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Peak District National Park

Population Projection Update & Housing Needs Assessment

Peak District National Park Authority

01 December 2023

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1.0   **Introduction**

1.1   Lichfields has been appointed by the Peak District National Park Authority [PDNPA] to undertake a Population Projection Update and Housing Needs Assessment [HNA] for the study area set out in Figure 1.1.

Figure 1.1: Peak District National Park Boundaries
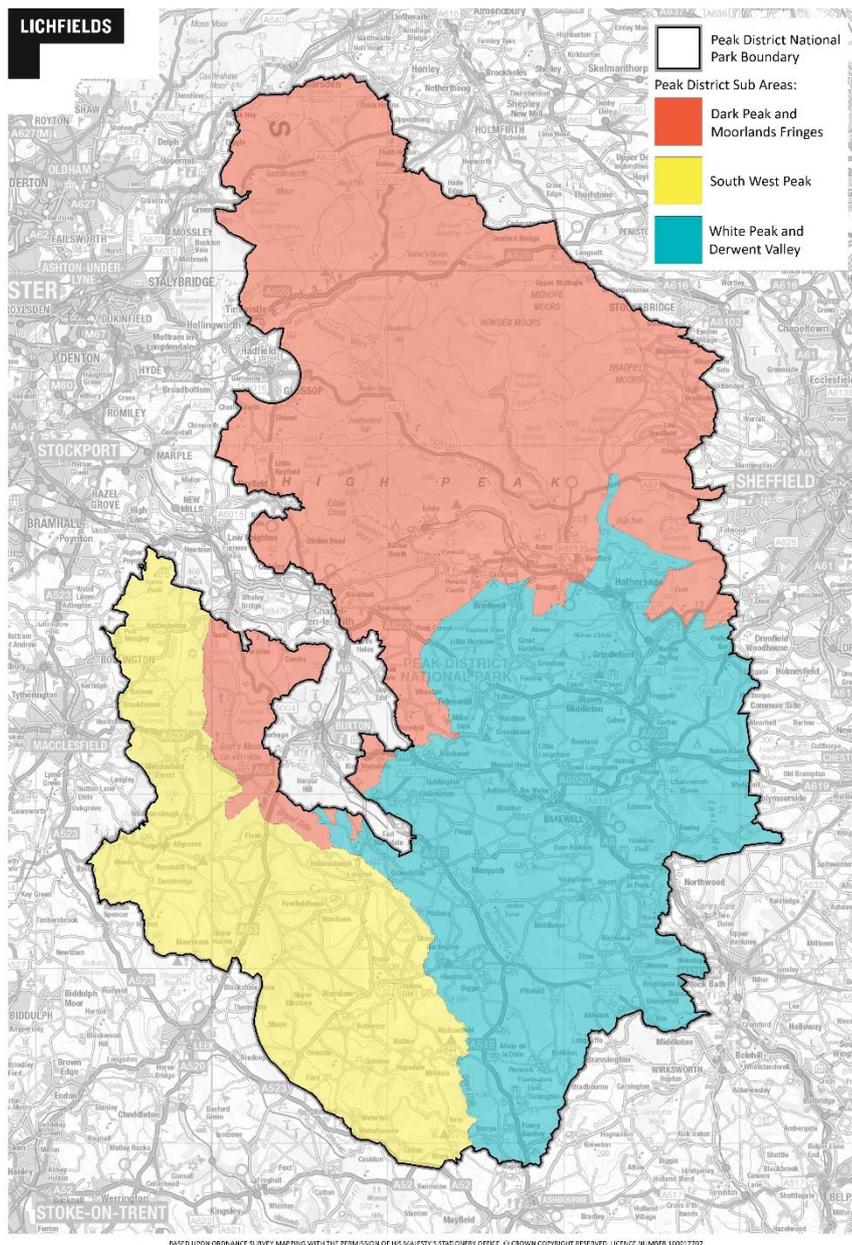
Source: Lichfields

1.2   The overarching aim of the study is to provide 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. The Authority is currently reviewing its Core Strategy and Development Management Policies aiming to consult on issues and options in 2024. The plan period is likely to be between 2025 and 2045 and will be informed by the assessment of sub-area needs as set out in this HNA.

1.3 The three sub-areas are aligned with, but do not exactly correspond to, the sub areas defined in the adopted Core Strategy (October 2011). They follow local authority boundaries rather than the Core Strategy's landscape character types, and as such, the White Peak and Derwent Valley Core Strategy sub area contains part of High Peak (e.g. Bamford, Hope).

1.4 For the purposes of this HNA, the sub-areas are: the Dark Peak and Moorlands fringe, comprising the National Park elements of Barnsley, Oldham, Sheffield, Kirklees, North East Derbyshire and High Peak; the South West Peak, comprising the National Park elements of Cheshire East and Staffordshire Moorlands; and the White Peak and Derwent Valley, comprising those areas of Derbyshire Dales District within the National Park.

1.5 A key element of the work has involved disaggregating needs across these three sub-areas under the planning auspices of the PDNPA which only requires a certain level of development that is necessary to meet its immediate indigenous needs.

Study Scope

1.6 This HNA is 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.

1.7 To this end, the scope of the study involves:

1   Reviewing the housing market issues in the Peak District, exploring the link between housing and economic growth.

2   Determining overall housing need using a range of scenarios to understand local housing needs with a focus on meeting local affordable housing requirements.

3   Determining the overall affordable housing need and how it should be provided in relation to the different tenure types and sizes. This should include recommendations regarding the policy merits of different scenarios and the required level of discount.

4   Assessing the role discounted market housing has in providing intermediate affordable housing.

5   Consideration of the private rented sector in the housing market.

6   Estimate of the household size, tenure and type of housing required by the following household groups who have particular housing requirements:

a   Self-build and custom housebuilding;

b   Family housing;

c   Housing for older people;

d   Housing for people with disabilities;

e   Wheelchair accommodation;

f   Service families; and,

g   Key workers.

Report Structure

1.8   This HNA is structured as follows:

- Section 2 - Background policy context setting out the national and local planning policy and guidance context along with the housing strategy for the PDNPA.

- Section 3 - A summary and explanation of the methodology adopted.

- Section 4 - Identifying the Housing Market Area [HMA] that the Peak District sits within.

- Section 5 – Analysis of the housing and demographic context of the Peak District.

- Section 6 - Area profile and Market Signals Analysis providing a detailed assessment of the Peak District's demographic characteristics and the housing market more generally.

- Section 7 – Assessing Local Housing Need [LHN] for the Peak District through the application of the Government's standard methodology and a range of population projections, taking into account demographic change and housing delivery from 2006/07.

- Section 8 - An analysis of the scale of affordable housing needs that current exists in the Peak District.

- Section 9 - Analysis of the type, tenure and size of housing required across the Peak District.

- Section 10 – Analysis of the needs of specific household groups in the Peak District.

- Section 11 - Conclusions and Recommendations, bringing together the findings of the previous sections of the report and summarising the key findings.

2.0 Background – Policy Context

Introduction

2.1 This section comprises the housing evidence base that will be used to inform the PDNPA's emerging Local Plan policies and is in accordance with the following policy and economic documents at a national, regional, and local level.

National Planning Policy Framework

2.2 The National Planning Policy Framework [NPPF] was updated on 5th September 2023 and sets out the government's planning policies for England and how these are expected to be applied. At the time of writing, the Government has published a new NPPF consultation 'Prospectus' setting out how it intends to change national planning policy later this summer. The consultation period closed 2nd March 2023 with no further updates announced. In the meantime, the 2021 version of the NPPF remains extant. It has several stated priorities which comprise a stronger plan-led approach, able to support the provision of new homes, improve affordability and ensure a higher rate of housing delivery. Policies on economic growth remain a key part of the planning balance and the Government retains the aspiration to support growth, innovation and above all, to improve productivity levels.

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. Notably, strategic plans and policies should provide for development needs that cannot be met within neighbouring areas and should demonstrate this through new statements of common ground [SoCG].

2.4 The NPPF sets out a need to effectively cooperate, setting out how strategic plan-making authorities should collaborate, again emphasising that this includes where development needs cannot be met wholly in one area, and could be met elsewhere. Joint working and SoCGs are significant and for a plan to be found sound, cross-boundary strategic matters must be 'dealt with rather than deferred'. This is a significant addition to national policy, to help ensure strategic needs are planned for now. Importantly, SoCGs should be kept up to date.

2.5 The NPPF outlines how LPAs should determine housing needs:

"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 guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. 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" [§61].

2.6   LHN is defined in Annex 2 of the NPPF as follows:

"Local housing need: the number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of the Framework)."

Planning Practice Guidance

2.7   On 6th March 2014 the Government launched the Planning Practice Guidance [PPG] web-based resource.[1] This brought together many areas of English planning guidance into a new format linked to the NPPF. This included replacing the previous Strategic Housing Market Assessment [SHMA] Practice Guidance published in 2007, which has now been cancelled. Although the new PPG is more succinct and provides less detail on the assessment of affordable housing need than the 2007 Guidance, the overall approach remains essentially the same. Following the publication of revisions to the NPPF, the section of the PPG addressing the calculation of objectively assessed housing needs was updated on 24 June 2021. The PPG's more general guidance on Housing and Economic Needs Assessments was last updated on 16th December 2020.

2.8   The PPG states that the NPPF expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. This uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply[2]. This takes an average of the Sub-National Household Projections [SNHP] over a 10-year period and adjusts them based on the affordability of the area. A cap may be applied which limits the increase, depending on the current status of relevant policies for housing.

2.9   The PPG states that:

"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.[3]"

2.10   The PPG also provides helpful commentary on the following circumstances relevant to the Peak District, which allows for an alternative approach to the standard methodology for identifying housing need:

"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, where local authority boundaries have changed due to reorganisation within the last 5 years or local authority areas where the samples are too small, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels."[4]

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[1] http://planningguidance.planningportal.gov.uk/
[2] 2a-002-20190220
[3] 2a-005-20190220
[4] 2a-014-20190220

2.11   If an authority uses a different method for calculating housing need the PPG sets out how this should be tested at examination:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point."

"Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."[5]

2.12   The PPG states that for the purposes of decision making "*there is separate guidance on how the standard method for assessing local housing need applies to calculating 5 Year Land Supply and the Housing Delivery Test*"[6].

2.13   The PPG[7] states the following:

"Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure where:

- *the plan was adopted in the last 5 years, or*
- *the strategic housing policies have been reviewed within the last 5 years and found not to need updating.*

In other circumstances the 5-year housing land supply will be measured against the area's local housing need calculated using the standard method."

2.14   On this basis, the starting point for identifying local housing needs for the purposes of decision taking should usually be the standard methodology, but in the case of National Parks, an alternative approach will have to be used using the best available information on anticipated changes in households as well as local affordability levels.

Local and Sub-Regional Evidence Base

Peak District National Park Core Strategy (2011)

2.15   The PDNPA adopted its Core Strategy in October 2011. It sets out the vision, objectives and spatial strategy for the Peak District, with core policies to guide development and change in the Peak District to 2026.

2.16   The Core Strategy initially summarises the national context as it relates the purpose of planning policy in a National Park. It states that the 1995 Environment Act establishes the statutory purposes of national park designation, as:

i   to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and

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[5] 2a-015-20190220
[6] 2a-016-20190220
[7] 68-005-20190722

ii   to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.

2.17   Section 62 of the Act also places a general duty on all relevant authorities to have regard to these purposes. In pursuing these purposes, section 62 also places a duty on the National Park Authorities [NPAs] to seek to foster the economic and social well-being of their local communities. Where there is an irreconcilable conflict between the statutory purposes, the Sandford Principle will be applied and the conservation of the Peak District as a National Park will be given priority.

2.18   The Core Strategy details policies that relate closely to the delivery of National Park purposes. These are to conserve and enhance natural beauty, wildlife and cultural heritage, and to promote opportunities for the understanding and enjoyment of the park's special qualities. Within this context policies provide for new affordable dwellings, community facilities and small-scale business and retail facilities in or on the edge of 63 'named settlements'.

2.19   There are no targets for housing provision but the spatial objectives for the core strategy set out indicative figures for each landscape character area. These are, over the plan period, between 35 and 75 homes across the Dark Peak and Moorland Fringes, between 550 and 890 homes across the White Peak and Derwent Valley and between 30 and 130 homes across the South West Peak.

2.20   The Core Strategy seeks to protect employment sites in sustainable locations such as Bakewell, Tideswell (both located in Derbyshire Dales District) and through the Hope Valley. The Core Strategy notes that there is a higher-than-average number of residents in the National Park who work from home, with improved internet connectivity it is expected more residents in the Peak District will be able to work from home.

2.21   The Core Strategy sets out a spatial portrait (see Figure 2.1) for the Peak District segmenting it into three distinct areas comprising:

- The Dark Peak – the less populated upland moorland areas and their associated fringes;
- The White Peak and Derwent Valley – the most populated lower-lying limestone grasslands and limestone dales and the Derwent Valley; and
- The South West Peak – the sparsely populated mixed moorland and grassland landscapes of the south west.

2.22   The Core Strategy sets out a series of overarching challenges faced by the Peak District and draws out key spatial differences and particular pressures facing the diverse landscapes of the area. It is the case that many of the challenges are experienced park-wide however their extent and impact on particular areas differ.

2.23   The Core Strategy sets out how larger land ownerships across the Dark Peak moorlands makes large scale land management more possible than in areas of fragmented land ownership such as the White Peak. The Core Strategy also recognises the need to maintain a high level of protection for the moorland areas and the South West Peak landscapes given that both areas are mostly classified as the Natural Zone and remain extremely fragile and susceptible to damage.

2.24   In contrast, the White Peak landscapes are generally in small ownership comprising farmed landscape interwoven with striking limestone features. The South West Peak bears many

smaller settlements as well as several larger villages including Longnor, Warlsow and Waterhouses. Copious amounts of farmland are interspersed with these settlements and topography is a mixture of rugged moorlands and more gentle pasture.

2.25   The established vision set out in the Core Strategy is one of a conserved and enhanced Peak District that values the natural beauty and quality of its landscapes, biodiversity, cultural heritage, and settlements within. The vision also includes the ambition to maintain the Peak District's welcoming culture that builds on the existing visitor economy and the Park's unique qualities. A living, modern and innovative Peak District is central to the vision, fostering vibrant communities for residents and demonstrating a high quality of life whilst conserving and enhancing the special qualities of the National Park.

2.26   The Core Strategy acknowledges various housing challenges across the Peak District that tend to manifest themselves more in the White Peak and Derwent and Hope Valleys given the population of around 38,000 at the time of writing. A key challenge stated is the need to assist the delivery of affordable homes and is heightened by the fact that development sites are scarce making it more difficult to conserve and enhance the National Park area whilst addressing housing and community needs.

2.27   Significant growth in the elderly population of the Peak District raises the challenge of providing sufficient social care facilities alongside the provision of other community and public services to a declining share of the remaining population scattered across settlements.

2.28   The Core Strategy also bears specific reference to the presence and impact of second homes and holiday home ownership and that it reduces the availability of housing stock and in parts can exacerbate the gap between house prices and peoples' incomes. The White Peak has been identified as a particular area of concern where, at ward level, these types of tenure account for an estimated 10% of housing stock and furthermore acknowledges that at a settlement level this figure could likely be much higher.

2.29   In terms of spatial policies, the General Spatial Policies [GSP] contained within the Core Strategy set out the overarching principles for spatial planning in the Peak District and relate closely to the delivery of National Park purposes.

2.30   Policy GSP1 – *securing National Park purposes and sustainable development* sets out how any development proposal must comply with core policies that satisfy the statutory purposes of the national park designation. Regarding development, Policy GSP1 states that in securing national park purposes, major development should not take place within the Peak District other than in exceptional circumstances and there where a proposal for major development can demonstrate significant net benefit to the National Park, every effort to mitigate potential localised harm to the area's valued characteristics would be expected to be secured.

2.31   Policy GSP2 – *Enhancing the National Park* sets out how opportunities for enhancing the characteristics of the Peak District will be identified and acted upon provided they offer significant overall benefit to the natural beauty, wildlife, and cultural heritage of the area. It stresses the need for development to respect character and for any landscaping to be consistent with the landscape characteristics.

Figure 2.1 Peak District Spatial Portrait
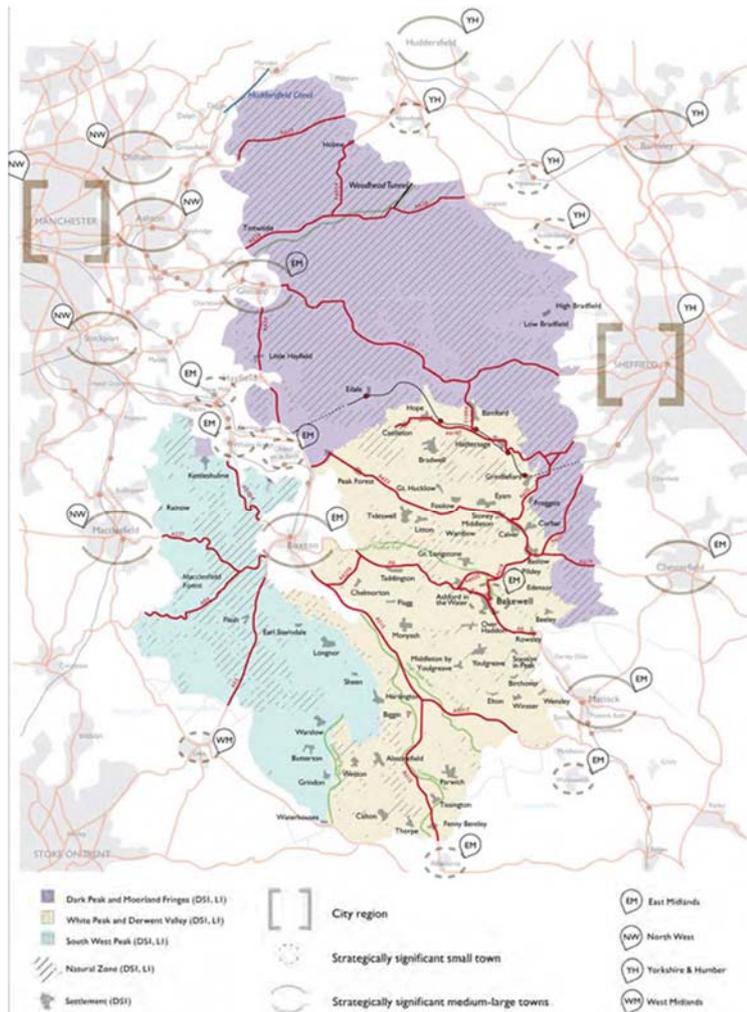
Source: Peak District National Park Authority Core Strategy (2011)

2.32   Policy DS1 – *Development Strategy* sets out a key principle to ensure development within the Peak District is sustainable and supports the effective conservation and enhancement of the National Park. The policy also states that around 80 to 90% of new homes will be directed towards Bakewell and other named settlements with the remaining percentage distributed across other settlements and the remaining countryside.

2.33   Policy CC1 – *Climate Change Mitigation and Adaptation* emphasises the need to build in resilience to and mitigate the causes of climate change in all future development.

2.34   The vision for homes, shops and community facilities is that communities will be more sustainable and resilient with a reduced unmet level of eligible affordable housing need.

2.35

2.36   The Core Strategy also sets out a series of housing policies that consider a range of housing-related issues including permissible circumstances for the development of new housing, the provision of housing for rural enterprise key workers as well as accommodation for travellers and showpeople across the Peak District. The Core Strategy carries forward the policy approach used across the Peak District since 1994: that it is not appropriate to permit

new housing simply in response to the significant open market demand to live in its sought-after environment. Homes and Communities policies in the context of the Development Strategy (Policy DS1 in the Local Plan) will be able to support:

- Work within these communities to explore and identify potential for new affordable homes and to meet wider community needs and challenges, particularly where there is no current evidence of capacity;

- The provision of new affordable dwellings by buying existing buildings as part of the effective use of the existing housing stock;

- Retention and provision of community facilities and services; and,

- The co-location of jobs and homes in order to reduce the need for people to travel.

2.37   PDNPA's focus is on affordable housing for local people and agricultural workers, and on housing that conserves and enhances the National Park. Policy DS1, HC1 and HC2 permit new housing (whether newly built or from re-use of an existing building) where it:

1   addresses eligible local needs for homes that remain affordable in perpetuity (this applies to registered social housing providers, community land trusts, or eligible individuals that cannot afford a home on the open market);

2   addresses eligible local needs for 'aged persons assisted accommodation';

3   provides for key workers in agriculture, forestry or other rural enterprises;

4   is required in order to achieve conservation and/or enhancement of valued vernacular or listed buildings; and,

5   is required in order to achieve conservation or enhancement in 'named' settlements.

Peak District National Park Development Management Policies (May 2019)

2.38   The Peak District Development Management Policies Plan [DMPP] was adopted in May 2019 and represents Part 2 of the Local Plan for the Peak District. It comprises of a written statement of policies for the positive management and control of development and the use of land within the authority's boundary.

2.39   The DMPP supplements the spatial strategy and core policies of the Core Strategy with detailed operational policies. The DMPP does not provide targets for the completion of new build homes within the Peak District area. It has been agreed that any new homes built within the Peak District area count towards the target in the respective local authority area.

2.40   The DMPP affords significant weight to conserving and enhancing the Peak District's valued characteristics with Policy DMC1 requiring any development proposal to clearly demonstrate how valued landscape character, including natural beauty, biodiversity, cultural heritage features and other valued characteristics will be conserved across all areas of the National Park.

2.41   Policy DMC2 concerns the protection and management of the Natural Zone and outlines the exceptional circumstances in which development is permissible in the Natural Zone. These include when a suitable and more acceptable location cannot be found elsewhere, and the development is essential for:

- The management of the Natural Zone; or,

- For the conservation and/or enhancement of the National Park's valued characteristics.

2.42 With regards to housing, Policy DMH1 states that affordable housing will be permitted in accordance with the Core Strategy provided there is a proven need and the homes built are within specified size thresholds.

2.43 Policy DMH2 concerns the first occupation of new affordable housing where, in all cases, new affordable homes must be first occupied by persons satisfying at least one of the following criteria:

- A minimum period of 10 years permanent residence in the Parish or an adjoining Parish inside the National Park and is current living in accommodation which is overcrowded or otherwise unsatisfactory;

- A former resident having lived for at least 10 years out of the last 20 years in the Parish or an adjoining Parish and is also living in accommodation which is overcrowded or otherwise unsatisfactory; or,

- A person with an essential need (a need arising from infirmity) to live close to another person with 10 years of residence).

2.44 Policy DMH3 sets out the second and subsequent occupancy obligations for affordable housing (the occupancy cascade) across the Peak District. For Registered Social Landlord [RSL] owned and managed homes and privately owned and managed affordable homes, eligibility rules initially prioritise those living within the Parish or adjoining Parish that meet the eligibility criteria set out in policies DMH1 and DMH2 before a progressive relaxation of the occupancy requirements in the event an occupier is not found.

2.45 Policy DMH4 recognises the need to provide dwellings for essential workers across the National Park with the need for a worker dwelling to support agriculture, forestry, or other rural businesses to be considered against the needs of the business concerned. A detailed appraisal must demonstrate genuine and essential need for the worker(s) concerned with the business able to prove an operating history within the Peak District of at least three years; has been profitable for at least one of those three years, and that the given level of profitability can sustain the cost of the dwelling.

2.46 Policy DMH9 permits the replacement of a dwelling provided a given dwelling is:

- Not Listed individually or as part of a group listing; and,

- Is not considered to bear cultural heritage significance; and,

- Is not considered to contribute positively towards the valued landscape character or surrounding built environment.

Peak District National Park Neighbourhood Plans

Chapel-en-le Frith Parish

2.47 The Chapel-en-le-Frith Neighbourhood Plan [CFNP] was adopted in August 2015 and covers the plan period 2013 to 2028. The vison statement for the CFNP gives regard to:

- Affordable, quality homes to provide for local needs;

- Ample, well-paid jobs for local people;

- Re-invigorated town and villages centres;

- Excellent facilities for all ages;

- Safe, convenient, and sustainable transport links; and,

- Access to, and protection of, countryside recognised as special.

2.48   Only a small part of the neighbourhood plan area is within the boundary of the National Park.

Bradwell Neighbourhood Plan

2.49   The Bradwell Neighbourhood Plan [BNP] was adopted in November 2015 and covers the plan period 2015 to 2030. The vision statement for Bradwell includes an ambition for the Parish to be:

- A sustainable community made up of all people of all ages;

- A place that has grown with the times, but where development has been carefully managed to remain in keeping with heritage and to protect and enhance the environment of the Peak District;

- A working community with a vibrant economy made up of a balance of businesses and services for both residents and visitors; and,

- A connected community with access to viable options for using public transport and technology for work, health, education, and leisure.

2.50   Regarding housing, a housing needs survey conducted in October 2014, identified a need for 12 affordable houses up to 2019. Policy H1 of the BNP asserts that the provision of local needs affordable housing is encouraged, provided it is limited to the needs of the Parish and adjoining Parishes and is based on the current local needs housing survey. Furthermore, in consistency with the Core Strategy and DMPP, the BNP recognises that open market housing is not normally permitted within the National Park without demonstrable justification.

2.51   Policy H2 of the BNP supports the development of market and affordable homes on the Newburgh industrial site, which is brownfield site, and so far has delivered 55 dwellings.

Leekfrith Neighbourhood Plan

2.52   The Leekfrith Neighbourhood Plan [LNP] was adopted in May 2021, and covers the period 2019 to 2033. Only part of the LNP area is within the boundary of the National Park. Policy 1 supports the provision of affordable housing as part of the redevelopment of Upper Hulme Mill. The vision statement set out in the LNP describes an ambition for the Parish to be:

- A community of all ages;

- A place where the community focal points are valued and protected;

- A community where suitable businesses and can employ and thrive; and,

- a Parish that prides itself on the conservation of the landscape and surrounding natural environment.

Dore Neighbourhood Plan

2.53 The Dore Neighbourhood Plan [DNP] was adopted in October 2021 and covers the period 2021 to 2035. The vision statement set out in the DNP is as follows:

- To respect the landscape character transition between the Eastern Moorland Fringe and the urban area;

- To provide a diverse, quiet, safe, attractive, distinctive, and desirable residential environments with good tree cover and mature gardens;

- To safeguard local open spaces that are valued by residents and businesses;

- For the Village Centre to remain a vital and viable economic and community facility;

- For future generations to be able to enjoy and understand the areas of historical or architectural interest and significance; and,

- To provide good public transport and appropriate and car parking management necessary for a sustainable community.

2.54 Only part of the DNP area is within the boundary of the National Park.

Holme Valley Neighbourhood Plan

2.55 The Holme Valley Neighbourhood Plan [HVNP] was adopted in December 2021 and covers the period 2021 to 2035. The vision statement set out in the HVNP states:

The Holme Valley of the future will continue to be a beautiful rural landscape offering safe environments for wildlife and a place where its culture, heritage and splendour are celebrated by local people and visitors. It will be home to a vibrant and welcoming community whose people live and/or work within its thriving settlements. It will offer the services and facilities for modern life, whilst sustaining a strong sense of identity and belonging for everyone.

2.56 Only part of the DNP area is within the boundary of the National Park.

Further development of Neighbourhood Plans

2.57 At the time of writing, the Brampton Neighbourhood Plan [BrNP] was submitted to both North East Derbyshire District Council [NEDDC] and the PDNPA. It has now been examined and the independent Examiner's report has confirmed that the BrNP meets the Basic Conditions and other relevant legal requirements. A Referendum relating to the adoption of the Brampton Parish Neighbourhood Plan was held on the 21st November 2023.

2.58 HPBC have invited feedback from organisations and individuals on the Whaley Bridge Neighbourhood Plan [WBNP]. Following a Consultation period, the Whaley Public Referendum is planned for the December 2023.

2.59 The Hartington Neighbourhood Plan [HNP] is currently in the process of a pre-submission consultation as per regulation 14 of the 2012 Neighbourhood Planning Regulations.

Constituent Local Authority Evidence Base

Barnsley

2.60   The Barnsley Local Plan was adopted in January 2019 and aims to support jobs growth through the provision of at least 21,546 homes over the Local Plan period of 2014 to 2033 – equivalent to 1,134 dwellings per annum. The Local Plan retains the spatial strategy and settlement hierarchy set out in the Barnsley Core Strategy (2011) indicating that Urban Barnsley the principal towns of Wombwell, Hoyland, Penistone, Goldthorpe, Cudworth and Royston will be the focus of development during the plan period.

2.61   Key challenges set out in the Local Plan include:

- Providing the right mix, type, and density of housing;

- Meeting the need for affordable homes;

- Meeting the shortfall of sites for Travellers and Travelling Showpeople;

- Meeting the accommodation needs of children and vulnerable adults; and,

- Accommodating the shift towards a population profile with a growth in smaller households.

2.62   Barnsley Metropolitan Borough Council also published the Barnsley SHMA in June 2021 and considers the need for affordable housing and the size, type, and tenure of housing need for specific groups within the Borough up to 2033.

2.63   Key demographic drivers for housing include a projected population increase of 7.9% from 2019 to 2033 to 267,000 people. The Barnsley SHMA details a marked increase in the number and proportion of older residents in the Borough with the cohort projected to rise 34.2% over the period. Key economic drivers include 51.5% of Household Reference People are in employment 31.4% are retired, 8.6% are permanently sick or disabled and a further 5.6% are looking at the home or provide full-time care. ONS data also illustrates that across Barnsley, residents' incomes are comparable to those across Yorkshire and The Humber but below the national averages.

2.64   In terms of housing need, the SHMA sets out an additional dwelling requirement for Barnsley of at least 21,546 homes from 2014 to 2033. The scale of affordable housing requirements, accounting for supply through shared ownership sales, social and affordable relets, the SHMA sets out a net shortfall of affordable housing of 190 households each year. In terms of the HMA, the SHMA indicates that Barnsley is its own self-contained HMA. The SHMA does not indicate that any of the need identified will be met with the Peak District Boundary.

Cheshire East

2.65   The Cheshire East Local Plan was adopted in July 2017 and aims to support jobs growth through the provision of at least 36,000 homes from 2010 to 2030 – equivalent to 1,800 dwellings per annum. The Local Plan sets out how the policy principles underpinning the vision are to prioritise the development of brownfield sites and ensure a town-centre first policy to support the main urban centres across Cheshire East thereby deterring out of town development. In the main, new development will be directed to the Principal Towns of

Crewe and Macclesfield to support regeneration priorities as well as to the Key Service Centres such as Alsager, Congelton, Handforth, Knutsford, Nantwich, Poynton, Sandbach and Wilmslow.

2.66   Key housing challenges set out in the Local Plan include:

- Providing adaptable accommodation that accounts for an ageing population;

- Meeting affordable housing needs;

- Meeting the need for self-build and Key Worker housing; and,

- Reversing a declining working-age population across the Borough.

2.67   Cheshire East Council also published the Cheshire East Residential Mix Assessment in June 2019 and provides evidence for the size and tenure of dwellings required across the Borough and also considers the sub-groups in the population. The study underpins the Cheshire East Site Allocations and Development Policies spanning the period from 2018 – 2030.

2.68   Key population drivers include a total population growth of 21,000 over the period, at an average of 1,050 per year. Employment drivers in the Borough indicate that the economically active population in Cheshire East would increase by around 8,300 people over the period alongside a projected fall in unemployment culminating in around 12,849 extra available workers from 2010 to 2030.

2.69   The Report builds on the Cheshire East Housing Development Study published in June 2015 that set out a need for 36,000 homes over the period 2010 – 2030 at an average of 1,800 dwellings per annum (this figure includes an objective assessed need for affordable housing of a minimum of 7,100 dwellings – equivalent to an average of 355 dwellings per year.

2.70   In terms of the HMA, the 2015 Housing Development Study sets out that the Cheshire East HMA is split into two parts: the north linked to Greater Manchester and the South to North Staffs and given the Authorities' incongruence with either of the HMAs, it is reasonable to conclude that Cheshire East is its own HMA with the recognition of the two key sub HMAs. The Housing evidence base for Cheshire East does not indicate than any of the need identified will be met within the Peak District National Park boundary.

Derbyshire Dales

2.71   The Derbyshire Dales Local Plan was adopted in December 2017 and aims to support jobs growth through the provision of at least 5,680 homes over the Local Plan period of 2013 to 2033 – equivalent to 284 dwellings per annum. The market towns of Matlock, Ashbourne, and Wirksworth are the largest settlements in the Plan area accommodate the majority of the District's population, services and facilities. The spatial strategy seeks to focus future growth in these settlements and to strengthen their role as service centres.

2.72   Key housing challenges set out in the Local Plan include:

- An ageing population driven by inward migration of older families at the expense of younger people;

- A reduction in the average household size across Derbyshire Dales juxtaposed with an existing housing stock with a significant proportion of 4 or more-bedroom properties; and,

- A particular need across the Plan area to provide affordable housing.

2.73 Derbyshire Dales District Council also published the Derbyshire Dales HNA in September 2021 and provides an up-to-date evidence base regarding overall housing needs, affordable housing need and housing mix. Key population drivers set out in the HNA include a projected increase of between 1,539 and 4,566 residents from 2018 to 2040 as well as a projected increase of 3,424 households to 35,203 in 2040. Key economic drivers include an increase in economic activity rates, particularly in the district's older demographic as well as females across all age cohorts up to 2040.

2.74 The HNA builds on the HEDNA prepared by GL Hearn in 2015 that sets out a housing requirement for 5,680 dwellings over the plan period (2013-2033), equivalent to 284 dwellings per annum. In terms of the HMA, the HNA sets out that:

- The southern part of the district falls within a wider Derby-focused HMA that includes the areas of Ashbourne and Wirksworth.

- The northern part of the District falls within a Sheffield-focused HMA. This includes Bakewell and Hathersage.

- The Central part of the District, including Matlock, falls within an area of overlap between different HMAs with influences from Sheffield, Chesterfield and Derby.

2.75 The HNA also sets out that a proportion of the local housing need set out will be delivered in the Peak District National Park via a Memorandum of Understanding.

High Peak

2.76 The High Peak Local Plan was adopted in April 2016 and aims to support jobs growth through the provision of 7,000 homes over the Local Plan period of 2011 to 2031 – equivalent to 350 dwellings per annum. The Local Plan sets out that larger villages such as Chinley and Hayfield will benefit from development with an improved range of amenities and facilities while the areas of countryside and green space around the smaller villages will act as an important resource for recreational use.

2.77 HPBC policies do not apply to any land within the National Park, but they have duty to have regard to national park purposes. Namely, development proposals must seek to conserve and enhance the natural beauty, wildlife and cultural heritage of the constituent National Parks and promote opportunities for the understanding and enjoyment of the special qualities of the parks by the public.

2.78 Key housing challenges set out in the Local Plan include:

- A need to provide a sufficient quantum of affordable housing;

- To accommodate an ageing population;

- To provide an appropriate range of housing sizes, types, and tenures to safeguard the sustainability of towns; and,

- Reducing the local authority's per capita carbon footprint.

2.79   Lichfields produced the High Peak Housing and Economic Land Needs Assessment [HELNA] published by High Peak Borough Council in September 2022 that sets out the economic landscape of High Peak, the implications of employment growth on workforce and housing requirements and the related need for employment and housing land. With regard to housing, key population drivers include a projected increase of between 3,795 (2014 based Sub-National Population Projections [SNPP]) and 5,594 residents (2018 based SNPP) from 2021 to 2039 – a significant proportion of this growth is concentrated in those over the age of 65.

2.80   In terms of the HMA, the HELNA illustrates that in the decade to 2022, High Peak has experienced a strengthening level of self-containment with more people moving into the Borough from adjoining Greater Manchester authorities than before. Analysis showed that the self-containment in High Peak was sufficiently high for the Borough to be considered a single HMA for the purpose of considering housings needs.

2.81   Although High Peak Borough Council has no official agreement in place for any proportion of housing need to be delivered by the PDNPA, the HELNA sets out a recommendation for the Peak District to take on a housing share equating to less than 5%.

Kirklees

2.82   The Kirklees Local Plan was adopted in February 2019 and aims to support jobs growth through the provision of at least 31,140 homes over the Local Plan period of 2013 to 2031 – equivalent to 1,730 dwellings per annum. The Local Plan sets out how development will be located in accordance with the spatial development strategy allowing much of the growth to be met in the main urban areas of Huddersfield and Dewsbury with development in smaller towns supplementing this.

2.83   Key housing challenges include:

- Providing a sufficiently diverse housing offer that addresses Kirklees' ageing population and retains younger age groups; and

- A sufficient supply of affordable housing.

2.84   Kirklees Borough Council also published a SHMA in October 2016 setting an up-to-date analysis of the social, economic, housing, and demographic landscape across the Borough. Key population drivers include a total population increase of around 47,500 people or 11.1% from 2013 to 2031. This growth comprises a marked increase in the number and proportion of residents aged 65 and over which is expected to increase by an estimated 44.1% from 69,600 in 2013 to 100,300 in 2031. Furthermore, economic drivers include downward trending unemployment from 2013 to 2020 alongside a general increase in economic activity, particularly among the Borough's older demographics.

2.85   In terms of the HMA, the SHMA illustrates that although the report identified three Local HMAs (Huddersfield, Dewsbury and Mirfield, and Batley & Spen) operating within, across and beyond the Kirklees administrative area, analysis indicates a relatively high level of self-containment. Evidence therefore suggests that Kirklees Borough is a self-contained HMA for the purposes of Local Plan policy making.

2.86   The SHMA also sets out an Objectively Assessed Housing Need [OAN] figure of 1,730 per annum for the period and furthermore does not indicate that any of the need identified will be provided for under the auspices of the PDNPA.

North East Derbyshire

2.87   The North East Derbyshire Local Plan was adopted in November 2021 and aims to support jobs growth through the provision of at least 6,600 homes over the Local Plan period of 2014 to 2034 – equivalent to the 330 dwellings per annum. The spatial strategy contained within the Local Plan sets out that much of the housing development will come forward in 'Level 1 Settlements' comprising the four towns of Clay Cross, Dronfield, Eckington and Killamarsh. These towns are considered to be the most sustainable locations for new development in North East Derbyshire with 'Level 2 Settlements' (Level 2 settlements include places such as Calow, Grassmoor, Holmewood and Morton) providing the locations for the remaining planned housing growth.

2.88   Key housing challenges set out in the Local Plan include:

-    A need for more housing to accommodate the district's ageing population;

-    A high ratio of house prices to household income means that affordability is a key issue for many parts of North East Derbyshire; and,

-    An estimated 10% of the district's population live in the top 20% most deprived neighbourhoods in England.

2.89   North East Derbyshire Council's most recent SHMA was published in October 2013 with a subsequent Objectively Assessed Need update published in October 2017 and is the product of a joint commission by Chesterfield Borough Council, and Bassetlaw, Bolsover and North East Derbyshire District Councils. Population drivers include a projected increase in the total population of 5,494 residents or 5.5% in North East Derbyshire and 24,793 or 6.3% across the wider HMA.

2.90   In terms of the HMA, the SHMA sets out that the HMA includes the local authority districts of Bolsover, Bassetlaw, Chesterfield and North East Derbyshire and furthermore recognises the economic linkages between the area and Sheffield and Rotherham to the North. The SHMA does not indicate that any of the housing need for North East Derbyshire is provided for under the auspices of the PDNPA.

Oldham

2.91   At the time of writing, the Places for Everyone [PfE] Greater Manchester Local Plan is currently undergoing an Examination in Public [EiP] and has therefore not yet been adopted by Oldham and the eight other comprising authorities. As such, the Joint Core Strategy and Development Management Policies Plan, adopted in November 2011 remains extant. The Oldham Core Strategy aims to support jobs growth through the provision of at least 5,780 homes over the Local Plan period of 2011 to 2031 – equivalent to 289 dwellings per annum. The spatial strategy set out in the Local Plan illustrates that much of the development will be focused on key regeneration areas including Oldham Town Centre and areas within and accessible to the Borough's other centres of Chadderton, Failsworth, Lees, Royton, Shaw and Uppermill).

2.92   Key housing challenge set out in the Core Strategy include:

- The need to improve the choice, quality, and affordability of new homes;

- The opportunity to bring forward brownfield sites for development; and

- The provision of an appropriate housing mix across the Borough.

2.93   The evidence base underlying the PfE Local Plan comprises The Greater Manchester SHMA, published in April 2021, that provides more contemporary housing evidence for the nine constituent Boroughs, including Oldham, over the period 2018 to 2043.

2.94   Regarding Oldham Borough, key population drivers include a projected increase in the total population of around 11.9% over the period with a significant increase in the share of residents over 65 across the conurbation. Furthermore, economic drivers set out in the SHMA include, in the decade to 2020 an improving economic activity rate and a greater proportion of residents qualified at least to level 4 or above.

2.95   The SHMA defines the entire Greater Manchester area as a single HMA for strategic planning purposes though acknowledges the strong economic linkages not just to the district surrounding the boundary but to other cities across the country. In terms of Oldham specifically, the SHMA does illustrate that Oldham is above the PPG suggested threshold (70%) for self-containment (75%) however does remain slightly below the conurbation-wide figure of 81%. To the north of Greater Manchester, there are strong economic linkages with Rossendale and Blackburn with Darwen.

