA's strategic conclusions - in some larger villages with the most need, development potential is limited.

Communities have mixed views. Some, such as Bradwell, Tideswell, and Bakewell have welcomed affordable housing schemes in recent years. Other smaller communities have been more nervous of their impact. The Parish Statements have picked this up, and are a useful snapshot of current community opinion on the value of more housing.

The Parishes Forum is supportive of our affordable housing policy but considers that communities need a wider mix of new housing, including some starter homes for sale, and also houses to meet other needs, such as elderly people wanting to downsize.

The delivery of affordable housing at the level seen in this plan period is entirely due to Derbyshire Dales District Council part funding schemes when other grants have reduced. This situation is not sustainable in the medium to long term but there is currently no sustainable alternative.

The strategic evidence of housing need for the National Park as a whole needs refreshing. The strategic housing land assessment work will also need updating. These are statutory requirements.

Part 1: Context

1.1 National Park context

1.1.1 The National Park Authority (NPA) has a duty to foster the social and economic well-being of its 38,000 residents while it furthers the two purposes of National Park designation. The first of these purposes is the conservation of wildlife, cultural heritage, and natural beauty. The second is to enable people to understand and enjoy the National Park. We try to foster social and economic well-being wherever it is proposed but if there is any conflict we must meet our conservation purpose first.

1.1.2 In terms of the first purpose, the need to conserve cultural heritage means conserving beautiful villages and making sure that any new housing enhances rather than harms the look of the village. This creates challenges because whilst some local people might welcome more housing for their families to move into, unless it is achieved sensitively this can easily harm the character of these villages, many of which have Conservation Areas covering some or all of the built-up area. It can also harm the landscape around it¹.

1.1.3 In terms of the second purpose, the National Park landscape naturally offers many opportunities to experience beauty and adventure, and many visitors use the villages as a base from which to explore. Whilst a significant number of these people are day visitors², some people prefer to stay longer. This has created demand for holiday cottages and second homes. This means a proportion of housing stock is not available for local people to live in³ and can create resentment in some communities.

1.1.4 In terms of fostering social and economic well-being in this context, the issue of housing, and what is and isn't appropriate in the National Park, is therefore one of the most contentious policy areas. The National Park, like most rural areas, has an ageing population⁴ and at the current levels of housing delivery, the population overall will continue to slightly decline. The many and varied needs of different age groups and the impact of population decline on the wider social and economic well-being of communities inevitably begs questions about what the most appropriate solutions are.

1.1.5 The challenges have led to positive solutions. For example the Peak District Rural Housing Association was set up over 25 years ago to work with communities to deliver small scale housing schemes to meet local need. We retain a place on the board of that Housing Association and we work very closely with them to make sure our policies are workable.

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¹ <https://www.peakdistrict.gov.uk/looking-after/living-and-working/your-community/conservation-areas>

² Page 4 Derbyshire Dales District Council Visitor Economy Plan 2015-2019.

https://www.derbyshiredales.gov.uk/images/documents/V/Visitor_Economy_Plan_2015-2019.pdf

³

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/characteristicsofnationalparks/2013-02-19>

○ ⁴ Section 8 Normal Document Template (peakdistrict.gov.uk)

1.1.6 We also work closely with the Derbyshire Dales Rural Housing Enabler who provides a vital link between ourselves as the planning authority and the organisations that represent local communities. Typically this is Parish Councils, but in recent years two communities have set up Community Land Trusts (CLT) to progress housing schemes.

1.1.7 The CLT model of housing delivery has helped the wider community of these villages to accept housing, and CLTs work very well at a village scale. Both we and communities have a ready-made support network called East Midlands Community Led Housing. They have helped both villages set up their CLTs and remain available to help any other village that wants to do the same. CLTs are able to focus more widely on a community's needs and, subject to finding the funding and delivery partners, they are more able to promote and deliver all types of housing in principle.

1.2 National Planning Policy Framework

1.2.1 The [Framework](#) requires planning authorities to meet all the housing need for their planning area, either entirely in the area or by sharing delivery across neighboring planning authorities. This usually requires them to set a housing target for their plan period, show when these houses will be delivered, and identify a rolling 5 year supply of sites to enable this to happen. (Para. 67) The targets are established by applying a methodology laid down by Central Government. This means that all the nation's housing need is captured by Local Plans. National guidance has however made clear that expectations for delivery in rural areas generally are different. (Paras 77-79) It doesn't absolve NPAs from delivering houses, but we are not required to meet a housing target. However, although we can't sustainably meet all the housing need in the National Park, we agree with our constituent authorities how much will be delivered in the National Park⁵. Most NPAs rely on planning authorities around them for the delivery of most housing need, and the Government agrees that this is a sound approach for National Parks.