2.96   The SHMA sets out a Local Housing Need of 11,392 per annum across Greater Manchester, including a total of 677 per annum in Oldham and furthermore does not indicate that any of the housing need for Oldham, or indeed wider Greater Manchester, will be met under the auspices of the PDNPA.

Sheffield

2.97   Sheffield City Council are currently developing a new draft Sheffield Local Plan that will guide future development from 2019 to 2039 and carried out a statutory public consultation on the Issues and Options document in 2020. The Regulation 18 Issues and Options document outlined an intention to build around 40,000 homes up to 2039 to cater for the growing population – this would equate to around 2,000 dwellings per annum over the plan period.

2.98   The current Sheffield Development Framework Core Strategy was adopted in March 2009 and aims to support jobs growth through the provision of at least 29,750 homes over the Local Plan period of 2004 to 2026 – equivalent to an average of 1,025 dwellings per annum from 2004 to 2007 and an average of 1,425 dwellings per annum from 2008 to 2026. The overall approach to the location of land for housing adheres to the spatial strategy with its focus on development in the main built-up area of Sheffield. The main urban area of Sheffield will comprise at least 90% of additional dwellings in addition to further development in the areas of Stocksbridge and Deepcar. Furthermore, outside of the urban areas and larger villages, housing development will be limited.

2.99   Key housing challenges set out in the Local Plan include:

- A present imbalance in the housing market with high demand to the South West of the housing market alongside a decline in areas to the North and inner South East areas where regenerative efforts are needed;

- The growing proportion of elderly people and a general ageing of the population; and,

- The significant projected shortfall of affordable homes across several areas of Sheffield.

2.100   Sheffield City Council also published the Sheffield and Rotherham SHMA in July 2018 that sets out the structure and operation of the local housing market. Key demographic trends across Sheffield and Rotherham include an increasing overall population and a region that is becoming increasingly ethnically diverse. Looking forward, Office for National Statistics [ONS] 2014 based SNPP indicate that the total population is expected to increase from around 280,000 in 2016 to around 290,000 by 2041 in Rotherham and from around 580,000 to 640,000 in Sheffield over the same period.

2.101   In terms of the HMA, the SHMA illustrates that the local housing market area functions across the local authorities of Sheffield City Council and Rotherham Metropolitan Borough Council. Discussions with Officers at Sheffield Local Planning Authority [LPA] also indicated that the Peak District Fringe sub housing market area comprises the entirety of the constituent National Park and forms its own sub-regional HMA. Neither the latest Sheffield and Rotherham SHMA not discussions with planning offices indicated that any of the need for the Sheffield and Rotherham HMA would be met under auspices of the PDNPA.

Staffordshire Moorlands

2.102   The Staffordshire Moorlands Local Plan was adopted in September 2020 and aims to support jobs growth through the provision of at least 5,700 homes over the Local Plan period of 2014 to 2033 – equivalent to 300 dwellings per annum. The spatial strategy set out in the Local Plan emphasis development in the market towns of Leek, Biddulph and Cheadle with a more modest scale of development in the villages that lie within the Rural Area.

2.103   Key housing challenges set out in the Local Plan include:

- A significant rise in older persons across Staffordshire Moorlands;

- A decline in the number of young people and families is a major concern, particularly in rural areas where communities are ageing; and,

- Providing an appropriate quantum of affordable housing across Staffordshire Moorlands.

2.104   On behalf of Staffordshire Moorlands Council, Lichfields produced the Staffordshire Moorlands SHMA Update in February 2017 and following the initial SHMA produced the previous year. Key population drivers include historical and future population growth across Staffordshire Moorlands increasing from around 95,000 in 2006 to around 97,900 in 2015. The 2014-based SNPP project this increase to continue with the districts population likely to reach just over 100,000 by 2033.

2.105   In terms of the HMA, the SHMA sets out that, based on migration commuting data, Staffordshire Moorlands District in isolation does not comprise a self-contained HMA.

3.0   **Methodology**

3.1   The Peak District has the highest status of protection in respect to conserving and enhancing the landscape and scenic beauty. The NPPF states that great weight should be given to this and recognises the need to limit the scale and extent of development [paragraph 176]. Unlike other local planning authorities, national parks are exempt from housing targets. Nevertheless, the PDNPA is required to understand housing needs and to focus on meeting local affordable housing requirements (National Parks Circular (2010) para. 782).

3.2   The PPG states that national parks "*may continue to identify a housing need figure using a method determined locally[8]*". However, any alternative approach that we use to understand housing need will be tested at examination and our evidence must be 'robust'[9].

3.3   In this regard, Lichfields has modelled a series of population projections up to 2045 that reflect different migration, population and dwelling led scenarios. This has used Lichfields' HEaDROOM tool, which comprises of a conceptual framework for identifying local housing requirements providing a robust basis for planning through Local Plans (see Figure 3.1).

Figure 3.1 HEaDROOM Framework for Objective Assessment of Need for Housing
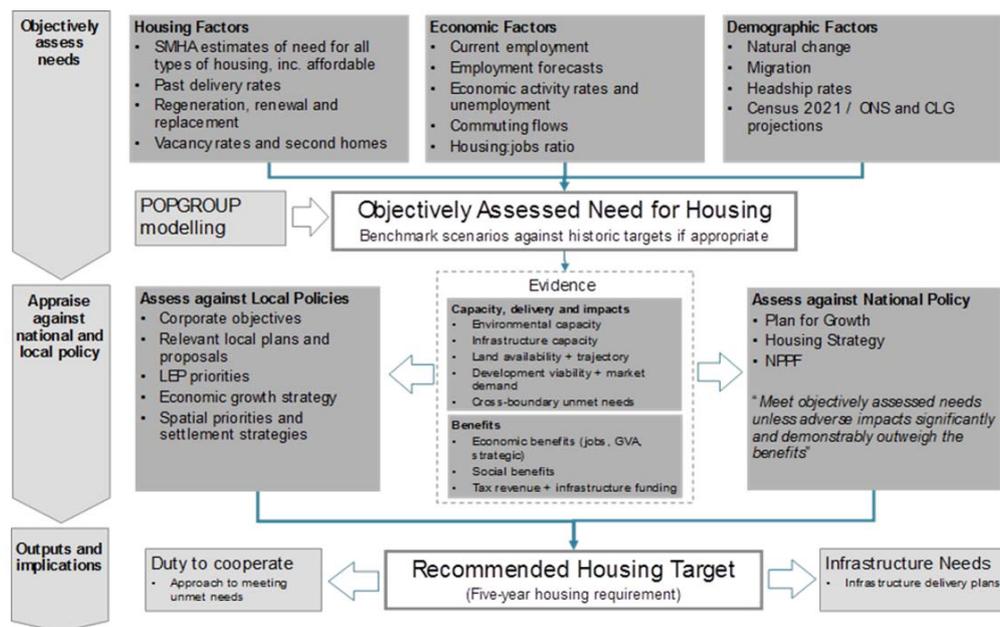
Source: Lichfields

3.4   The approach has evolved over the years so that it continues to align with the changing requirements of the NPPF, the PPG, and the Government's former SHMA Practice Guidance, providing the necessary evidence and 'core outputs' to estimate local future housing need and demand.

3.5   The modelling generates a total population projection for the whole Peak District, with this figure to be split between High Peak, Derbyshire Dales and Staffordshire Moorlands, for the

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[8] Reference ID: 2a-014-20190220
[9] Reference ID: 2a-015-20190220

following migration, population and dwelling led scenarios, taking into account demographic change and housing delivery from 2006/07:

3 Migration trend scenarios:

1   Balanced flows

2   15 year history

3   6 year history

1 Population Scenario

4   Zero Population Growth (the number of houses needed to keep the population stable as a number (not structure)

4 Dwelling led scenarios

5   0 dwellings per annum [dpa]

6   48 dpa

7   95 dpa

8   150 dpa

Identification of the type, tenure and size of housing required

3.6   Paragraph 61 of the NPPF states that:

"...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)."

3.7   The PPG sets out guidance on how plan-making authorities should identify and plan for the housing needs of particular groups of people. It states that:

"This may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.

Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- *the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*

- *the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and*

- *the anticipated deliverability of different forms of provision, having regard to viability."*[10]

3.8 This element of the work identifies the type, tenure and size of housing required. The demographic modelling outlined above has been used as the starting point to quantify need by Peak District sub-area. This has then been broken down by the following categories as required by the NPPF:

- Private rented sector;

- self-build and custom building;

- family housing;

- housing for older people;

- housing for people with disabilities/mental health;

- student housing;

- service families; and,

- affordable housing.

3.9 The revised PPG states that plan-making authorities will need to count housing provided for older people against their housing requirement[11]. For the purposes of this study however, the needs of individuals living in communal (use class C2) accommodation, such as elderly residents living in Care Homes and students living in halls of residence, have been assessed separately.

Affordable Housing Needs

3.10 Lichfields has developed a methodology to enable a tenure split between intermediate, social rent, affordable rent and First Homes. The approach adopted by Lichfields examines the interaction between housing costs and income. An analysis has been taken of the ability of households with insufficient income to afford access to market housing, and to afford different types of affordable housing.

3.11 This element of the HNA draws upon a wide range of existing sources of data to identify affordable housing needs, relating to:

- The local housing market;

- Market signals, including house prices and affordability issues;

- The existing stock of affordable housing;

- Anticipated future changes in the affordable housing stock; and,

- Current and anticipated future levels of need for affordable housing.

3.12 The affordable housing target has been broken down by tenure, size, and type. Lichfields also considered the affordable rent model and the ability of households across the Peak District to pay up to 80% market rents, as well as the need for intermediate housing and First Homes.

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[10] 67-001020190722

[11] 63-016a-20190626

3.13   The PPG also requires a calculation to be made of the total annual need for affordable housing, as follows:

"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

*The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. **An increase in the total housing figures included in the plan** may need to be considered where it could help deliver the required number of affordable homes."[12]* [Lichfields' emphasis]

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[12] PPG: ID: 67-008-20190722

4.0   Defining the HMA

4.1   This section provides a broad overview of the Peak District and the HMAs that exist / operate in the National Park. The following provides an up-to-date analysis of the extent of the HMA in accordance with the guidance contained within the PPG, using the 2011 Census data on migration and commuting levels (and 2021 Census data where available at the time of writing).

4.2   Whilst the standard methodology for assessing local housing need assumes that each local authority administrative area forms its own HMA, identifying the extent of the HMA using the approach set out in this chapter is an important step in understanding the dynamics of the local housing market which will help inform and underpin the housing policies to be adopted in the PDNPA's emerging Local Plan.

4.3   The methodology adopted for this study follows the PPG approach on defining HMAs within and across local authority areas[13].

4.4   Regarding HMAs, the PPG states that this is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. These can be broadly defined by analysing:

- *"The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas.*

- *Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained, (due to connections to families, jobs, and schools).*

- *Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g., work or service use)."*

4.5   The Localism Act 2011 includes the statutory duty to cooperate on strategic planning for cross-boundary issues, and this is a requirement reiterated in the NPPF in terms of addressing issues including housing figures and job growth.

4.6   HMAs are inherently difficult to define. They are a geographic representation of people's choices and preferences on the location of their home, accounting for where they want to live and work. They can be defined at varying geographical scales from the national scale to sub-regional scale, down to local and settlement specific scales. HMAs are also not definitive. As well as a spatial hierarchy of different markets and sub-markets, they will inevitably overlap.

4.7   Previously, the '*Identifying sub-regional housing market areas'* advice note (March 2007) produced by the Government recommended that a measure of migration flow patterns can identify the geographical relationships of where people move house within an area with a 70% containment rate of migratory activity typically representing an HMA. In particular:

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[13] 61-018-20190315

"The typical threshold for self-containment is around 70 per cent of all movers in a given time period. This threshold applies to both the supply side (70 per cent of all those moving out of a dwelling move within that same area) and the demand side (70 per cent of all those moving into a dwelling have moved from that same area). Some areas maybe relatively more or less self-contained, and it may be desirable to explore different thresholds."

4.8   This level of self-containment was also recommended in the first iteration of the PPG (from March 2014). However, the PPG was revised in September 2018, removing the reference to 70% and instead stating that migration flow and housing search patterns can:

"...help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained."[14]

4.9   This arguably introduces an element of ambiguity in terms of what comprises a 'relatively high proportion' which suggests this may be up to the discretion of policy makers. Migration flows and calculation of self-containment percentages within and between local authorities have been used by Lichfields to assist in defining the HMA.

HMA Analysis

Previous analyses of HMAs for the PDNPA

Peak Sub-Region SHMA (December 2008)

4.10   This study first reported the findings of the 2005 study which assessed the sub-regional housing markets within the East Midlands. This exercise identified ten housing markets within the region. The author (DTZ) concluded that the majority of the area of the Borough of High Peak and Derbyshire Dales District [HPDD] comprised a single HMA, (see Figure 4.1) and that it made sense for a single HMA to be undertaken for both the Districts, while acknowledging that parts of the districts might fall into adjacent housing markets.

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[14] Lichfields emphasis

Figure 4.1 Spatial Delineation of the Sub-Regional Housing Markets of the East Midlands
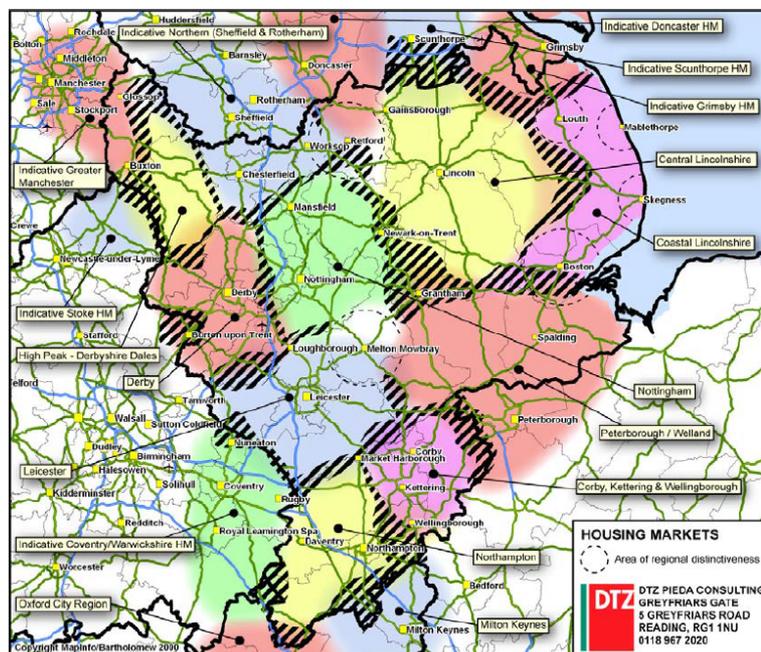
Source: DTZ (2005)

4.11   The subsequent 2008 study revisited the data at a more detailed spatial level to establish the degree to which HPDD operate as a single sub-regional HMA and the extent of the housing and economic relationship with adjacent markets (such as neighbouring districts, the rest of Derbyshire and the East Midlands.

4.12   The study found that there was little evidence of migration between the two component districts of the HPDD sub-area, with migration between HPDD accounted for just 300 of 8,500 overall household moves according to the 2001 Census. Levels of in migration and out migration were virtually the same.

4.13   Of particular note:

- Some 21% of in migrants are from three neighbouring metropolitan local authority areas: Tameside, Stockport and Sheffield.

- The same three local authority areas stand out as important destinations for outmigrants, with neighbouring Amber Valley also being a reasonably important destination.

- Migration is "localised" - virtually all Greater Manchester movements are to/ from neighbouring High Peak (most of which are movements between Glossop and Tameside, and New Mills and Stockport), and most internal migration along short distances.

- Travel to work patterns correlate with migration patterns – that is to say that there is little cohesion between the two Local Authority areas, and there is significant net out commuting, mostly from High Peak to the Greater Manchester area, suggesting that as people move out to the HPDD sub-area, they retain their jobs and commute. There is very little travel to work movement from Derbyshire Dales to Greater Manchester, with this area relating more to hinterlands to the south and east.

- Greater Manchester and Sheffield are key out-commuting destinations for people in the Peak National Park.

- The analysis confirms the 2005 regional level mapping which indicated that a significant part of the High Peak District is functionally part of the Manchester housing market, and that other parts on the edge of the HPDD are similarly strongly influenced by the surrounding urban centres. These influences have probably increased since 2001.

4.14   However, DTZ concluded that this does not undermine the validity of undertaking the HMA for the HPDD because of its special character, linked to the National Park. Recently published maps of Travel to Work Areas [TTWA], based on detailed analysis of the 2001 Census, also show that in 2001 there was still a self-contained Buxton TTWA and a self-contained Matlock TTWA:

"The analysis does indicate however, that the east and the west of the HPDD have very similar issues, and it makes sense to formulate a common policy. In strict terms the area does not have a unified housing market, with stronger ties to proximate urban settlements to east and west than within the area. The existence of two travel to work areas covering the majority of the area confirms this" [page 17].

4.15   The report concluded that one cannot consider the HPDD sub area as a single HMA, rather High Peak, Derbyshire Dales and the Peak District are united by common issues apparent throughout the area, including a lack of an adequate supply of affordable homes, high levels of second home ownership, limited supply of private rented stock, and limited supply of social housing [paragraph 2.46].

4.16   It must be noted that even at the time of the SHMA's release in 2008, the data underpinning this HMA analysis was already 7 years old, and is now more than 22 years out of date at the time of writing.

4.17   In conclusion, previous evidence demonstrates that the Peak District is in an area of overlapping HMAs. Previous work has not settled on a particular boundary or defined with absolute certainty the HMA in which the National Park sits. This has influenced this study and should be taken into account by the PDNPA and constituent LPAs going forward.

Housing Demand and Supply

4.18   Figure 4.2 shows median house prices across the Peak District and its neighbouring / overlapping local authorities. The median house price across the Peak District was £342,661 in the year to December 2022, compared to a much lower figure across the East Midlands (£234,995), the West Midlands (£232,000), and England (£286,000).

4.19   Median house prices within the Peak District are generally highest in the White Peak and Derwent Valley sub-area with median house prices of £462,500 in the year to December 2022. Median house prices in the Dark Peak and Moorland Fringes are more reflective of the National Park average at £346,231 whilst median house prices in the South West Peak sub-area are significantly lower than the average at £266,880.

Figure 4.2 Median House Price Paid (2022)
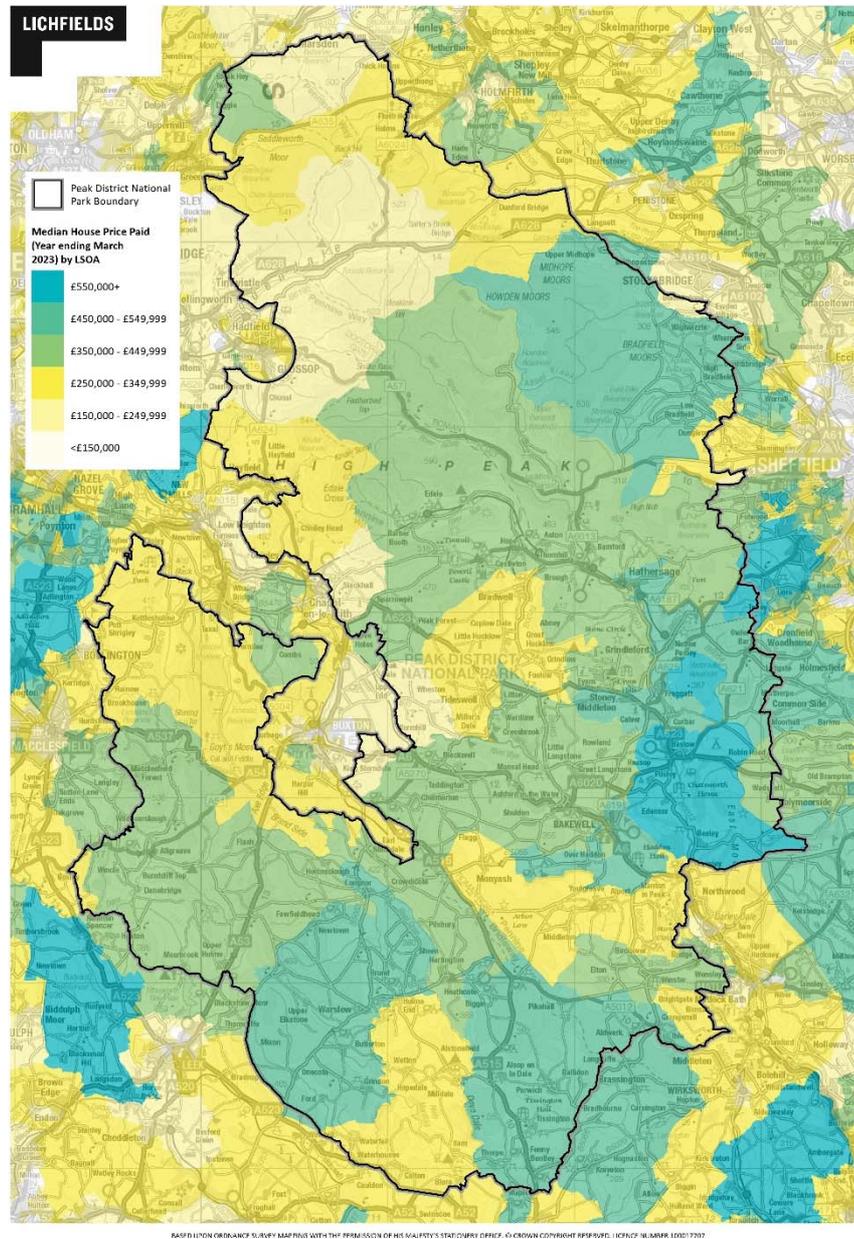
Source: Median House Price by Lower Layer Super Output Area: HPSSA dataset 46

4.20   Figure 4.3 illustrates the percentage growth in median house prices by Lower Super Output Area [LSOA] from 2013 to 2023. Overall, median house prices grew by £135,000 or by 63.5% from the 2013. However, this figure masks a level of variance across the Peak District sub-areas with median house prices growing by £119,000 (63.4%) across the Dark Peak and Moorland Fringes and by £159,921 (65.8%) across the White Peak and Derwent Valley sub-area, whilst median house prices across the South West Peak increased by £136,000 or 52.6% over the period.

Figure 4.3 Change in Median house Price in Peak District National Park (2013 – 2023)
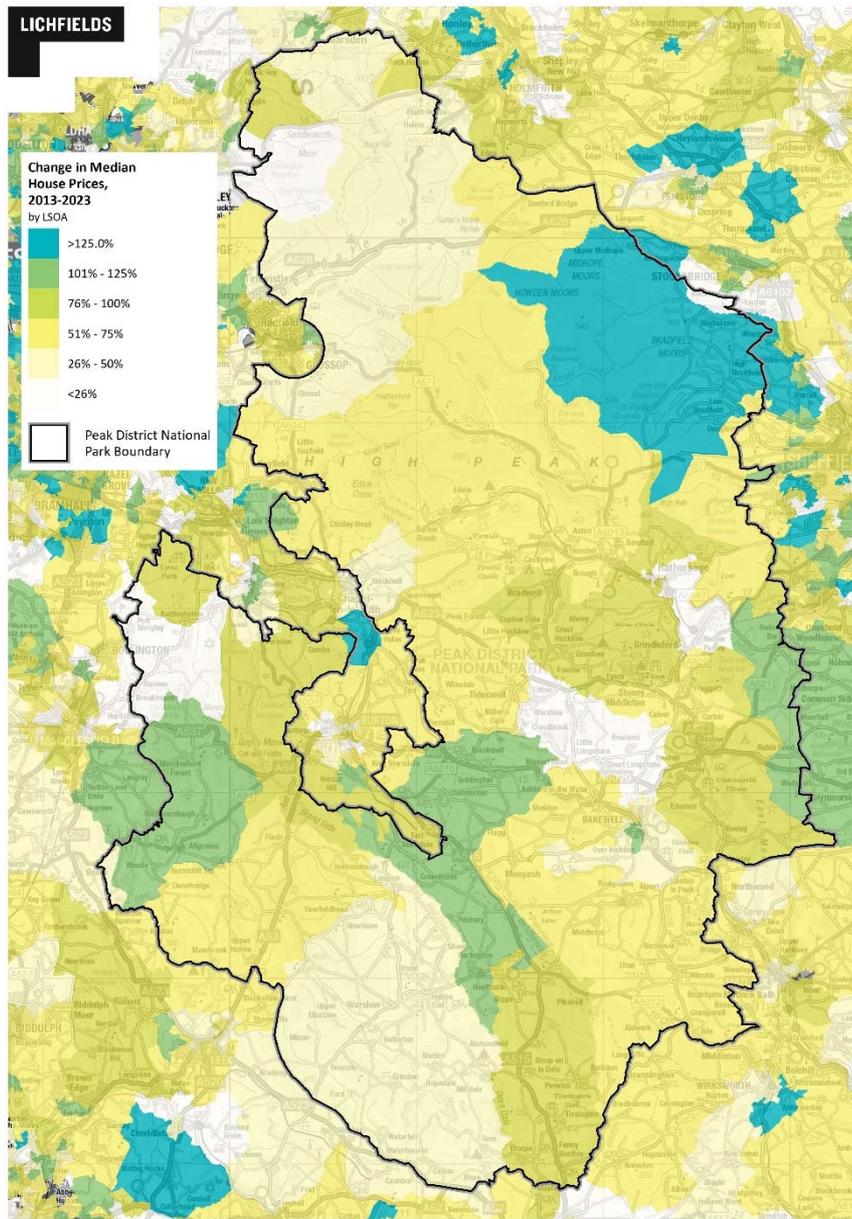
Source: Median House Price by Lower Layer Super Output Area: HPSSA dataset 46

Commuting Patterns

4.21   In July 2014, origin/destination data on commuting patterns was released for the 2011 Census at local authority level. At the time of writing (summer 2023) this remains the most up to date information as the ONS has yet to release comparable commuting statistics from the 2021 Census. Although some raw data is available, the ONS's Origin-Destination dataset is currently unable to be used for workplace and migration analysis due to the limited comparability provided between different geographies.

4.22   Due to the complexity and size of the data, the ONS' release does not allow for analysis between local authority, Output Area or Middle Super Output Area making it difficult to

understand flows between the National Park and wider UK local authorities. The ONS has not confirmed when this will be available.

4.23   Based on the 2011 Census data, it appears that there is a relatively low level of inter-dependency between the Output Areas of the Peak District and neighbouring / overlapping authorities in terms of commuting patterns. The National Park has a resident workforce population of 31,145, of whom 17,337 commute in to work from other areas. This means that 44.3% or 13,808 of the Peak District's residents also work in the National Park – this includes 8,396 who work from home within the National Park. The majority of these 13,808 residents (7,967) live in that part of Derbyshire Dales that lies within the National Park, with 2,409 in the High Peak area and 1,397 in the Staffordshire Moorlands area.

Figure 4.4 Peak District National Park Commuting Flows (2011)
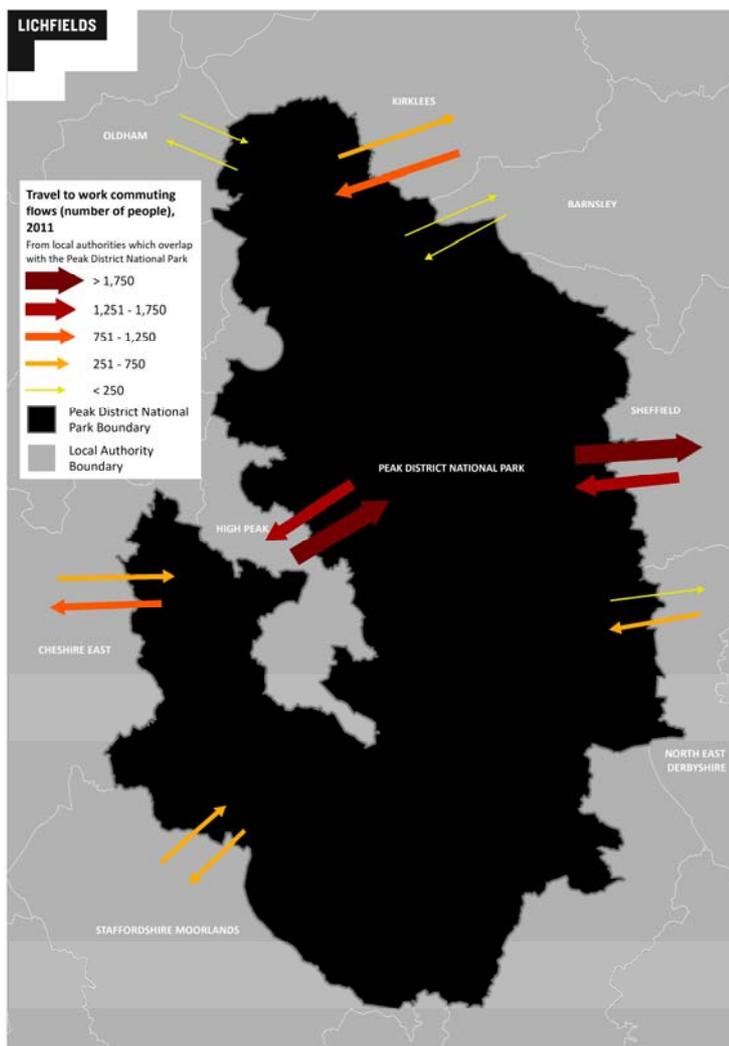
Source: O/D Data, 2011 Census

4.24   Similarly, the Peak District has a workplace population of 26,483, of whom 12,675 people commute out to other authorities for work. This means that 52% of people who are in work in the Peak District also live in the National Park. These are relatively low levels of self-containment, and well below the typical 66.6% to 75% thresholds for defining distinct TTWA.

Travel-to-Work Areas

4.25   Detailed guidance on how to define a Functional Economic Market Area [FEMA] has been produced by the Government[15]. This states that examining commuting flows can help to define the FEMA of an economy. The latest commuting flows data from the 2011 Census can be used to define TTWAs to consider the relationship between where people live and where they work.

4.26   TTWAs provide a good indication of which labour market a location or local authority is in and how labour market areas are split across the UK. The ONS 2011 TTWAs were developed to approximate self-contained labour market areas, i.e. areas where most people both live and work and therefore relatively few commuters cross a TTWA boundary on their way to work.

4.27   The ONS 2011 TTWA mapping indicates that much of the Peak District falls within the Buxton TTWA, which covers most of the central part of the National Park. Meanwhile, the northern and western sides of the National Park fall within the Manchester TTWA (which also includes Whaley Bridge, New Mills and Glossop just beyond the Peak District's boundaries). A portion in the east of the Peak District also sits within the Sheffield TTWA, including Bamford, whilst the south eastern part of the Peak District, including the largest settlement of Bakewell, lies within the Chesterfield TTWA. Four other TTWAs also overlap the Peak District National Park's boundaries to a lesser extent, namely Stoke on Trent and Derby to the south, and Huddersfield and Barnsley to the north.

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[15] DLUHC (2010) Functional Economic Market Areas: An Economic Note

Figure 4.5 Travel to Work Areas
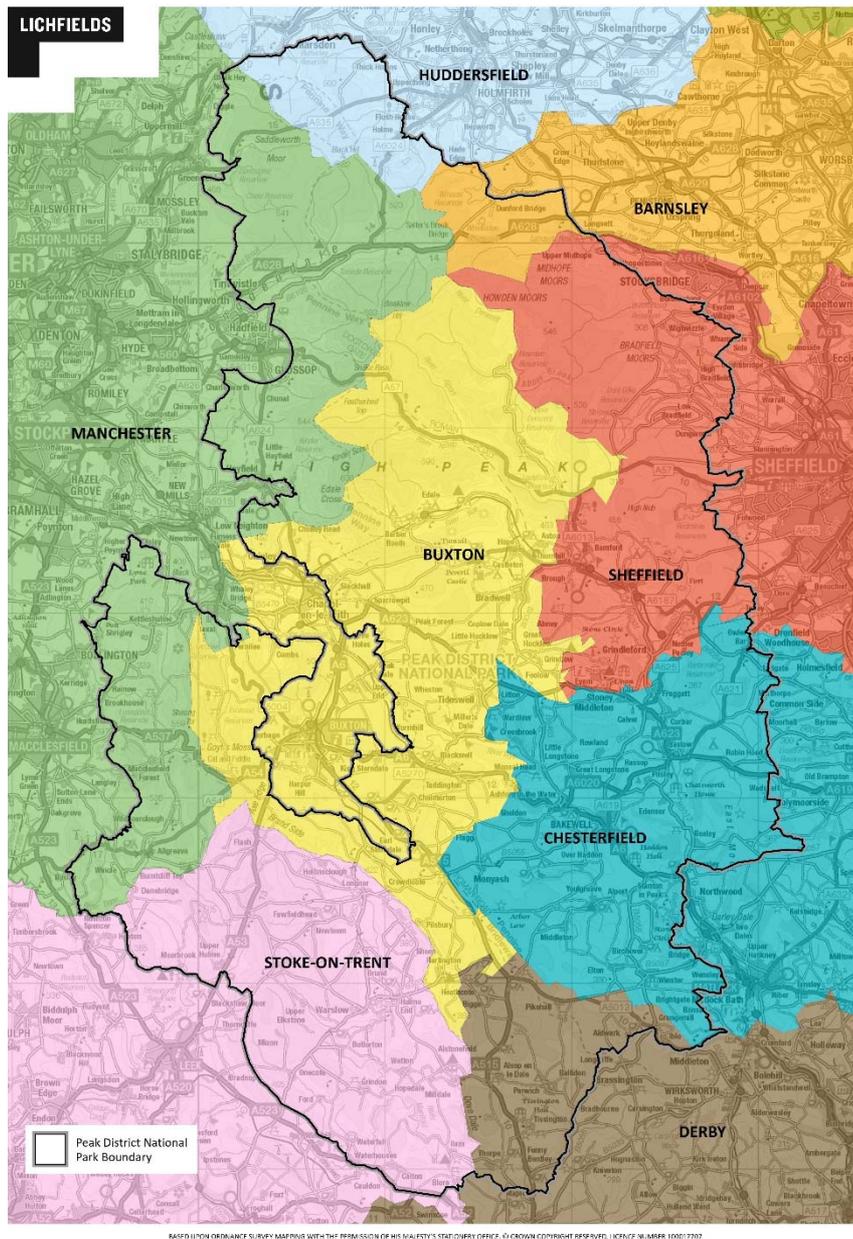
Source: ONS TTWAs, based on 2011 Census data (2015)

Flow of goods, services, and information within the local economy

4.28   The flows of goods, services and information in an area are influenced by a range of factors including digital connectivity, the location and change in the stock of commercial floorspace, commercial property market geographies and transport networks. These are considered in the sub-sections below.

Duty-to-Co-operate

4.29   The Localism Act 2011 sets out that the duty to co-operate [DtC] applies to activities which can 'reasonably be considered to prepare the way' for a development plan or local

development document. This is reaffirmed by the NPPF, which sets out a paragraph 24 that:

"Local Planning Authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."

4.30   Regarding the DtC, it is relevant to note that the Levelling Up and Regeneration Act [LURA] became law on 26th October 2023. Amongst a raft of important changes to the current planning process, the Government repealed the current DtC and introduced a legal obligation via the Localism Act 2011 that requires cooperation between LPAs with regard to plan-making.

4.31   DtC has been replaced by a 'requirement to assist' with certain plan making. This requirement to assist is broader than DtC in the sense that it covers a range of prescribed public bodies. The government has provided clarity that despite abolition of DtC, there will be a continued need for engagement between the plan-making authorities and relevant bodies when planning development to enable delivery of infrastructure at a local or strategic level. Further regulations are required to define the scope of these requirements.

4.32   New powers are also proposed that would allow for at least two LPAs to produce a joint spatial strategy. This would have the similar effect to the strategic role of the Greater Manchester PfE plan, albeit across much smaller geographies.

4.33   Whilst there remains a requirement on specific bodies (prescribed public bodies) to assist in the plan-making process (if requested by the plan making authority), cross boundary issues are likely to remain a challenge in particular the ability to assist in accommodating growth from a neighbouring authority.

4.34   This HNA recognises that all nine constituent LPAs of the Peak District have pursued individual Local Plans and are at varying stages of the plan-making process. However, it is currently understood that, with the exception of Derbyshire Dales, neighbouring LPAs are committed to meeting their own housing land needs and do not require the National Park to accommodate any of their needs, or vice versa.

4.35   Lichfields contacted all nine of the constituent LPAs and, where discussions took place, details are set out below.

Barnsley

4.36   Discussions with Officers at Barnsley Metropolitan Borough Council indicated that following the publication of the Barnsley SHMA in June 2021, there is no expected update to the authorities' housing evidence base in the pipeline. Discussions highlighted a self-contained housing market with the Peak District bearing no role in assisting Barnsley Borough Council to meet its housing need.

Cheshire East

4.37   Discussions with Officers at Cheshire East Borough Council indicated that following the publication of the Cheshire East SHMA in 2013, and subsequent Housing Development Study 2015, officers set out the intention to commission a new SHMA towards the end of 2024. Discussions highlighted a self-contained housing market across the Cheshire East

due to the awkward fit between the northern part of the Borough with Greater Manchester and the Southern part to the North Staffordshire area. Furthermore, discussions highlighted that Cheshire East does not help nor is helped by any other surrounding authority to meet needs with provision taking place outside of the Peak District area.

Derbyshire Dales

4.38   Discussions with Officers at Derbyshire Dales District Council indicated that following the publication of the Derbyshire Dales Housing Needs Assessment in 2021, there is no update to the housing evidence base in the pipeline. Discussions highlighted that for the purposes of the objectively assessed housing need, Derbyshire Dales is a single HMA with the PDNPA currently having no role in helping the District meet its overall housing need.

High Peak

4.39   Lichfields produced the High Peak Housing and Economic Development Needs Assessment [HEDNA] in 2022 and remains the most up to date housing evidence for the Borough. Discussions highlighted that High Peak remains a single HMA for the purposes of considering housing needs and it is understood that the Peak District currently has no role in helping the Borough meet its overall housing need.

Kirklees

4.40   Despite repeated requests for input Kirklees Council has not responded to Lichfields. Given the small population in this Borough in the National Park it is assumed that the Peak District has no role in helping the authority meet its overall housing need.

North East Derbyshire

4.41   Discussions with Officers at North East Derbyshire District Council indicated that following the publication of the North East Derbyshire SHMA in 2013 and subsequent OAN update 2017, Officers are formulating a specification for a new SHMA/HEDNA intending to commission consultants by the end of 2023. Discussions highlighted that the Peak District has no role in helping the district meet overall housing need and there are no identified settlements in the National Park area.

Oldham

4.42   Despite repeated requests for input Oldham Council has not responded to Lichfields. Given the small population in this Borough in the National Park it is assumed that the Peak District has no role in helping the authority meet its overall housing need.

Sheffield

4.43   Discussions with Officers from Sheffield City Council indicated that following the publication of the Sheffield and Rotherham SHMA in 2019, there is no expectation among Officers to update the housing evidence base until around 2025. Discussions highlighted that the last two SHMAs have been joint commissions between Sheffield City Council and Rotherham Metropolitan Borough Council given that both local authorities function as a single housing market. Council Officers set out that Sheffield's existing housing needs are met outside of the National Park and furthermore expect no change to this.

Staffordshire Moorlands

4.44   Discussions with Officers from Staffordshire Moorlands District Council indicated that following the publication of the Staffordshire Moorlands SHMA Update in 2017 by Lichfields there has been no further update to the housing evidence base and as such the report remains extant. Furthermore, discussions with Officers did not indicate any update to the District's housing evidence base was in the pipeline. Discussions also highlighted that Staffordshire Moorlands District Council does not depend on the PDNPA to meet any of the District's housing need.

Conclusion on the extent of the HMA

4.45   At the time of writing, the 2011 Census remains the most up to date information on commuting and migration statistics as the ONS has yet to release comparable commuting statistics from the latest Census. Although some raw data is available, the ONS's Origin-Destination dataset is currently unable to be used for workplace and migration analysis due to the limited comparability provided between different geographies.

4.46   Unsurprisingly, the ONS 2011 TTWA data indicates that residents of the National Park are drawn in very different directions depending upon their proximity to the major urban centres that surround the Peak District. Whilst the central part of the Peak District is centred on Buxton, the northern and western sides of the National Park fall within the Manchester TTWA. A portion in the east of the Peak District also sits within the Sheffield TTWA, whilst the south eastern part of the Peak District, including the largest settlement of Bakewell, lies within the Chesterfield TTWA. Four other TTWAs also overlap the Peak District National Park's boundaries to a lesser extent, namely Stoke on Trent and Derby to the south, and Huddersfield and Barnsley to the north.

4.47   The assessment of the extent of the HMA and TTWA demonstrates that the Peak District has a relatively weak level of self-containment in terms of local housing market dynamics, as well as commuting and migration patterns. The updated information reinforces the conclusion of the 2008 SHMA that whilst the Peak District cannot reasonably be considered a single HMA, the Peak District elements of High Peak, Derbyshire Dales and Staffordshire Moorlands districts are nevertheless united by common housing issues apparent throughout the area.

5.0   Housing and Demographic Context

5.1   This section provides evidence at a national, regional and local level to provide context for the housing market analysis, exploring the demographic context as well as trends in the local housing market.

Demographic Context

5.2   Understanding the demographic context of an area is critical to understand the foundations for a robust objective assessment of housing need. Up-to-date demographic evidence, informed by the 2021 Census and other nationally consistent data sources such as the Annual Population Survey [APS] and ONS Mid-Year Population Estimates [MYPE], provides an understanding of:

- How the Peak District's population has evolved in the past;

- How the key components of change (notably births, deaths, and migration) have influenced this; and,

- How they are likely to continue shaping population and household change in the future.

Methodology Note

5.3   National Park boundaries across England and Wales do not align with the established administrative boundaries that are used to inform the collection of Census data. National Park data is created by plotting unique properties as identified by their Unique Property Reference Number [UPRN] or postcodes into National Park boundaries current in December 2022. This differs from the Output Area [OA][16] best fit methodology used for other geographical level data[17].

5.4   In this context, Lichfields commissioned ONS to provide a comprehensive list of OAs for both 2011 and 2021 that overlap with the established Peak District boundary and the associated population within the National Park for each OA. The demographic analysis set out below combines the population of the Output Areas that are entirely within the National Park and number of residents living within the Peak District in those Output Areas that straddle the National Parks administrative boundaries, by age and sex.

5.5   In total, some 185 OAs are either wholly within, or straddle the PDNPA's administrative boundaries. Of these OAs, 114 OAs are wholly within the National Park, and 71 straddle the boundary. Five of these latter OAs had no residents at all living in the Peak District according to ONS.

Population and Household Change

5.6   Table 5.1 sets out the total population change across the Peak District as per the 2011 and 2021 Censuses. It indicates that the population of the National Park fell from 37,905 in 2011 to 35,897 in 2021 – a fall of 2,008 or 5.3% over the period.

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[16] Output Areas are designed specifically for statistical purposes. They are based on data from the 2001 Census and were built from postcode units. Output Areas are used not only for Census output but also as the basis of Super Output Areas which have been introduced as stable and consistently sized areas for Neighbourhood Statistics.

[17] ONS (2021): Methodology note on production of population estimates by output areas, electoral, health and other geographies, England and Wales.

5.7   It should be noted that the detailed 2021 Census data by OA provided by ONS came to a total resident population figure of 35,891, which is 6 lower than the official Census total figure for the Peak District, just 0.02% lower – effectively a rounding error. It is the 35,891 figure that we have used for the subsequent sub-area analysis as this is the only one that enables us to split the demographic analysis by sub-area.

5.8   Similarly, the number of households living in the Peak District has also declined, although very slightly, down to 16,160 in 2021 – a fall of 301 households or -0.2%. Given that the number of residents living in the Peak District fell by a much greater proportion, this indicates that average household size is declining in the National Park (as it is elsewhere in the country), with more people living alone or in smaller households than ten years previously. The number of households may also have declined as a result of dwellings being used as short-term holiday lets.

Table 5.1 Population and Household change in Peak District National Park (2011 – 2021)

	2011	2021	Change	Change (%)
Peak District Resident Population	37,905	35,897	**-2,008**	**-5.3%**
Peak District Households	16,461	16,160	**-301**	**-0.2%**

Source: Census 2011 and 2021

5.9   ONS also provides MYPE for the National Park for each year from 2001 to 2020 (see Figure 5.1). It is noted that at the time of writing, this data has not been adjusted by ONS to account for the more accurate figures from the 2021 Census, which suggests that the population has been declining at a faster rate than ONS were anticipating.

Figure 5.1 Mid-year Population Estimates for the Peak District National Park, 2001-2021
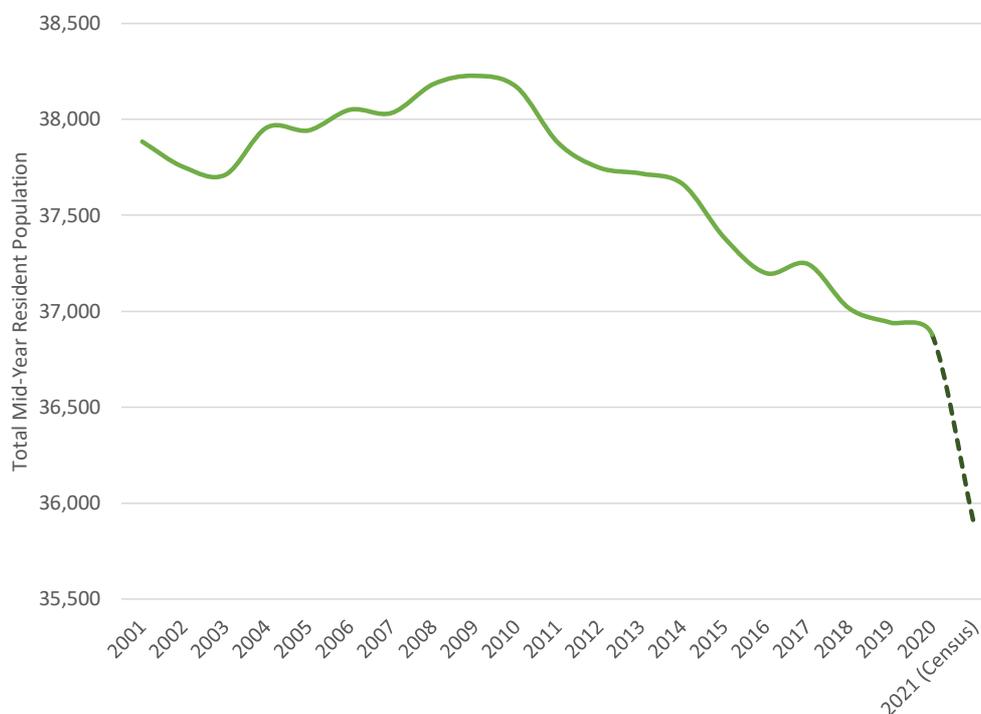
Source: ONS (2021): Table SAPE20DT9: Mid-year Population Estimates for National Parks in England and Wales by Single Year of Age and Sex, Persons - Experimental Statistics

5.10   This is a concerning finding, given that between 1991 and 2011 the population of the Peak District was relatively stable, with the Census for 1991 reporting a resident population of 38,100, falling slightly to 37,937 by 2001 and to 37,905 by 2011. The fall to 35,897 residents in the latest 2021 Census suggests that the number of residents living in the National Park is declining rapidly, with a 5% fall in the past 10 years compared with a 1% fall in the previous 20 years.

5.11   Table 5.2 provides a breakdown of the population change by sub-area set against the regional and national changes. The population fell most strongly in the White Peak and Derwent Valley sub-area (Derbyshire Dales), from 24,784 in 2011 to 23,359– a fall of 1,425 or 5.7%. This is the only sub-area that saw a decline above the Peak District rate of change as a whole. The population across the Dark Peak and Moorland fringes also declined, but by a lower rate of 3.5%, from 7,712 to 7,444. The South West Peak sub-area saw a fall in the total resident population of 3.5%, from 5,325 to 5,088. Moreover, these changes compare to an observed increase in the overall population across the East Midlands (7.7%), the West Midlands (6.2%) and across England and Wales as a whole (6.3%).

Table 5.2 Total population change in Peak District National Park comparator areas (2011 – 2021)

	2011 Population	2021 Population	Change	Change (%)
Peak District National Park*	37,821	35,891	**-1,930**	**-5.1%**
Dark Peak & Moorlands Fringes	*7,712*	*7,444*	***-268***	***-3.5%***
South West Peak	*5,325*	*5,088*	***-237***	***-4.5%***
White Peak and Derwent Valley	*24,784*	*23,359*	***-1,425***	***-5.7%***
East Midlands	4,533,222	4,880,056	**+346,834**	**+7.7%**
West Midlands	5,601,847	5,950,764	**+348,917**	**+6.2%**
England and Wales	56,075,912	59,597,546	**+3,521,634**	**+6.3%**

Source: Census 2011; 2021 / Lichfields Analysis
*Based on ONS's OA level population figures for the Peak District, which are very slightly different to the total figures reported in the equivalent Censuses due to rounding errors.
note figures may not sum exactly due to rounding

Demographic Profile

5.12   Table 5.3 illustrates the change in the Peak District's population by broad age cohort between the two Census periods and compares this by the regional and national rates of change over the same time period.

5.13   The data indicates that the number of young people living in the Peak District declined by 1,069, or 17.9%, from 5,960 in 2011 to 4,891 in 2021. The rate of decline stands in stark contrast to the increase in the number of children living in the regions and nationally. The number of children living in the East Midlands increased by 5.2% between the two Censuses in the East Midlands, by 5.0% in the West Midlands, and by 4.3% nationally. The situation was not quite as pronounced for the young adults age cohort of 16-24 years of age, although even here the decline of 13.1% seen across the Peak District was more than double the rate of decline seen nationally (-5.1%).

5.14   As can be seen from Table 5.3, of particular concern is that the number of working age residents living in the Peak District fell from 23,007 in 2011 to 20,259 in 2021, a fall of 2,748 or 12%. This contrasts starkly with growth elsewhere, with the national picture

suggesting growth of 3.4% over the past ten years in the number of residents of working age.

5.15   The only growth in Peak District's population has been in the older age cohorts. The number of older residents increased by 1,809, or 20% over the past ten years, from 8,938 to 10,747. This rate of increase is very similar to the national rate of growth and is actually above the West Midlands rate, although it is below the East Midlands growth rate of 23%. Most of this growth is in the 65-84 age bracket, however; as can be seen in the Table, there were just 127 additional residents aged 85 and over living in the Peak District in 2021 compared to 2011, an increase of 11%, which is well below the growth rate in this very elderly age category across the comparator areas.

Table 5.3 Population Change by Age Cohort in the Peak District National Park and comparator areas (2011 – 2021)

Change in Pop 2011-2021 (%)	Under 16 years		16-24 years		16-64 years		65+		85+	
	Change	%	Change	%	Change	%	Change	%	Change	%
Peak District National Park	-1,069	-17.9%	-397	-13.1%	-2,748	-11.9%	1,809	20.2%	127	10.6%
East Midlands	43,554	5.2%	-8,887	-1.6%	124,451	4.3%	178,829	23.1%	17,151	16.9%
West Midlands	54,987	5.0%	-28,815	-4.2%	122,668	3.4%	171,262	18.1%	23,837	19.3%
England and Wales	452,039	4.3%	-340,322	-5.1%	1,229,321	3.4%	1,840,274	20.0%	200,190	16.0%

Source: Census 2011; 2021 / Lichfields Analysis
Note: figures may not sum exactly due to rounding

Current Population Structure

5.16   Figure 5.2 presents the population structure of the Peak District as compared to the national level in 2021. There are stark contrasts between the two areas across both sexes, with proportionately far fewer Peak District residents under the age of 50 across all age cohorts than might be expected nationally, whilst the reverse is true for over 50s. There are particularly stark contrasts between the two areas in the 30-34 year old age cohort (containing just 3.9% of all males and 3.8% of all females living in the National Park, compared to 6.6% and 6.7% respectively across England and Wales) and the 60-64 age group (containing 9% of all males and 8.7% of all females living in the Peak District, compared to just 5.8% of males and females nationally).

Figure 5.2 Population Structure of Peak District National Park and England & Wales
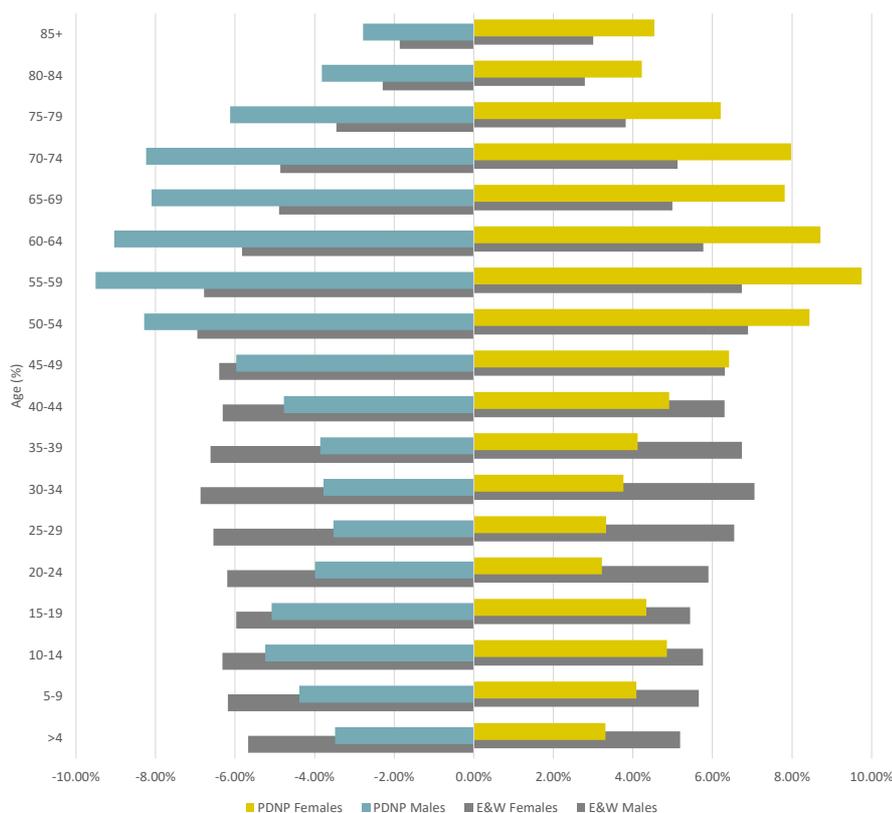
Source: ONS 2021 Census

Components of Change

5.17   Although ONS does not provide detailed components of change for National Parks, detailed information is available regarding births and deaths for each output area. Lichfields has apportioned these out to the National Park over the past 20 years based on the same approach as set out above for calculating the population by sub-area. It is then possible to deduct this 'natural change' from the net population growth to come to a net migration figure for each sub-area of the Peak District.

5.18   As can be seen from Figure 7.1, based on components of change estimated from the MYPE figures for the National Park, any population growth has been driven solely by net migration (on those occasions when it has been positive). Natural change (i.e. the difference between the number of births and deaths) has been consistently negative over the past 15 years. In general, recent years have seen net migration decline, whilst the number of deaths relative to births has increased, leading to the sharp population fall.

Figure 5.3 Mid-Year Population Estimates Components of Change for the Peak District National Park, 2006-2021

Source: ONS (2021): Table SAPE20DT9: Mid-year Population Estimates for National Parks in England and Wales by Single Year of Age and Sex, Persons - Experimental Statistics / Lichfields analysis / ONS (2021): Births and Deaths by sex and output area, England and Wales

Deprivation

5.19   Deprivation at the local level is measured by the Indices of Multiple Deprivation [IMD], which uses several datasets to rank areas across seven sub-domains of deprivation that range from access to health care to income levels.[18] These categories are combined to produce an overall deprivation rank for each local authority and lower layer super output area in England.

5.20   The IMD 2019 identifies that out of all 32,844 Lower Super Output Areas [LSOAs][19] in England, the average rank of deprivation of the LSOAs comprising the Peak District is 22,594. This means that the comprising LSOAs, on average, are within the 69% most deprived LSOAs in England. The relative lack of deprivation is further highlighted given that no LSOAs covering the Peak District are within the 30% most deprived LSOAs in England, whilst 25 (54%) of the 46 LSOAs are within the 30% least deprived (see Figure 5.4).

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[18] DLUHC (2019): Indices of Multiple Deprivation

[19] Lower layer Super Output Areas (LSOAs) are made up of groups of OAs, usually four or five. They comprise between 400 and 1,200 households and usually have a resident population between 1,000 and 3,000 persons.

Figure 5.4 Peak District National Park Indices of Multiple Deprivation
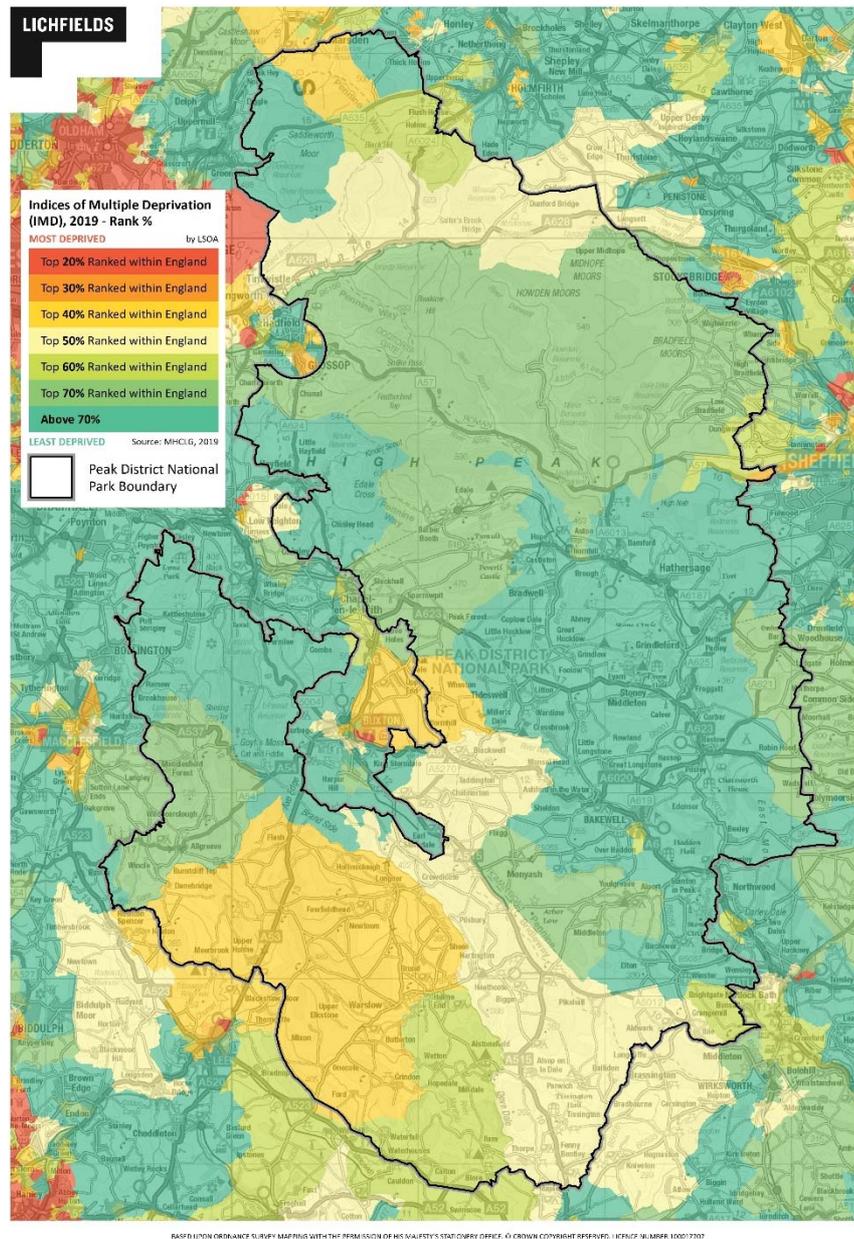
Source: DLUHC (2019) Indices of Multiple Deprivation

6.0 Housing Market Signals

6.1 This section provides evidence at a national, regional, and local level to provide context for the housing market analysis, exploring the demographic context as well as trends in the housing market including house holding, occupancy rates and a range of market signals.

Household Change

6.2 Census datasets capture the number of households and household composition only at the National Park level and do not provide an exact breakdown by sub-area.

6.3 As noted in Section 5.0, in parallel with the overall population trends, the number of households across the Peak District declined slightly by 301 households or 1.8% from 16,461 in 2011 to 16,160 in 2021 (Table 6.1).

Table 6.1 Total households across the Peak District National Park (2011-2021)

	2011	2021	Change	Change (%)
Peak District	**16,461**	**16,160**	**-301**	**-1.8%**
East Midlands	1,895,604	2,037,334	141,730	7.5%
West Midlands	2,294,909	2,429,493	134,584	5.9%
England and Wales	23,366,044	24,783,199	1,417,155	6.1%

Source: Census 2011: Key statistics for National Parks in England and Wales; Census 2021: TS003 – Household Composition
note figures may not sum exactly due to rounding

6.4 In terms of household composition, Table 6.2 clearly demonstrates that over the past ten years to 2021, there has been a significant increase in the number of couple households over the age of 65 living in the Peak District (+27%, compared to 20% nationally), and to a lesser extent, older single person households which increased by 6.6%. There was a greater percentage increase of single person elderly households across the East Midlands (13.8%), the West Midlands (9.9%) and England and Wales (10.1%).

6.5 There was a notable drop in the number of households below the age of 65 across the Peak District, across all household types. Single person households below the age of 65 fell 6.6% compared to the modest increases recorded across the East Midlands (5.1%), the West Midlands (4.9%) and England and Wales (2.9%).

6.6 In particular, the number of families living in the Peak District decreased by a very substantial 12% over the past ten years, compared to an increase of 5% nationally.

Table 6.2 Net change in Household type in the Peak District National Park and comparator areas (2011 – 2021)

	Single 65+		Single <65		Couple 65+		Couple, No children		Families		Lone Parents		Other	
	Change	%	Change	%	Change	%	Change	%	Change	%	Change	%	Change	%
Peak District	167	6.6%	-140	-6.6%	549	26.6%	-255	-6.7%	-504	-12.0%	-28	-2.9%	-90	-12.2%
East Midlands	32,144	13.8%	16,044	5.1%	39,021	22.9%	753	0.2%	22,890	4.7%	21,544	11.5%	9,334	7.4%
West Midlands	28,537	9.9%	19,022	4.9%	34,247	17.4%	-820	-0.2%	21,009	3.5%	28,459	11.0%	4,130	2.5%
England and Wales	293,915	10.1%	120,612	2.9%	377,895	19.8%	32,557	0.8%	293,072	4.9%	268,973	10.8%	30,131	1.6%

Source: Census 2011; 2021
Note figures may not sum exactly due to rounding

Occupancy Patterns

6.7   In the open market, households typically do not strictly occupy housing in line with their 'needs', or their household size. This is because households are free (within their financial means) to buy or rent property in line with what they want, rather than what they might be considered to 'need'. Households may wish to have additional space generally or for a specific purpose, e.g. for working from home. Growing families may also live in housing with a view to having more children, or older couples may live in the family home even once adult children have left (often referred to as 'empty-nesting').

Figure 6.1 Number of Bedrooms by Household type – Peak District National Park (All Households)

Source: Census 2011

6.8   Figure 6.1 shows how different household types in the Peak District occupy housing (as per the 2011 Census as this level of detail is not yet available for the 2021 Census). 2, 3 and 4-bedroom properties account for most households across all household types.

6.9 Single person households over 65 are most likely to live in 1-bedroom properties (18.7%), whilst single person households over the age of 65 are most likely to live in 2-bed homes (41.2%). 45% of couples over 65 and 46.5% of households with dependent children live in 3-bedroom properties, with the former evident of empty-nesting and a product of ageing.

6.10 A quarter of households with dependent children live in 4-bedroom properties.

6.11 Older couples are the most significant under-occupiers in the market, with only 4.5% occupying 1-bedroom properties and 69% occupying 3, 4 or 5-bedroom homes. This suggests that older single person households may be more inclined to downsize than couples, perhaps due to the maintenance required for larger homes.

6.12 However, a significant proportion of families occupy smaller 1 or 2-bedroom properties (16.4%), suggesting that there could be some overcrowding in certain sectors of the market. Other types of households include student households and families with non-dependent children, which explains why these types of households occupy a higher proportion of large housing (73.1% live in 3, 4 or 5 bed+ properties).

6.13 In a perfectly functioning 'ideal' market, the housing stock would be used most efficiently to ensure that households which under-occupy housing do not block larger households from accessing larger homes, leading to overcrowding.

6.14 ONS does not provide an exact breakdown of occupancy rating across the Peak District by household composition and therefore our analysis adopts the same rebasing technique that was used to derive a more accurate household figure.

6.15 Figure 6.2 illustrates which household types most commonly experience over-occupation across the Peak District. Across the National Park, up to 50.5% (8,162) of households under-occupy homes with at least two bedrooms than is considered necessary for their household size and a further 33.1% (5,347) of households have one more bedroom than necessary. On the other hand, just 15.4% (2,488) of households live in a property that is considered suitable for their current household size. This not only highlights the significant levels of under-occupancy across the Peak District but also provides a baseline from which to draw comparisons between various household compositions.

6.16 There is a notable level of under-occupancy among single person households at 84.2% for those aged 66 and over, and 80.2% for those below 66. Conversely, fewer than one in five households over the age of 66 (15.8%) and below the age of 66 (19.8%) represent a good match between occupants and number of bedrooms.

6.17 Regarding couples, the level of under-occupancy is significant with as many as 96.5% of couples aged 66 and above and 96.0% below 66 under-occupying homes by at least one bedroom. This may, in-part, be explained by the likelihood of many younger couples intending to start a family and therefore ensuring they occupy a house that meets their future, rather than present, needs.

6.18 To a lesser extent, families are also likely to under-occupy homes in the Peak District, with 74.4% of households living in a property with at least one bedroom more than is considered necessary. As with couples, many families may occupy a larger house with the possibility of having another child or to work from home and subsequently convert the extra bedroom space into a home office or workspace.

6.19 Therefore, it is reasonable to infer that in general (on the open market at least), households

typically do not occupy housing in line with their 'needs' or their household size. This is because households are free (within their financial means) to buy or rent property in line with what they want, rather than what they might be considered to need. Households may wish to have additional space generally or for a specific purpose such as for working from home. Growing families may also live in housing with a view to having more children, or older couples may live in the family home even once adult children have left (often referred to as 'empty nesting').

Figure 6.2 Occupancy Rating by Household Composition (2021)
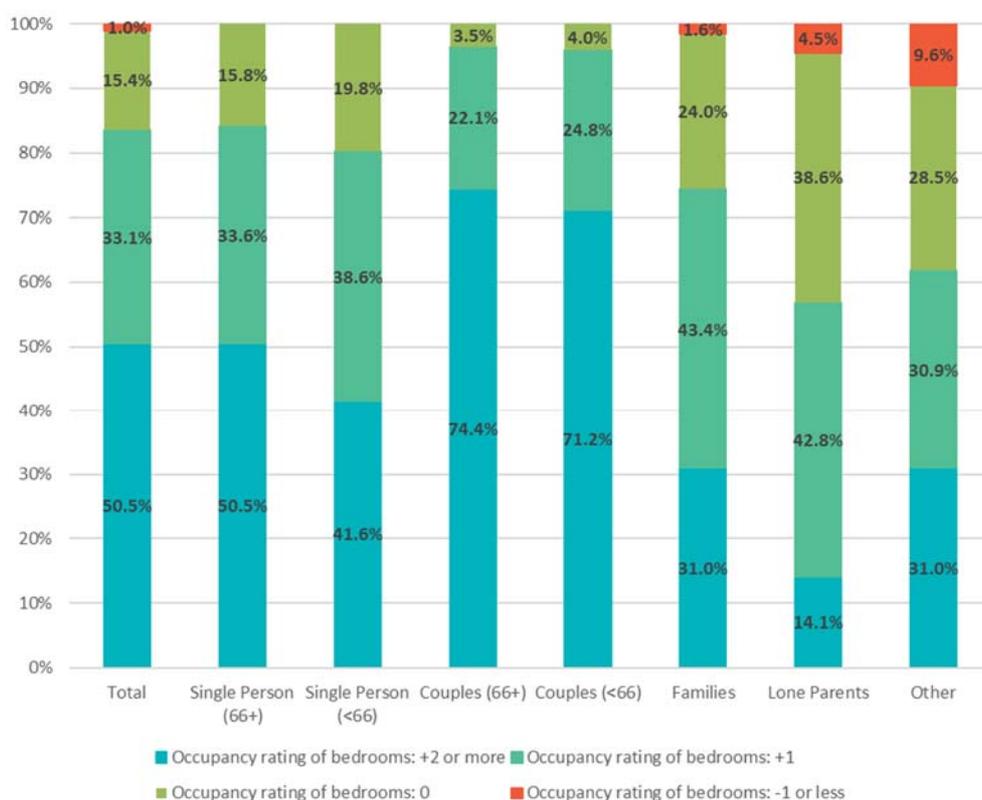
Source: Census (2021): RM098 – Occupancy rating (bedrooms) by household composition

Housing Stock

Existing Stock by Type

6.20   Figure 6.3 illustrates the breakdown of the Peak District's housing stock by accommodation type in 2021 and draws comparisons with the East and West Midlands and across England and Wales. Detached properties comprise 45.7% of properties across the National Park, which is a much greater share than across the East Midlands (33.2%), the West Midlands (24.5%) and nationally across England and Wales (23.2%).

6.21   Conversely, the share of all other housing types across the Peak District is below that of the regional and national comparators. Semi-detached properties across the National Park comprised just 29.3% of total stock in 2021 and is the lower share than that across the East Midlands (35.7%), the West Midlands (37.6%) and across England and Wales (31.5%). 17.9% of homes across the National Park are terraced properties, slightly below the 19.3%

across the East Midlands, 21.5% across the West Midlands and 23.2 nationally. This pattern is also reflected in the 4.7% share of flats/maisonettes across the Peak District. This is a much smaller share when compared to the 10.1% across the East Midlands, 14.6% across the West Midlands and 20.1% share across England and Wales.

Figure 6.3 Housing Stock by Accommodation Type in Peak District National Park and Comparator Areas (2021)
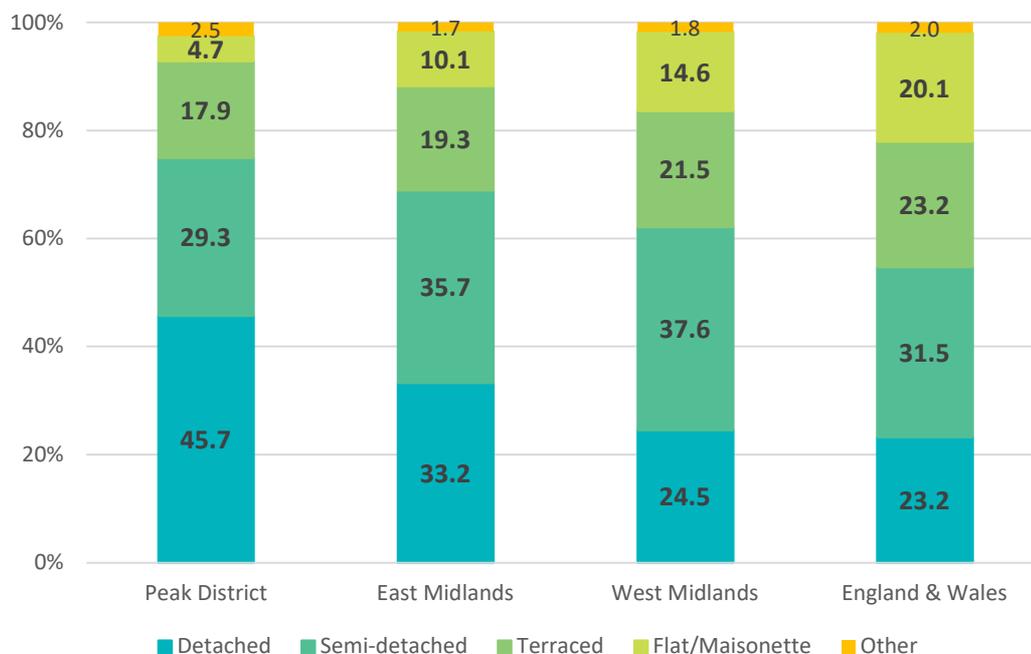
Source: Census 2021: TS004 – Accommodation type

Tenure Profile

6.22   An analysis of the Peak District and its key comparator's housing stock by tenure using the data from Census 2021 is illustrated in Figure 6.4. The data demonstrates that a disproportionate number of households in the Peak District own their home outright (51.3%) compared to just 35.4% across the East Midlands, 34.4% across the West Midlands and 32.8% across England and Wales. This trend is reversed for all other major types of tenure across the Peak District. The share of properties owned with a mortgage or private loan comprises 22.8%, somewhat below that of the East Midlands (30.0%) and West Midlands (28.4%) as well as England and Wales (28.7%).

6.23   Socially rented properties comprise just 10.0% of properties across the Peak District and is a much smaller proportion that across the East Midlands (14.9%), the West Midlands (18.2%) and England and Wales (17.1%). 15.2% of dwellings across the National Park are privately rented. This share is lower than the level privately rented dwellings across the East Midlands (18.7%), the West Midlands (17.9%) and is notably lower than across England and Wales (20.3%).

Figure 6.4 Housing Stock by Tenure Profile in Peak District National Park and Comparator Areas (2021)
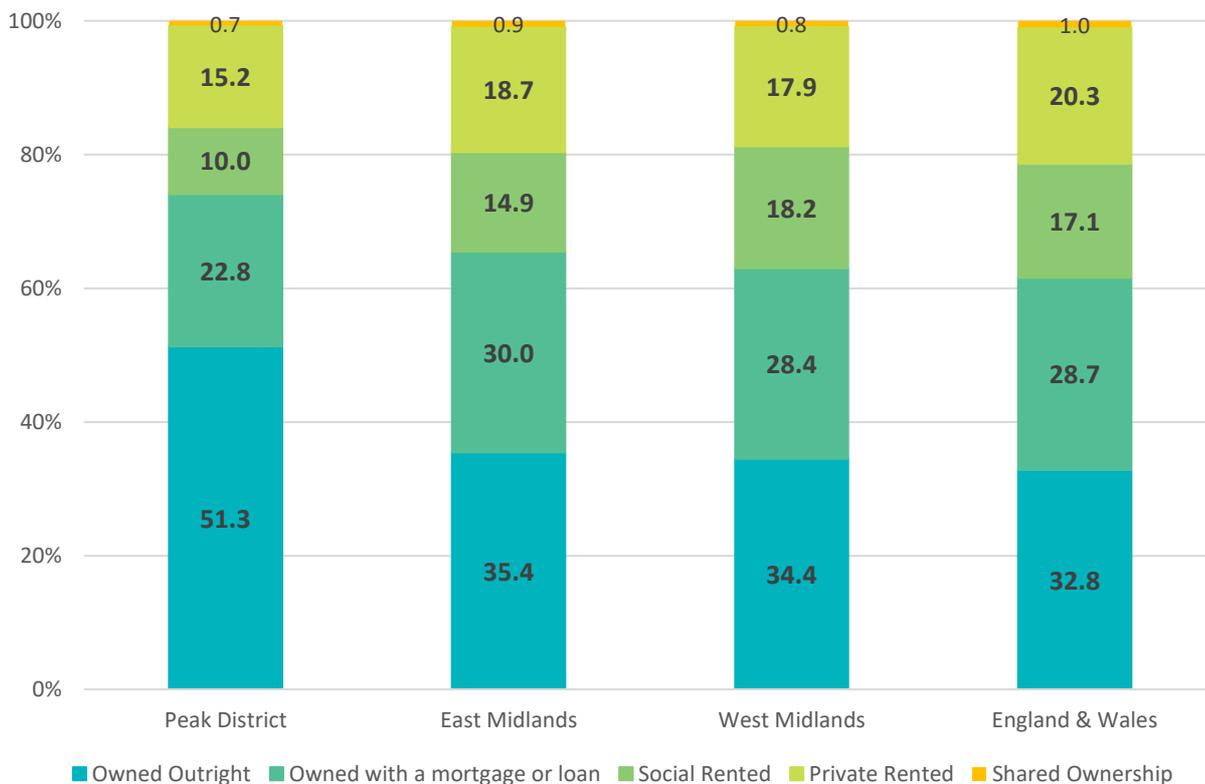
Source: Census 2021 – TS054.
Note totals may not sum due to the omission of those living rent free.

6.24   The tenure profile of the Peak District, broken down by sub-area, is illustrated in Figure 6.5. The share of outright property ownership is predominantly consistent across the sub-areas with the lowest share of 49.5% in the Dark Peak and Moorland Fringes and the highest share of 53.9% across the South West Peak. There is greater variance in the share of properties owned with a mortgage or private loan by sub-area. 22.8% of properties are owned with a mortgage or private loan across the Peak District. This compares to a low of 21.6% across the White Peak and Derwent Valley and a high of 28.3% across Dark Peak and Moorland Fringes. The levels of privately rented properties across the Peak District sub-areas are reflective of the National Park average (15.2%). 14.1% of properties across the Dark Peak and Moorland Fringes are privately rented compared to 14.5% across the South West Peak and 15.5% across the White Peak and Derwent Valley.

Figure 6.5 Housing Stock by Tenure Profile in Peak District National Park Sub-Area (2021)
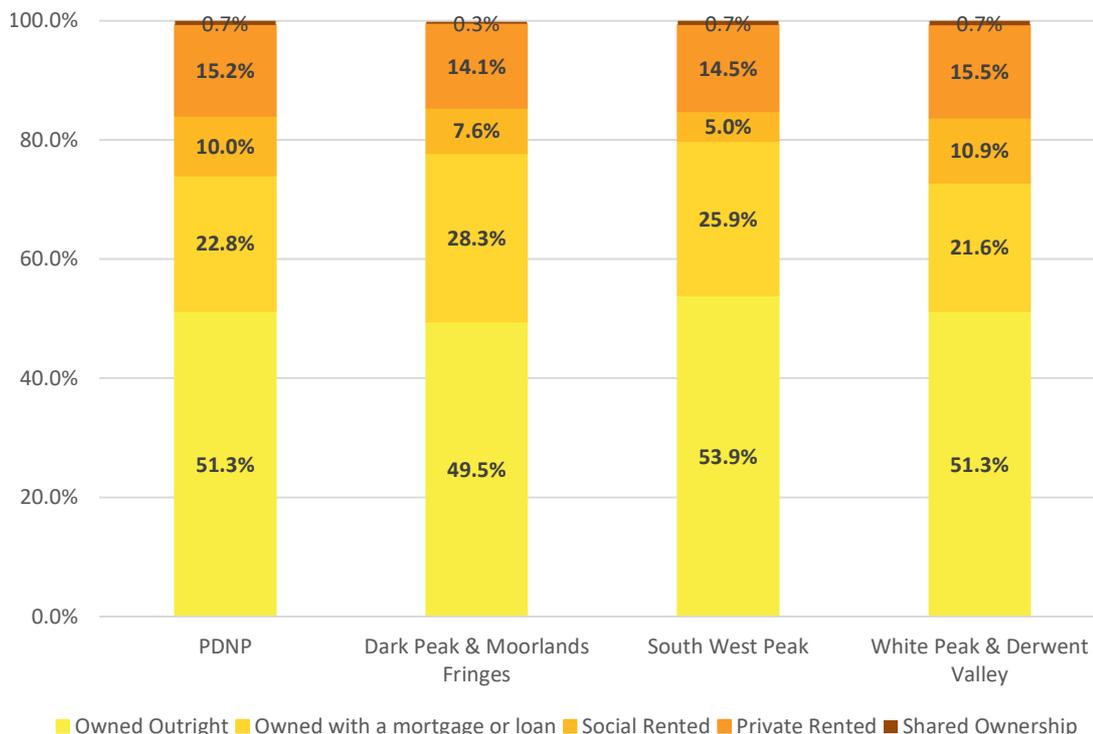
Source: Census 2021 – KS402EW; TS054.
Note totals may not sum due to the omission of those living rent free.

Stock Age and Condition

6.25   The most recent statistics on the age of the stock of domestic properties in England and Wales were published in June 2023 by the Valuation Office Agency [VOA]. Figure 6.6 illustrates that almost 40% of properties located in the Peak District were built before 1900. This share is significantly higher than across the East Midlands (13.5%), the West Midlands (11.1%) and across England and Wales (15.6%). This is perhaps unsurprising given the highly restrictive policy constraints to development in the Peak District since World War II.

6.26   Throughout the twentieth century, the share of properties built in any single 10-year period was well below that of the respective regional and national comparators. 14.1% of current properties across the Peak District were built between 1900 to 1939 compared to 17.0% across the East Midlands, 21.2% across the West Midlands and 20.1% nationally.

6.27   This trend continues with 25.5% of the current properties in the Peak District were built from between 1945 to 182 – a share below that of the East Midlands (36.2%), the West Midlands (39.5%) and below that of England and Wales (34.8%). From 1983 to 2000, just 7.9% of existing properties in the Peak District were built and is a proportion below the 13.3% across the East Midlands, 11.3% across the West Midlands and 12.0% across England and Wales.

6.28   This trend has continued into the 21st century with 10.9% of properties across the Peak District built in the period of 2000 to 2023. This is lower than the 18.6% proportion across the East Midlands, 15.8% across the West Midlands and 16.7% across England & Wales.