1.2.2 Paragraph 172 of the Framework and the associated [National Park Vision and Circular](#) justifies this approach by specifically reducing the pressure to deliver housing in National Parks. In light of this, most National Park Authorities (NPA) set modest targets for delivery, with a lot being delivered by conversions, or by exceptions sites⁶ and windfalls⁷. Whilst we identify land that could theoretically be used for affordable housing, few NPAs allocate land to achieve social of housing, because this can inflate land values (hope value) and reduce the likelihood that landowners will sell at a price that enables affordable housing to be built.

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⁵ Example: Page 24 and 25 Development Management Policies Part 2 of the Local Plan for the Peak District National Park Pre-submission Publication Version Duty to Co-operate Statement: October 2016.
https://www.peakdistrict.gov.uk/__data/assets/pdf_file/0020/72362/DMP-duty-to-cooperate-statement.pdf

⁶ These are sites identified throughout the plan period. They are not allocated on plan

⁷ Windfalls are similar to exception sites and represent opportunities that arise throughout the plan period rather than being allocated as sites for development in the plan itself. Planning authorities can assume that some of their housing delivery via windfalls but they must identify and allocate sites to meet most of the target.

1.3 Local Plan⁸

New build houses

1.3.1 Under our current Core Strategy policy HC1 and Development Management Policies policy DMH1, we only permit new houses in the National Park for very specific reasons. Some is to meet the housing need of local people who want to stay in the area and are currently live in overcrowded or otherwise unsatisfactory accommodation. This type of housing can be built on green field sites provided that it doesn't harm any valued built environments, particularly in conservation areas⁹. Care must also be taken to avoid harm to valued landscape character as expressed in our Landscape Strategy¹⁰. We also consider that people wanting to form a household for the first time are eligible because whilst they are often living with family in conditions that are not overcrowded, it is considered unreasonable to expect the family to sustain this arrangement, or to deny a person an opportunity to move out of the family home and set up their own household.

1.3.2 The green field sites are known as '*exception sites*' because their development is considered an exception to the general policy approach of preventing development in order to conserve the National Park. They are usually delivered by housing associations or individuals to meet community and individuals' housing need. The [Rural Housing Enabler](#) and Housing Associations such as Peak District Rural Housing Association ([PDRHA](#)) work with us and the Parish Council and other organisations

1.3.3. At present under our Core Strategy policy DS1 we permit new affordable housing in principle in or on the edge 62 villages and our only town (Bakewell). These places were considered to be the most suitable places to build housing, based on their population size and their range of services or ease of access to services. Everywhere else is considered to be countryside where we do not permit new housing to meet local need.

1.3.4 When permitting housing to address housing need, under Development Management Policy DMH2, we prioritise occupation of those houses to those who have a strong local connection in addition to a housing need. Since 2001, we have defined strong local connection as having lived in the National Park, and specifically the parish or the adjoining parish to where development is intended for at least 10 out of the last 20 years. This priority applies initially and on every subsequent sale or re-let (in perpetuity). We think this approach helps keep generations of family together in the community. However, the occupancy restrictions makes finance harder to come by for housing associations and, in the case of shared ownership properties, it makes it harder for eligible local people to get a mortgage. Peak District Rural Housing Association sees this as a risk to their ongoing ability to operate successfully in the National Park. Other community representatives such as Parish Councillors and

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⁸ <https://www.peakdistrict.gov.uk/planning/policies-and-guides>

○ ⁹ [Conservation areas: Peak District National Park](#)

○ ¹⁰ [Landscape Strategy: Peak District National Park](#)

District Councillors have also sought a less restrictive approach that doesn't require such a strong local connection when these properties are rented or part sold. The 'locals first' approach also re-enforces the relative lack of diversity within communities, and is seen by some in our communities as a negative outcome of our policies.

1.3.5. Our Core Strategy policy HC2 and Development Management policy DMH4 permit essential worker housing, but we define essential worker as working for a business that is managing the landscape in a way that conserves it, and only where there is a proven business need for a worker to live on site (farmworker or estate worker housing). This recognises that the national park landscapes need to be managed, but also recognises that these landscapes are not good places for other types of business to set up or expand.

1.3.6 Primarily for this reason we don't permit any other form of worker housing. We consider that most businesses don't need workers to live on site 24 hours a day seven days a week to sustain.