Figure 6.6 Percentage of properties built by build period in the Peak District National Park and comparator areas (pre-1900s to 2023)
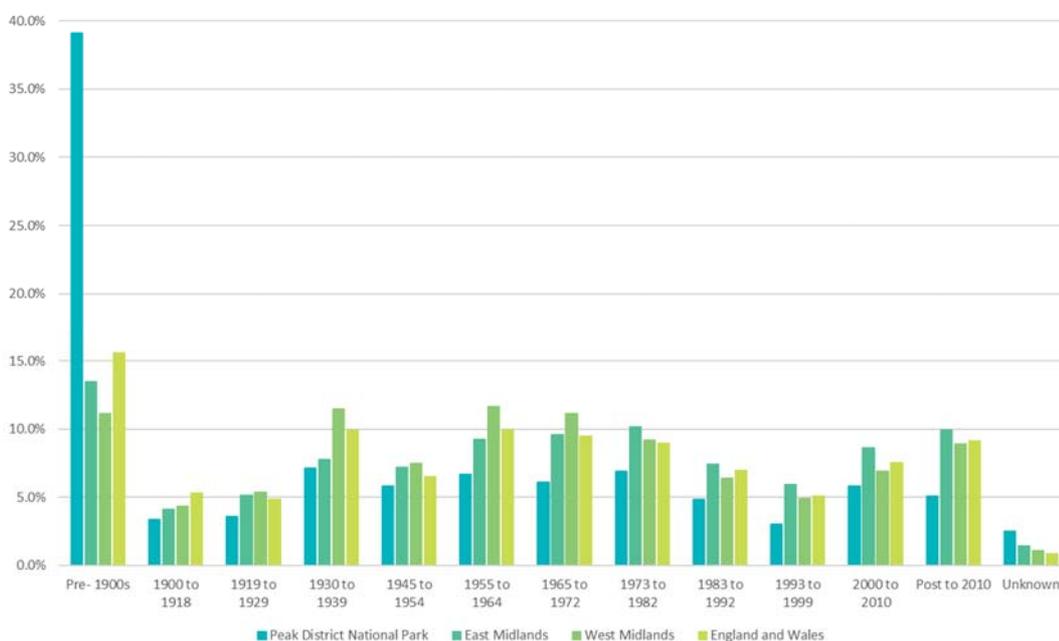
Source: VOA (2023): table CTSOP4.1
note LSOA is the lowest geography available for VOA data.

6.29   Figure 6.7 illustrates the same breakdown of build period set out in Figure 6.6 regarding the defined sub-areas of the Peak District. Unsurprisingly, the sub-area trends generally reflect those observed across the National Park as a whole. The 39.1% proportion of dwellings built prior to 1900 across the entire Peak District is above the 32.7% proportion across the Dark Peak and Moorland Fringes but below the 47.5% across the South West Peak and 44.0% across the White Peak and Derwent Valley.

6.30   From 1900 to 1939, there were comparatively fewer properties built across the South West Peak (9.7%) than the Peak District average (14.1%). 14.4% of existing properties were built in the White Peak and Derwent Valley sub-area and 15.1% across the Dark Peak and Moorland Fringes over this period.

6.31   The post-war recovery is also reflected across the three sub-areas of the Peak District with 21.2% of existing properties in the South West Peak sub-area, 25.1% in the White Peak and Derwent Valley area, and 27.1% in the Dark Peak and Moorland Fringes built from 1945 to 1982. From 1983 up to 2000, the proportion of properties built closely reflects that of the National Park average (7.96%) – a low proportion of 7.6% were built across the Dark Peak and Moorland Fringe sub-area compared to a high proportion of 8.2% across the White Peak and Derwent Valley sub-area.

Figure 6.7 Percentage of properties built by build period in Peak District National Park and Sub-Areas (pre-1900s to 2023)
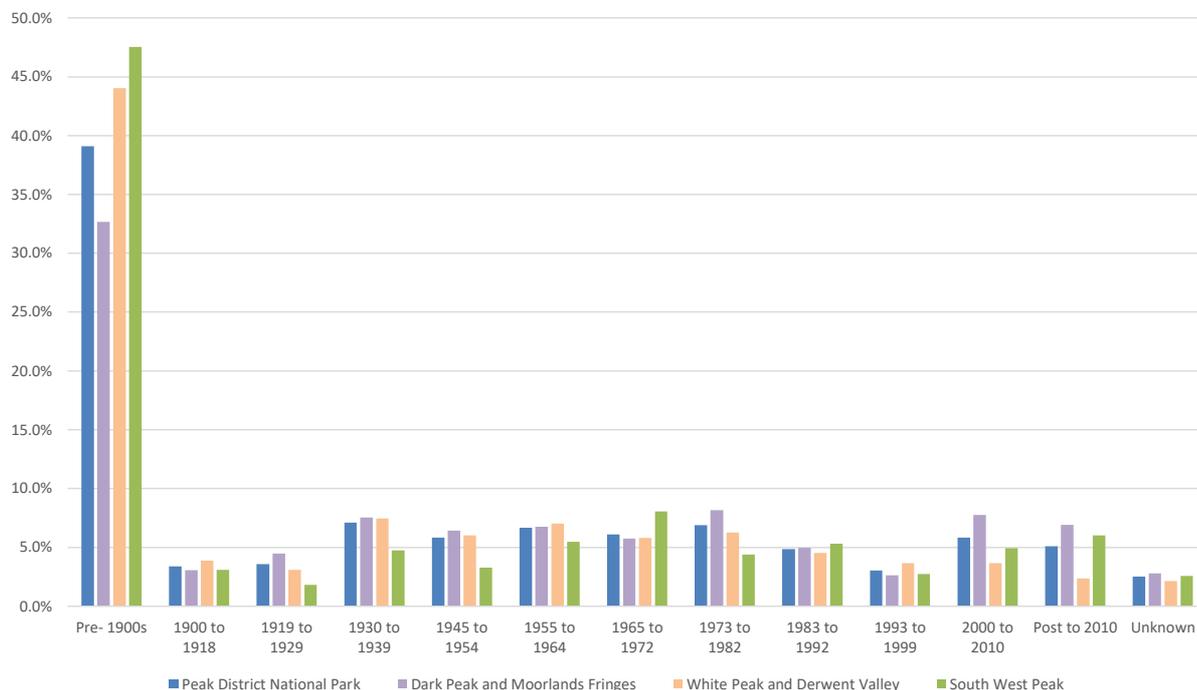
Source: VOA (2023): Table CTSOP4.1
note LSOA is the lowest geography available for VOA data.

The Active Market

Changes in Stock

6.32   Net additional dwelling completions in the Peak District have fluctuated significantly between 2006/07 and 2021/22. The average number of completions over this period was 73 dpa, peaking at 205 in 2008/09 with a low of 24 in 2013/14. A total of 1,174 dwellings have been completed since 2006/07, with 76 dwellings completed in the most recent year for which data is available, 2021/22.

6.33   Under the PDNPA's current Core Strategy Policy HC1 and DMPP Policy DMH1, the Authority only permits 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 currently live in overcrowded or otherwise unsatisfactory accommodation. This type of housing can be built on greenfield, or exception, sites provided that it doesn't harm valued landscape character or other of the Peak District's special qualities.

6.34   Looking at overall housing delivery, as can be seen in Figure 6.8 there were just 1,174 completions over the past 16 years, an average of 73 dpa. However, the PDNPA is on track to meet its indicative housing upper figure of 1,285 homes between 2006 and 2026 (of which the vast majority, 1,015, were intended to be located in the White Peak, with just 110 in the Dark Peak and 160 in the South West Peak).

Figure 6.8 Housing completions in the Peak District 2006/07 – 2021/22
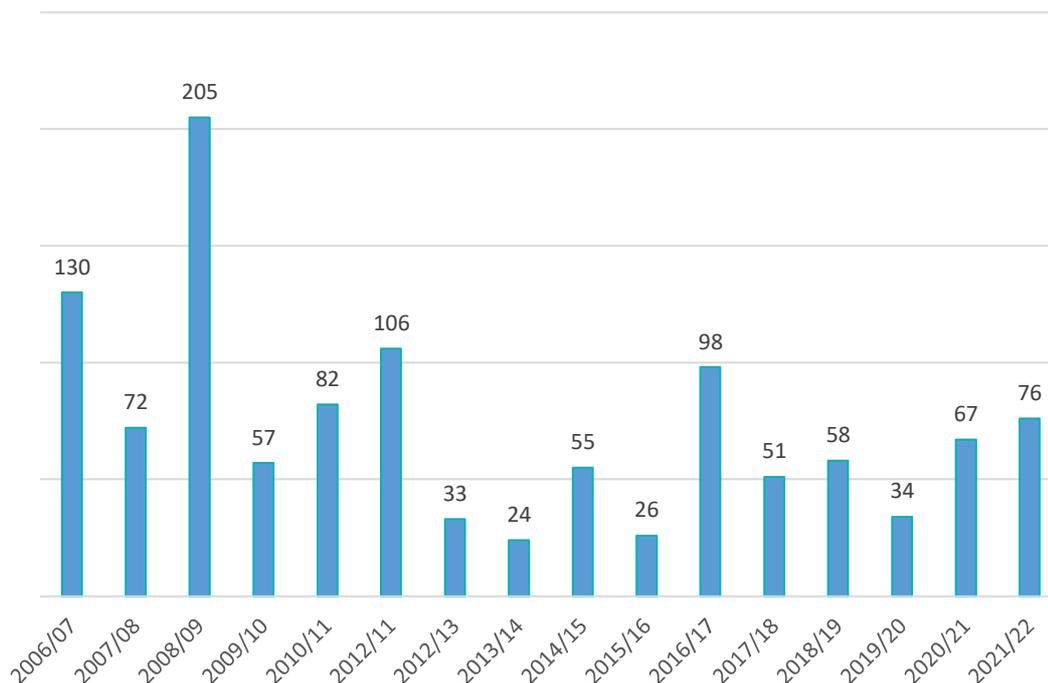
Source: Peak District National Park Authority 2023

6.35   Between 2006/07 and 2020/21, 425 or 38.8% of net completions were for open market housing, whilst 274 or 25.0% of completions were holiday homes. A further 259, or 23.7%, related to local needs.

Table 6.3 Housing completions in the Peak District National Park by type, 2006/07 -2021/22

Dwelling Type	Completions 2006/07 – 2020/21	Share of total*
Open Market	425	38.8%
Local Needs	259	23.6%
Agricultural	46	4.2%
Agricultural or Holiday	2	0.2%
Ancillary	72	6.6%
Ancillary or Holiday	18	1.6%
Holiday	274	25.0%
Total Completions	**1,096**	**100.0%**

Source: Peak District National Park Authority Monitoring Data. Note: 2021/22 housing data currently available by dwelling type.

6.36   In general, the PDNPA does permit some new build market housing where it is an effective way to enhance a brownfield site or conserve a valued building. The Council's long-held policy to refuse new build market housing on greenfield sites is intended to positively conserve the National Park by directing investment into the 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.

6.37   As for affordable housing, the Table indicates that 259 properties were delivered that met 'local needs'. At present, Core Strategy Policy DS1, new affordable housing is potentially acceptable in principle in or on the edge of the Peak District's 62 villages and the only town,

Bakewell. When permitting housing to address housing need, under DMPP Policy DMH2, the PDNPA prioritises occupation of those houses to those who have a strong local connection in addition to a housing need. Since 2001, the PDNPA has 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[20]. The PDNPA therefore does 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 Housing 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*"[21].

6.38   For the three most recent years for which data was available, Officers confirmed that of the 177 properties that were delivered in the Peak District, the vast majority (92%) were located in the administrative boundaries of Derbyshire Dales District, followed by Staffordshire Moorlands District (7 units, or 4% of the total) and High Peak Borough (6 units, or 3%). Just 2 dwellings were delivered outside these three administrative areas within the National Park in Cheshire East and Oldham.

Table 6.4 Housing completions by Sub Area, 2019/20 -2021/22

Associated Planning Authority	Net Additions for 2019/20	Net Additions for 2020/21	Net Additions for 2021/22	% of total
Derbyshire Dales District Council	**33**	**66**	**63**	**92%**
High Peak Borough Council	**1**	**1**	**4**	**3%**
Staffordshire Moorlands District Council	**0**	**0**	**7**	**4%**
Barnsley Metropolitan Borough Council	0	0	0	0%
Cheshire East Borough Council	0	0	1	1%
Kirklees Council	0	0	0	0%
Oldham Council	0	0	1	1%
North East Derbyshire District Council	0	0	0	0%
Sheffield City Council	0	0	0	0%
Peak District TOTAL	**34**	**67**	**76**	**100%**

Source: Peak District National Park Authority Monitoring Data

Transactions and Prices in the Private Market

6.39   There are relatively few house transactions in the Peak District, with an average of 545 sales per year (499 sales in 2022 and peaking at 596 in 2019). Clearly the Covid-19 pandemic

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[20] Peak District National Park (April 2021): Local Paper Review Topic Paper - Housing
[21] PDNPA (April 2021): Local Paper Review Topic Paper – Housing, paragraph 1.3.8

had a significant impact on sales, with just 499 transactions in 2021. Generally, the vast majority of sales relate to homes in the White Peak & Derwent Valley area of the National Park (around 70% of all transactions over the past 5 years).

Figure 6.9 Number of house transactions in the Peak District, 2018 - 2022
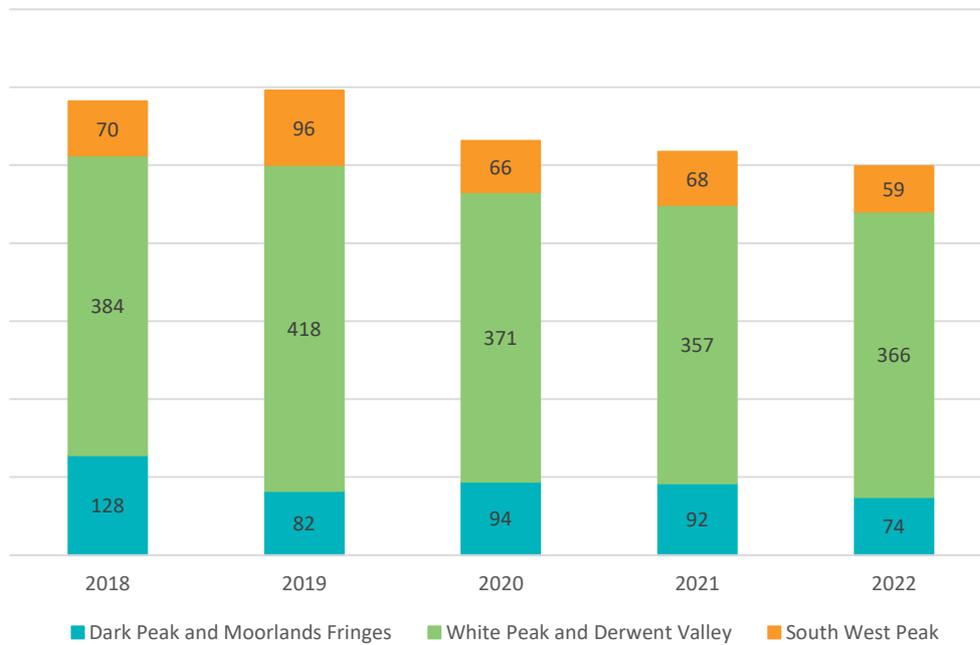
Source: HM Land Registry Price Paid Data

6.40   Figure 6.10 illustrates lower quartile, median and upper quartile house prices across the Peak District, based on average sales between 2018 and 2022. Across the National Park, the median house price was £342,300, with a lower quartile price of £247,000 and upper quartile price of £538,800. The White Peak and Derwent Valley area of the National Park is slightly less expensive than the other parts of the Peak District but even here the lower quartile house price is still £243,200 and median prices are £338,800. The Dark Peak area has the highest lower quartile house price at £263,600, with the South West Peak at £253,200.

Figure 6.10 Lower Quartile, median and upper quartile house prices in the Peak District (5-year average 2018 – 2022)

Source: HM Land Registry Price Paid Data

6.41   **As of 2022, lower quartile house prices average £291,250 in the Dark Peak, £275,000 in the White Peak, and £293,500 in the South West Peak sub-areas. Overall, the 2022 lower quartile house prices average £277,500 over the Peak District as a whole.**

6.42   Figure 6.11 illustrates the distribution of lower quartile house prices by LSOA across the Peak District. LQ house prices are lowest in the northernmost part of the Peak District as well as in Buxton, where LQ prices range from £100,000 to £150,000. However, there are large parts of the National Park where even LQ prices average above £300,000.

Figure 6.11 LQ House Price Paid in Peak District National Park (2022)
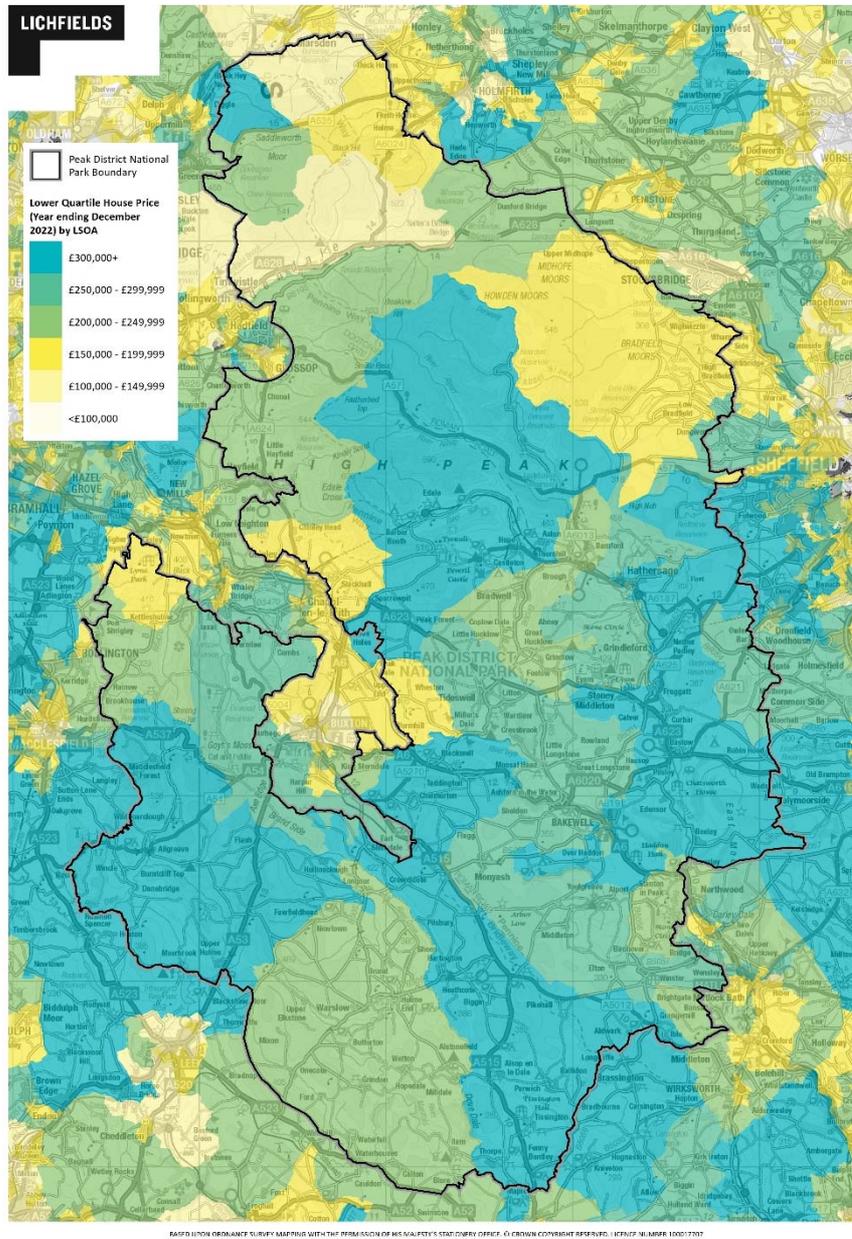
Source: HPSSA Dataset 46. Median Price Paid for residential properties by LSOA

6.43   Figure 6.12 illustrates the distribution of median house prices by LSOA across the Peak District. Median prices are highest at £550,000+ around Baslow, Pilsley and Edensor and Beeley near to Chatsworth house.

Figure 6.12 Median House Price Paid in Peak District National Park (2022)
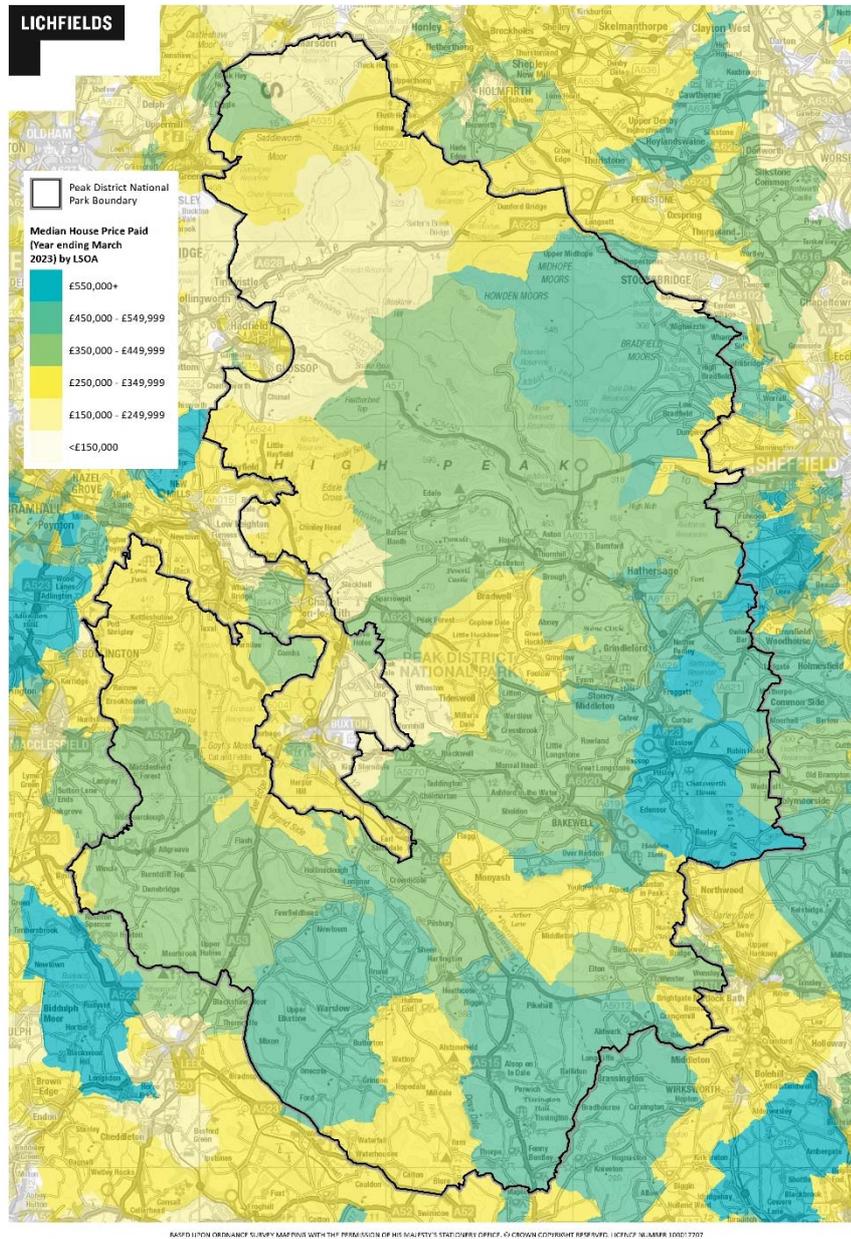
Source: HPSSA Dataset 46. Median Price Paid for residential properties by LSOA

6.44   Whilst house price data is not currently available for National Parks for 2022/23, a bespoke ONS dataset did include figures for Local Authorities split by National Parks using 2019 information. This is presented for the five largest Local Authority sub-areas of the Peak District by population in Table 6.5.

6.45   Whilst a significant difference in house prices is to be expected in authorities such as Sheffield, there remains a premium even in more rural and expensive authorities such as Cheshire East and Derbyshire Dales. The data shows that the median house price of a Derbyshire Dales property had a 27% premium uplift if it is located within the Peak District, compared to outside the National Park boundaries, with the lower quartile uplift being very similar.

6.46   Table 6.5 indicates that Derbyshire Dales is very much at the lower end of the scale when it comes to a Peak District price uplift. The uplift for High Peak Borough properties within the National Park was 59%, whilst median prices for homes located in the Peak District double in Staffordshire Moorlands, and increase by 131% for lower quartile properties.

6.47   This is supported by recent research by Nationwide in 2022[22], which found that on average, properties located within a National Park attract a 25% premium over an otherwise identical property, whilst properties located within 3 miles of a National Park attract a 7% premium over identical properties outside this range.

Table 6.5 House prices by Local Authority inside and outside the Peak District National Park (2019)

	Lower Quartile House Prices (Sept 2019)			Median House Prices (Sept 2019)		
	Outside Peak District	Inside Peak District	Peak District Uplift (%)	Outside Peak District	Inside Peak District	Peak District Uplift (%)
Derbyshire Dales	£184,995	£235,000	+27%	£250,000	£319,220	+28%
High Peak	£145,000	£231,000	+59%	£185,000	£295,000	+59%
Staffordshire Moorlands	£129,995	£260,000	+100%	£168,000	£388,500	+131%
Cheshire East	£161,000	£210,000	+30%	£235,000	£390,000	+66%
Sheffield	£117,500	£470,000	+300%	£160,000	£553,750	+246%

Source: ONS (2021): House price to workplace-based earnings ratio, LAs split by National Parks, England, 2019

Rental Levels

6.48   A review of various commercial property websites found 38 properties available for rent in the Peak District's boundaries as of April 2023, with 24 of these being in the White Peak and Derwent Valley area, nine in the Dark Peak & Moorland Fringes area, and five in the South West Peak area.

6.49   Figure 6.13 shows lower quartile, median and upper quartile rental levels across the National Park. Median rents are highest in the South West Peak area at £1,250, followed by the White Peak and Derwent Valley area (£1,050) and the Dark Peak & Moorland Fringes sub-area (£895). Across the Peak District as a whole lower quartile rents were £760, with a median of £1,050 and upper quartile rents of £1,250. Most properties had two or three bedrooms, with just two 1-bedroom properties and two 4-bedroom properties available.

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[22] https://www.nationwidehousepriceindex.co.uk/reports/national-parks-and-areas-of-outstanding-natural-beauty-boost-house-prices-by-up-to-25-percent

Figure 6.13 Rental levels in the Peak District National Park, April 2023

Source: Rightmove (accessed April 2023)

6.50   Comparison with VOA average rents for the Local Authority districts which overlap with the
        Peak District demonstrates the premium on rental properties within the National Park,
        with a median rent of £618 across the nine districts.

Table 6.6 Private Rental Levels by District, Oct 2021-Sept 2022

Associated Planning Authority	Lower Quartile	Median	Upper Quartile
Derbyshire Dales District	**£600**	**£725**	**£950**
High Peak Borough	**£425**	**£600**	**£750**
Staffordshire Moorlands District	**£475**	**£575**	**£695**
Barnsley Metropolitan Borough	£433	£495	£575
Cheshire East Borough	£595	£725	£950
Kirklees Metropolitan Borough	£450	£550	£675
Oldham Borough	£550	£625	£750
North East Derbyshire District	£545	£625	£750
Sheffield City	£550	£650	£775
Average across the nine districts	**£514**	**£619**	**£763**

Source: VOA Private Rental Market Statistics (December 2022)

Affordability

6.51   The former SHMA Practice Guidance (2007) defines affordability as a *'measure of whether
        housing may be afforded by certain groups of households'* (Annex G). A household can be
        considered able to afford to buy a home if it costs 3.5 times the gross household income for
        a single earner household or 2.9 times the gross household income for dual-income
        households. Where possible, allowance should be made for access to capital that could be
        used towards the cost of home ownership (page 42).

6.52   The PPG's standard methodology for calculating local housing needs incorporates the most
        recent median workplace-based affordability ratios as an uplift to the average annual

household growth. This is a helpful measure of identifying areas where the market is under stress, as affordability involves comparing costs against a households' ability to pay, with the higher the ratio, the more unaffordable a home is in that locality.

6.53   Table 6.7 shows the 2022 median workplace-based income, house prices and affordability ratios for the constituent Local Authorities of the National Park. The least affordable district is Derbyshire Dales, where median house prices are 10.24 times the median annual income. Derbyshire Dales has also seen the largest increase in the ratio since 2012, increasing by 2.09. The most affordable district is Barnsley with a ratio of 5.40.

Table 6.7 Ratio of median house price to median gross annual workplace-based earnings, 2022

	Median Income	Median House Price	Median Affordability Ratio	Change since 2012
Barnsley	£27,799	£150,000	5.40	+0.92
Cheshire East	£31,397	£255,500	8.14	+1.31
Derbyshire Dales	£30,767	£315,000	10.24	+2.09
High Peak	£29,263	£230,562	7.88	+1.56
Kirklees	£30,062	£175,000	5.82	+0.53
North East Derbyshire	£29,424	£215,000	7.31	+1.07
Oldham	£28,470	£175,000	6.15	+1.04
Sheffield	£30,419	£188,000	6.18	+1.18
Staffordshire Moorlands	£29,614	£200,000	6.75	+1.57

Source: ONS (2023): Ratio of median house price to median gross annual (where available) workplace-based earnings

6.54   To set this into context, the Bank of England imposes a loan to income flow limit which restricts the number of mortgages that lenders can grant to borrowers at ratios at or greater than 4.5-times the borrower's salary; hence it is unusual for a lender to consider a higher loan-to-income ratio than 4.5, and certainly not the 10.24 ratio seen in Derbyshire Dales.

6.55   To be able to afford a median-priced house in a relatively affordable district such as Barnsley, residents would therefore need to be earning around £33,330 at the maximum loan-to-income ratio of 4.5, which is well in excess of the average income in the district. In Derbyshire Dales, a prospective buyer would need to earn around £70,000, demonstrating the extent to which home ownership is an unaffordable aim for many.

6.56   Whilst affordability ratios are not available for National Parks for 2022/23, a bespoke ONS dataset did include figures for Local Authorities split by National Parks, using 2019 data. Only Derbyshire Dales has an affordability ratio calculated within and without the Peak District boundaries. The ONS data indicates that for Derbyshire Dales, the median affordability ratio inside the National Park was 12.24, compared to 8.67 outside its boundaries, highlighting the premium on homes within the Peak District.

Vacancy Rates, Second Homes and Short-Term Lets

6.57   At the time of writing, the 2021 Census does not provide a composite National Park figure for unoccupied dwellings. However, for the purposes of this study we have analysed the data that has been published relating to LSOAs within the Peak District and apportioned them out on the basis of the total population living within/without the National Park. The results are summarised in Table 6.8.

6.58   The data indicates that across the Peak District as a whole, some 2,131 dwellings are unoccupied as a primary residence, equal to **11.6% of the total number of dwellings**. This is no doubt inflated by the high number of second homes and holiday lets in the area. This is more than double the average rate of vacancy experienced across the nine districts that contain a portion of the Peak District within their boundaries. As can be seen in the Table, both the White Peak and South West Peak have particularly high rates of unoccupied dwellings, at 12.4%/12.8% respectively, with the Dark Peak having a lower rate of 8.2%.

6.59   Homes become vacant for many reasons, including natural churn in the market (e.g., a void between tenancies or short-term vacancies as people move home). Long term vacancies may indicate either structural weaknesses in the housing market (e.g. low demand) or may be reflective of problems with the stock of housing (e.g. condition or type). However as none of these have been identified as issues in the Peak District it is reasonable to infer that second homes and holiday lets are the main contributor to the high level of unoccupied dwellings.

Table 6.8 Unoccupied Dwellings in the Peak District National Park and composite districts, 2021

	District-wide			Within the PDNP		
	All dwellings	Unoccupied dwellings	% Unoccupied	All dwellings	Unoccupied dwellings	% Unoccupied
Barnsley	113,635	5,600	4.9%	52	3	5.8%
Cheshire East	183,770	9,025	4.9%	615	42	6.8%
Derbyshire Dales	35,460	3,160	8.9%	12,194	1,515	12.4%
High Peak	43,170	2,370	5.5%	2,996	263	8.8%
Kirklees	188,140	10,335	5.5%	107	6	6.1%
North East Derbyshire	47,280	1,210	2.6%	43	2	4.8%
Oldham	97,870	4,675	4.8%	42	2	4.4%
Sheffield	245,640	13,700	5.6%	416	22	5.2%
Staffordshire Moorlands	44,800	2,435	5.4%	1,859	276	14.8%
TOTAL	**999,765**	**52,510**	**5.3%**	**18,326**	**2,131**	**11.6%**
Dark Peak & Moorlands Fringes	*735,735*	*37,890*	*5.1%*	*3,657*	*298*	*8.2%*
White Peak & Derwent Valley	*35,460*	*3,160*	*8.9%*	*12,194*	*1,515*	*12.4%*
South West Peak	*228,570*	*11,460*	*5.0%*	*2,474*	*318*	*12.8%*

Source: Census (2021): *Dwelling occupancy by dwelling type, by lower layer super output area, England and Wales, 2021*

6.60   The ONS has produced analysis[23] which shows that the number of holiday homes in the Peak District were between 2 and 30 per 1,000 dwellings in 2021, which was one of the lowest scores for any of the UK's National Parks. For example, the Lake District and Northumberland National Parks had between 30-100 holiday homes per 1,000 dwellings, with particularly higher concentrations in areas surrounding Lake Windemere and Berwick-upon-Tweed. Based on MSOAs, those that cross into the Peak District range from 0.2% of homes being used as holiday lets (Cheshire East 020) to 2.9% (Derbyshire Dales 002), although data is missing for many areas.

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[23] ONS (2023). Available: <u>More than 1 in 10 addresses used as holiday homes in some areas of England and Wales - Office for National Statistics (ons.gov.uk)</u>

Figure 6.14 Location of second addresses used as a holiday home, by MSOA, England and Wales
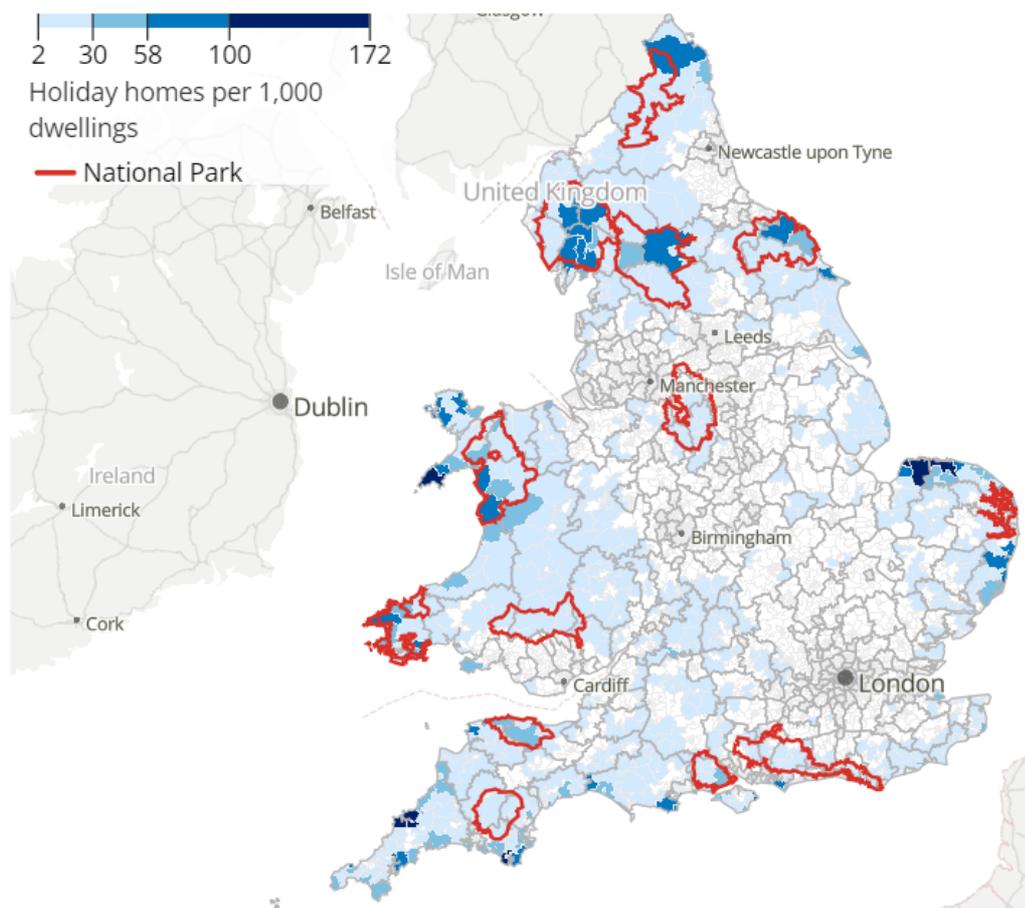
Source: ONS (2023). Available: More than 1 in 10 addresses used as holiday homes in some areas of England and Wales

6.61   The 2021 Census data only counts holiday homes that are occupied by their owners for more than 30 days per year, meaning the actual number of holiday homes and holiday lets is likely to be much higher than indicated in this data. Indeed, if owners of short-term lets do not use their own properties (or do so for less than 30 days a year), their property would not be picked up by this dataset, but would be included in the 11.6% of homes described as unoccupied as a primary residence.

6.62   Additionally, this Census dataset does not reveal how many of these second homes are used as short-term lets throughout the remainder of the year, although the proportion is likely to be high.

6.63   According to AirDNA, there are currently 5,195 holiday rentals in the Peak District, of which 66% are listed on the rental platform AirBnB[24]. This would include properties which would not otherwise be used as principal residencies, such as holiday park lodges.

6.64   When compared to other national parks, the Peak District has notably fewer short term lets than Devon (15,371), which contains Dartmoor and (part of) Exmoor National Parks, the Lake District (9,704), and North East England (9,081), with the latter containing Northumberland National Park. The Peak District does have more short-term holiday

[24] AirDNA (2023).

rentals than Mid Wales (3,692) however, which includes Bannau Brycheiniog (formerly the Brecon Beacons National Park).

6.65   However, it is again difficult to rely on this figure. Firstly, AirDNA's definition of the Peak District extends past its true boundaries to include areas such as Chesterfield, Burton, Derby etc. Secondly, the holiday rentals will include properties which could not be used as primary residencies, such as glamping pods, holiday park lodges and purpose-built holiday homes.

6.66   Whilst holiday rentals in the Peak District have increased by 24% since 2022, this is slightly below the rate of change seen in the Lake District which saw an increase of 25% over the same time period.

Table 6.9 Available Holiday Rentals Across Key UK Locations, 2023

Location	Total Number of households (2021 Census)	Total available listings	Total available on AirBnB
Peak District	**16,160**	**5,195**	**3,406**
Lake District	17,793	9,704	5,803
Devon	352,620	15,371	9,700
North East England	1,175,683	9,081	5,630
Cornwall	250,534	19,088	12,038
Mid Wales	60,182	3,692	2,237

Source: AirDNA (2023)

6.67   Across these different datasets it is still difficult to precisely understand the share of possible primary residency dwellings that are in use as second homes or short-term lets. The Census data on holiday homes underestimates the number by excluding those which are not used by the owner for more than 30 days a year. The Census figure of 11.6% of properties unoccupied as principal dwellings may include an element of properties which sit empty for large parts of the year, so may be a slight overestimate in this regard.

6.68   Conversely, the Census data does not fully reflect the recent boom in short term lets as indicated by the AirDNA data (with a 24% increase in the Peak District since 2022), although again the AirDNA data includes properties such as holiday lodges which may not have been listed during Covid and may contribute to the rapid recent rise.

6.69   Unfortunately, even as new datasets emerge it is still a difficult task to definitively identify the share of dwellings used as short-term lets in the Peak District without further, more detailed survey work, although it is likely to be higher than the 11.6% as indicated by the Census. The distorting impact of the Covid-19 pandemic may also have influenced the 2021 Census figures as we know that many households moved into their second home, and out of their usual address, for extended periods. Further work is clearly necessary here at a more fine-grained level to fully understand the impact that second homes and short term lets are having on the National Park's housing supply.

6.70   In summary, whilst there is no single dataset that enables us to definitively understand how many properties in the Peak District that could be used as permanent homes are instead in use as holiday homes/short term lets at present, we can make the following inferences from ONS and other commercial data:

- 2,131 dwellings in the Peak District are unoccupied as a primary residence as of 2021, equal to 11.6% of the total number of dwellings in the National Park.

- This figure is unlikely to represent the true number of holiday homes because it ignores the recent boom. For example, holiday rentals in the Peak District have increased by 24% since 2022. AirDNA suggests that there are currently 5,195 holiday rentals in the Peak District, of which 66% are listed on the rental platform AirBnB. If we assume that only those on AirB&B are dwellings, that means 3,406 dwellings in the Peak District are short term lets, i.e. 18.6%. It is likely that this is an over-estimation given that the data source's delimitation of the Peak District extends beyond its true boundaries.

- Levels of holiday and second homes in the Peak District are slightly lower than other comparable areas such as other national parks (notably the Lake District) or popular coastal areas.

- However, even if this is the case, there remains a clear issue with a reduction in the stock of permanent dwellings in the Peak District that would be available to local residents to move into, due to the loss of a high proportion of homes to the holiday lettings and second homes market.

Overcrowding and Homelessness

6.71 Indicators on overcrowding, sharing households and homelessness can demonstrate unmet need for housing within an area. The previous 2014 version of the PPG stated that indicators on:

"…overcrowding, concealed and sharing households, homelessness and the number in temporary accommodation demonstrate unmet need for housing. Longer term increases in the number of such households may be a signal to consider increasing planned housing numbers…"[25].

6.72 Whilst this section has now been removed from the latest iteration of the PPG, overcrowding and homelessness nevertheless represents an important housing market indicator.

6.73 The Census measures overcrowding based on a standard formula; this measures the relationships between members of a household (as well as the number of people in that household) to determine the number of rooms they require. A rating of -1 or less indicates a household has one fewer room than required, +1 or more indicates a household has one or more rooms than needed. At the national level, affordability issues in recent years, as well as a shortfall in housing supply, have meant that people are either willing to accept sub-optimal living conditions (e.g. living in a smaller home to manage costs) or are forced into accepting such housing outcomes (e.g. are priced out of the market and have to share with friends/family).

6.74 Table 6.10 illustrates that overcrowding against the occupancy rating in the Peak District is not considered to be severe, with just 1.0% of households living in a dwelling that is too small for their household size and composition. This figure is well below the national average of 4.3% and the regional averages also.

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[25] §2a-019-20140306

Table 6.10 Overcrowding: Household Bedroom Occupancy Rating (2021)

	Total households	-1 room occupancy or less	-1 room occupancy or less (%)
Peak District	**16,159**	**165**	**1.0%**
East Midlands	2,037,330	63,754	3.1%
West Midlands	2,429,493	104,181	4.3%
England & Wales	24,783,199	1,054,423	4.3%

Source: Census 2021 Table TS052

6.75   The Census also recorded the number of concealed families i.e., where there is more than one family present in a household. Nationally, this rose significantly between 2001 and 2011, at least in part due to the impact of recession on younger households' ability to afford their own homes. This meant that many younger people, including families, remained in the family home for longer than might have been expected in the past, through choice (to save money) or through necessity.

6.76   At the time of the 2021 Census, 2.2% of all families in England and Wales were concealed; this represented 367,481 families. This is a rise compared to 2011, when 1.8% or 289,295 families were identified as being 'concealed'. In the Peak District, there were 230 concealed families at the time of 2021 Census (estimated on the basis of output areas as no composite figure is available at the time of writing), representing 1.8% of all families. 137 of these 230 households had a family reference person under the age of 50. The National Park has a lower proportion of concealed families than the East Midlands (2.0%), the West Midlands (2.4%) and the national average (1.8%) (see Table 6.11).

Table 6.11 Concealed families in the Peak District National Park by sub-area and in regional and national comparators (2011 – 2021)

	2011		2021		Change in number of concealed families	% change
	No.	%	No.	%		
Peak District TOTAL	**171**	**1.3%**	**230**	**1.8%**	**59**	**34.5%**
Dark Peak & Moorlands Fringes	*49*	*1.5%*	*67*	*2.0%*	*18*	*36.7%*
South West Peak	*41*	*2.1%*	*58*	*2.9%*	*17*	*41.5%*
White Peak & Derwent Valley	*81*	*1.1%*	*105*	*1.4%*	*24*	*29.6%*
East Midlands	20,403	1.6%	28,376	2.0%	7,973	39.1%
West Midlands	34,461	2.2%	41,138	2.4%	6,677	19.4%
England and Wales	289,295	1.8%	367,481	2.2%	78,186	27.0%

Source: Census 2011 (LC1110EW), Census 2021 (RM009)

6.77   Table 6.11 also illustrates the share of concealed families across the sub-areas of the Peak District. The number of concealed families in the White Peak and Derwent Valley sub-area increased from 81 (1.1%) in 2011 to 105 (1.4%) in 2021 – an increase of 29.6% over the period. The number of concealed families in the Dark Peak and Moorland Fringe sub-area increased from 49 (1.5%) to 67 (2.0%) and in the South West Peak from 41 (2.1%) to 58 (2.9%) over the period.

6.78   The levels of overcrowding and concealed households across the Peak District as a share of existing households, are therefore relatively modest when compared with the regional and national levels. However, from 2011 to 2021 there has been a greater level of growth in the

number of concealed families across the National Park (+34.5%) than across the West Midlands (+19.4%) and also across England and Wales (27.0%).

7.0 Local Housing Need

Introduction

7.1 The population of the Peak District is an outcome of policy rather than a target. Nevertheless, it is important for the PDNPA to understand what different population outcomes may result when tested against different levels of house building. This work was last undertaken in 2018 and requires updating in accordance with the NPPF and PPG.

7.2 The NPPF supports the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed; meeting the needs of groups with specific housing requirements; and ensuring that land with planning permission is developed without unnecessary delay [§60]. It states that to determine the minimum number of homes needed in an area, strategic policies should be informed by a LHN assessment, conducted using the standard method as set out in the PPG, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

7.3 Unlike other local planning authorities, national parks are exempt from housing targets. Nevertheless, the PDNPA is required to understand housing needs and to focus on meeting local affordable housing requirements:

"The Authorities have an important role to play as planning authorities in the delivery of affordable housing. Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services" (National Parks Circular 2010, paragraph 78)[26].

7.4 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. The NPPF states 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 guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. 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 61].

7.5 The PPG states that national parks *"may continue to identify a housing need figure using a method determined locally"*[27]; however, any alternative approach that is used to understand housing need will be tested at examination and the evidence must be 'robust'[28].

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[26] DEFRA (March 2010): English National Parks and the Broads, UK Government Vision and Circular
[27] Paragraph: 014 Reference ID: 2a-014-20190220
[28] Paragraph: 015 Reference ID: 2a-014-20190220

7.6   As such, this study has undertaken different assessments of housing need: one that is in accordance with the standard method and other 'alternative approaches' appropriate to the Peak District's purposes. This includes the consideration of up-to-date population forecasts, net migration and household formation.

Current Approach

7.7   The current Peak District Core Strategy does not allocate land for housing. Under Core Strategy Policies DS1 and HC1, housing is not permitted solely to meet open market demand. It may be permitted if it:

     i   addresses local, eligible need for affordable housing;

     ii   is for key workers in agriculture, forestry or rural enterprise; or,

     iii   is required to achieve conservation and/or enhancement of a valued vernacular or listed building, or a settlement.

7.8   Instead of housing targets the Core Strategy gives indicative figures for housing delivery over the period 2006-2026. Indicative figures are an estimate of the level of housing that could be built without harm to the landscape or other special qualities. They are based on commissioned evidence of housing need and levels of past delivery, and are agreed with constituent authorities. Indicative figures are not a target and the PDNPA is not tested on whether it meets them. However, they are used to assess the effectiveness of policy and any houses built 'count' towards the housing targets of our constituent authorities.

7.9   The indicative figures for the current plan period (2006-2026) are set out for each of the three broad landscape areas that form part of the settlement strategy for the National Park[29]. These are:

- For the White Peak and Derwent Valley, between 550 and 890 new homes (and 125 via other routes)

- For the Dark Peak and Moorland Fringe between 35 and 75 new homes (and 35 via other routes)

- For the South West Peak between 30 and 130 new homes (and 30 via other routes)

7.10   The upper estimate total indicative figure (all housing) for the whole of the National Park is 1,285. The lower estimate total indicative figure (all housing) for the whole of the National Park is 805. Annual / Authority Monitoring Reports [AMR] 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 predominantly open-market dwellings achieved by conversion and are often unaffordable to local people.

7.11   This HNA provides the evidence to enable the PDNPA to establish a new set of housing indicative figures and determine the settlement strategy for the next plan period.

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[29] These landscape areas are slightly different to the areas used for calculating future housing need, as part of the Derwent Valley is in High Peak.

Methodology

7.12   The PDNPA's current evidence base for its plan period 2006 – 2026 included population, household and labour force projections modelling the impact of four different levels of housing development: 0 dpa, 48 dpa; 95 dpa and 150 dpa, with the annual figures split between the three largest constituent council areas by population. This work was updated in 2018 and requires a further update to cover the period to 2045.

7.13   This HNA has modelled a total population projection for the entire National Park, and for this figure to be split between High Peak, Derbyshire Dales and Staffordshire Moorlands, for the following migration, population and dwelling led scenarios, taking into account demographic change and housing delivery from 2006/07:

1 Standard Methodology scenario:

1   SM2

3 Migration trend scenarios:

2   Balanced flows

3   15-year history

4   6-year history

1 Population scenario:

5   Zero Population Growth

4 Dwelling led scenarios:

6   0 dpa

7   48 dpa

8   95 dpa

9   150 dpa

7.14   The 2021 Census data has been released for the Peak District. This indicates that as of 31st March 2021, some 35,891 residents were living within the National Park's borders. Whilst this starting point for assessment was extremely helpful, no detailed breakdown was provided by ONS as to how it was split between the constituent local authorities. Whilst individual output area level data was available, there were many instances whereby an output area was only partially within the Peak District's boundaries, with no indication as to the number of residents who lived outwith the National Park.

7.15   As such, Lichfields liaised extensively with ONS and were provided with a detailed breakdown for each output area regarding the number of residents who lived inside or outside the national park. From this, we were able to calculate the number of residents living in each authority in the National Park.

7.16   As illustrated in Figure 1.1, it was also assumed for the purposes of modelling, that for the Dark Peak and Moorlands fringe, this would comprise the National Park elements of Barnsley, Oldham, Sheffield, Kirklees, North East Derbyshire and High Peak. For the South West Peak, this comprised the National Park elements of Cheshire East and Staffordshire

Moorlands, whilst for the White Peak and Derwent Valley, this just comprised those output areas of Derbyshire Dales District within the National Park[30].

7.17   This is summarised in Table 7.1.

Table 7.1 2021 Census Population living in the Peak District National Park by sub-area

	Census 2021 Peak District Population	% of Total Peak District Population
Barnsley	116	0.3%
High Peak	5,956	16.6%
Kirklees	226	0.6%
North East Derbyshire	93	0.3%
Oldham	97	0.3%
Sheffield	956	2.7%
Dark Peak and Moorlands Fringes	**7,444**	**20.7%**
Derbyshire Dales	23,359	65.1%
White Peak and Derwent Valley	**23,359**	**65.1%**
Cheshire East	1,311	3.7%
Staffordshire Moorlands	3,777	10.5%
South West Peak	**5,088**	**14.2%**
Peak District National Park	**35,891**	**100.0%**

Source: Census 2021 / Lichfields' analysis

7.18   The data suggests that by far the largest share of the Peak District's population live within the administrative boundaries of Derbyshire Dales District, containing almost two thirds of all the Park's residents. This is followed by High Peak (5,956, or 17% of the total); and Staffordshire Moorlands (3,777, or 10.5%). Of the other 6 districts that partly straddle the National Park's boundaries, only Cheshire East has a significant population based in the Park, at 1,311 or 4% of the total, followed by Sheffield at 956 residents. In total, the 6 smaller districts only contribute 2,799, or 8%, of the Peak District's population, with the remainder living within the administrative boundaries of Derbyshire Dales, High Peak and Staffordshire Moorlands.

7.19   For the purposes of modelling, it has been assumed that (for example) the 956 Peak District residents living in Sheffield City's administrative boundaries are more likely to share similar demographic, social and economic characteristics with High Peak's residents, than they are with most of the other 555,565 residents living in the City (of which National Park based residents comprise 0.17% of the total).

7.20   In accordance with the study brief, this HNA provides robust evidence on population projections from 2021 (the base date of the latest Census) to 2045 and a housing needs assessment (tailored to the purposes of the PDNPA) to support the emerging Local Plan.

[30] These landscape areas are slightly different to the areas used for calculating future housing need, as part of the Derwent Valley is in High Peak.

7.21   In summary, our approaches are as follows:

1   The Standard Method [SM2] 'top down' assessment has housing need distributed on a 'fair share' basis using population data from the 2021 Census for the three main districts straddling the Peak District.

2   The second scenario modelling includes a 'bottom-up' assessment, which uses the PopGroup demographic to project the local Peak District's population based on changes in births, deaths, and migration to project future growth. This has been calculated based on three migration scenarios projecting forward balanced flows of migration, and 15- and 6-year historical trends. This data has been partly obtained from ONS, which provided MYPE for the National Park for each year from 2001 to 2020 (see Figure 7.1). It is noted that at the time of writing, this data has not been adjusted by ONS to account for the more accurate figures from the 2021 Census, which suggests that the population has been declining at a faster rate than ONS were anticipating.

Although ONS does not provide detailed components of change for the National Parks, detailed information is available regarding births and deaths for each output area, and we have apportioned these out to the National Park over the past 20 years based on the same approach as set out above for calculating the population by sub-area. We are then able to deduct this 'natural change' from the net population growth to come to a net migration figure for each sub-area of the National Park. This net migration figure for each year was split between in and out migration, and internal and international migration, on the basis of observed patterns for each of the respective three main constituent districts in the components of change MYPE evidence provided by ONS for those years.

Figure 7.1 Mid-Year Population Estimates Components of Change for the Peak District National Park, 2006-2021

Source: ONS (2021): Table SAPE20DT9: Mid-year Population Estimates for National Parks in England and Wales by Single Year of Age and Sex, Persons - Experimental Statistics / Lichfields analysis / ONS (2021): Births and Deaths by sex and output area, England and Wales

3   Lichfields also projected a zero-population growth scenario to determine the number of dwellings required to stabilise the current (rapidly ageing) population.

4   The final sets of scenarios take a dwelling-led approach which is tailored for the purposes of the Peak District (i.e. to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public) and the limited availability of housing land. This also reflects the duty on National Park Authorities to seek to foster the economic and social well-being of local communities. Therefore, the dwelling-led approach responds to the 2010 Vision and Circular[31]. This has involved modelling the population change derived from 0, 48, 95 and 150 dpa over the Local Plan period, split across the three main sub-areas on the basis of their proportionate share of population size (as of 2021).

7.22   The scenarios demonstrate the extent to which the population of the Peak District could change over the Plan period and how this change would be translated into households, dwellings, numbers of economically active residents and the number of jobs that might be supported by the local population.

7.23   For the projections, both the 2014-based Sub-National Population Projections [SNPP] / Sub-National Household Projections [SNHP], which inform the Government's updated Standard Methodology [SM2] calculation, and the latest sets of projections, the 2018-based SNPP / SNHP, have been modelled for completeness.

7.24   The number of households is translated into dwelling needs through the application of an assumption about the proportion of vacant properties / second homes that are currently recorded in the Peak District (see Appendix 1 for modelling assumptions).

7.25   Lichfields has modelled each of these scenarios using industry standard PopGroup demographic modelling software. The detailed assumptions utilised in the modelling can be found in Appendix 1.

7.26   This section reports the findings of this analysis for the Peak District.

Starting Point – Standard Methodology

7.27   In August 2020 the Government undertook consultation on changes to the standard method which looked to incorporate more recent household projections (2018-based SNHP) and remove the cap that limits the level of local housing needs. The Government's *"Response to the local housing need proposals in 'changes to the current planning system"[32], published* in December 2020, confirmed that the Government would not be proceeding with the proposed changes to the standard method; instead proceeding with a reformed standard method which reflects their commitment to levelling up and enables regeneration and renewal of urban areas.

7.28   Regarding the calculation of housing need, the NPPF states 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

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[31] DEFRA (March 2010): *English National Parks and the Broads, UK Government Vision and Circular*

[32] https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system

national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. 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." [§61]

7.29   This has been calculated across the three Peak District sub-areas[33] as follows:

1   **Dark Peak and Moorlands Fringes**: For High Peak Borough, as of August 2023, the standard methodology figure is 246 dpa (198 households per annum [hpa] using the 2014-based SNHP, plus an affordability uplift of 24.25%). 7,444 residents live in the Dark Peak sub-area, which is 8.2% of High Peak Borough's 90,932 residents according to the 2021 Census. 8.2% of 246 dpa equates to **20 dpa**.

2   **White Peak and Derwent Valley**: For Derbyshire Dales District, as of August 2023, the standard methodology figure is 217 dpa (156 hpa using the 2014-based SNHP, plus an affordability uplift of 39.00%). 23,359 residents live in the White Peak sub-area, which is 32.7% of Derbyshire Dales District's 71,540 residents according to the 2021 Census. 32.7% of 217 dpa equates to **71 dpa**.

3   **South West Peak**: For Staffordshire Moorlands District, as of August 2023, the standard methodology figure is 174 dpa (148 hpa using the 2014-based SNHP, plus an affordability uplift of 17.19%). 5,088 residents live in the South West Peak sub-area, which is 14.2% of Staffordshire Moorlands District's 95,845 residents according to the 2021 Census. 14.2% of 174 dpa equates to **9 dpa**.

7.30   This totals **100 dpa** across the Peak District as a whole.

7.31   Table 7.2 summarises the breakdown of demographic change once the SM2 dwellings have been modelled in PopGroup as a constraint. It demonstrates that due to the adverse impacts of natural change (i.e. deaths exceeding births), the driving force behind any population growth in the National Park is inward migration. The delivery of 100 dpa could sustain an increase of 5,479 residents and support 1,881 net additional jobs over the plan period to 2045.

Table 7.2 Summary of the demographic outcomes – Standard Methodology

2021-2045	Dark Peak	White Peak	SW Peak	**Peak District TOTAL**
Population change	1,150	3,938	390	**5,479**
Of which natural change	*-635*	*-3,693*	*-651*	**-4,980**
Of which net migration	*1,786*	*7,631*	*1,042*	**10,459**
Labour force growth	438	1,421	34	**1,893**
Job growth	434	1,425	22	**1,881**
Households	444	1,489	193	**2,126**
Dwellings	483	1,700	222	**2,406**
Dwellings per annum	**20**	**71**	**9**	**100**

Source: Lichfields using PopGroup and ONS 2014-based SNPP/SNHP

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[33] It should be noted that, for the Dark Peak and South-West Peak sub-areas, the figure includes the marginal contributions from the NPA parts of the other constituent authorities.

Demographic Analysis

Future Housing Scenarios

7.32   As noted above, the population of the National Park is constrained due to purposes and duty set out in the Environment Act, 1995 and is therefore an outcome of policy rather than a target. Nevertheless, it is important for the PDNPA to understand what different population outcomes may result when tested against different levels of house building. This section models a number of potential demographic outcomes based on a number of dwelling and migration assumptions.

7.33   The number of households is translated into dwelling needs through the application of an assumption about the proportion of vacant properties / second homes that are currently recorded in the National Park.

7.34   Lichfields has modelled each of these scenarios using industry standard PopGroup demographic modelling software. The detailed assumptions utilised in the modelling can be found in Appendix 1.

Sensitivities – Assumptions and Approach

7.35   The following sensitivities have been considered for each of the subsequent scenarios for the Local Plan period 2021 to 2045 as follows:

Demographic Scenarios

- **Scenario A: Standard Method** – based on the Government's LHN methodology as of July 2023 (100 dpa), using the 2014-based SNHP and distributed across the three sub-areas of the Peak District on the basis of size of population.

- **Scenario B: 2014-based SNPP 2021 Census adjust** – a scenario utilising the 2014-based SNPP and headship rates from the Department for Levelling Up, Housing and Communities [DLUHC] 2014-based SNHP, extended to 2045, with the starting point adjusted to the latest 2021 Census population position for the Peak District (35,891).

- **Scenario C: 2018-based SNPP 2021 Census adjust** – a scenario utilising the 2018-based SNPP and headship rates from the 2018-based SNHP, but utilising the latest 2021 Census data for the Borough to adjust the starting point to the latest population position.

Migration Trend Scenarios:

- **Scenario D: Balanced Flows** – a scenario whereby the number of residents migrating out of the Peak District on an annual basis, equals the number moving in, resulting in net zero migration over the 24-year Plan period.

- **Scenario E: 15-year history** – Long term migration assumptions based on Peak District MYPE and births / deaths data from ONS between 2005/06 and 2019/20.

- **Scenario F: 6-year history** – Short term migration assumptions based on Peak District MYPE and births / deaths data from ONS between 2014/15 and 2019/20.

Population Scenario

Scenario G: Zero Population Growth – The number of houses needed to keep the population stable as a number. This involved constraining the Peak District population at 2021 levels (35,891).

Dwelling-led Scenarios:

- **Scenario H: Zero Dwellings** – Zero dwelling delivery is assumed across the plan period to 2045.

- **Scenario I**: **48 dpa** – Annual dwelling growth of 48 dpa is assumed every year in the Peak District across the Plan period. This is split across the three largest National Park districts on the basis of size of population at 2021, resulting in the following distribution: 10 dpa in High Peak; 31 dpa in Derbyshire Dales; and 7 dpa in Staffordshire Moorlands. As per the 2018 Peak District demographic forecasts work, it has been assumed that no dwelling growth occurs in all other areas of the National Park.

- **Scenario J**: **95 dpa** – Annual dwelling growth of 95 dpa is assumed every year in the Peak District across the plan period. This is split as follows: 20 dpa in High Peak; 62 dpa in Derbyshire Dales; and 13 dpa in Staffordshire Moorlands.

- **Scenario K**: **150 dpa** – Annual dwelling growth of 150 dpa is assumed every year in the Peak District across the plan period. This is split as follows: 31 dpa in High Peak; 98 dpa in Derbyshire Dales; and 21 dpa in Staffordshire Moorlands.

7.36 It should be noted that the 2014-based projections project forward over a 25-year period to 2039, therefore for the purposes of modelling it is assumed a pro rata change for six years to 2045. The 2018-based SNPP Total Fertility Rate [TFR] and Standardised Mortality Ratio [SMR] data has been used to underpin the migration / dwelling sensitivities alongside the 2018-based SNHP household formation rates.

Modelling Results

7.37 The scenarios use components of population change (births, deaths and migration) to project how the future population and household composition are related to the need for housing. The implications for future employment growth are also considered. The headline results for each scenario are outlined below.

Scenario B: 2014-based SNPP 2021 Census Adjusted

7.38 As set out above, the latest 2021 Census data suggests that the population of the Peak District has declined in recent years, from 37,905 residents recorded in the 2011 Census, down to 35,891 ten years later – a fall of 5.1%. All three sub-areas of the National Park experienced a decline in population, from -3.5% in the Dark Peak, to -5.7% in the White Peak, with the South West Peak seeing a fall of -4.5%.

7.39 Scenario B pegs the 2014-based SNPP population for all three sub-areas back to the 2021 Census, but applies the migration rates, mortality rates and fertility rates from the 2014-based SNPP. As a result, the rate of growth remains similar, albeit from a much lower base. This results in a fall in the population of the Dark Peak and South West Peak, of -361 and -38 respectively, but a modest increase in the White Peak's population of +213, driven entirely by net inward migration. All areas experience a sharp drop in population due to natural change.

7.40   This results in a modest growth in households of 29 across the Peak District as a whole, which translates into a net increase of 40 dwellings or 2 dpa (with the Dark Peak seeing a small net decline and the White Peak area seeing the largest increase of +6 dpa). This scenario would see a decline in the labour force (of -1,177) and jobs, with a net loss of -1,260. This would be focused particularly in the Dark and White Peak sub-areas.

7.41   A summary of the demographic outcomes under Scenario B is shown in Table 7.3.

Table 7.3 Summary of the demographic outcomes - Scenario B: 2014-based SNPP 2021 Census adjusted

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	-361	213	-38	**-186**
Of which natural change	*-874*	*-4,092*	*-690*	***-5,656***
Of which net migration	*513*	*4,305*	*652*	***5,470***
Labour force growth	-431	-605	-225	**-1,260**
Job growth	-426	-607	-144	**-1,177**
Households	-132	125	35	**29**
Dwellings	-143	142	41	**40**
Dwellings per annum	**-6**	**6**	**2**	**2**

Source: Lichfields using PopGroup and ONS 2014-based SNPP/SNHP

Scenario C: 2018-based SNPP 2021 Census adjusted

7.42   Scenario C applies the same approach as for Scenario B above, but interposes the data from the 2018-based SNPP / SNHP as opposed to the 2014-based iteration. As can be seen from Table 7.4, this results in a slightly more optimistic future for the National Park, with a modest net increase in the population of 239 overall, and an increase of 491 dwellings (20 dpa) driven entirely by growth in the White Peak.

7.43   A summary of the demographic outcomes under Scenario C is shown in Table 7.4.

Table 7.4 Summary of the demographic outcomes - Scenario C: 2018-based SNPP 2021 Census adjusted

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	-109	457	-109	**239**
Of which natural change	*-1,203*	*-5,153*	*-926*	***-7,282***
Of which net migration	*1,094*	*5,610*	*817*	***7,521***
Labour force growth	-112	29	-127	**-211**
Job growth	-111	29	-81	**-164**
Households	-35	451	12	**428**
Dwellings	-38	515	14	**491**
Dwellings per annum	**-2**	**21**	**1**	**20**

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Migration Flow Scenarios

Scenario D: Balanced Flows

7.44   This scenario ensures that for each sub-area of the Peak District, the number of residents migrating out of the area on an annual basis equals the number moving in, resulting in net zero migration over the 24-year plan period. The base migration statistics are adapted from the ONS's MYPE figures for the National Park, with the fertility and mortality rates taken

7.45 Given that net migration is the only demographic input driving population growth in both the 2014-based and 2018-based SNPPs, it is unsurprising that when this is neutralised, population growth declines significantly as it is driven down by worsening natural change. The result is a decline in the population of -5,469 to 2045, a loss of 2,482 jobs, and a decline in housing need of -145 dpa. This highlights the extent to which the Peak District needs in-migrants to ensure a positive economic future for the area.

7.46 A summary of the demographic outcomes under Scenario D is shown in Table 7.5.

Table 7.5 Summary of the demographic outcomes - Scenario D: Balanced Migration Flows

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	-1,045	-3,676	-748	**-5,469**
Of which natural change	*-1,045*	*-3,676*	*-748*	***-5,469***
Of which net migration	*0*	*0*	*0*	***0***
Labour force growth	-577	-1,645	-410	**-2,631**
Job growth	-571	-1,650	-262	**-2,482**
Households	-584	-2,118	-367	**-3,068**
Dwellings	-636	-2,418	-421	**-3,474**
Dwellings per annum	**-26**	**-101**	**-18**	**-145**

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Scenario E: 15-year Migration History

7.47 This scenario models long-term migration assumptions based on the Peak District MYPE and births / deaths data from ONS between 2005/06 and 2019/20. This scenario is rather more optimistic than the balanced migration scenario, given that over the past 15 years net migration has been positive into the National Park. Nevertheless, it is still insufficient to outweigh the strong decline in the birth rate and rise in mortality of residents living in the Peak District, with the result that the area's population continues its steady decline, by 3,254 residents over the next 24 years. This would result in a fall of -1,243 jobs, 2,210 households and 2,490 dwellings, or -104 dpa.

7.48 A summary of the demographic outcomes under Scenario E is presented in Table 7.6.

Table 7.6 Summary of the demographic outcomes - Scenario E: 15-Year Average Migration Flows

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	-1,258	-1,196	-801	**-3,254**
Of which natural change	*-1,072*	*-3,428*	*-756*	***-5,255***
Of which net migration	*-186*	*2,232*	*-45*	***2,001***
Labour force growth	-701	-264	-445	**-1,410**
Job growth	-694	-265	-284	**-1,243**
Households	-672	-1,151	-387	**-2,210**
Dwellings	-731	-1,314	-445	**-2,490**

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[34] Note: Lichfields also modelled the scenarios using the TFRs and SMRs from the 2014-based SNPP, and the household formation rates from the 2014-based SNHP. This resulted in a slightly more optimistic level of dwelling growth, of -111 dpa compared to -145 dpa using the 2018-based inputs.

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Dwellings per annum	-30	-55	-19	-104

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Scenario F: 6-year Migration History

7.49 This scenario models short-term migration assumptions based on the Peak District MYPE and births / deaths data from ONS between 2014/15 and 2019/20. On the face of it, this scenario is very similar to Scenario E, the 15-year migration scenario, with net migration totalling +1,730 in Scenario F, compared to +2,001 in Scenario E. As a result, the change in the number of dwellings is also reasonably consistent (albeit slightly lower), at -109 dpa compared to -104 dpa over the longer term.

7.50 A summary of the demographic outcomes under Scenario F is presented in Table 7.7.

Table 7.7 Summary of the demographic outcomes - Scenario F: 6-Year Average Migration Flows

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	-1,457	-1,104	-916	**-3,477**
Of which natural change	*-1,076*	*-3,372*	*-759*	***-5,207***
Of which net migration	*-381*	*2,268*	*-156*	***1,730***
Labour force growth	-807	-184	-510	**-1,502**
Job growth	-799	-185	-326	**-1,310**
Households	-759	-1,121	-436	**-2,316**
Dwellings	-827	-1,280	-500	**-2,606**
Dwellings per annum	-34	-53	-21	-109

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Population Scenario

Scenario G: Zero Population Growth

7.51 This scenario constrains the model so that there is no change in the Peak District's overall resident population over the period 2021-2045. The 2021 Census figure of 35,891 is therefore kept constant, although this does not mean that the structure of the population by age cohort is similarly stabilised, as the demographic characteristics of the in-migrants gradually changes the age composition of the National Park. For example, the constraints increase the Peak District's older population (aged 75 and over) by 471 over the 24 years to 2045; however, this is counted by a continued decline in the number of adults (aged 16-74) by 442 as more residents leave the National Park seeking higher education / employment.

7.52 These shifts in the age cohorts, aligned with a decline in household formation rates over time, result in a very modest increase in the housing need, of 382 dwellings overall, or 16 dpa. A summary of the demographic outcomes under Scenario F is shown in Table 7.7.

Table 7.8 Summary of the demographic outcomes - Scenario G: Zero Population Growth

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	0	0	0	**0**
Of which natural change	*-1,168*	*-5,216*	*-912*	***-7,296***
Of which net migration	*1,168*	*5,216*	*912*	***7,296***
Labour force growth	-54	-254	-53	**-361**
Job growth	-53	-255	-34	**-342**
Households	12	267	56	**335**
Dwellings	13	305	64	**382**
Dwellings per annum	1	13	3	16

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Dwelling-led Scenarios

Scenario H: Zero Dwelling Growth

7.53 This scenario constrains the model so that there is no change in the Peak District's overall households or dwellings over the period 2021-2045. Given that there is a continuation of the gradual tend towards smaller household sizes due to societal change, this means that there would be fewer people living in the National Park as a result of this hypothetical scenario, as well as fewer economically active residents and, ultimately, jobs.

7.54 A summary of the demographic outcomes under Scenario H is shown in Table 7.9.

Table 7.9 Summary of the demographic outcomes - Scenario H: Zero Dwelling Growth

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	-21	-681	-136	**-838**
Of which natural change	*-1,194*	*-5,284*	*-937*	***-7,416***
Of which net migration	*1,173*	*4,603*	*801*	***6,578***
Labour force growth	-61	-580	-140	**-781**
Job growth	-60	-582	-89	**-731**
Households	0	0	0	**0**
Dwellings	0	0	0	**0**
Dwellings per annum	0	0	0	0

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Scenario I: 48 dpa

7.55 This scenario constrains the model so that there is an average of 48 dwellings per annum [dpa] delivered every year to 2045, resulting in a net increase of 1,152 dwellings in total. In contrast to the previous scenarios, this results in a significant increase in the population, of 1,731, as well as an increase in the number of jobs, of 623.

7.56 A summary of the demographic outcomes under Scenario I is shown in Table 7.10.

Table 7.10 Summary of the demographic outcomes - Scenario I: 48 dpa

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	519	985	226	**1,731**
Of which natural change	*-1,122*	*-5,125*	*-898*	***-7,145***
Of which net migration	*1,641*	*6,110*	*1,125*	***8,876***
Labour force growth	248	325	80	**654**
Job growth	246	326	51	**623**
Households	219	657	142	**1,018**
Dwellings	239	750	163	**1,152**
Dwellings per annum	**10**	**31**	**7**	**48**

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Scenario J: 95 dpa

7.57 This scenario constrains the model so that there is an average of 95 dpa delivered every year to 2045, resulting in a net increase of 2,280 dwellings in total. This results in a significant increase in the population, of 4,247, as well as an increase in the number of jobs, of 1,950.

7.58 A summary of the demographic outcomes under Scenario J is shown in Table 7.11.

Table 7.11 Summary of the demographic outcomes - Scenario J: 95 dpa

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	1,048	2,618	581	**4,247**
Of which natural change	*-1,051*	*-4,968*	*-860*	***-6,879***
Of which net migration	*2,099*	*7,586*	*1,441*	***11,126***
Labour force growth	551	1,211	296	**2,058**
Job growth	546	1,215	189	**1,950**
Households	434	1,300	282	**2,016**
Dwellings	473	1,484	323	**2,280**
Dwellings per annum	**20**	**62**	**13**	**95**

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Scenario K: 150 dpa

7.59 This final scenario constrains the model so that there is an average of 150 dpa delivered every year to 2045, resulting in a net increase of 3,600 dwellings in total. This results in a significant increase in the population, of 7,191, as well as an increase in the number of jobs, of 3,502.

7.60 A summary of the demographic outcomes under Scenario J is shown in Table 7.11.

Table 7.12 Summary of the demographic outcomes - Scenario K: 150 dpa

2021-2045	Dark Peak	White Peak	SW Peak	Peak District TOTAL
Population change	1,667	4,528	996	**7,191**
Of which natural change	*-968*	*-4,784*	*-816*	***-6,567***
Of which net migration	*2,635*	*9,312*	*1,812*	***13,758***
Labour force growth	906	2,248	548	**3,702**
Job growth	896	2,255	350	**3,502**
Households	686	2,052	445	**3,183**
Dwellings	747	2,343	510	**3,600**
Dwellings per annum	31	98	21	150

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Modelling Summary

7.61   A summary of the scenarios assessed is presented in Figure 7.2. Compared to the (proportionate) SM2 minimum starting point of 100 dpa, extending the 2014-based SNPP for the Peak District to 2045, and factoring in the significant decline in the population by 2021 based on the latest 2021 Census data, reduces housing need significantly to just 2 dpa, rising slightly to 20 dpa if the 2018-based SNPP is used as the base. All the migration-based projections are lower than these unrestrained scenarios, as the Peak District is entirely reliant on net migration to drive future population growth given the significant negative natural change that occurs due to the number of deaths exceeding the number of births in the National Park.

Figure 7.2 Summary of Housing Scenarios for the Peak District National Park, 2021-2045
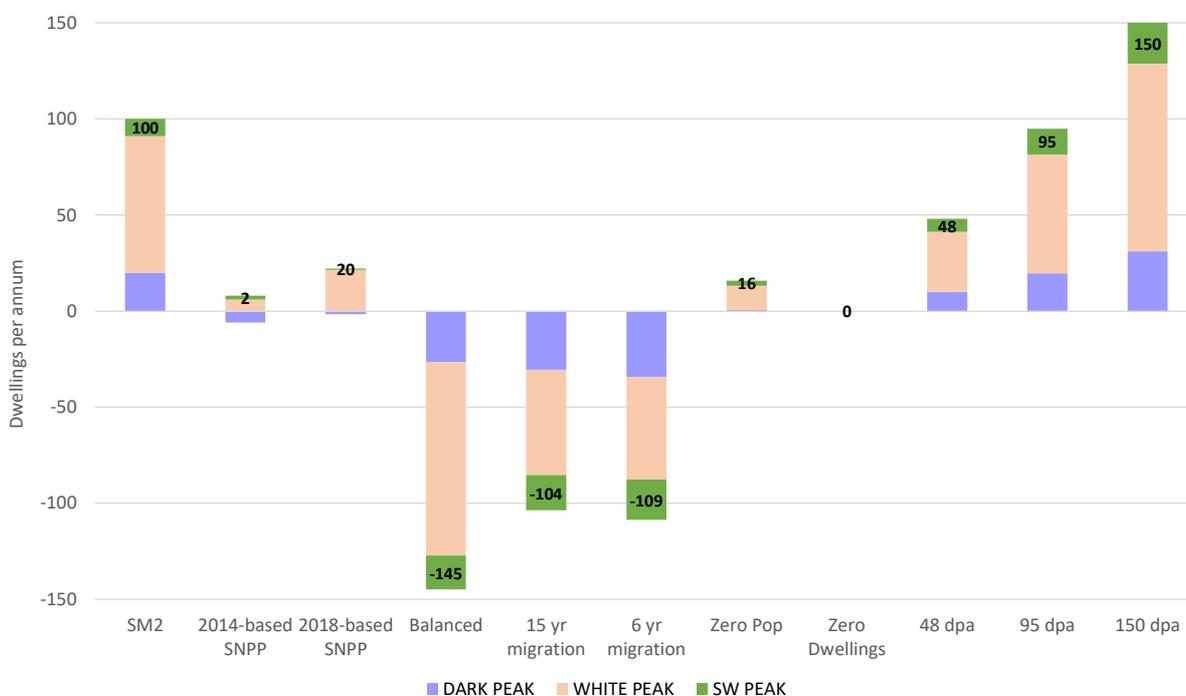
Source: Lichfields

7.62   Fixing the National Park's dwelling delivery to 48 dpa, 95 dpa and 150 dpa would have a very significant knock-on effect on the size of population growth and, by extension, the

number of jobs that could be supported in the area. As can be seen in Figure 7.3, these three dwelling-led scenarios would all generate a significant upswing in the number of residents living in the Peak District in marked contrast to the other modelled scenarios and particularly the marked decline experienced in recent years.

7.63   The decline in the size of the National Park's resident population reported by the 2011 and 2021 Censuses was equivalent to a Combined Annual Growth Rate [CAGR] of -0.54%, which is broadly in line with the -0.69% CAGR in the most pessimistic Scenario (D, Balanced Migration) and the -0.40% CAGR of Scenario E (15-year Migration Trend) and 0.42% CAGR of Scenario F (6-year Migration Trend).

Figure 7.3 Population Outcomes of Housing Scenarios for the Peak District National Park, 2021-2045
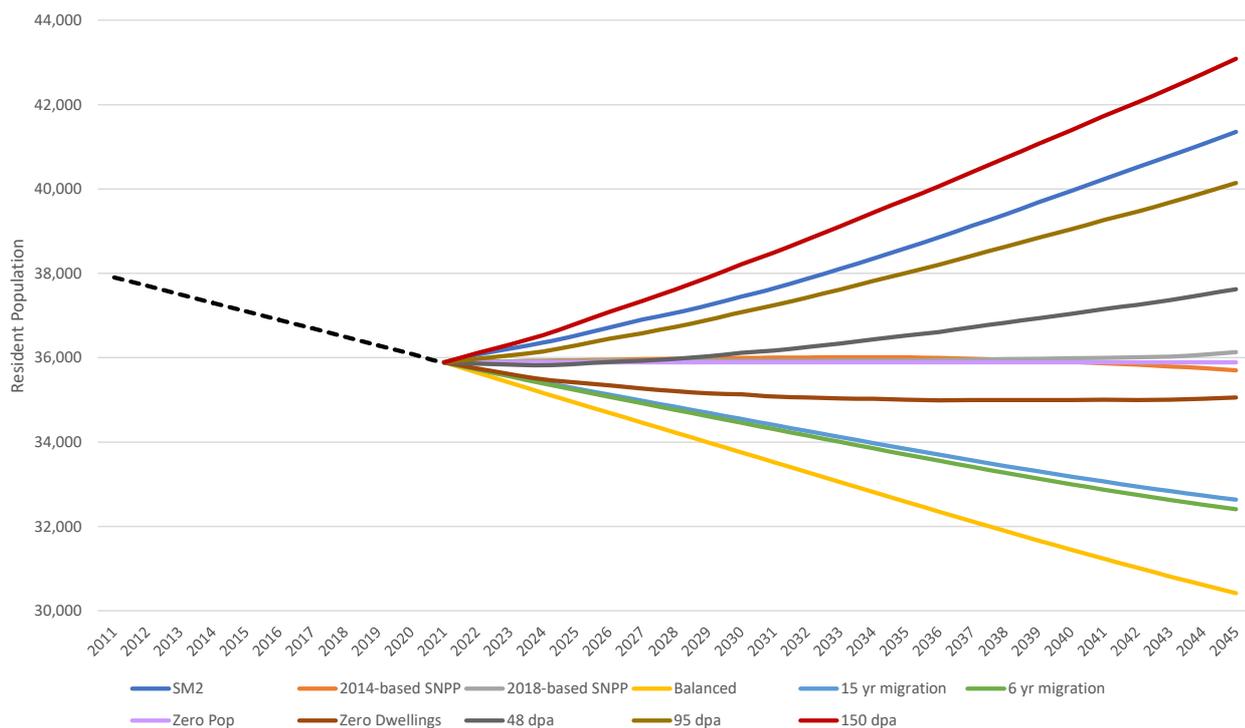
Source: Lichfields

Previous Delivery Levels

7.64   As noted earlier in this HNA, the PDNPA's Core Strategy does not have housing targets in the manner of other Local Plans across the country; rather, it includes 'indicative figures' for housing delivery over the period 2006 and 2026 which are intended to support the provision of affordable homes for local need and consolidate services, without causing harm to the landscape or other special qualities of the National Park. The indicative figures are not a target and were agreed with the constituent authorities, and the PDNPA is not tested on whether it meets them. However, they are used to assess the effectiveness of policy and any houses built are permitted to count towards the housing targets of the constituent authorities.

7.65   In this regard, the indicative figures are as follows:

-    Across the Dark Peak and Moorland Fringes: The provision of **between 35 and 75 homes** in Edale, Hayfield, High Bradfield, Holme, Little Hayfield, Low Bradfield, and Tintwistle (depending on identified capacity), with an **additional 35** outside these

settlements (e.g. agricultural dwellings and change of use or conversion). Around 80% are expected to be locally needed affordable homes, meeting up to 94% of identified eligible need in this area if the upper figure is achieved.