Ancillary dwellings

1.3.7 Our Development Management Policy DMH5 permits ancillary dwellings, by conversion or new build, which gives people the option to make space for generations of families. These tied dwellings create a stock that can benefit future families who might want or need two or more generations to live together.

Starter Homes and Discounted Market Sale Housing

1.3.8 We do not ordinarily permit Starter Homes, Discounted Market Sale housing or any other model of affordable housing that cannot safely be secured in perpetuity by legal agreement for occupation by local people in housing need. Many of the models defined by Government as Affordable housing¹¹ are high risk in this regard. We refuse permission for them unless they form part of a housing scheme on a site where we have agreed that housing is the best way to regenerate it. In these circumstances we can permit any form of housing that achieves enhancement of the site. The tenure of the houses is of secondary importance. We think that in order to best conserve the National Park we should only permit housing on green-field land (exception sites) if it can meet local housing need and continue to do so into the future with no end date on that commitment. This acceptance of some loss of green field land is our commitment to the health of our communities.

Open Market Housing (no occupancy restrictions)

1.3.9 We do not ordinarily permit new build open market housing for its own sake. Such housing already forms a large percentage of the overall housing stock¹² and it can be bought and sold freely on the open market. This means a large

¹¹ Annex 2 NPPF:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹² Section 11 Tenure:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/characteristicsofnationalparks/2013-02-19#household-spaces>

percentage of houses is already too expensive for many local people in housing need. However we know that some of these get used as holiday homes or second homes¹³. Whilst the Peak District appears to have fewer of these as a percentage of total housing stock than the other northern National Parks (Yorkshire Dales, Lake District, Northumberland and North York Moors), we do not underestimate the impact this can have on some communities where the rates are high. This issue is frequently mentioned by Parish Councils in discussions around housing need and community need.

1.3.10 We do permit some new build market housing where it is a good way to enhance a brownfield site or conserve a valued building. Our long-held policy to refuse new build market housing on green field sites positively conserves the National Park because it directs investment into conservation of heritage assets and means those green field sites can better serve the needs of the community for affordable housing for local people only.

1.3.11 We recognise that household needs change but that people get attached to communities and don't want to move to get more living space. We therefore permit alterations and extensions to most housing where it doesn't harm the building or the setting. We also permit replacement of housing where the proposed design is better than the existing one, and provided heritage significance is not lost. This gives existing householders adequate scope to enhance the value and usefulness of their homes as the needs of their household evolves. However this approach is arguably unsustainable given the embedded carbon in the existing building and the carbon requirement of building a whole new house. We need to re-evaluate the net impact of this approach bearing in mind the need to mitigate climate change.

¹³Section 12: Household Spaces:
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/characteristics-ofnationalparks/2013-02-19>

Part 2: Performance of Policy

2.1 What are we judging policy against?

2.1.1 Indicative housing delivery figures for the period 2006 – 2026 are set out in the Core Strategy Spatial Objectives¹⁴.

	Upper estimate
White Peak & Derwent Valley	1015
South West Peak	160
Dark Peak & Eastern Moors	110
Total	1285

2.2 Evidence: Annual Monitoring reports¹⁵

2.2.1 [These reports](#) show that overall housing delivery is keeping pace with the indicative delivery figures for the period 2006 – 2026 as set down in our Core Strategy Spatial Objectives. However, the number of market housing units added to stock by conversion or brownfield land regeneration consistently outstrips the number of affordable housing units. Delivery has been distributed between three spatial areas: the Dark Peak and Moorland Fringe, the White Peak and Derwent Valley, and the South West Peak. These spatial areas are for planning monitoring purposes only and were decided upon based on landscape character, population and development pressure. The figures for housing delivery in each spatial area are broadly in line with the spatial objectives for each area.