- Across the White Peak and Derwent Valley policies will support: The provision of **between 550 and 890 homes** in Alstonefield, Ashford, Bakewell, Bamford, Baslow, Beeley, Biggin, Birchover, Bradwell, Culver, Castleton, Chelmorton, Curbar, Earl Sterndale, Edensor, Elton, Eyam, Fenny Bentley, Flagg, Foolow, Froggatt, Great Hucklow, Great Longstone, Grindleford, Hartington, Hathersage, Hope, Litton, Middleton by Youlgrave, Monyash, Over Haddon, Parwich, Peak Forest, Pilsley, Rowsley, Stanton in Peak, Stoney Middleton, Taddington, Thorpe, Tideswell, Tissington, Wardlow, Wensley, Wetton, Winster, and Youlgrave (depending on identified capacity), with an **additional 125** outside these settlements. Around 60% are expected to be locally needed affordable homes, more than meeting identified eligible need in this area if the upper figure is achieved.

- Across the South West Peak policies will support: The provision of **between 30 and 130 homes** in Butterton, Calton, Flash, Grindon, Kettleshulme, Longnor, Rainow, Sheen Waterhouses, and Warslow (depending on identified capacity), with perhaps an **additional 30** outside these settlements. Around 60% are expected to be locally needed affordable homes, meeting up to 99% of identified eligible need in this area if the upper figure is be achieved.

7.66 **This totals between 805 at the lower end of the indicative range and 1,285 at the upper end of the range.**

7.67 Reviewing the PDNPA's past rate of net housing delivery against the upper end of the Core Strategy housing delivery range in Table 7.13 indicates that the National Park has slightly over delivered year-on-year, by around 150 dwellings over the past 16 years. It has delivered around 73 dpa, with particularly high rates of delivery in the first few years of the Core Strategy.

Table 7.13 Housing completions in the Peak District 2006/07 – 2021/22 against Core Strategy Indicative delivery (upper end of range)

	Net Completions	Indicative Core Strategy Housing Figures	Cumulative Difference
2006/07	130	64	**+66**
2007/08	72	64	**+74**
2008/09	205	64	**+215**
2009/10	57	64	**+208**
2010/11	82	64	**+226**
2011/12	106	64	**+268**
2012/13	33	64	**+237**
2013/14	24	64	**+197**
2014/15	55	64	**+188**
2015/16	26	64	**+150**
2016/17	98	64	**+184**
2017/18	51	64	**+171**
2018/19	58	64	**+165**
2019/20	34	64	**+135**

	Net Completions	Indicative Core Strategy Housing Figures	Cumulative Difference
2020/21	67	64	**+138**
2021/22	76	64	**+150**
Total	**1,174**	**1,024**	**+150**

Source: Peak District National Park Authority 2023

7.68   This level of past delivery sits between the 48 dpa and 95 dpa scenarios modelled above. On an indicative basis, Lichfields modelled the implications of replicating the total dwelling delivery of 73 dpa split on the basis of the sub-areas' distribution seen over the past three years (of which around 91.5% of the net additional dwellings were delivered in the White Peak sub-area, with the remaining 4% in the Dark Peak and 4.5% in the South West Peak Sub-Areas).

7.69   A summary of the demographic outcomes under this Scenario is shown in Table 7.11. it indicates that if those levels of delivery were seen over the next 24 years to 2045, there would be an overall net increase of 3,079 residents and 1,378 jobs, almost entirely driven by growth in the White Peak sub-area where the vast majority of housing in the National Park has come forward in recent years.

Table 7.14 Summary of the demographic outcomes – Past Delivery Rates – 73 dpa

2021-2045	Dark Peak	White Peak	SW Peak	**Peak District TOTAL**
Population change	136	2,902	41	**3,079**
Of which natural change	*-1,173*	*-4,941*	*-918*	***-7,032***
Of which net migration	*+1,310*	*+7,843*	*+959*	***10,112***
Labour force growth	29	1,365	-33	**1,361**
Job growth	29	1,370	-21	**1,378**
Households	64	1,412	69	**1,545**
Dwellings	**70**	**1,612**	**80**	**1,762**
Dwellings per annum	3	67	3	73

Source: Lichfields using PopGroup and ONS 2018-based SNPP/SNHP

Conclusions on Housing Figures in the Peak District

7.70   As noted above, national parks are exempt from housing targets. Nevertheless, the PDNPA is required to understand its housing needs and to focus on meeting local affordable housing requirements. In this regard, the 12 scenarios modelled in this section provide a wide range of future housing needs, from -145 dpa based on balancing net migration levels, to as high as 150 dpa based on a dwelling-led constraint. The 100 dpa figure that aligns with the SM2 approach (distributed across the Peak District from the constituent districts) would represent an uplift of 27 dpa from past delivery rates going back to 2006/07, but would see a net increase of around 5,480 residents over 24 years, and an increase in potential jobs of around 1,880.

7.71   It is for the PDNPA to consider the evidence contained in this HNA when identifying a local housing figure which would support the strategy underpinning the emerging plan, and having considered whether an adjustment to meet affordable housing needs is appropriate. An analysis of the National Park's affordable housing need and its implications are set out in detail in Section 8.0.

8.0 Affordable Housing Needs

Number of Current and Future Households in Need

8.1 In the 2021 Budget, the Government committed to investing a further £11.5 billion in the Affordable Homes Programme to build up to 180,000 new affordable homes across England over the five years from 2021 to 2026. The five-year programme will also help more people into homeownership and help those most at risk of homelessness. The programme is intended to unlock a further £38 billion in public and private investment in affordable housing. Nearly £7.5 billion will be delivered outside London by Homes England. This is over £2 billion more than the amount given under the previous Affordable Homes Programme. It is clear the Government is taking the issue of affordability seriously and is seeking to boost delivery of affordable homes.

8.2 Against this context, the PDNPA's AMR data from 2019[35] reported that between 2006/07 and 2018/19 there was 216 gross affordable housing completions. An annual breakdown is provided in Table 8.1.

Table 8.1 Gross Affordable Housing Completitions in the Peak District National Park (2006/07 – 2018/19)

	Affordable Housing Completions	% Share
2006/07	79	36.6%
2007/08	4	1.9%
2008/09	30	13.9%
2009/10	20	9.3%
2010/11	21	9.7%
2011/12	27	12.5%
2012/13	15	6.9%
2013/14	1	0.5%
2014/15	1	0.5%
2015/16	4	1.9%
2016/17	7	3.2%
2017/18	1	0.5%
2018/19	6	2.8%
Total	**216**	

Source: Peak District National Park Annual Monitoring Data (2019)

8.3 Table 8.2 provides a breakdown of affordable homes by Parish and illustrates that affordable housing was delivered mainly in Bakewell (36 units), Tideswell (25 units) and Bradwell (17 units).

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[35] Peak District National Park (2019): Annual Monitoring Reports – Housing Report 2017-19

Table 8.2 Gross Affordabe Housing Completions by Parish (2006/07 – 2018/19)

Parish	Gross Affordable Housing Completions	Parish	Gross Affordable Housing Completions
Aldwark	1	Hartington Town Quarter	1
Alstonfield	1	Hathersage	3
Bakewell	36	Hollingsclough	1
Ballidon	1	Hope	13
Bamford	8	Hope Woodlands	1
Baslow & Bubnell	16	Leekfrith	2
Bradfield	2	Litton	1
Bradwell	17	Monyash	3
Butterton	1	Over Haddon	3
Calver	6	Quarnford	1
Castleton	2	Rainow	1
Chelmorton	2	Sheen	1
Edale	1	Taddington	1
Elton	7	Taddington & Priestcliffe	1
Eyam	11	Thornhill	1
Fawfieldhead	2	Tideswell	25
Fenny Bentley	4	Wardlow	1
Flagg	1	Warslow and Elkstone	9
Grindleford	15	Wetton	2
Grindlow	1	Winster	2
Harthill	2	Youlgreave	2
Hartington Nether Quarter	4	**Total**	**216**

Source: Peak District National Park Annual Monitoring Data (2019)

Overarching Approach

8.4   Within this section, a calculation of affordable housing need, in line with the revised PPG on affordable housing needs assessment[36], has been undertaken for the Peak District to inform the assessment of the scale of housing need as well as arriving at an estimate of future housing need.

8.5   The first stage analyses affordable housing needs based on households unable to afford private market rents as per the PPG. We also set out an assessment of the further potential demand for intermediate housing, based on households which can afford to rent in the local market but are unable to access home ownership in the market, and where ownership is their aspiration. This adopts a simplified version of the methodology set out above based on net change / need.

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[36] Reference ID 2a-018-20190220 to 2a-024-20190220

8.6   There is a relatively new requirement set out in the PPG, which states that as part of the calculation needed to understand the current unmet gross need for affordable housing, this should include:

"the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.[37]"

8.7   Therefore, households who, in theory, can afford to rent privately but have an aspiration to own their property, can be assumed to be in need. This element has been calculated separately in the analysis below.

8.8   This methodology is now well established, and although a detailed step-by-step approach is not provided in the PPG, a more detailed staged approach is recommended in the now superseded 2007 SHMA Practice Guidance, issued by the former Department for Communities and Local Government in August 2007. These steps are as follows:

Stage 1: Current housing need (gross):

- 1.1 Homeless households and those in temporary accommodation
- 1.2 Overcrowding and concealed households
- 1.3 Other groups
- **1.4 Total current housing need (gross)**

Stage 2: Future need:

- 2.1 New household formation (gross per year)
- 2.2 Proportion of new households unable to buy or rent in the market
- 2.3 Existing households falling into need
- **2.4 Total newly arising housing need (gross per year)**

Stage 3: Affordable Housing Supply:

- 3.1 Affordable dwellings occupied by households in need
- 3.2 Surplus stock
- 3.3 Committed supply of new affordable housing
- 3.4 Units to be taken out of management
- 3.5 Total affordable housing stock available
- 3.6 Annual supply of social re-lets (net)
- 3.7 Annual supply of intermediate affordable housing available for re-let or resale at sub market levels
- **3.8 Annual supply of affordable housing**

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[37] Reference ID:2a-020-20190220

8.9   The over-arching approach is set out in Figure 8.1:

Figure 8.1 Net Housing Need Methodology

Total Current Housing Need (gross) to be addressed

Plus

Total Newly Arising Housing Need (gross per annum)

Less

Annual Supply of Affordable Housing

Equals

Net Housing Need

Source: Lichfields

Background

8.10   Affordable housing is defined within Annex 2 to the NPPF as:

"housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- *Affordable housing for rent;*

- *Starter homes;*

- *Discounted market sales housing; and,*

- *Other affordable routes to home ownership, which is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sales (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent)."*

8.11   With regards to the incorporation of affordable housing needs into the total housing figures included in Local Plans, the PPG[38] sets out the following:

"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."

8.12   The PPG therefore requires that LPAs consider how and whether affordable housing needs can be met. This is in the context that paragraph 63 of the NPPF requires LPAs to specify the type of affordable housing required where a need is identified.

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[38] Reference ID:2a-024-20190220

Affordable Housing Needs Calculation

Lower Quartile House Prices

8.13   HM Land Registry [HMLR] 'Price Paid' data indicates that lower quartile house prices for the year ending December 2022 averaged £277,500 across the Peak District. This is based on the sale of 499 properties in 2022. Having analysed HM Revenue and Customs [HMRC] Price Paid data at sub-area level, there were a total of 366 house sales in the White Peak and Derwent Valley, which resulted in an lower quartile average price of £275,000; 74 in the Dark Peak and Moorland Fringes (with an lower quartile average price of £291,250), and 59 sales in the South West Peak (with an lower quartile average price of £293,500).

Table 8.3 House Prices in the Peak District National Park (2022)

	Lower Quartile House Prices
Dark Peak and Moorland Fringes	£291,250
White Peak and Derwent Valley	£275,000
South West Peak	£293,500
Peak District National Park	**£277,500**

Source: HM Land Registry 'Price Paid' data for yr/ending December 2022

8.14   Given the limited numbers of sales in some parts of the Peak District, we have checked the figures against a one-off cut of data of house price to earnings affordability ratios for Local Authorities split across National Park boundaries in England that was produced by ONS in 2019 (and published on 9th March 2020). As can be seen in Table 8.4, for all three sub-areas, lower quartile house prices within the Peak District are significantly higher than those parts of the same districts outside the National Park's boundaries. When compared to the overall lower quartile house prices for the respective districts as a whole, the price premium, or uplift, ranges from between 21% in Derbyshire Dales, to 100% in Staffordshire Moorlands.

Table 8.4 Lower Quartile House Prices (Sept 2019)

2019	All	Outside PDNP	Inside PDNP	Peak District Uplift
High Peak	£145,000	£145,000	£231,000	59%
Derbyshire Dales	£195,000	£184,995	£235,000	21%
Staffordshire Moorlands	£130,000	£129,995	£260,000	100%

Source: ONS (March 2020): Ratio of house price to workplace-based earnings (LQ) for Local Authorities split across National Park boundaries in England, 2019

8.15   On the presumption that this price premium has been maintained over the intervening years to 2022, Table 8.5 indicates that this could suggest a lower quartile house price of £272,421 in High Peak; £271,154 in Derbyshire Dales; and £290,000 in Staffordshire Moorlands. When compared against the analysis of the HMLR's Price Paid data discussed above and reported again in Table 8.5 below, it is clear that the two datasets are broadly consistent.

Table 8.5 Lower Quartile House Prices (September 2022)

2022	All	Peak District Uplift	Potential adjusted LQ prices inside Peak District	Observed LQ from HMLR Price Paid data
High Peak	£171,000	59%	£272,421	**£291,250**
Derbyshire Dales	£225,000	21%	£271,154	**£275,000**
Staffordshire Moorlands	£145,000	100%	£290,000	**£293,500**

Source: ONS (March 2023): Lower Quartile House Prices 2022 / HM Land Registry 'Price Paid' data for yr/ending December 2022

8.16   By way of comparison, the average lower quartile house price for England was £186,500 in the year to December 2022, indicating that in general, the Peak District's overall house prices are significantly higher than the national level. The comparable figure for the East Midlands was £172,000 and for the West Midlands was £170,000 – also significantly lower than the National Park average. Given that the Price Paid data is the most up to date, this is the data that has been included in the affordable housing model discussed in detail below.

Lower Quartile Rents

8.17   Data on rents at a sub-district level is not available in any publicly available datasets. A search for properties available to rent in the Borough as of April 2023 showed that 38 properties were available, with lower quartile and median rents summarised in Table 8.6:

Table 8.6 Private Rental Prices in the Peak District National Park per Calendar Month (2023)

	Lower Quartile	Median
Peak District National Park	**£760**	**£1,050**
Dark Peak and Moorland Fringes	£800	£895
White Peak and Derwent Valley	£760	£1,050
South West Peak	£1,100	£1,250

Source: Lichfields search of property websites, April 2023

8.18   It indicates that lower quartile private sector rents were particularly high in the South West Peak at £1,100 per calendar month, or 144% of the Peak District-wide total. Similarly, lower quartile rents in the Dark Peak and Moorland Fringes were 105% of the Peak District-wide total based on a search return of nine properties. Private sector rents across the White Peak and Derwent Valley (£760) are consistent with those across the wider National Park (£760). These figures are all in excess of the equivalent private rental market statistics by district[39], which suggested that lower quartile rents in March 2023 were £446 per calendar month [pcm] in High Peak Borough; £580 pcm in Derbyshire Dales District; and £475 pcm in Staffordshire Moorlands District.

Income Profiles

8.19   To understand how affordable (or unaffordable) local housing is to local residents, the analysis requires an understanding of local household incomes. The lower quartile household income across the Peak District is around £28,800, with lower quartile incomes generally higher in the South West Peak sub-area (£35,000) and the dark Peak (£31,600)

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[39] Source: VOA's administrative database as at 31 March 2023: Table 2.7: Summary of monthly rents recorded between 1 April 2022 to 31 March 2023 by administrative area for England

than in the White Peak (£26,600). The distribution of household incomes for the Peak District and its component sub-areas are shown in Table 8.7 and plotted in Figure 8.2:

Table 8.7 Comparison of LQ and Median Incomes – Peak District National Park (2023)

	Lower Quartile Income
Peak District National Park	£28,800
Dark Peak and Moorland Fringes	£31,600
White Peak and Derwent Valley	£26,600
South West Peak	£35,000

Source: Experian 2023 / Lichfields analysis

Figure 8.2 Household Income Profiles – Peak District National Park and sub-areas (2023)

Source: Experian (2023)

Affordability

8.20   A key stage of the assessment involves an affordability test. Information in respect of local house prices, market rents and household income levels has informed the test which estimates the ability of households to afford lower quartile market housing. The affordability test has been calculated by identifying the costs of entry level (lower quartile) market housing, the costs of which have been obtained from the HMLR and private rental costs obtained from an analysis of commercial property websites as discussed above.

8.21   Drawing upon the review of current house prices and private rental values, lower quartile prices for a house (£291,250 price paid for an lower quartile dwelling in the Dark Peak; £275,000 in the White Peak; and £293,500 in the South West Peak for– all property types

in 2022) and an lower quartile rental property (£9,600 per annum in the Dark Peak; £9,120 in the White Peak; and £13,200 in the South West Peak) have been used as an indicator of the entry price to market housing. Such houses are available within the Borough and these values are relatively typical of smaller properties on the market (of which several operate across the Peak District), suitable for newly forming households seeking to move into a first property, very high prices notwithstanding.

8.22   To understand what income would be required to sustain ownership or occupation of such properties, it is necessary to consider how much households can afford to spend on their housing. The former SHMA Guidance from 2007 (superseded by the NPPF and PPG but still containing useful context where the PPG is silent) sets out that a household can be considered able to afford to buy a home if it costs 3.5 times the gross household income for a single earner or 2.9 times the gross household income for a dual-income household. However, the PPG does not prescribe exactly how affordability calculations should be undertaken other than to say that access to lower quartile (entry level) market housing is the relevant barometer.

8.23   The household income data utilised for the Peak District does not differentiate between single earners and dual earners, whilst the former SHMA Guidance is now some fifteen years old and the loan to income mortgage ratios do not reflect current lending practices.

8.24   In 2014 the Bank of England's Financial Policy Committee said that it would only allow 15 percent of new mortgages to be at multiples higher than 4.5 times a borrower's income, in effect 4.5 times as a maximum. There are even cases where this is exceeded; for example, Halifax will allow couples with a combined income of £50,000 to £75,000 to borrow five times their income at up to 75% LTV[40].

8.25   Lichfields has complemented this with evidence from the Council of Mortgage Lenders[41] [CML], which identified that in Q3 2018, average loan-to-value ratio for first time buyers in England was 85%, whilst according to the English Housing Survey [EHS], the median deposit for first time buyers was also around 15.1% in 2020/21[42]. Although there may be difficulties in newly forming households in being able to secure a 15% deposit, there are options available including Government initiatives as well as traditional sources of deposits such as parents.

8.26   For the purposes of this assessment, we have assumed that single-earner households can borrow up to 4x their annual income and dual-earner households can borrow up to 4.5x their annual income when buying housing, both with a 15% deposit secured[43].

8.27   In respect of renting, there is no official, or definitive, threshold for how much a household can spend on rent before it is unaffordable. The former SHMA Guidance (2007) set out that a household can be considered able to afford renting on the private market in cases where the rent payable was up to 25% of their gross household income.

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[40] https://www.which.co.uk/news/2021/11/how-much-can-you-borrow-when-taking-out-a-mortgage/
[41] Median loan to value ratio for first time buyers - data.gov.uk
[42] EHS (2020/21): Annex Table 1.9: Deposit and type of mortgage, recent first time buyers, 2020-21
[43] It is acknowledged that the methods by which lenders now determine borrowing limits is more complex than simply using mortgage multipliers – lenders take into account a wide range of factors including length of mortgage (which can now be up to 35-40 years), committed expenditure and loan-to-value ratio which can affect the amount borrowed relative to income. However for the purposes of this assessment it is necessary to make some assumptions, and the use of a 4-4.5 income multiplier is considered reasonable for first-time buyers with around a 15% deposit. The lower multiplier used for single person households reflect the higher risk associate with single earner households.

8.28   However, there is more up to date evidence which suggests that the proportion of gross household income spend on rent may be higher than 25%.

8.29   For example, data released more recently estimates that the national average is 33% of gross household income (excluding services but including Housing Benefit), although there is a wide range across the country, from a low of 26.3% in the North East, to a high of 41.5% in Greater London. The equivalent figure for the East Midlands is 27.8%, the North West is 28.4%, and for the West Midlands, 30.1%[44].

8.30   For the purposes of this assessment, we have assumed that households in the private rented sector in High Peak can reasonably be expected to spend **between 25% and 33% of their annual income on rent. A figure of 30% has also been modelled to align with the West Midlands average.**

8.31   These affordability criteria have been applied to the identified rental costs to arrive at an income threshold to support ownership / occupation of entry level market housing. Under both scenarios, households require considerably lower incomes to rent privately in the Peak District (in every sub-area) than it is for them to buy a property on the open market.

Table 8.8 Income Thresholds for Entry Level Market Housing in the Peak District National Park

	Market	Product	Cost	Basis	Income Threshold
Peak District	**Private Buy**	**Lower Quartile House Prices**	**£277,500**	4 x income and 15% deposit	**£58,969**
				4.5 x income and 15% deposit	**£52,417**
	Private Rent	**Lower Quartile Rental Prices**	**£9,120 per annum**	25% income	**£36,480**
				30% income	**£30,400**
				33% income	£27,636
Dark Peak	Private Buy	Lower Quartile House Prices	£291,250	4 x income and 15% deposit	£61,891
				4.5 x income and 15% deposit	£55,014
	Private Rent	Lower Quartile Rental Prices	£9,600 per annum	25% income	£38,400
				30% income	£32,000
				33% income	£29,091
White Peak	Private Buy	Lower Quartile House Prices	£275,000	4 x income and 15% deposit	£58,438
				4.5 x income and 15% deposit	£51,944
	Private Rent	Lower Quartile Rental Prices	£9,120 per annum	25% income	£36,480
				30% income	£30,400
				33% income	£27,636
South West Peak	Private Buy	Lower Quartile House Prices	£293,500	4 x income and 15% deposit	£62,369
				4.5 x income and 15% deposit	£55,439

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[44]   DLUHC EHS 2021/22 – Private Rented Sector, Annex Table 2.7: Proportion of income spent on Rent

	Market	Product	Cost	Basis	Income Threshold
	Private Rent	Lower Quartile Rental Prices	£13,200 per annum	25% income	£52,800
				30% income	£44,000
				33% income	£40,000

Source: SHMA Guidance, CML, EHS, HMLR, ONS and Lichfields analysis

8.32   The income distribution of newly forming households is different from total households, reflecting their lesser incomes compared to the average[45]. This means that a greater proportion of newly-forming households are unable to access market housing than households overall. The PPG, however, sets out clearly that the affordability of housing for newly-forming households must be considered foremost, as it is these households that will most likely fall into housing need if their housing requirements are not met in the market.

Stage 1: Current Housing Need Steps 1.1 to 1.4

8.33   The first stage of the assessment considers current affordable housing need, also referred to as the 'backlog' (those needs which exist, and are unmet, now). The PPG is clear that an estimate should be made of the number of households who lack their own housing or who cannot afford to meet their housing needs, in the open market. The PPG[46] provides an indication of the types of housing that should be considered unsuitable which are set out below:

- the number of homeless households;
- the number of those in priority need who are currently housed in temporary accommodation;
- the number of households in over-crowded housing;
- the number of concealed households;
- the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and,
- the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.

8.34   Although potentially not including all households in need of housing, the housing waiting list is the starting point for estimating what the need and demand for affordable housing is. If all households on the waiting list and in priority need were accommodated, it would be reasonable to assume that all demand for affordable housing would be met, even if there remain households in need which are not reflected in the housing waiting list.

8.35   Therefore, it has been considered that the components of affordable housing need including those in need and within a reasonable preference group for affordable housing (e.g. homeless households and overcrowded households), currently concealed households and other groups in need, are best represented by those identified on the waiting list as a best-case proxy.

8.36   PDNPA has indicated, with reference to constituent housing authorities home options data and in consultation with constituent authority housing officers, that there are **751**

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[45] EHS 2015 to 2016: housing costs and affordability - Annex Table 2.1: Mean and median income, 2015-16. HRP aged 16-34 have an average weekly income of £718 per week compared to £780 per week for all households, meaning younger newly forming households earn **92%** of the 'all households' amount.
[46] ID 2a-020-20190220

households on the Housing Register as of April 2023. Of this total, 231 are identified as being 'non-priority' for housing (i.e. in Band D), leaving the remaining 520 as being classified as being in priority need of social housing. Of this total, 150 households already live in social housing and would represent transfers seeking to move to alternative social housing, resulting in a net priority need for 370 homes. This is summarised in Table 8.9 below, with a total of 179 households in need of social housing in the Dark Peak (net), 171 (net) in the White Peak, and just 20 (net) in the South West Peak.

Table 8.9 Number of Households on the Housing Register in the Peak District National Park (April 2023)

	Bands A-D Total	Bands A-D excl. transfer	Bands A-C Total	**Bands A-C Total excl. transfers**
Dark Peak and Moorland Fringes	378	267	267	**179**
White Peak and Derwent Valley	343	257	231	**171**
South West Peak	30	25	22	**20**
Peak District National Park Total	**751**	**549**	**520**	**370**

Source: PDNPA Planning Officers (April 2023) Households in priority bandings not already living in social housing

8.37   The figures only include those people who have applied for and are eligible for social or affordable rent housing in accordance with the PDNPA's Housing Allocation Policy. The figures do not include households in housing need and who are seeking and eligible for intermediate affordable housing tenures (e.g. shared ownership). The PDNPA does not hold data on intermediate housing need as sales are normally done through the national Homebuy agent.

8.38   Households in unsuitable housing already living in affordable housing have therefore been excluded from the calculation at Step 1.4. Although these households do have a housing need, this could be addressed via a transfer within affordable housing (e.g. by transferring an overcrowded household living in social rented to a larger social rented house). This transfer would result in their existing home becoming available for someone else in need. Thus, these households do not contribute to the net requirement for affordable housing and in turn when these households move, this does not contribute to net supply.

8.39   Although existing households in need already occupying affordable housing are excluded from the affordable housing calculation, it is noted that they do still have a requirement for the right type of affordable housing to become available to meet their needs. If an appropriate unit does not become available (e.g. due to shortage of supply of a specific type or size of unit) then these households will remain in need, despite not contributing to a net need requirement. New affordable housing provision provides the opportunity to focus on the size/type of provision to balance affordable housing mix, as explained at Section 9.0.

Stage 2: Future Need Steps 2.1 to 2.3

8.40   Future housing need is split into two components. The PPG[47] sets out that projections of affordable housing need will firstly have to reflect new household formation and the proportion of these newly forming households unable to buy or rent in the market area, and secondly an estimate of the number of existing households falling into need:

"This process will need to identify the minimum household income required to access lower quartile (entry level) market housing (strategic policy-making authorities can use current costs in this process, but may wish to factor in anticipated changes in house prices and wages). It can then assess what proportion of newly-forming households will be unable to access market housing".

This could be either through purchasing a dwelling or renting privately, although as we have set out below, households require a considerably higher income to buy, than to rent privately under all scenarios, in all sub-areas of the Peak District. For the purposes of this affordable / social rented analysis therefore, we have focused on those newly forming households unable to rent, with the separate calculation on intermediate housing to purchase analysed in a subsequent section.

New Household Formation (Step 2.1)

8.41   The PPG[48] recommends that gross household formation should be used as the measure of newly forming households, as opposed to net household growth which takes into account household dissolution. This is required to ensure that household dissolution is not double-counted in the calculation, once as a net loss of households and potentially again as a re-let of the house they may have occupied. However, gross household formation is typically much higher than net rates and may represent an overestimate of the number of households seeking new housing in each year within the Peak District. This is limited to households forming who are under the age of 45, which is consistent with the former 2007 SHMA Guidance (Annex B) which notes that after 45 years of age, household formation rates 'plateau'[49].

8.42   For the purposes of considering future newly forming households, the DLUHC 2014-based SNHP have been used in line with the standard methodology. This demographic data generates a housing requirement of just 2 dpa, which is a net figure, but a 223 hpa figure gross[50].

8.43   This output of future housing need should be treated with caution. Such gross estimates may include people that form several different households over the period at different stages of their life, but does not account for their previous household no longer existing (i.e. two single person households becoming a couple and moving in together).

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[47] 2a-021-20190220
[48] 2a-021-20190220

[49] This is supported by the EHS data for 2020/21 *(Annex Table 1.8: Demographic and economic characteristics, recent first time buyers, 2020-21)*, which indicates that 92.9% of First Time Buyers are aged between 16 and 44, with 63% aged between 25 and 34.
[50] We note that SHMAs undertaken by certain other housing consultants prefer to apply average gross household formation rates based on applying national rate to total households over the period, using data from the EHS. If such an approach were to be applied here, then using the 3-year average national gross household formation rate of 1.439% from the EHS 2016/17-2018/19 and applying it to the 21-year 2014-based SNHP (2021 Census adjusted) for the Peak District, this would generate a gross annual household formation of 288 hpa, which is reasonably close to 223 hpa recorded above.

Table 8.10 Gross newly-forming households in the Peak District National Park under 45 years

	No. newly forming households annually (gross)
Dark Peak and Moorland Fringes	45
White Peak and Derwent Valley	146
South West Peak	32
Peak District National Park Total	**223**

Source: DLUHC 2014 based SNHP adjusted for 2021 Census and Lichfields analysis

Those unable to rent or buy (Step 2.2)

8.44 This stage of the assessment involves an affordability test. Information in respect of local house prices, market rents and household income levels has informed the test which estimates the ability of households to afford lower quartile market housing. The affordability test has been calculated by identifying the costs of entry level (lower quartile) market housing, the costs of which have been obtained from the HMLR, as well as private rental costs obtained from an analysis of commercial property websites in summer 2023.

8.45 As set out above, drawing upon the review of current house prices and private rental values, lower quartile prices for a house (price paid by local authority and equal to £277,500 across the Peak District) and a rental property (£760 per month) have been used as an indicator of the entry price to market housing. Such houses are available within the National Park and such values are relatively typical of smaller properties on the market, ideal for newly forming households seeking to move into a first property.

8.46 The income distribution of newly forming households is different from total households, reflecting their lesser incomes compared to the average[51]. This means that a greater proportion of newly forming households are unable to access market housing than households overall. The PPG, however, sets out clearly that the affordability of housing for newly forming households must be considered foremost, as it is these households that will most likely fall into housing need if their housing requirements are not met in the market.

8.47 The percentage of both existing and newly forming households unable to afford to buy/rent is set out below and equates to 46% for newly forming households based on 25% gross income, falling to 35% of all the National Park's households if a 30% gross income threshold is modelled rather than 25%, and down to 30% if a 33% threshold is used[52].

8.48 In addition, Step 2.3 uses secondary data for the number of households who move house each year (based on past trends) to estimate the number of existing households falling into need annually. Using data for the number of people actually moving (from HMLR and CORE data[53]) provides a good indicator of need, as it shows actual moves; whereas the Housing Register only provides an indication of intentions to move.

8.49 Existing households falling into need is therefore based upon an analysis of recent trends of movements from the private sector into the social sector as a proxy for existing households

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[51] EHS 2015 to 2016: housing costs and affordability - Annex Table 2.1: Mean and median income, 2015-16. HRP aged 16-34 have an average weekly income of £718 per week compared to £780 per week for all households, meaning younger newly forming households earn 92% of the 'all households' amount.

[52] Note: As has been well publicised the country is in the midst of a 'cost of living' crisis. These figures are a point in time estimate and are reflective of what people can currently afford to borrow, although clearly the adverse economic headwinds and soaring utilities bills may make such levels unaffordable. As such, despite the analysis including sensitivity testing to help future-proof the analysis, this should be monitored by the Authority and adjustments made as necessary going forward.

[53] CORE (COntinuous REcording of Lettings and Sales in Social Housing in England) is a national information source funded by DLUHC that records information on the characteristics of both private registered provider's and LA's new social housing.

falling into need. These figures were averaged from CORE data over the past 5 years. CORE data is only available at Borough-level rather than sub-area / National Park area level. Therefore, an analysis was undertaken of the number of social rented and shared ownership properties present in each output area wholly/partially within the PDNPA's boundaries, using the latest 2021 Census data. A proportionate split was applied to those Output Areas straddling the National Park boundary as per the analysis set out above using the bespoke ONS data. This proportionate split was then applied to the respective Boroughs of High Peak, Derbyshire Dales and Staffordshire Moorlands to arrive at an approximate figure for the likely level of existing households living within the Peak District likely to fall into social housing need for a given year.

8.50   In summary, the components of the future affordable housing need for the Peak District are set out in Table 8.11.

Table 8.11 Future Affordable Housing Needs for the Peak District National Park

Component	Peak District			Source/Calculation
	25% Income Threshold	30% Income Threshold	33% Income Threshold	
Newly forming households (Gross per annum)	223			2014-based SNHP adjusted for the 2021 Census
% unable to rent or buy in the private market	46.0%	35.0%	30.0%	Lichfields' Affordability Modelling
Newly forming households unable to afford market housing (per annum)	103	78	67	Newly forming households (Gross per annum) x % unable to rent or buy in the private market
Existing households falling into need (annual average)	37			CORE 2017/18 to 2021/22
Estimate of Future Housing Need (p.a.)	**140**	**115**	**104**	Newly forming households unable to afford market housing (per annum) + Existing households falling into need (annual average)

Source: DLUHC 2014-based Household Projections, CORE Data and Lichfields analysis

8.51   Peak District sub-area data is provided in Table 8.12.

Table 8.12 Future Affordable Housing Needs by Peak District National Park Sub-Area

Component	Peak District			Dark Peak			White Peak			South West Peak		
	25%	30%	33%	25%	30%	33%	25%	30%	33%	25%	30%	33%
% of PDNP's Social Housing located in each sub-area	100%			18.3%			73.9%			7.8%		
Newly forming households (Gross per annum)	223			45			146			32		
% unable to rent or buy in the private market	46.0%	35.0%	30.0%	39.5%	29.5%	25.0%	46.4%	35.4%	30.4%	54.9%	42.2%	36.2%
Newly forming households unable to afford market housing (per annum) *	103	78	67	18	13	11	68	51	44	18	13	12
Existing households falling into need (annual average)	37			6			28			3		
Estimate of Future Housing Need (p.a.)	140	115	104	23	19	17	96	80	72	21	17	15

Source: DLUHC 2014-based Household Projections, 2021 Census TS054 - Household Tenure, DLUHC Local Authority Live Table, CORE Data and Lichfields analysis
*Balanced to sum.

8.52 These outputs of future affordable housing need should be treated with caution. Utilising gross estimates of household formation may include people that form several different households over the period at different stages of their life but does not account for their previous household no longer existing.

Stage 3: Affordable Housing Supply steps 3.1 to 3.8

8.53 This Section estimates the existing and forthcoming stock of affordable housing as per the PPG. This stage examines housing stock that can accommodate households in housing need. The information is required to calculate net affordable housing requirements. The model considers both current affordable housing stock (including how much of this is available) as well as the level of future annual new supply.

Current Affordable Housing Stock (Steps 3.1 to 3.5)

8.54 The PPG[54] sets out the current components of housing stock used to accommodate current households in affordable housing need as well as future supply:

- the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need;

- Suitable surplus stock (vacant properties);

- the committed supply of new net affordable homes at the point of the assessment (number and size); and,

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[54] 2a-022-20190220

- Identifying units to be taken out of management (demolition or replacement).

8.55 The PPG states that the first three components are to be added together, and the number of social housing units to be taken out of management deducted, to equate to the total affordable housing stock that is available.

Affordable Dwellings occupied by Households in Need (Step 3.1)

8.56 The purpose of Step 3.1 is to identify the number of affordable dwellings which become available but are occupied by households in housing need. Thus, this step considers transfers within the affordable housing stock. The movement of these households (within affordable housing) will have a nil effect overall in terms of housing need. These 150 households have already been netted off at Stage 1 of the calculation and the figure for this step is therefore zero.

Surplus Stock (Step 3.2)

8.57 A certain level of voids is normal and allow for transfers and works to properties. The former SHMA Guidance (page 48) noted that a social housing vacancy rate in excess of 3% (and properties which are vacant for considerable periods of time), should be counted as surplus stock.

8.58 An analysis has been undertaken utilising vacancy level data. This indicates a social housing vacancy level of 1.2% in 2022[55] for High Peak Borough; 1.5% for Derbyshire Dales District; and 0.9% for Staffordshire Moorlands District, with just 163 vacant Registered Provider [RP] properties on average across the three districts over the past 5 years. Therefore, as the current vacancy rate in these districts is well below the 3% rate recommended by the former SHMA guidance, a surplus stock rate of zero has been included within the model.

Committed Supply of New Affordable Housing (Step 3.3)

8.59 The former SHMA Guidance states that this step of the model should utilise information about new social rented and intermediate affordable dwellings which are committed at the point of assessment. The Local Authority Housing Statistics [LAHS] data no longer shows the number of planned and proposed affordable units. However, data on committed supply of affordable housing has been provided by PDNPA and suggests that there is no social rented affordable housing currently in the development pipeline.

Units to be taken out of Management (Step 3.4)

8.60 The former SHMA Guidance states that this stage should *"estimate the numbers of social rented or intermediate affordable housing units that will be taken out of management."* This includes properties which are planned to be demolished or redeveloped (with a net loss of stock).

8.61 It is our understanding that no affordable homes are proposed to be taken out of management, therefore a figure of zero has bene included in the model.

Total Affordable Housing Stock Available (Step 3.5)

8.62 Table 8.13 sets out these current components of supply in the Peak District as at March 2023.

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[55] DLUHC Data: Table 100 (2023) and Table 615 (2023)

Table 8.13: Current Supply of Affordable Housing in the Peak District National Park

Component	#	Source
Step 3.1 (Affordable Dwellings Occupied by households in need)	**None** – already netted off at Stage 1 (Step 1.4 – 150 units)	Housing Register Spring 2023
PLUS Step 3.2 (Surplus Stock) – Vacant but available for letting	0	Various districts as at March 2023
PLUS Step 3.3 (Committed Supply of New Affordable Housing to Rent)	0	PDNPA as at March 2023
MINUS Step 3.4 (Units to be taken out of management) – Vacant but not available for letting	0	PDNPA as of March 2023
EQUALS Step 3.5 Current Supply of Affordable Housing	**0**	

Source: PDNPA 2023

Future Affordable Housing Supply (Steps 3.6 to 3.7)

8.63   The final part of the calculation relates to an analysis of the level of likely future affordable housing supply coming forward, which considers future annual supply of social housing re-lets (net), calculated based on past trends (generally the average number of re-lets over the previous three years should be taken as the predicted annual levels). This only includes those re-lets that would lead to a net gain in the stock, hence it excludes first lets, internal transfers and tenancy renewals.

8.64   Social re-lets data has been obtained from 5 years-worth of CORE data (for 2017/18 to 2021/22). The data obtained for this component is set out in Table 8.14. As noted above, CORE data is only available at Borough-level rather than sub-area / National Park area level, an analysis was undertaken of the number of social rented and shared ownership properties present in each output area wholly / partially within the PDNPA's boundaries, using the latest 2021 Census data, with a proportionate split applied to those Output Areas straddling the PDNPA boundary as per the analysis set out above using the bespoke ONS data. This proportionate split was then applied to the respective Boroughs of High Peak, Derbyshire Dales and Staffordshire Moorlands to arrive at an approximate figure for the likely level of social re-lets in the Peak District for a given year.

Table 8.14: Future Annual Supply of Social Re-lets

	Social re-lets
2017/18	70
2018/19	63
2019/20	72
2020/21	55
2021/22	62
Average	**70**

Source: CORE Data

Estimate of Net Affordable Housing Needs

8.65   Bringing the above elements together the analysis can calculate net affordable housing need, with the assumption that the backlog need will be addressed in full in the first 5 years of the Plan.

8.66   Table 8.15 below sets out the calculation of net annual affordable housing need.

Table 8.15 PDNP's Affordable Housing Need Calculation

Stage and step in calculation	Notes	Peak District			Dark Peak			White Peak			SW Peak		
		25%	30%	33%	25%	30%	33%	25%	30%	33%	25%	30%	33%
Stage 1: Current Need (Gross)													
1.1-1.3 Current Need (including Backlog)	Housing Register April 2023	370			179			171			20		
Stage 2: Future Need													
2.1 New household formation (gross p.a.)	ONS 2014 SNHP	223			45			146			32		
2.2 Proportion of new households unable to buy or rent in the market	Unable to afford lower quartile rents	**46%**	**35%**	**30%**	40%	30%	25%	46%	35%	30%	55%	42%	36%
2.3 Existing households falling into need	5-year average to 2022 CORE data	37			6			28			3		
2.4 Total newly arising housing need (gross p.a.)	(2.1 x 2.2) +2.3	**140**	**115**	**104**	**23**	**19**	**17**	**96**	**80**	**72**	**21**	**17**	**15**
Stage 3. Affordable Housing Supply													
Current Supply													
3.1 Affordable dwellings occupied by households in need	Housing Register April 2023	**0 (150 units already deducted)**			0 (88 units already deducted)			0 (60 units already deducted)			0 (2 units already deducted)		
3.2 Surplus stock (Vacant but available for letting)	DLUHC Tables 100 and 615	**0**			0			0			0		
3.3 Committed supply of affordable housing for rent	(Peak District data return 2023)	**0**			0			0			0		
3.4 Units to be taken out of management (vacant but not available for letting)	(Officer discussions as at 2023)	**0**			0			0			0		
3.5 Total affordable housing stock available	3.1+3.2+3.3-3.4	**0**			**0**			**0**			**0**		
Future Supply													
3.6 Annual supply of social re-lets (net)	5-year average from 2017/18 to 2021/22 CORE data	**64**			9			49			6		
3.8 Annual supply of affordable housing	3.6	**64**			9			49			6		
Net Annual Affordable Housing Need	1.3 – 3.5 (annualised over 5 years)+2.4-(3.1+3.2+3.4)-3.8	**150**	**125**	**114**	**50**	**45**	**43**	**81**	**65**	**58**	**19**	**15**	**13**

Source: NELC, Local Authority Live Tables, CORE Data, Housing Register and Lichfields analysis.

8.67   This illustrates that net annual need based on current data over the period 2021 to 2045 amounts to **between 114 and 150 homes for affordable / social rent** (depending on the income multiplier used). This reflects gross household formation and therefore does not account for household dissolutions, with the implication that needs are likely to be

'worst case' under this approach as it could include some double counting. It also assumes that the **backlog need will be addressed in full in the first 5 years of the Plan**. Strongest levels of affordable housing rental need are identified for the White Peak and to a lesser extent the Dark Peak, and the lowest in the South West Peak.

Affordable Homes for Purchase

8.68   The previous 2008 SHMA only assessed the need for intermediate housing based on households which could not afford to rent in the open market. It effectively assumed that all households which can afford to rent in the market do not represent a need for any form of affordable housing. However, the latest version of the PPG states that the affordable housing need assessment should include an estimate of those that cannot afford their own home to rent or to own their home where that is their aspiration[56]. This introduces a new concept whereby the need figure must include an indication of the number of households who can currently afford to rent privately, but who nevertheless aspire to own their own home (which could include intermediate affordable home ownership products and First Homes).

8.69   We therefore need to also consider households which want to move towards ownership tenures, but may be unable to, even if their needs are currently being met in the private rented sector. These households' needs would be met through affordable home ownership products, including shared ownership and other types (e.g. discount market). Being a current tenant of the private rented sector does not exclude a household from being able to apply for shared ownership, as long as they are a first-time buyer or cannot afford to buy a home now (if they used to own a home).

8.70   In the case of assessing needs of affordable homes for purchase, it is therefore necessary to capture households who can afford to rent in the market but are unable to afford to buy. This is because those unable to afford renting are captured in the assessment of affordable rented need, whilst those able to buy in the market without assistance are unlikely to be eligible for forms of affordable housing for purchase (except for First Homes).

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[56] PPG ID: 2a-020-20190220

Figure 8.3 Income Distribution and Product Affordability in the Peak District National Park
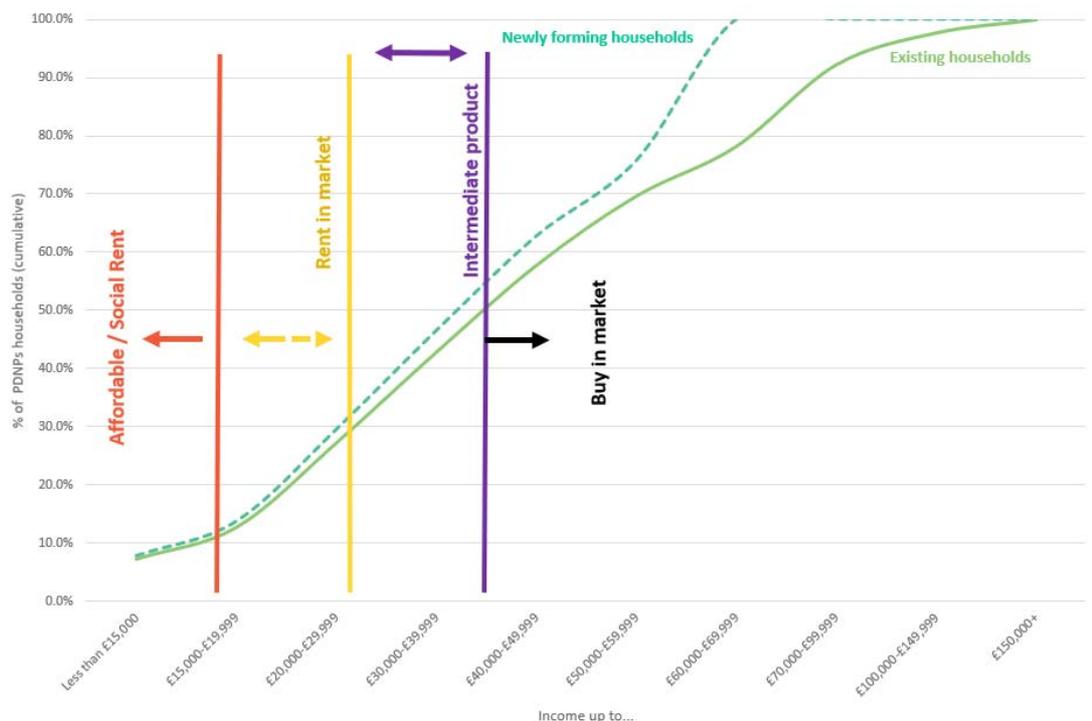
Source: Experian (2023). Figures are calculated on the basis of 4.5x income multiples for home ownership and 30% of gross annual earnings for rentals.

8.71   To calculate this, and as set out above, we have obtained household income data for the Peak District from Experian and adjusted this based on data from the EHS, which shows younger/newly forming households have a slightly lower than average income[57]. We have assumed that households which cannot afford more than 80% of market rents need affordable rented or social rented housing and that households which can afford market rents and private home ownership represent the potential market for intermediate products such as shared ownership.

8.72   This results in a household income distribution for the Peak District as shown in Figure 8.3.

8.73   This indicates that, based on 4.5x income multiples for home ownership and 30% of gross annual earnings for rentals:

- 22.0% of newly-forming Peak District households have income levels below the threshold likely to afford affordable rent (and 9.1% cannot afford social rent);

- 35.0% of newly-forming Peak District households cannot afford to rent privately; and,

- 66.9% of newly-forming Peak District households cannot afford to buy a property on the open market.

8.74   For the local area, the potential additional demand for intermediate housing is therefore quite wide and ranges from households with an income of between £30,400 (the income needed to access lower quartile market rents @30%) and £52,417 (the income needed to buy at lower quartile prices @4.5x income multiplier). Any household earning in this range can afford to rent privately but cannot afford to buy in the open market (assuming a 15%

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[57] EHS (2015/16) Housing costs and affordability – Annex Table 2.1: Mean and median income by age of Household Reference Person (HRP). Households with HRP age 16-34 have average weekly income of £718 per week compared to £780 for all households; therefore younger/newly forming households earn 92% of the overall average.

deposit). This range would widen to between £36,480 and £58,969 if the sensitivity thresholds of 25% income threshold for renting and 4x income multiplier for purchase are applied for dual earners.

8.75 The households in this range represent the further potential demand for intermediate housing in the Peak District. Based on this income distribution with an income multiplier of 4.0 / 25%, an estimated 28.4% of all existing households in the local area can afford market rents but are unable to buy, staying at around 28.0% for newly forming households, as shown in Table 8.16. This rises to 35.3% if a 33% income multiplier is used for existing households, and 36.9% for newly forming households. This represents a substantial portion of the local population that are unable to purchase their own home. As indicated in the Table, the gap is particularly wide in the Dark Peak and much narrower in the White Peak Sub Area. It reflects the fact that it is relatively unaffordable to buy a property in the Peak District.

Table 8.16: Percentage of households able to afford private rents but unable to buy

	Income multiples	Dark Peak	White Peak	South West Peak	**PDNP**
All households	4x / 25%	31.0%	12.0%	30.5%	**28.4%**
	4.5x / 30%	33.6%	15.3%	31.9%	**30.8%**
	4.5x / 33%	38.1%	20.8%	35.8%	**35.3%**
Newly Forming Households	4x / 25%	30.3%	11.7%	30.8%	**28.0%**
	4.5x / 30%	34.4%	16.4%	33.6%	**31.9%**
	4.5x / 33%	39.4%	22.3%	38.2%	**36.9%**

Source: Lichfields analysis of Experian/VOA/ONS data

8.76 This means that affordable home ownership options are needed for private rented households which cited affordability as a main reason for them not expecting to buy (i.e. those who would expect to buy if they could afford to do so). This assessment should therefore be regarded as a minimum, because if any private renters who do expect to buy need (or expect that) an affordable home ownership option will be available when they plan to buy, the demand for affordable ownership products will be higher.

8.77 Having established the percentage of households falling in this 'gap', we need to understand how many households this is likely to represent over the course of the 24-year Plan period. For the purposes of this assessment, we have projected household growth using the 2014-based SNHP.

8.78 The assessment of need has been restricted to under 45s on the basis that this is the age most newly forming households form[58] (and older households may have equity as well as income, which would affect their eligibility for affordable home ownership products). However, it is entirely possible that households over the age of 44 would be eligible for (and be interested in purchasing) discounted market housing. Whilst occupants of the scheme would be subject to income and local connection criteria, there is no proposal to specifically restrict occupants based solely on age, thus households over the age of 44 could potentially add additional demand on top of that identified in this analysis.

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[58] The EHS for 2020/21 indicates that 92.9% of First Time Buyers are aged 44 and under. Source: EHS, full household sample, Annex Table 1.8: Demographic and economic characteristics, recent first-time buyers, 2020-21

8.79   With the above caveat, and when applied to the household growth in the 2014-based SNHP, this could suggest that there will be an annual pool averaging **924 households over the period 2021-2045** who can afford to rent but not buy privately (based on the 4x/25% income multipliers; the figure would rise to 1,052 households per annum based on the higher 4.5/30% income multipliers are used, and up to 1,218 hpa based on 4.5/33%).

8.80   The Peak District currently has some supply of shared ownership housing which is likely to be catering to the needs of some households which would otherwise be in the private rented sector (and cannot afford to buy in the open market). The 2021 Census indicates that there were **118** shared ownership homes across the National Park, of which 86 were located in the White Peak and 16 each in the Dark Peak and South West Peak Sub-Areas.

8.81   Considering that 118 households in the local area already live in shared ownership housing, the remaining households which can afford rents but unable to afford open market purchase (and are assumed to be currently living in private rented housing) reduces the annual pool from 924 households over 24 years, to **806** households.

8.82   Of course, not every household within the private rented sector will need (or will want) to move into home ownership each year. Some households may not want to move into ownership due to not having a secure enough job, not wanting to be in debt, the cost of repairs and maintenance, not wanting the commitment / preferring the flexibility of renting and liking their current accommodation.

8.83   The EHS (2019/20) found that nationally, 59.5% of private renters expect to buy at some point in the future and 40.5% do not. Amongst those who do not expect to buy, 68.2% cited affordability. Based on this, we can estimate the number of households which may be expected to buy if the affordability barrier were removed. This would be:

1   The percentage of households in a group who would be expected to buy anyway (59.5%); plus; and,

2   The percentage of households which currently do not expect to buy, mainly due to affordability reasons (40.5% x 68.2%).

8.84   Having established the percentage of households in the Peak District which would be expected (at any time) to buy if an affordable home ownership option were made available to them, we then need to determine how many actually buy in a given period. The EHS found that of private renters who did expect to buy, 26.74% expected to do so within two years; this would equate to 13.4% per annum[59]. Applying this to the total number of households (by type) which would expect to buy if an affordable home were available gives an estimate of the potential demand each year for affordable housing for purchase from first time buyers[60]. This is shown in Table 8.17 and equates to **11.6%.**

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[59] Source: EHS 2019/20 Annex Table 1.20: Buying expectations, social and private renters, 2019-20. Refers to privately renting households

[60] Note: in Year 1 of the assessment, all households in a given group which can afford to rent but not to buy are included as potential FTBs. In subsequent years these households are removed, so the 'pool' of potential FTBs gradually decreases to take into account those who have already bought.

Table 8.17: Estimate of households who would buy (in the next year) if affordable home is available

	Percentage	Source
a. Percentage of households expecting to buy (at any point in the future)	59.5%	EHS 2019/20 Annex Table 1.20: Buying expectations, social and private renters, 2019-20
b. Percentage of households not expecting to buy	40.5%	(100% - a)
c. Percentage of private renters not expecting to buy citing affordability as main reason	68.2%	EHS 2019/20 Annex Table 3.17: Perceived barriers to buying a home, by tenure, 2019-20
d. Total percentage expected to buy if affordable home provided	**87.1%**	(a + [b * c])
e. Of those expecting to buy, percent expecting to buy within 2 years	26.74%	EHS 2019/20 Annex Table 1.20: Buying expectations, social and private renters, 2019-20. Refers to privately renting households
f. Equivalent per annum	13.4%	(e / 2)
g. Total – expected to buy in next year	**11.6%**	(d * f)

Source: Lichfields' analysis based on EHS data

8.85   As a sensitivity test, we have modelled the implications of excluding people who were already expecting to buy anyway (59.5% of all households in the Table above) and only including people who were not expecting to buy due to affordability problems. The inherent assumption here being that those people who were expecting to buy may well have assumed that they would be able to do so in the market. This would reduce the percent expected to buy in the next year from 11.6% to **3.69%**.

8.86   Conversely, it is noted that the EHS presents national data on expectations in relation to home ownership. It therefore does not reflect the more severe affordability pressures in rural areas. Hence, the use of this national data represents a conservative approach, and it is likely that there may be a higher proportion of people locally that would like to buy but are not expecting to do so due to affordability issues in certain parts of the National Park and therefore a larger pool of potential buyers may exist at a localised level.

8.87   The approach used below to assess the potential demand for intermediate housing from households currently in the private rented sector does not include separate calculations of backlog, future need and supply. All elements are wrapped up in a single calculation by using all households as the basis for need (thus implicitly including backlog) and by using net household change (thus removing the need to separately calculate gross need and future supply).

8.88   This calculation of need is shown in Table 8.18. This analysis suggests an annualised demand for **33 affordable homes for purchase** from existing and future households in the Peak District. Split by sub-area (with the 2014-based SNHP split based on the 2021 Census), this indicates that need is greatest in the White Peak, followed by the Dark Peak with a very modest level of need in the South West Peak.

Table 8.18: Estimate of existing and future demand for intermediate housing: Peak District National Park and Sub-Areas

	Peak District Total	Dark Peak	White Peak	South West Peak
a. Annual Average households aged under 45	**3,188**	816	1,902	469
b. Percentage who can afford lower quartile market rent but are unable to purchase (@ 4x income / 25% annual income)	**28%**	31%	30%	12%
c. Number of households who can afford lower quartile market rent but are unable to purchase (a * b)	**924**	263	596	57
d. Supply (current shared ownership units)	**118**	16	86	16
e. 'Pool' of potential demand (net) (c-d)	**806**	247	510	41
f. Percentage of households living in private rented sector [PRS] expecting to buy in the next year if affordable homes are available	**11.65%**			
g. Potential gross need for affordable housing to purchase, annual average (e * f). After year 1, the assessment reduces the 'pool' of households which are potential buyers to account for the fact that some are assumed to have moved into affordable homes for purchase the previous year.	**33**	**10**	**21**	**2**

Source: Lichfields' analysis

8.89   If the income ratio increases to 4.5x income and a 30% of annual income being spent on rent, then paradoxically the level of intermediate housing need increases, as the gap between people's ability to rent a lower quartile property or to buy one actually widens. As a result, the potential gross annual need under this test increases from 33 to **38** as set out in Table 8.18.

Table 8.19: Estimate of existing and future demand for intermediate housing: Peak District National Park – SENSITIVITY #1

	Peak District Total	Dark Peak	White Peak	South West Peak
a. Annual Average households aged under 45	**3,188**	816	1,902	469
b. Percentage who can afford lower quartile market rent but are unable to purchase (@ 4.5x income / 30% annual income)	**32%**	34%	34%	16%
c. Number of households who can afford lower quartile market rent but are unable to purchase (a * b)	**1,052**	287	676	79
d. Supply (current shared ownership units)	**118**	16	86	16
e. 'Pool' of potential demand (net) (c-d)	**934**	271	590	63
f. (Percentage of households living in PRS expecting to buy in the next year if affordable homes are available	**11.65%**			
g. Potential gross need for affordable housing to purchase, annual average (e * f). After year 1, the assessment reduces the 'pool' of households which are potential buyers to account for the fact that some are assumed to have moved into affordable homes for purchase the previous year.	**38**	**11**	**24**	**3**

Source: Lichfields' analysis

8.90 Finally, if the income ratio increases to 4.5x income and a 33% of annual income being spent on rent, then the potential gross annual need under this test increases from 38 to **45** as set out in Table 8.20.

Table 8.20: Estimate of existing and future demand for intermediate housing: Peak District National Park – SENSITIVITY #2

	Peak District Total	Dark Peak	White Peak	South West Peak
a. Annual Average households aged under 45	**3,188**	816	1,902	469
b. Percentage who can afford lower quartile market rent but are unable to purchase (@ 4.5x income / 33% annual income)	**37%**	38%	39%	22%
c. Number of households who can afford lower quartile market rent but are unable to purchase (a * b)	**1,218**	326	774	108
d. Supply (current shared ownership units)	**118**	16	86	16
e. 'Pool' of potential demand (net) (c-d)	**1,100**	310	688	92
f. Percentage of households living in PRS expecting to buy in the next year if affordable homes are available	**11.65%**			
g. Potential gross need for affordable housing to purchase, annual average (e * f). After year 1, the assessment reduces the 'pool' of households which are potential buyers to account for the fact that some are assumed to have moved into affordable homes for purchase the previous year.	**45**	**13**	**28**	**4**

Source: Lichfields' analysis

8.91 As with the affordable rent calculation, the PPG notes that there will be a current supply of housing stock that can be used to accommodate households in affordable housing need as well as future supply. Assessing the total affordable housing supply requires identifying:

- the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need;

- suitable surplus stock (vacant properties); and,

- the committed supply of new net affordable homes at the point of the assessment (number and size).

8.92 As noted above, the current number of shared ownership units that could be occupied by households in need has already been netted off the need in the Table above. As regards vacant properties, the overall proportion of vacant dwellings in the overall social housing stock is very small in the Peak District, at around 1.2% (the average across the three main districts that cover the National Park) and therefore given the demand for intermediate housing it is considered highly unlikely that there would be sufficient vacant intermediate housing (over 3% of the overall stock) to warrant a further adjustment to the requirement.

8.93 Regarding the committed supply of new affordable homes, data on committed supply of affordable housing has been provided by PDNPA (Table 8.21) and suggests that potentially, there is very little intermediate housing currently in the development pipeline, equal to just 4 units.

Table 8.21: Total Supply of New Intermediate Affordable Units

	Peak District	Dark Peak	White Peak	SW Peak
Supply of New Affordable Housing to Buy (Committed Supply) 2022/23	4	0	4	0

Source: Local Authority Information provided by Peak District National Park Officers in 2023

8.94   Going forward, social re-sales data has been obtained from 10 years-worth of CORE data (for 2009/10 to 2018/19). The data obtained for this component is set out in Table 8.14. As can be seen, there has been an average of just 9.6 intermediate re-sales annually since 2009/10 across the three districts which cover the bulk of the Peak District. Whilst data is unavailable at the National Park level, given that according to the 2021 Census, around 15% of all shared ownership housing in these three districts is located within the Peak District, it is not unreasonable to assume that around 15% of the re-sales for these three districts will occur within the National Park. This equates to around **1.4 annually**.

Table 8.22: Re-Sales of Intermediate Housing

	High Peak	Derbyshire Dales	Staffordshire Moorlands
2009/10	3	0	0
2010/11	9	4	2
2011/12	6	8	0
2012/13	3	7	2
2013/14	2	3	3
2014/15	0	1	0
2015/16	4	2	2
2016/17	1	4	7
2017/18	0	3	7
2018/19	3	4	6
Average	**3.1**	**3.6**	**2.9**

Source: CORE Data

8.95   Clearly, given that there are 118 shared ownership properties currently located in the Peak District, the level of churn is likely to be greater than 1.4 per annum. As an alternative approach, the latest EHS for 2021/22 states that the average number of years in a home for owner occupiers with a mortgage (which includes shared ownership households) is 9.4 years. If those 118 households residing in the shared ownership properties in the Peak District remain for a similar length of time before moving, this would suggest that there would be a churn in resales of **12.6 homes annually**.

8.96   These shared ownership homes are likely to meet some of the need for entry-level homes suitable for newly forming households. As there is currently a supply of just 4 affordable dwellings to buy in the pipeline from the 2022 intermediate need, and assuming that there will be a churn of **12.6** intermediate dwellings per annum thereafter, the net requirement for intermediate housing equates to **21 dpa**. This breaks down to 9 dpa in the Dark Peak; 12 dpa in the White Peak; and 0 dpa in the South West Peak. The net figures increase to 26 dpa and 33 dpa based on an income multiple of 30% and 33% respectively for the Peak District as a whole.

8.97   Table 8.23 sets out the overall calculation of the Peak District's net annual affordable housing need, combining the need for social/affordable rented properties with affordable home ownership. Overall, it indicates that there is an affordable housing need in the order

of **171 dpa** based on 4x / 25%income multipliers, falling to **151 dpa** based on 4.5x / 30% income multipliers and **147 dpa** based on 33%. There is a higher level of need in the White Peak sub-area and the lowest level of need in the South West Peak.

Table 8.23 Peak District National Park Affordable Housing Need Calculation – To Rent and Purchase. Backlog addressed over 5 years

Stage and step in calculation	Peak District Total			Dark Peak			White Peak			South West Peak		
	25% income	30%	33%	25%	30%	33%	25%	30%	33%	25%	30%	33%
Net Annual Affordable Housing Need for **Rent**	**150**	**125**	**114**	50	45	43	81	65	58	19	15	13
Net Annual Affordable Housing Need for **Sale**	**21**	**26**	**33**	9	10	11	12	15	19	0	1	2
Overall Net Annual Affordable Housing Need	**171**	**151**	**147**	59	55	54	93	80	77	19	16	15

Source: PDNPA, Local Authority Live Tables, CORE Data and Lichfields analysis. Sums may not add due to rounding errors.

8.98 It should be noted that the level of need identified above aims to remove the existing backlog in full within the first 5 years of the Plan. Whilst this would be the ideal approach, if the PDNPA were to decide to aim for an alternative approach that addressed the backlog gradually over the length of the Plan, this could reduce the overall level of need significantly (as set out in Table 8.24) to **between 88 and 112 dpa** depending on the income multiplier.

Table 8.24 Peak District National Park Affordable Housing Need Calculation – To Rent and Purchase. Backlog addressed over the full Plan period

Stage and step in calculation	Peak District Total			Dark Peak			White Peak			South West Peak		
	25% income	30%	33%	25%	30%	33%	25%	30%	33%	25%	30%	33%
Net Annual Affordable Housing Need for **Rent**	**91**	**67**	**55**	21	17	15	54	38	31	16	11	10
Net Annual Affordable Housing Need for **Sale**	**21**	**26**	**33**	9	10	11	12	15	19	0	1	2
Overall Net Annual Affordable Housing Need	**112**	**93**	**88**	30	27	26	66	53	50	16	12	12

Source: PDNPA, Local Authority Live Tables, CORE Data and Lichfields analysis. Sums may not add due to rounding errors.

Types of Affordable Housing Needed

8.99 The purpose of this section of the report is to establish the relative need between social rent, affordable rent and forms of affordable home ownership as set out in the NPPF within the overall affordable housing need figure. This exercise has examined the interaction between housing costs and household income. First Homes are also now included in the definition and are considered in further detail below.

8.100 The income required for each of the alternative tenure options, and the assumptions underpinning these figures, is set out in Table 8.25 and discussed in further detail below.

Table 8.25: Annual Rents and Costs

	Cost Assumption	Price Assumptions	Affordability Requirements	Income Required
LQ Private Purchase	£277,500	HMLR Existing lower quartile Price Paid 15% deposit on sales value	4-times income / 4.5-times income	**£58,969 / £52,417**
Lower Quartile Rental	£9,120 per annum	Lower quartile Market Price 2023	25% / 30% / 33% of Income	**£36,480 / £30,400 / £27,636**
Social Rent	£4,606 per annum	CORE data 2021/22	25% / 30% / 33% of Income	**£18,424 / £15,353 / £13,958**
Affordable Rent	£7,296 per annum	80% of Lower Quartile rent	25% / 30% / 33% of Income	**£29,184 / £24,320 / £22,109**
Shared ownership (50% Share)	£228,000 (£114,000 @50%)	Lower quartile Shared ownership properties currently on the market in the vicinity of the Peak District (as of October 2023). Deposit of at least 10% of the share value. Monthly mortgage costs @ 6.24% over 25 years. Rental Costs per Month. Service Charge @£34 per month.	25% / 30% / 33% of Income	**£48,432 / £40,362 / £36,691**
Shared ownership (35% Share)	£228,000 (£79,800 @35%)			**£41,376 / £34,480 / £31,345**
First Homes (30% discount)	£342,713 (lower quartile private purchase), discounted to £239,899	HMLR Existing lower quartile Price Paid with a 23.5% new build premium* Discounted by 30% 15% deposit on sales value.	4-times income / 4.5-times income	**£50,978 / £45,314**

Source: CORE 2021/22, VOA and Lichfields' analysis

Social and Affordable Rent Housing

8.101   Whilst the need for social and affordable rents have been assessed separately, in reality these needs should be combined for the purposes of considering tenure mix. Whilst developers or RPs may pursue new build social housing where viable, new housing is currently rarely built to be occupied at traditional social rented levels; homes currently let at social rent levels tend to be legacies of historic local authority housing stock. New housing stock which is rented at below-market rent levels tends to be provided as affordable rented housing (i.e. up to 80% of market rents), provided as part of mixed market-affordable developments, with local housing allowance making up any difference in cost which a household cannot afford.

8.102   The key modelling assumptions were as follows:

1   **Social Rent** – CORE social housing lettings (PRP owned) – rents and charges 2020/21. Average weekly rent by dwelling in the three main districts covering the Peak District is £88.58, including service charges, or £4,606 per annum.

2   **Affordable Housing for Rent** – This is defined in the NPPF Annex 2 as "rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below market rents". Average lower quartile market rents in the Peak

District are £760 per month, or £9,120 per annum, 80% of this means affordable rent can be no more than £7,296 per annum.

8.103   Based on these assumptions, and as summarised in Table 8.26, the need for affordable rented housing can be taken as the need for both affordable and social rented housing and represents around 78%-83% of the overall affordable housing need based on the higher income multipliers. At the lower income multiplier, there is a more limited requirement for affordable housing for sale, with 88% of the need relating to social rented properties. The mid-point of these figures is 83%.

Table 8.26 Peak District National Park Affordable Housing Need Calculation – To Rent and Purchase

	25% / 4x Single Earner Income multiplier		30% / 4.5x Single Earner Income multiplier		33% / 4.5 Dual Income multiplier	
Stage and step in calculation	N	%	N	%	N	%
Net Annual Affordable Housing Need for **Rent**	150	88%	125	83%	114	78%
Net Annual Affordable Housing Need for **Sale**	21	12%	26	17%	33	22%
Overall Net Annual Affordable Housing Need	**171**	**100%**	**151**	**100%**	**147**	**100%**

Source: PDNPA, Local Authority Live Tables, CORE Data and Lichfields analysis. Sums may not add due to rounding errors

Rent to Buy

8.104   Rent to Buy is a government-designed scheme that allows working households to rent a home at Intermediate Rent (usually with an 80% discount on market rents) with the intention of providing them with the opportunity to save for a deposit over time to purchase their first home. To be eligible for Rent to Buy tenants must be first time buyers having not previously owned their own home. An exception to this is where an applicant is looking to return to home ownership following a relationship breakdown. There are no local or other prioritisation criteria to be applied to the Rent to Buy product, other than on rural exception site.

8.105   Ordinarily, the homes will be let at an Intermediate Rent for a minimum of five years during which it is expected that tenants will save for the deposit to purchase their home. After the initial five-year letting period, the RP may continue offering the property as Rent to Buy; sell the home on an outright basis with the tenant being given the right of first refusal; or retain and convert the home as rented housing on either an affordable or market rent basis. A tenant can also purchase their property within the five years rental period but at the discretion of the provider. A purchase under Shared Ownership is permitted as it remains as affordable housing. Tenants must meet all the shared ownership eligibility, affordability and sustainability requirements.[61]

8.106   The initial affordability of the product is therefore akin to affordable rent, although after the 5-year rental period there is clear cross-over with the shared ownership product assessed below.

Shared Ownership and Other Intermediate Housing

8.107   Intermediate housing (including shared ownership) is defined in Annex 2 of the July 2021 version of the NPPF as "*housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market.*" It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at

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[61] 2. Rent to Buy - Capital Funding Guide - Guidance - GOV.UK (www.gov.uk)

least 20% below local market value) and rent to buy (which includes a period of intermediate rent). This is less detailed than the previous definition of Intermediate housing in the 2012 version of the NPPF, which defined it as follows:

"Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing."

8.108   On the basis of the earlier definition, this type of housing must be more expensive than social rent (established to be £4,605 per annum) and not include affordable rent. As per the above affordable needs calculation, the average market rent is £9,120 per annum and any household that cannot afford this is in housing need. Although it is plausible that some people in affordable housing need could afford both affordable rent and intermediate housing, there is a clear gap between housing costing more than £4,605 and £9,120 which could be filled by more intermediate properties.

8.109   We have cross checked this against the cost of share-to-buy properties currently available in and around the Peak District. To understand the current average cost of shared ownership properties in the area, the listings from http://www.sharetobuy.com has been obtained. At the time of writing (October 2023) there were no properties available for shared ownership in the Peak District.

8.110   Extending our search on the fringes of the National Park just outside its boundaries, there were 5 properties currently being marketed for shared ownership, one each in High Peak, Chesterfield, Barnsley, Staffordshire Moorlands and Cheshire East. Prices ranged from £210,000 for a 2-bedroom house in Chesterfield to £329,950 for a 3-bed house in Low Leighton, High Peak.

Table 8.27: Properties advertised in the immediate vicinity of the Peak District National Park

Address	Size	Description	Full Price	Share Percentage	Deposit	Website's Monthly cost calculator
High Hill View, Hayfield Road, Low Leighton, **High Peak** SK22 4HY	3 bedroom house	Shared ownership (New Build)	£329,950	50%	at least 5% of share value (£8,249)	@50%, purchase price £329,950, £8,249 Min Deposit. Mortgage calculated using a rate of 6.24% over 25 years (£1,033). Monthly Rent =£378 Service charge = £17. **Total monthly cost = £1,428**
48 Woodcote Way, **Chesterfield** S40 3FF	2 bedroom house	Shared ownership (New Build)	£210,000	25%	at least 5% of share value (£2,625)	@25%, purchase price £210,000, £2,625 Min Deposit. Mortgage calculated using a rate of 6.24% over 25 years (£329). Monthly Rent =£361 Service charge = £49. **Total monthly cost = £739**
New Smithy Avenue, Thurlstone, **Barnsley** S36 9QZ	3 bedroom house	Shared ownership (New Build)	£255,000	40%	at least 5% of share value (£5,100)	@40%, purchase price £102,000, £5,100 Min Deposit. Mortgage calculated using a rate of 6.24% over 25 years (£639). Monthly Rent =£351 Service charge = £12. **Total monthly cost = £1,002**
Ashbank Road, Werrington, **Staffordshire Moorlands** ST9 0JR	4 bedroom house	Shared ownership (New Build)	£295,000	10%	at least 5% of share value (£1,475)	@10%, purchase price £29,500, £1,475 Min Deposit. Mortgage calculated using a rate of 6.24% over 25 years (£185). Monthly Rent = £608 Service charge = £32. **Total monthly cost = £825**

Address	Size	Description	Full Price	Share Percentage	Deposit	Website's Monthly cost calculator
Hudson Meadows, Buxton Road, Congleton, **Cheshire East** CW12 2DY	3 bedroom house	Shared ownership (New Build)	£228,000	35%	at least 5% of share value (£3,990)	@35%, purchase price £79,800, £3,990 Min Deposit. Mortgage calculated using a rate of 6.24% over 25 years (£500). Monthly Rent = £340 Service charge = £34 **Total monthly cost = £874**

Source: www.sharetobuy.com/properties (October 2023)

8.111   The most affordable properties relate to the two 2-bed new build homes available on the Woodcote Way development at Chesterfield. This is currently available for a total monthly cost of £739, due to the low share percentage of 25%. The equivalent annual payment, of £8,868, sits above the social/affordable rent (£4,605/£7,926) but below the lower quartile rental prices (£9,120) and the lower quartile market purchase (£17,376, with a 15% deposit and 5.5% interest rate as of October 2023), which suggests that it is reasonable that smaller shared ownership properties could meet the needs of some who fall between affordable rent and average lower quartile market sales, albeit there may be some overlap between those who can afford affordable rent and a cheaper shared ownership property.

8.112   **Table 8.26 identified that up to 20% of the overall affordable housing need was for intermediate housing for sale.** This was despite the fact that the costs of purchasing a shared ownership property, even with a 35% share rather than 50% share, required an income of at least £31,345 based on a 33% income multiplier, which is in excess of the £27,636 annual household income (again based on the 33% income multiplier) that it was estimated to be required to rent privately in the Peak District.

8.113   **The gap between the cost of renting and buying in the Peak District is very significant for low earners.** To afford entry level market rents using 25% of income, a household income of £36,480 is required (as previously established, falling to £27,636 if a higher proportion of income - 33% - is allowed for). However, to afford to buy an existing entry level home (lower-quartile), at £277,500 (assuming a 15% deposit and that a household can borrow up to 4 x its income) requires a housing income of £58,969 (as shown in Table 8.28, falling to £52,417 if a 4.5x income multiple is used).

Table 8.28 Gap between cost of renting and buying in the market

Measure	Cost	Income required @ 4 x income / 25%	Income required @ 4.5 x income / 30%	Income required @ 4.5 x income / 33%
Lower Quartile Market Rent	£9,120 (p.a.)	£36,480	£30,400	£27,636
Shared ownership (50% Share)	£114,000 (£5,700 deposit @5%, £108,300 mortgage and £714 pcm costs, rental costs of £261 pcm plus £34 monthly service charge)	£48,432	£40,362	£36,691
Shared ownership (35% Share)	£79,800 (£3,990 deposit @5%, £75,810 mortgage and £488 pcm costs, rental costs of £340 pcm plus £34 monthly service charge)	£41,376	£34,480	£31,345
Lower Quartile House Price	£277,500 (£41,625 deposit, £235,875 mortgage)	£58,969	£52,417	£52,417

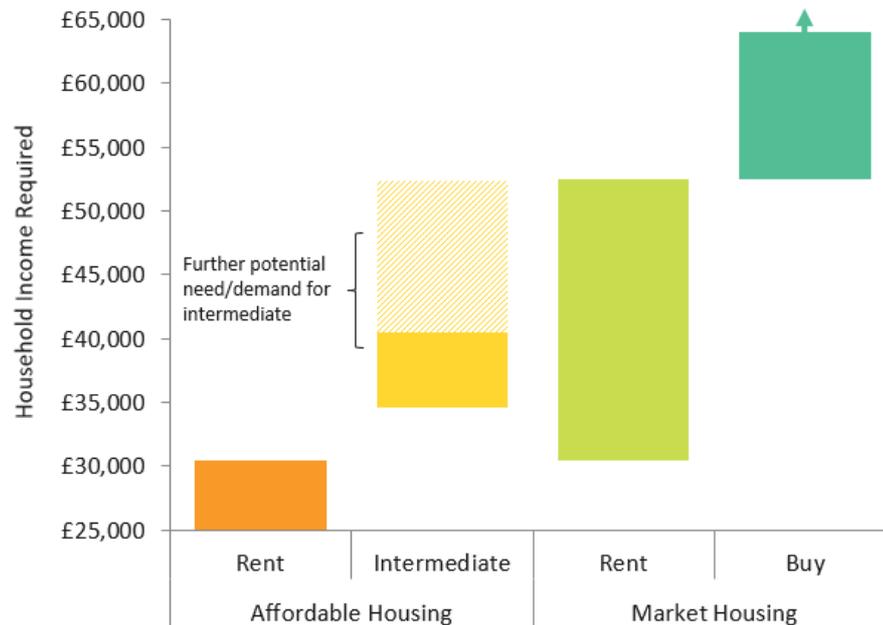Source: Lichfields based on VOA/ONS

8.114   This means any household with an income between £27,636 and £52,417 is theoretically ineligible for affordable housing to rent but is unable to buy, meaning the only options for these households is renting privately in the market, or some form of intermediate home ownership product. In this context intermediate housing could be a way of addressing demand from renters who do not want to remain in the private rented sector (but are not able to obtain either affordable rented or market housing) or those who cannot appropriately meet their need in the private rented sector (e.g. for family housing) but may be able to do so in intermediate housing. These households are indicated in Figure 8.4 using the lower multiples of 25% annual income for rent and 4x annual income to buy; Figure 8.5 using the multiples of 30% annual income for rent and 4.5x annual income to buy; and Figure 8.7 using the highest multiples of 33% annual income for rent and 4.5x annual income to buy.

Figure 8.4: Household income and tenure – potential further need for intermediate housing in the Peak District National Park: @25% / 4x income multipliers
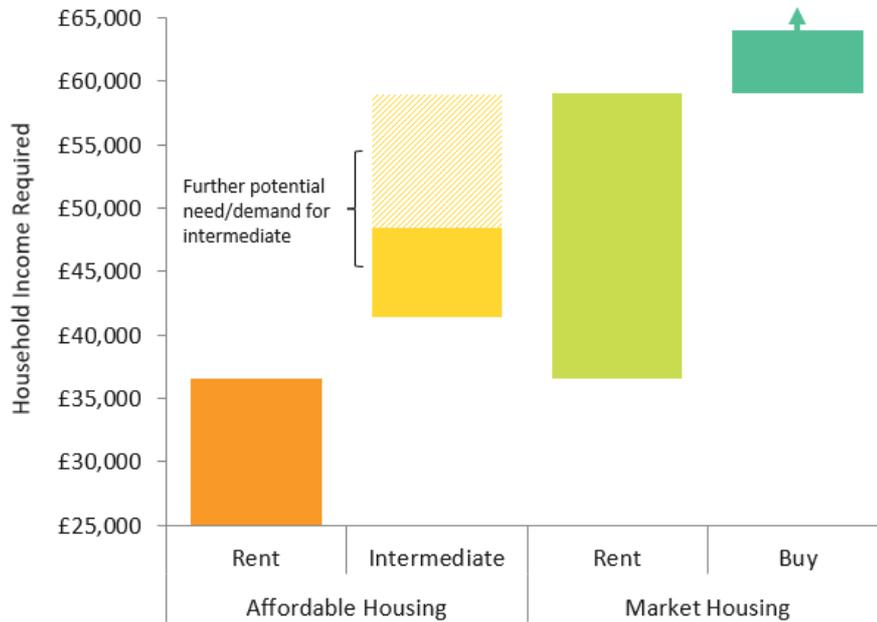
Source: Lichfields based on ONS/VOA

Figure 8.5: Household income and tenure – potential further need for intermediate housing in the Peak District National Park for Dual Income Households: @30% / 4.5x income multipliers
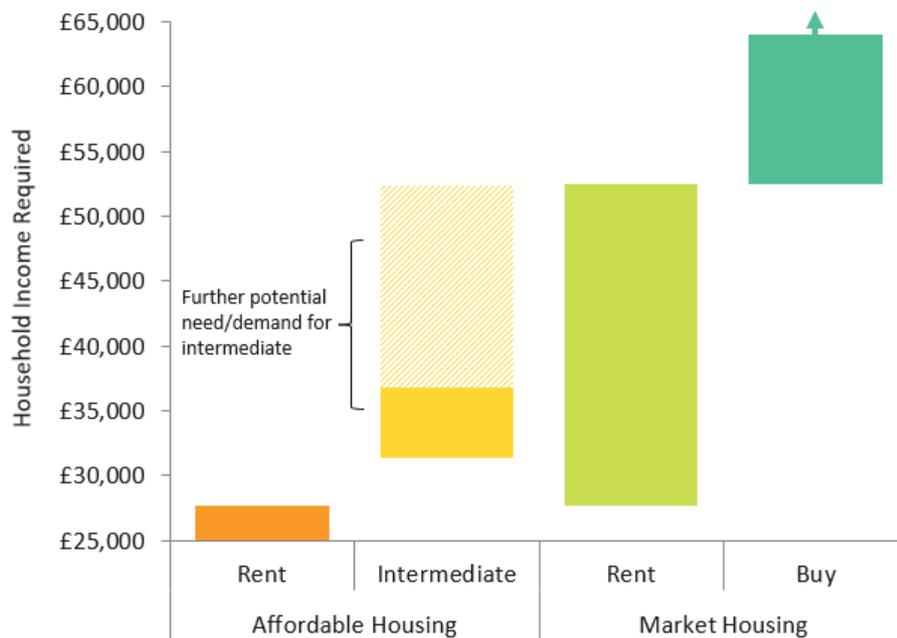

Source: Lichfields based on ONS/VOA

Figure 8.6: Household income and tenure – potential further need for intermediate housing in the Peak District National Park for Dual Income Households: @33% / 4.5x income multipliers

Source: Lichfields based on ONS/VOA

First Homes

8.115 First Homes are the Government's preferred discounted market tenure and are intended to account for **at least 25% of all affordable housing units** delivered by developers through planning obligations. As defined in the PPG[62], these comprise a specific kind of discounted market sale housing, which should be considered to meet the definition of 'affordable housing' for planning purposes (even though technically speaking, certain high-income first-time buyers who would not normally be in need of affordable housing may be eligible). First Homes must be reduced by a minimum of 30% against the market value; are sold to a person or persons meeting the First Homes eligibility criteria; on their first sale, will have a restriction registered on the title at HMLR to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and, after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).