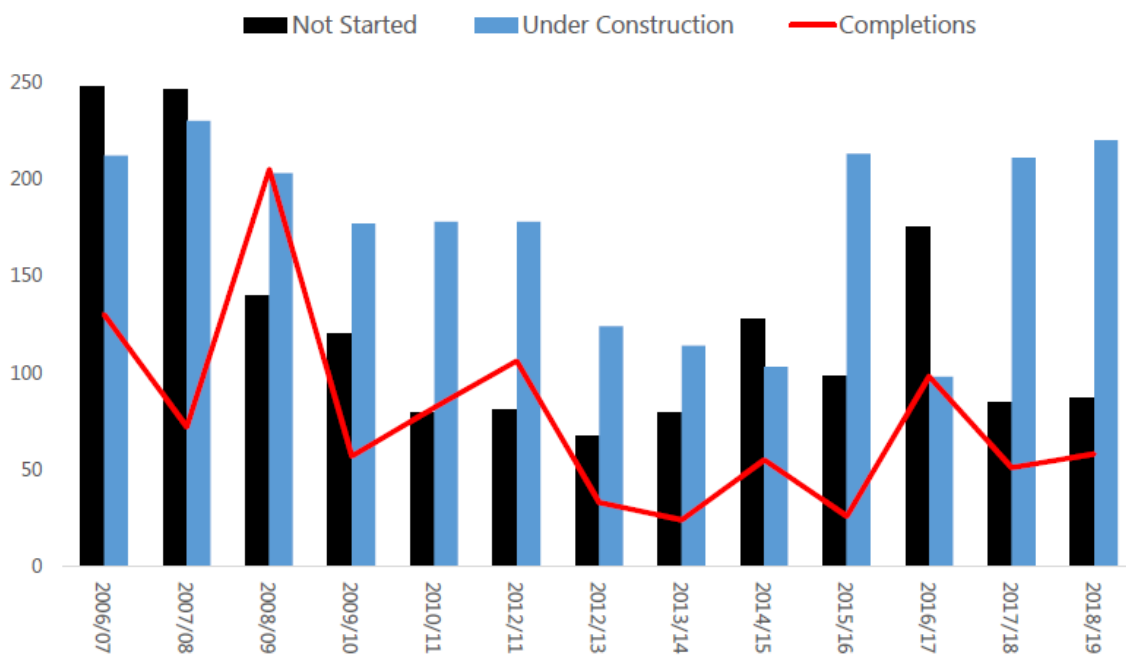
2.2.2 Since Core Strategy adoption in 2011, the levels of grant available for social housing has reduced markedly, though there are once again encouraging signs¹⁶. The reduction in grant availability overall has inhibited delivery by Housing Associations. Where it does still occur, it has often relied on heavy subsidy from Derbyshire Dales District Council as the constituent housing authority with the largest numbers of their residents living inside the National Park. However, the two housing authorities with the next largest populations in the National Park (High Peak and Staffordshire Moorlands) have either been unable or unwilling to provide such support, so social housing delivery in these parts of the National Park has been limited. The spatial objectives did not identify delivery figures for the other constituent council areas of the National Park such as Sheffield, Barnsley and Oldham, because their low ‘Park’ populations did not generate housing need that justified a target figure.

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- ¹⁴ Pages 45 – 47 [Local Development Framework Core Strategy - Final Errata 2 \(30/11/11\)](#) (peakdistrict.gov.uk)
- ¹⁵ [Annual monitoring reports: Peak District National Park](#)

¹⁶ Page 6 Section 5 Peak District Rural Housing Association Business Plan 2018: <https://www.peakdistrictrha.org.uk/media/3415/pdrha-business-plan-2018.pdf>

2.2.3 Over the Plan period we have delivered in line with the anticipated figures¹⁷. Between 2006/07 and 2018/19 there have been 997 housing completions giving an average of 77 dwellings per year. As the following table shows, there is disparity between the commitments (permission granted) and completions. The most productive years for both commitments and completions were 2006/07, 2007/08 and 2008/09 with an average of 562 per annum. This was just before the economic crash in 2008, from which the numbers of commitments and completions has not recovered, averaging around 321 per annum between 2009/10 and 2018/19.

Summary of gross Completions and Commitments 2006/7 – 2018/19



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 ○ ¹⁷ Pages 45 – 47 [Local Development Framework Core Strategy - Final Errata 2 \(30/11/11\) \(peakdistrict.gov.uk\)](#)

The following table shows the scale and type of housing delivery over the plan period as a whole.

Summary of Gross Completions and Commitments 2006/7 – 2018/19

(NS Outstanding, UC Under Construction, CO Completions)

Type	Status	2006/07	2007/08	2008/09	2009/10	2010/11	2012/11	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Totals
Open Market	NS	58	54	52	41	30	30	27	39	83	49	118	46	49	676
	UC	81	88	47	48	53	53	61	37	80	94	35	108	95	880
	CO	25	34	82	27	27	25	13	15	24	11	53	25	22	383
	Total	164	176	181	116	110	108	101	91	187	152	206	179	166	1937
Local Needs	NS	17	24	22	21	4	4	1	4	6	11	6	4	1	125
	UC	27	31	14	30	33	34	5	21	12	14	4	9	49	283
	CO	79	4	30	20	21	27	15	1	1	4	7	1	6	216
	Total	123	59	66	71	58	65	21	26	19	29	19	14	56	626
Agricultural	NS	5	10	5	4	2	2	1	1	1	1	4	3	3	42
	UC	12	12	9	10	8	8	3	3	8	9	5	5	4	96

	CO	2	2	8	1	5	6	3	2	1	2	4	4	5	45
	Total	19	24	22	15	15	16	7	6	10	12	13	12	12	183
Ancillary	NS	17	17	15	11	4	4	6	2	5	2	10	3	5	101
	UC	13	14	9	12	9	9	3	7	3	6	5	8	7	105
	CO	6	5	17	1	8	7	1	3	3	1	4	8	7	71
	Total	36	36	41	24	21	20	10	12	11	9	19	19	19	277
Agricultural or Holiday	NS	0	0	0	0	0	0	0	1	3	0	0	0	0	4
	UC	0	0	0	0	0	0	1	0	0	5	0	0	0	6
	CO	0	2	0	0	0	0	0	0	0	0	0	0	0	2
	Total	0	2	0	0	0	0	1	1	3	5	0	0	0	12
Ancillary or Holiday	NS	0	0	0	0	0	0	4	1	4	3	4	3	4	23
	UC	0	0	0	0	0	0	2	2	0	5	1	6	6	22
	CO	0	2	0	0	0	0	0	0	6	1	4	1	3	17
	Total	0	2	0	0	0	0	6	3	10	9	9	10	13	62
Holiday	NS	151	141	46	43	39	41	28	31	26	32	33	26	25	662
	UC	79	85	124	77	75	74	49	44	0	80	48	75	59	869
	CO	18	23	68	8	21	41	1	3	20	9	26	12	15	265
	Total	248	249	238	128	135	156	78	78	46	121	105	113	99	1794
Total	NS	248	246	140	120	79	81	67	79	128	98	175	85	87	1633
	UC	212	230	203	177	178	178	124	114	103	213	98	211	220	2261
	CO	130	72	205	57	82	106	33	24	55	29	98	51	58	1000
	Total	590	548	548	354	339	365	224	217	286	337	371	347	365	4892

2.2.4 Bringing the picture up to date as much as possible, in 2018/19 we approved 33 new build affordable local needs houses, including 30 at the Lady Manners site in Bakewell, and one conversion. We also approved three agricultural worker's dwellings and 18 additional open market houses. In 2017/18 there were 108 open market dwellings under construction, a further 46 not yet started, but just 25

were completed. This demonstrates that our policies are enabling a small but steady number of additions to housing stock. It also demonstrates that planning permissions for housing (either by new build or conversion) are no guarantee of delivery on the ground.

2.2.5 The policy of requiring regeneration schemes to deliver a proportion of affordable housing has had some success at Bradwell (Newburgh) and at Hartington (Dove Dairy). It hasn't proved successful in every case though, e.g. Tideswell (Markovitz Builders Merchants). The decision about the mix of house types and tenure is determined by viability rather than policy thresholds but it is also about being true to our conservation purposes. This means that design, build quality and layout are the most important considerations for us, not the number of houses and proportion of affordable houses.

2.3 Other evidence and data

*Parish Statements*¹⁸

2.3.1 Parish Statements use Census data, land-use surveys and consultation with residents to provide a 'snapshot' description of Peak District communities. They show that:

- some but by no means all parishes think a thriving and sustainable community needs more local houses for local people.
- 84.5% of residential properties are owned (including mortgaged). (Census Data.)
- the average number of properties with 'no usual residents' is 10.2%. This can indicate properties that are empty or second homes/holiday homes. The parishes with the lowest number are Pilsley (1.5%) and Harthill (1.9%). Those having the highest number are Litton and Little Longstone (20.3%), South Darley (20.2%) and Monyash (20%). Nineteen (19) parishes have 15% or more properties with no usual residents.
- the average number of privately rented properties is 14.6%. The lowest level of privately rented properties is in Brough and Shatton (1.8%). The highest levels are in the estate villages of Tissington & Lea Hall (66.7%), Harthill (51%), Pilsley (42.4%), Chatsworth (41.4%), Beeley (41.4%), and Edensor (30.8%).
- the average number of social rented properties is only 6%. Eighteen (18) parishes had no social rented properties at all, whilst Longnor

¹⁸ Parish Statement and Village Plans: <https://www.peakdistrict.gov.uk/looking-after/living-and-working/your-community/village-plans>

(19.7%) and Rowsley (21.3%) have the highest levels of social rented housing provision.

- against this background evidence, only 16 of the 109 Parishes within the National Park stated that the building of more affordable houses for local people was an aspiration.

National Park Management Plan (NPMP) 'Thriving and Sustainable Communities'

2.3.2 A key action in the current NPMP is for the Authority to work with residents and stakeholders to define a 'thriving and sustainable' community. This definition includes:

“The provision of safe, energy efficient homes in a mixture of tenures so that:

a diverse population can be sustained

those with local roots can remain or return

family groups across the generations can stay together for mutual support.”

*Supporting evidence for Development Management Policies: Housing Topic Paper February 2018*¹⁹

2.3.3 This formed part of the evidence base for the Development Management Policies adopted in 2019. It confirmed that housing delivery and commitments were on track to meet plan expectations for the period 2006 – 2026. This remains the case, with some substantial schemes in the pipeline at Hartington, Bradwell, and Bakewell.

2.3.4. It concludes by stating that 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. It admits that affordable housing delivery is considerably lower than the need for it, however it puts this into context by explaining that this situation is common across the constituent councils outside the National Park, none of whom are meeting their affordable housing need.

2.3.5 The figures from our AMRs show that additional open market housing consistently outstrips additional affordable housing but most is achieved by conversions, so they don't have the visual impact of new housing schemes. They prove that our policy does lead to delivery of new market housing units as well as new affordable houses in the National Park, however, the mix of all types of houses added to the housing stock has not put downward pressure on house prices, or put any significant dent in the figures of unmet housing need in the National Park.

¹⁹ https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0026/82817/EB17_HOUSING-TOPIC-PAPER-FEBRUARY-2018_-_AMEND-DtC.pdf

NPMP background paper on community

2.3.6 [The paper](#) re-enforces what some of the other evidence shows. It states that whilst quality of housing is thought to be good overall, its availability and affordability are big issues for many residents struggling to get on the housing ladder. Of added concern is the level of second or holiday homes and other properties with no usual occupants.

2.3.7 However the background paper also revealed evidence that some local people see the positive benefits of tourism to local businesses and the economy²⁰. This includes servicing and maintenance of holiday properties, which often provide work for small local businesses.

State of Communities Report 2020

2.3.8 This NPA produced report draws heavily on the 2011 census, but also on the views of communities in 2020. It reveals changes in the level of services, such as the loss of some shops and schools. It also highlights the issues that concern communities most, and their aspirations for the future. It reveals that few communities are overly concerned about housing issues, but about a third would nevertheless support some housing for local people.

Settlement Capacity Studies from 2009 onwards²¹

2.3.9 Over the plan period we have worked with parishes and the housing enabler to agree potential housing sites. This work has focused on the most populated villages such as Tideswell, Bamford, and Hathersage because housing need is greatest here. The surveys do not result in site allocations, but they do give an indication of the sites that might receive planning permission for affordable housing, as well as those that probably wouldn't. The results show that it is becoming difficult to find sites in some villages with the highest need, e.g. Hathersage. However in Tideswell it revealed capacity for a scheme of 25 houses at Richard Lane, and because the site is understood to be acceptable in principle to us and the local community a scheme is being progressed by Nottingham Community Housing Association.

Strategic Housing and Employment Land Availability Assessment (SHELAA) 2018²²

2.3.10 This study refreshed the Strategic Housing Land Availability Assessment (SHLAA) undertaken as strategic evidence for the Core Strategy. The assessment provides a theoretical indication of housing capacity against indicative housing delivery figures for the future plan period. The indicative need figure is between 40 and 64

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- ²⁰ PDNPA resident's survey of 2016

²¹ These studies result in a map showing potential sites for housing delivery. They are a result of work done with Parish Councils and local housing bodies. They are indicative only and carry no statutory weight as local plan documents. The sensitivity of these studies means they are not published on line but anyone interested in seeing a study for their village should email policy@peakdistrict.gov.uk

²² This is not a Local Plan document and is not published online. Anyone interested in the assessment should email policy@peakdistrict.gov.uk

dwellings per annum for the Core Strategy plan period 2006 – 2026 (800 – 1280 total). This figure was considered to be sound because neither government nor local policy advocates population growth or economic growth in the National Park, and the current level of housing delivery has sustained a healthy population and economy. The SHELAA study included a review of sites identified in the earlier SHLAA study plus a new call for sites. It concluded that:

- 150 suitable sites could potentially yield around 1,308 dwellings.
- 682 dwellings are from 64 ‘deliverable’ Category 1 sites, which could be expected to come forward for development in years 1 to 5;
- 492 dwellings are from 61 ‘developable’ Category 2 sites, which could be expected to come forward for development in years 6 to 10; and
- 134 dwellings are from 25 ‘not yet developable’ Category 3 sites, which could be expected to come forward for development in years 11 to 15.

2.3.11 The study took into account outstanding planning commitments and found that these are able to meet the minimum dwelling figure for the first 5-year period.

2.3.12 The theoretical yield is not high and we suspect many landowners did not engage with a SHELAA because they may believe there is no realistic prospect of the Authority granting permission for high value housing. The study would need refreshing if housing need figures change as a result of a change in national or local policy or both.

Housing Need

2.3.13 Housing need is no longer assessed in any regular way by the Authority or the Housing Authorities. However the Housing Authority will undertake a parish wide survey provided it has available resources to do that. Recent examples include surveys for Waterhouses, Eyam, and Over Haddon. Housing need is also evidenced from registrations with Home Options²³, which is where people can register their housing need and bid for social housing.

2.3.14 Our evidence suggests that housing need has reduced for some communities, which means our policies may be contributing to a healthier picture for some communities.

2.3.15 As an example of changing need, in Tideswell in 2011 the combination of housing need survey and home options registrations revealed a total of 99 households in housing need. By 2017 this had reduced to 58 households in housing need.

2.3.16 Similarly, a survey in Youlgrave in 2007 revealed 28 households in housing need. By 2020 there were 17 households in housing need. In the interim period, the community had set up a Community Land Trust and worked with the Authority to deliver a scheme of 8 local needs houses.

○ _____
²³ <https://www.home-options.org/choice/>

2.3.17 In 2007, 40 households in Hartington needed an affordable home. By 2014 that figure had reduced to 19 households, though in this case the reason is unclear since no new affordable houses were provided for those in need over that period.

2.3.18 The level of housing need does not always decline. In 2009 a survey of Bakewell showed that 89 households were in need of affordable housing. By 2015 a further survey showed that 119 households were in need of affordable housing. This shows that addressing unmet housing need remains a big challenge. The Authority's response was to permit a scheme of 30 affordable houses and there is scope for more, provided appropriate sites can be agreed. This is helped by the fact that the Bakewell Neighbourhood Plan process has led to co-operative working between ourselves and the community to agree a new boundary for the town. This creates some theoretical potential for limited growth to address local housing needs.

2.4 Conclusion

2.4.1 The AMR evidence suggests the policy approach will enable housing delivery in line with the plan's indicative figures by the end of the 2006 – 2026 plan period. The delivery is however skewed in favour of market dwellings, and achieved mostly by conversion. These houses are often unaffordable to local people. The level of unmet housing need is reducing in some villages, but remains stubbornly high in others.

2.4.2 The strategic assessment of potential housing land, plus the level of outstanding planning permissions (the SHELAA) reveals enough potential to meet a similar level of delivery over the next 20 year plan period, but it also shows that the sites are not in the villages with the greatest housing need. The village scale capacity assessments confirm the SHELAA's strategic conclusions by showing insufficient

2.4.3 The view of communities are mixed. Some, such as Bradwell, Tideswell, and Bakewell have welcomed affordable housing schemes in recent years. Other smaller communities have been more nervous of the impact on their community. The Parish Statements have picked this up, and are a useful snapshot of current community opinion on the value of more housing.

2.4.4 The Parishes Forum is supportive of our affordable housing policy but considers that communities need a wider mix of new housing, including some starter homes for sale, and also houses to meet other needs, such as elderly people wanting to downsize.

2.4.5 The level of housing need is up in some villages but down in others and the ease of finding and securing a suitable site can prevent or slow down housing delivery considerably in some of the largest villages with the most pressing need.

2.4.6 The delivery of affordable housing at the levels seen in this plan period is entirely due to Derbyshire Dales District Council backfilling schemes where grant levels have reduced. We are aware that this situation is not sustainable in the medium

to long term and if we lose this source of income we currently have no sustainable backup plan to fund affordable housing delivery.

Part 3: Issues and Evidence Driving New Policy

Planning for the Future²⁴

3.1.1 The Government's plans to reform the planning system will, if enacted, put additional pressure on the National Park because it encourages the delivery of market housing to raise money to deliver affordable houses. This is known as cross subsidy and it requires more land to be developed to deliver the same number of affordable houses as are currently delivered under the exceptions site policy.

3.1.2 The Government wants more growth and quicker growth, particularly housing growth. It is proposing to reform the planning system to make it easier for everyone to understand what can be built where.

3.1.3 At the time of writing it is unclear what levels of housing the Government consider necessary in National Parks but it doesn't appear that the targets established by constituent planning authorities will justify more pressure being put onto National Park Authorities. The Government had suggested that a different approach (to its recently proposed housing methodology) would be needed in protected areas like National Parks because the methodology could inflate housing targets and create pressure to build more houses in National Parks despite the need to conserve and enhance these areas. The Government has however decided not to introduce a new methodology.

Response to the Covid-19 Pandemic

3.1.4 As the current Covid 19 situation evolves, people may need to rely more on domestic locations for holidays. This may in turn generate more demand for and supply of holiday accommodation. This would enable people to stay in the area, which means they can enjoy the National Park and support the local economy. On the flip side, it may result in further loss of housing for permanent use, which may worsen housing affordability for local people. This is an unknown at the moment, but we need to gather intelligence as best we can to inform future policy options.

3.1.5 The Covid pandemic has led to much more home working. This could become a permanent shift in work arrangements post pandemic if people and businesses decide home working is a better option. This begs the question as to whether our policy that restricts sizes of affordable housing would be fit for purpose. It also begs the question as to whether our extensions and alterations policy and replacement dwelling policy is fit for purpose. Whilst size restrictions help suppress property value and make social houses more affordable, it could also benefit a community more if people were able to comfortably work from home and make more use of local services.

²⁴ <https://www.gov.uk/government/consultations/planning-for-the-future>

Part 4: Requirement for Further Evidence and Questions Arising

4.1 Further Evidence

4.1.1 The strategic evidence of housing need for the National Park as a whole needs refreshing. The strategic housing land assessment work will also need updating. These are statutory requirements.

4.1.2 The existing local “village scale” evidence of sites’ capacity should be robust for most villages. This is because we are unlikely to change our view on sites previously assessed unless other factors cause us to do so. The government proposals to revise the planning system will determine the level of risk to the National Park landscape.

4.1.3 The attitudes towards new housing vary from community to community. The evidence suggests some communities want more housing of various sizes and tenures to keep them vibrant and thriving. Other villages express no desire at all for more housing which perhaps suggests they consider they don’t need more housing to thrive. We need a clearer steer from communities.

4.1.4 We need to cross check community views with those of visitors to the National Park. Visitors have every right to expect that the beauty of peak district villages is conserved for their enjoyment. Without their views we risk putting our duty to communities ahead of our need to conserve the beauty of the National Park.

4.1.5 We need to understand the long-term impact of the Covid-19 pandemic on the demand for UK-based holidays.

4.1.6 We need to understand the long term impact of the Covid-19 pandemic on home-working.

4.2 Questions Arising

4.2.1 Should we shift focus away from social affordable housing and permit a wider range of house types including smaller housing for an ageing and increasingly dependent population, as well as permitting housing for younger generations and those who want or need to work from home?

4.2.2 Should we change the local connection requirement attached to social housing to make it easier for those with less than 10 years connection to stay here? What do you think is fair?

4.2.3 Should we refuse applications to convert buildings where the intention is that it would have sole use as holiday accommodation, and then put a primary occupancy clause on any new housing we permit so that it is lived in for most of the year?

- 4.2.4 Should we give more certainty to developers by allocating sites for housing, or should we continue our approach of identifying a community's housing need and then working with communities and housing associations to identify suitable sites?
- 4.2.5 Should we change the way we assess housing need to address the community needs rather than individuals' housing needs (accepting that these two things could be the same or different)?
- 4.2.6 Can the National Park accommodate more housing on green-field sites or is it already spoiling the beauty of the villages?
- 4.2.7 Where should new housing go without it harming the beauty of the villages or the character of the wider landscape?
- 4.2.8 Are the bigger villages that have the most services better places for new housing than small places with few shops and services?
- 4.2.9 Should every village be allowed to have new housing so that the bigger villages don't need to grow to meet wider community needs?
- 4.2.10 Should housing policy in a protected landscape respond to community aspirations or respond to objectively assessed need?
- 4.2.11 Should councils that share part of their area with the National Park accommodate more housing to take the pressure off the National Park and help us protect it?
- 4.2.12 Would visitors' enjoyment of the National Park and its villages be affected by more housing in and around the edge of some villages?