8.116 Eligibility requires purchasers to be first time buyers with a combined annual household income not exceeding £80,000 (or £90,000 in Greater London) in the tax year immediately preceding the year of purchase. A purchaser of a First Home should have a mortgage or home purchase plan to fund a minimum of 50% of the discounted purchase price.

8.117 Whilst the National Park is exempt from providing First Homes on rural exception sites, it may consider First Homes on previously developed land.

8.118 LPAs are encouraged to ensure that First Homes work well in their area, which may include requiring a higher minimum discount, lower price or income caps, or local connection/key worker requirements. In such circumstances, the minimum discount level should be fixed at either 40% or 50% below market value if LPAs can demonstrate a need for this, and

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[62] ID: 70-001-20210524

should not be set at any other value. LPAs are also encouraged to make the development requirements for First Homes clear for their area.

8.119 Aspects of this HNA's evidence could be used in the future to consider the applicability of the appropriate discount were First Homes to be provided, including the scale of discount (between 30% and 50%) and the sales price cap, as well as other matters such as local occupancy criteria. This is considered further below.

8.120 Clearly then, whilst First Homes are included in the definition of affordable housing going forward, any first-time buyer in the Peak District with an annual household income of below £80,000 could apply for a First Home even if they could afford to buy a suitable property on the open market. This means that it is not a simple matter to set out what the potential demand is likely to be for First Homes in the Peak District. In many respects, there are considerable similarities with the First Homes product and more traditional discounted market housing for sale.

8.121 In the absence of any data on the likely purchase price of typical First Homes in the Peak District, indicative monthly housing costs for First Homes have been identified using lower-quartile market values for LQ new build homes at a cost of £342,713[63], with a 30% discount and the purchaser paying a 15% deposit. On this basis, minimum incomes required to afford a First Home is assumed to be between £50,978 and £45,314 per annum depending on whether a 4 or 4.5-times single earner/dual income multiplier is used.

8.122 Given that the lower quartile new build house prices are so high, it would ordinarily be helpful to model the implications of delivering smaller (and more affordable) 1/2 bed apartments. However, in this instance, there are very few of these that have come forward in the Peak District in recent years and hence the dataset upon which we would rely is too small to be robust.

8.123 Lichfields has undertaken an analysis of the potential pool of households who may be eligible and able to purchase a First Home over the period 2021-2045. This process is summarised in Table 8.29, with sensitives applied with a 40% and 50% discount.

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[63] Note: due to the very low number of new build market properties coming forward in the Peak District, the difference between price paid data on new build and all housing across High Peak Borough, Derbyshire Dales District and Staffordshire Moorlands District was calculated, resulting in a 23.5% uplift for new build across the wider area

Table 8.29   Potential First Home Demand in the Peak District National Park (2021-2045)

		Potential Pool of First Time Buyers 2021-45	% Who can afford to purchase a new discounted property		Number able to afford a First Home per annum	
			@4x income	@4.5x income	@4x	@4.5x
With a 30% Discount (reduced purchase price of £240,000)	Existing Households with a HRP[+] under 45	1,471*	41.0%	49.2%	25	30
	Newly Forming Households with a HRP[+] under 45	5,345	35.7%	43.3%	80	96
	TOTAL	**6,816**	-	-	**105**	**127**
With a 40% Discount (reduced purchase price of £205,630)	Existing Households with a HRP[+] under 45	1,471*	51.6%	59.0%	32	36
	Newly Forming Households with a HRP[+] under 45	5,345	45.9%	53.8%	102	120
	TOTAL	**6,816**	-	-	**134**	**156**
With a 50% Discount (reduced purchase price of £171,360)	Existing Households with a HRP[+] under 45	1,471*	62.7%	69.1%	38	42
	Newly Forming Households with a HRP[+] under 45	5,345	57.8%	64.7%	129	144
	TOTAL	**6,816**	-	-	**167**	**186**

Source: 2021 Census Land Registry Data; HPSSA Dataset 16, Year ending 2022; Experian Income Data (2023); 2014-based SNHP

[+]HRP: Household Reference Person

*Note: For existing households with a HRP under the age of 45, it has been assumed that if they are currently living in rented accommodation then they would not previously have owned a home and would therefore be eligible for a First Home. Whilst this is likely to be true for the majority of cases, it will necessarily under-estimate the total number of households who have, for whatever reason, decided to rent having purchased a property in the past.

8.124   Table 8.29 indicates that as a worst-case scenario, with a 30% discount and a 4x income multiple, this would typically price out 41% of existing households with a Household Reference Person [HRP] under 45, and 36% of newly-forming households with an HRP under 45. Applied to the total number of households in this age bracket, this would suggest that there is potentially an annual reservoir of **105 households** (both existing and emerging) over the next 24 years who would be eligible and theoretically able to purchase a First Home, rising to 127 if a more generous 4.5x income threshold is applied.

8.125   This assumes a discount of 30% over open market value. Of course, if the level of discount is increased, then more first-time buyers will be able to afford a First Home. The analysis above suggests that it could boost the potential supply of first-time buyers who might be eligible and have sufficient income to 167 p.a. with a 50% discount and a 4x income multiplier, and as high as 186 p.a. with a 4.5x income multiplier.

8.126   These figures are based on a number of assumptions regarding individuals' ability to pay and how the First Homes discount is likely to work in practice. We do not know yet how this will play out in the Peak District, and whether given the comparatively high house prices in much of the National Park, there will be substantial interest in this discounted product from either developers or potential occupiers (noting that the PPG requires that

minimum discounts should apply to the entire local plan area - except if Neighbourhood Plans are in place in certain areas - and should not be changed on a site-by-site basis)[64].

8.127   For example, it is likely that the demand for First Homes will primarily come from households who are either able to afford private rented or shared ownership properties, rather than affordable rented/social rented housing. It is unlikely therefore to have an impact on social rented housing unless there is a very high level of discount (i.e. above 50%), although it is probable that there will be significant overlap with other intermediate housing products to purchase.

8.128   This means that whilst new First Homes are likely to be affordable to some private renters in the Peak District, the existing housing stock is already meeting much of that need. As shown in Figure 8.7, First Homes with a discount of 30% would be accessible to households with an income of over £50,978, which is below the £58,969 required to access lower quartile market housing. The required income level falls to £43,696 if the discount rises to 40%, and as low as £36,413 if the discount increases to half the market price – which is slightly below the level required to rent privately (£36,480 at 30% income multiplier).

8.129   As can be seen in Figure 8.7 and Figure 8.8 (which applies a higher income multiplier of 4.5), it is almost certain that there will be a considerable overlap between the demand for intermediate (and particularly shared ownership) properties to buy and First Homes, with the overlap on affordable housing to rent unlikely to occur even the discount is at 50%.

Figure 8.7: Estimated household income needed to afford First Homes in the Peak District National Park with a 4x income multiple

Source: Lichfields based on VOA/ONS

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[64] PPG ID: 70-004-20210524

Figure 8.8: Estimated household income needed to afford First Homes in the Peak District National Park with a 4.5x income multiple

Source: Lichfields based on VOA/ONS

8.130   Our analysis shows that First Homes have significant potential to bring new households into home ownership, although there will still be some low-income households who would still be forced to remain in the PRS if the discount were in the order of 40%. Applying a 4x income multiplier, the 50% discount should be sufficient to plug this gap between affordable rent and private rented/intermediate properties to buy.

8.131   However, there is likely to be considerable cross over with shared ownership products, depending on the value of First Homes coming onto the market over the coming years.

8.132   It is expected that First Homes will be funded through a reduced contribution of other types of affordable housing, and that they will need to comprise at least 25% of all affordable housing on a particular site. Despite the affordable housing needs assessment (earlier in this Section) identifying a modest level of need for affordable housing to buy (c.21-33 dpa), the provision of First Homes in the Peak District may bring additional households into ownership (due to the very high lower quartile prices of existing / new build house prices). It would be advisable for the PDNPA not to significantly reduce its affordable housing requirements in lieu of First Homes.

8.133   In our view, given the very high house prices in the Peak District, the mandatory minimum 30% discount is likely to be insufficient to address the gap between market housing and other available products; an increase to at least 40% and perhaps even as high as 50% may help plug the gap in affordability.

8.134   This should be market tested given that these remain early days for the product and the market has yet to be tested either in the Peak District or the Midlands/North of England more generally. As such, the PDNPA will need to monitor the situation and prepare suitable policy responses, based on viability assessments, to ensure that any demand can be met without harming the wider property market (for either market or social rented properties) and whether a further increase in the discount from 30% to 40% and perhaps even 50% is appropriate and viable in the National Park.

Suggested Affordable Housing Split

8.135   The NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, applying the definitions of affordable housing set out in Annex 2 [paragraph 63]. In this regard, the latest iteration of the NPPF is slightly out of step with the PPG, as the latter makes no reference to 'First Homes', and instead focuses on 'affordable home ownership':

"Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups."

8.136   Furthermore, the PPG states that First Homes are a "*specific kind of discounted market sale housing*" and should be considered to meet the definition of 'affordable housing' for planning purposes. It states that:

"First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations."[65]

8.137   It is also relevant to note that the Government recently consulted on its proposed approach to updating to the NPPF. A fuller review of the NPPF is also planned in due course, and its content will depend on the implementation of the government's proposals for wider changes to the planning system, including the recently enacted Levelling-up and Regeneration Act 2023. The Government is currently analysing the feedback to the NPPF consultation received and the formal response has yet to be published at the time of writing (but is expected imminently). Whilst very limited weight can be attached to the Government's proposed changes to the NPPF at this stage, it is nevertheless a helpful indication of the direction of change, and potential future amendments to planning policy.

8.138   In respect of affordable housing, the Government is quite clear that more needs to be done to deliver additional homes for social rent[66]

"The Levelling Up White Paper made clear our commitment to "increase the amount of social housing available over time to provide the most affordable housing to those who need it" and to "ensure home ownership is within the reach of many more people". If we want to have functioning communities, with the right homes in the right places, then we need to deliver more homes that are genuinely affordable to rent and to own.

The Framework currently includes specific stipulations about securing homes for affordable home ownership, outlining an expectation that 10% of homes in major developments should be available for affordable home ownership. We believe our national planning policy must continue to support this but equally that it should place much greater value on the most affordable housing tenure: Social Rent

*We therefore intend to make changes to the Framework to make clear that **local planning authorities should give greater importance in planning for Social Rent homes, when addressing their overall housing requirements in their development plan and making planning decisions**. Securing Social Rent homes*

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[65] PPG Reference ID: 70-001-20210524

[66] https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy

will already be the priority for many local planning authorities, and we want national planning policy to support this. We would welcome views on how we could make specific provisions in the revised framework to deliver this, alongside the existing provisions for affordable home ownership.” [Chapter 5, paragraphs 2-5]

8.139   There is therefore a clear expectation from Government that the delivery of social rented properties ought to be prioritised. Nevertheless, it is not specified at this point whether or not this should be at the expense of, for example, First Homes, with no amendments made directly to the NPPF at this stage to bring it in line with the PPG. The only mention of this tenure is in Chapter 12:

“We will also consider opportunities to incorporate existing written ministerial statements [WMS] into revised national planning policy, such as that on First Homes policy” *[paragraph 1].*

8.140   Presumably this refers to the WMS made by the (then) Minister of State for Housing, Christopher Pincher, on 24th May 2021 which confirmed that:

“A minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. This is a national threshold which should be applied for England”.

8.141   At the time of writing then, Government Guidance remains that First Homes should be identified as part of the overall breakdown of affordable housing requirements, even though there will be plenty of households who are not strictly speaking in housing need (and could afford to rent or buy privately, given that could have a combined annual household income of up to £80,000 (or £90,000 in Greater London) in the tax year immediately preceding the year of purchase), but who nevertheless are eligible to take advantage of the substantial First Home discount of 30% or more on the market price.

8.142   In summary therefore, our recommended split of affordable housing to rent/buy is summarised in Table 8.30. The Table reflects the fact that affordable and social rent are more affordable than intermediate homes in the Peak District and that there is a significantly greater need for social/affordable rented properties than shared ownership. That said, the requirement is also heavily influenced by the Government’s policy parameters and guidelines that seek to promote the delivery of affordable home ownership.

8.143   Clearly the situation is considerably more complicated than this; with some social products falling between different income thresholds if they deviate from the average. In practice however, there is very limited difference between affordable rented and social rented properties and in any case recent structural changes at a national level – including the curtailing of capital/grant funding for social housing, with a move to revenue funding of affordable rent products through housing benefit – means there is a move away from social rented towards affordable rented tenure provision. In essence, and noting the Government’s recent consultation on changes to the NPPF, the Government has introduced measures to facilitate the provision of affordable rented properties at the expense of social rented dwellings and they have been combined in the overall indicative policy split as a consequence.

Table 8.30 Suggested Social/Affordable Rent and Intermediate Split

	Measure	Annual Housing Need (net)			Split of households in need (rounded)	Indicative Policy Split (%)
		25% / 4x income	30% / 4.5x income	33% / 4.5x income		
Affordable Homes to Rent	Social Rent	150	125	114	83%	**65%**
	Affordable Rent					
Affordable Homes to Purchase	First Homes	21	26	33	17%	**35%**
	Intermediate housing including shared ownership					
ALL		**171**	**151**	**147**	**100%**	**100%**

Source: Lichfields' analysis

8.144   As set out above, First Homes remains the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. If this is taken as a given and in effect ring-fenced from the rest of the requirements, then we need to re-distribute the remaining 75% of affordable housing requirements between affordable rent and intermediate housing. If the residual is split 85:15 (affordable rent : intermediate), then this would broadly equate to an overall split of affordable housing need as c.65% social/affordable rent; 25% First Homes; and the remaining 10% intermediate housing.

8.145   Such an approach would also align more closely with the NPPF's requirement that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership [paragraph 65].

8.146   As set out in the Peak District Core Strategy Policies DS1 and HC1, housing is not permitted solely to meet open market demand cross the Dark Peak and Moorland Fringes, but they will support:

• The provision of between 35 and 75 homes in the Dark Peak and Moorland Fringes, with perhaps an additional 35 outside these settlements. Around 80% are expected to be locally needed affordable homes.

• Across the White Peak and Derwent Valley policies will support the provision of between 550 and 890 homes with perhaps an additional 125 outside these settlements. Around 60% are expected to be locally needed affordable homes.

• Across the South West Peak policies will support the provision of between 30 and 130 homes with perhaps an additional 30 outside these settlements. Around 60% are expected to be locally needed affordable homes.

8.147   The percentage figures from the current policy relate to the proportion of locally needed affordable homes that should be provided in relation to the overall number of dwellings. They can be on greenfield as well as brownfield sites. The Policy does not currently say anything regarding the number of affordable homes that the PDNPA would expect on an enhancement site, other than it should be maximised within viability constraints.

8.148   Assuming the mid-point of delivery, this would suggest that around 62% of homes delivered across the Peak District would be expected to be locally needed affordable homes. If the suggested LHN of 100 dpa were to be taken forward as discussed in Section 7.0, then this

would result in the delivery of around 62 affordable homes per annum, which is below the lower end of affordable housing required (88-112 dpa).

8.149 **The Authority should therefore consider whether a higher proportion of affordable housing need should be required on enhancement sites, or whether the difference can be made up on exception sites which generally comprise 100% affordable housing for local needs.**

8.150 **Clearly the 100dpa is unlikely to deliver the level of affordable housing that is needed in the National Park. It is understood that the Authority is not minded to prevent the delivery of market housing as this is the PDNP's main delivery mechanism for conserving and enhancing valued vernacular and listed buildings (such as barn conversions), and delivering enhancement (e.g. brownfield sites). As a consequence, this may add weight to the PDNPA's current policy position of 100% affordable housing on greenfield exception sites, with the aim of maximising affordable/social rent on brownfield land, although this would of course be a policy choice for the Authority to make.**

9.0   Type, Tenure and Size of Housing Required

9.1   In addition to establishing the overall scale of housing needed, the NPPF requires plan-makers to also consider the need and demand for different types of housing. This section sets out an appropriate mix in terms of size (number of bedrooms) and tenure (affordable rent or intermediate), as well as how this might vary between the three sub-areas within the Peak District.

Housing Size and Type

9.2   This section provides further context on how the Peak District's housing market operates. It demonstrates that:

1   Locally and nationally, households tend to occupy housing which they can afford, rather than 'need', resulting in a high-level of under-occupation, particularly amongst older households;

2   Older households are likely to remain in larger, family homes and less likely to move as they age, resulting in 'empty-nesting' and significant under-occupation; and,

3   Although the dominant trend is one of under-occupation, a number of households (including families with children) are living in overcrowded conditions in the Peak District because they are unable to access the larger properties that they need.

Current occupancy patterns

9.3   In the open market, households typically do not strictly occupy housing in line with their 'needs', or their household size. This is because households are free (within their financial means), to buy or rent property in line with what they want, rather than what they might be considered to 'need'. Households may wish to have additional space generally or for a specific purpose, e.g. for working from home. Growing families may also live in housing with a view to having more children, or older couples may live in the family home even once adult children have left (often referred to as 'empty-nesting')[67].

9.4   Using the 2021 Census assessment of overcrowding and under-occupancy, we can understand the relationship between the size of a household and the number of bedrooms available (albeit that this does not take into account the relationships between household members).

9.5   Figure 9.1 compares the profile of the English dwelling stock and household structure. It demonstrates that whilst 64% of households in England comprise of just 1 or 2 persons, just 33.5% of dwellings have 1 or 2 bedrooms. By contrast, 36% of dwellings house 3 or more people, compared to 66.5% of households with 3 or more bedrooms.

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[67] For the purposes of this analysis, 'need' is taken to be the number of bedrooms a household would need according to ONS' definition. This takes into account the ages of the household members and their relationships to each other are used to derive the number of rooms/bedrooms they require, based on a standard formula

Figure 9.1 Comparison of dwelling mix (number of bedrooms) and household size (number of persons) in England

Source: Census 2021 (excludes social rented households)

9.6   Table 9.1 shows the occupancy patterns (in terms of household-dwelling type) of all private sector households in England. It shows that 2-person households in 3-bedroom dwellings form the largest group of household-dwelling type, with 15.6% of households falling within this group. This broadly aligns with the findings of the 2021 Census occupancy ratings, which shows that 'couples without children' make up the largest group of under-occupying households.

9.7   Contrary to what might be expected, most single person households actually occupy 2 and 3-bedroom dwellings, with relatively few living in 1-bedroom dwellings. Within larger dwellings, there is no clear trend for larger households being more likely to occupy larger housing, with more 2 person households occupying 4+ bed dwellings than 3-person households for example (no doubt reflecting the empty-nesters phenomenon whereby parents remain in their large family house even once their children have moved out).

Table 9.1 Household size by number of bedrooms in England

		Number of Bedrooms			
		1	2	3	4+
Number of People	1	5.4%	10.2%	9.6%	2.7%
	2	2.1%	10.5%	15.6%	7.9%
	3	0.3%	3.2%	8.1%	4.6%
	4+	0.1%	1.7%	8.7%	9.3%

|	
Under-occupied	42.8%
Standard	33.2%
Over-occupied	16.1%

Source: Census 2021

House Moves

9.8   Having assessed how households occupy housing in the open market, it is useful to benchmark these findings against the characteristics of moving households to assess the role that different households' play in 'freeing up' dwelling stock. In an arguably 'perfect' market, older households which under-occupy housing would downsize once they no longer require their family homes (meaning growth in the number of small, older households generates a need for smaller dwellings). This would subsequently allow larger families to optimally utilise the larger housing stock available.

9.9   However, as shown in Figure 9.2, the 2021 Census indicates that this is often not the case, with 1.4 million or 46.3% of households aged over 66 nationally having at least two spare bedrooms, and just 615,000 (20.5%) occupying housing in line with their 'needs'. This might relate to a lack of sufficient supply of housing products perceived to be attractive to those downsizing, but equally research suggests there is simply a strong preference from many people to remain in their existing homes.

Figure 9.2 Occupational patterns in England by household type
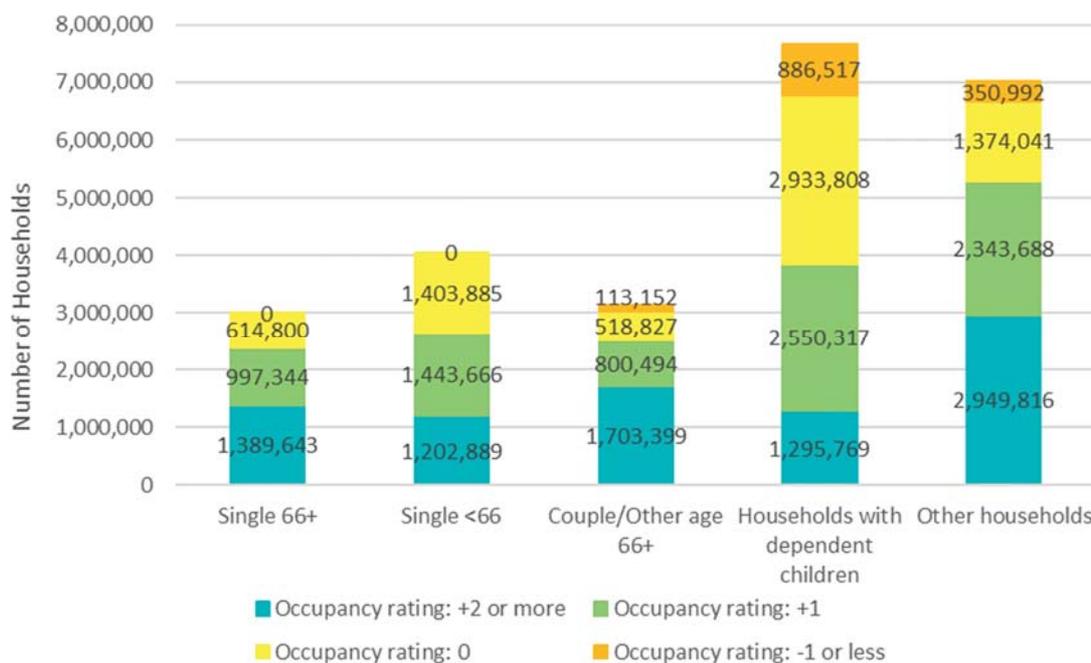

Source: Census 2021

9.10   Research[68] by the University of York (on behalf of the Government) found that the majority of older households were happy with their home, regardless of the type of property, having invested time and resources into their home, and that any potential issues arising with size or accessibility were not too great to be overcome through adaptation. Some also felt that moving would be stressful and overwhelming, and potentially result in the (unwanted) disposal of possessions. Even so, when older households considered the type of housing which would be seen as 'ideal', a minimum of two-bedrooms was seen as essential, as well as sufficient living space e.g. for eating and recreation. Depending on the layout of individual properties, this might therefore necessitate a minimum of three-bedrooms. In addition, research by the Joseph Rowntree Foundation [JRF][69] showed that 85% of larger housing released by older people is released due to death, as opposed to choosing to downsize.

9.11   The 2019/20 EHS further supports these findings by showing that older households are the least likely to move, with just 2.8% of households aged between 65 and 74 and 1.8% of households over the age of 75 moving in the previous 12 months. This pattern has been stable at c.2% over recent years, with no indication of changes in the tendency for older people to choose to remain in their homes. By comparison, younger households have a much higher propensity to migrate, with almost half of households aged 16-24 and almost 21% of households age 25-34 moving each year.

[68]Communities and Local Government (February 2008): Housing Choices and Aspirations of Older People, Research from the New Horizons Programme
[69] Supported housing for older people in the UK: An Evidence Review (December 2012)

Figure 9.3 Demographic characteristics of moving households
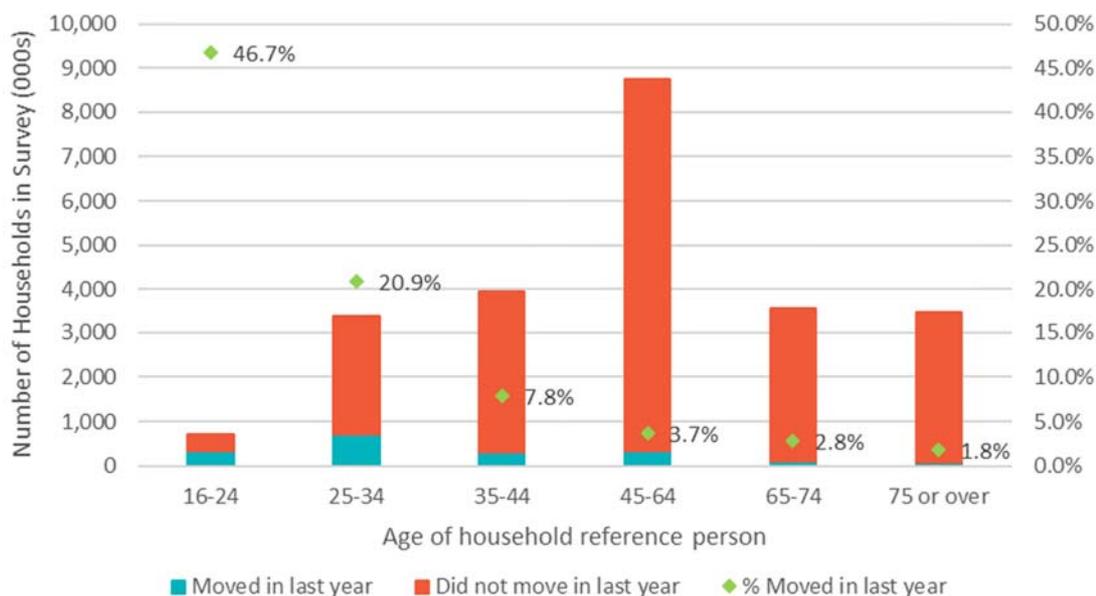
9.12 These patterns are reflected in the EHS data on household moves by employment status: only 2.1% of retired households moved in the 12 months prior to the 2018/19 Survey, compared to 10% of households where the household reference person was employed in full or part time work. This evidence is also consistent with findings of the Census, which found that only 3.6% of households over 50 moved in the year prior to 2011.

9.13 In addition to the factors identified above, these patterns of households moving are also likely to reflect different households' satisfaction with their housing. The 2018/19 EHS[70] also shows that households which are most satisfied with their housing are those which are:

1 Aged 75 and over (95.7% are satisfied or very satisfied with their housing);

2 Own outright or are buying with a mortgage (94.9%)

3 Retired (94.6%);

4 Have no dependent children (94.4%); and,

5 Under-occupy housing (93.7%).

9.14 It is evident from this analysis that older households are the most likely to:

1 Under-occupy housing;

2 Be the most satisfied with their housing; and as a result; and,

3 Be relatively inactive within the housing market.

9.15 This further highlights that older households cannot necessarily be relied upon to free up larger dwellings to the degree needed to meet the needs of future families.

9.16 As set out above, however, personal preference may not be the only reason why older households do not seek to downsize or rightsize. Separate research by JRF[71] also highlighted the potentially misleading nature of any discussion which assumes that older

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[70] Table FA5401

[71] Older People's Housing: Choice, Quality of Life and Under-occupation (May 2012)

people are holding onto housing and stated that this narrative *"ignores both the lack of housing choice, as well as older people's psychological and social reasons for staying put"* (page 4). Indeed, the 2016 '*Future of an Ageing Population Report',* which was prepared by the Government Office for Science, noted that that 58% of people over 60 were interested in moving but could not find suitable properties. This conclusion is supported by the Right-Size Report[72] which undertook analysis of the delivery of older person's accommodation nationally. It found that since 2000, on average, as few as 5,500 retirement housing units have been built each year, despite the prominence of the ageing population.

9.17   There is, generally, a distinct lack of data, evidence and research on the preferences and needs of elderly households; this makes it difficult to determine how best to meet the needs of an ageing population. However, though some older households may choose to downsize, evidence and research overwhelmingly indicates that most older households are unlikely to move and (for a multitude of reasons) intend to remain in the family home. Even those that do look to move to a new house would not necessarily seek a very small property, they move to properties that are more accessible or with care facilities. Small, high rise apartment schemes generally do not align with these aspirations. Ultimately, the research suggests that the lack of choice for older households is a product of supply and demand.

The Shift Towards Homeworking

9.18   Another factor that will influence the current and future demand for larger homes is the trend towards home working. The Covid-19 pandemic had a profound impact on working practices and particularly the shift to homeworking. Even before the pandemic, the ONS Labour Force Survey showed that there had been a steady rise in the proportion of people in employment of those working from home, either working directly from the home or using home as a base. In 2017 this stood at 13.6% of people in employment. Homeworking typically increases with age (increasing from 5.1% of those age 16-24 to 38.3% of people age 65+ using their home for work) and so the ageing in the population is likely to lead to further increases in home working.

9.19   Increases in the number of people working from home may translate into a demand for larger housing as people seek additional space, e.g. spare room or garage for use as an office. Research by the London School of Economics/Acas found that most homeworkers surveyed used a separate room/office that is only used for work, with this being a key aspect of separating work and home life. Of those who did not have the space for a separate working area, this was described as being "far from ideal", highlighting the importance of sufficient space for homeworkers. Although limited data availability means the relationship between home-working and housing size/demand cannot be interrogated in detail, the aspect of home working nonetheless remains implicit within the demand for housing.

9.20   The latest 'Characteristics of homeworkers' dataset from the ONS, which covers the period September 2022 to January 2023, shows that homeworking remains the 'new normal' in 2023. During the pandemic, levels of homeworking peaked in the first half of 2020, when 49% of adults reported working from home within the past seven days at various points. Two years later, when guidance to work from home was lifted, around 38% of adults continued to work from home. The most recent data (25th January to 5th February 2023) shows that this level of homeworking has remained fairly constant, with 40% of adults reporting they had worked from home in the last seven days. Between September 2022 and January 2023, 16% of adults stated they had only worked from home whilst 28% reported

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[72] Mapping the supply and demand of Britain's retirement housing in 2017 and beyond

hybrid working. Throughout 2022, levels of homeworking weekly fluctuated from 25% to 40% without a clear upward or downward trend, indicating that homeworking is proving resilient[73].

9.21 Many companies have switched to a 'hybrid' work pattern, allowing employees work from home part of the time. This is expected to have a direct impact on the demand for housing as people need appropriate space and facilities to work effectively from home. The increased prevalence of homeworking means that, in many cases, such people would be able to relocate without changing jobs.

Future Needs

9.22 In assessing future household growth by type, the 2014-based SNHP for the Peak District have been used as this aligns with the SM2 figure. The Stage 2 projections provide a breakdown of the projected change by age and type of household. This can be compared with the Census information to show, if current occupancy patterns were to continue, what the need for different sized housing would be[74].

9.23 Table 9.2 shows the change in projected household type between 2021 and 2045 in the Peak District incorporating the 2014-based SNHP as modelled in PopGroup (adjusted for the 2021 Census data). These figures do not include an allowance for dwelling vacancies and refer only to households. For the purposes of this assessment, we have assumed that the profile of need will remain the same (i.e. pro-rata'd) even if the overall housing provision is different to that shown in the projections.

9.24 The category with the largest projected growth is single person households over the age of 65, growing by 800 households or +27.7 to 2045. The second largest percentage increase is in 'Other Households' which includes households which are not easily categorised such as student households, communal establishments, and Houses in Multiple Occupation [HMOs]. This group is projected to increase by 172 households or +20.0% to 2045 and is driven primarily by growth in households aged 75+, so likely communal establishment residents, aligning with the lack of a student population in the National Park

9.25 Households with dependent children are projected to increase by 537 or 14.9%, and single person under 65 households by 134 or +5.8%.

9.26 The only category projected to decline is 'All Adult' households, which consists of families with only adult children or living with other adults. Digging into the data reveals that within this category growth is expected in older households, although this is being offset by a larger decline in younger households. This is likely to reflect a fall in younger households with adult children alongside an increase in the number of families living with elderly relatives.

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[73] ONS (2023): Characteristics of homeworkers, Great Britain Characteristics of homeworkers, Great Britain: September 2022 to January 2023

[74] It should be noted that due to the limited availability of Census data for National Park geographies and the need to disaggregate data further into the sub-areas, some Census data has been aggregated up from Output Area level, some from LSOA level, and some from MSOA level, before being adjusted to match National Park figures as closely as possible. This means that throughout this section there is a margin of error in the totals presented depending on the variables being assessed, and totals may not match exactly between different variables. The most granular data available has been used at every opportunity.

Table 9.2 2014-based Household Projections (adjusted for the 2021 Census) by Type for the Peak District National Park

	2021	2045	Net Change
Single 65+	2,308	2,442	134
Single <65	2,884	3,684	800
Couple only	6,054	6,866	812
All adult households	1,224	1,020	-204
Households with dependent children	3,601	4,138	537
Other households	862	1,034	172
Total	**16,933**	**19,184**	**2,251**

Source: Lichfields using DLUHC/Census 2021 / 2014-based SNHP

9.27   Figure 9.4 illustrates household growth indexed to 2021. It shows that much of the projected change in the number of single 65+ and all adult households occurs before 2035, after which time both household types begin to stabilise. Growth in households with dependent children and other households picks up in the 2030s, whilst the number of single <65 households is expected to fall to c.2035 before returning to growth over the remainder of the plan period. Overall, with many of these shifts being driven by changes in the share of pre- and post- retirement-age households, Figure 9.4 indicates that the move towards a more elderly population starts to slow in the mid-2030s, after which time growth in younger households begins to accelerate.

Figure 9.4 Indexed household growth in the Peak District National Park by composition 2021-2045 (2021=100)
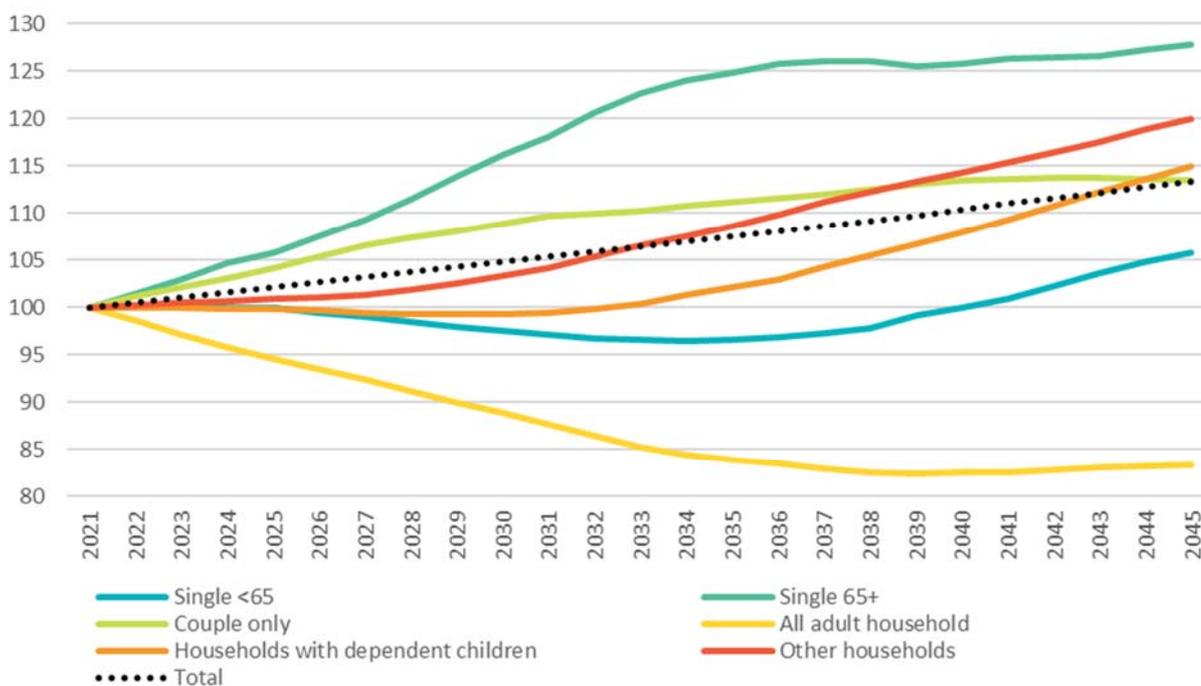
Source: Lichfields using DLUHC/Census 2021 / 2014-based SNHP

9.28   The current occupancy pattern in housing by household type and number of bedrooms in the Peak District is shown in Table 9.3.

Table 9.3 Household composition by number of bedrooms in the Peak District National Park (2021)

	1 bedroom	2 bedrooms	3 bedrooms	4+
Single <65	20.4%	40.9%	30.2%	8.5%
Single 65+	16.0%	33.9%	37.3%	12.8%
Couple only	3.6%	25.1%	42.1%	29.2%
All adult household	2.2%	19.3%	47.1%	31.3%
Households with dependent children	0.3%	14.2%	48.0%	37.4%

Source: Lichfields using DLUHC/Census 2021

9.29   The household occupancy patterns (Table 9.3) in the Peak District are applied to the projected household growth by type (Table 9.2) to establish the required housing by number of bedrooms.

Table 9.4 Peak District National Park projected household growth by bedroom size – net change 2021-2045

	1 bedroom	2 bedrooms	3 bedrooms	4+
Single <65	134	27	55	41
Single 65+	800	128	271	299
Couple only	812	29	203	342
All adult household	-204	-5	-39	-96
Households with dependent children	537	2	76	258
Other households	172	4	43	99
Total	2,251	186	610	942
%	8.3%	27.1%	41.8%	22.8%

Source: Lichfields using DLUHC/Census 2021 / 2014-based SNHP

9.30   The results indicate that the projected household growth in the Peak District is likely to predominantly be in cohorts requiring 2 and particularly 3-bed properties. However, this figure combines social with market housing. The former generally has a much higher incidence of smaller properties due (in part) to the under-occupancy penalty.

9.31   The 2021 Census indicates that although just 10.7% of Peak District households live in social housing, more than half (55.4%) of all 1-bedroom properties comprise social accommodation, compared to just 1.5% of all 4+ bed properties in the Borough (with the remaining 98.5% in private ownership / rented privately) (Table 9.5).

Table 9.5 Household tenure by number of bedrooms in the Peak District National Park, 2021

	Total	1 bedroom	2 bedrooms	3 bedrooms	4+
All Tenures	16,171	1,050	3,857	6,761	4,504
Owned or shared ownership: Total	12,132	198	2,341	5,444	4,149
Owned outright	8,308	157	1,776	3,759	2,616
Owned with a mortgage or loan or shared ownership	3,824	41	565	1,685	1,533
Rented: Total	4,039	852	1,516	1,317	355
Social Rented	1,618	575	513	496	35
Private rented or living rent free	2,421	278	1,003	821	320
% Living in Market Housing	**89.3%**	**44.6%**	**86.0%**	**91.9%**	**98.5%**
% Living in Social Housing	**10.7%**	**55.4%**	**14.0%**	**8.1%**	**1.5%**

Source: Lichfields using DLUHC/Census 2021 / 2014-based SNHP

9.32   These ratios are applied to the projected household growth by bedroom size as set out in Table 9.4. The results are set out in the Mix Table below (Table 9.6).

9.33   However, based on the factors and the qualitative analysis set out above, there is a strong argument to justify a further shift in the housing mix to consider the very pronounced socio-economic shock precipitated by the pandemic and the strong (and what appears to be a permanent) shift towards homeworking and the need for larger properties to accommodate this. Taking account of the overall profile and dynamics of the Peak District's market, and recognising the importance of ensuring that the needs of all households are met (particularly growing families), a further adjustment has been applied to take account of household change that factors in a 15% reduction in the number of smaller (1-2 bed) dwellings and a commensurate increase in the number of 3 and 4 bedroom properties. This is applied in Table 9.6.

9.34   The results indicate that once the market profile adjustment for recent homeworking trends is applied to the housing mix above, the projected household growth in the Peak District will be predominantly larger properties (3+ bedrooms) on the open market. Table 9.6 shows that 74% of the demand for market housing is projected to be for properties with at least three bedrooms, whilst for social housing the need is likely to be reversed, with a greater need for smaller 1 and 2-bedroom properties (59%) than larger 3 and 4-bed properties (41%).

Table 9.6 Sizemix for the Peak District National Park

		1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market Housing	Mix prior to market adjustment	4.2%	26.5%	43.8%	25.5%
	Mix following 15% market profile adjustment	3.6%	22.5%	46.1%	27.9%
	Overall Mix	**26%**		**74%**	
Social Housing	Mix prior to market adjustment	37.9%	31.4%	27.9%	2.8%
	Mix following 15% market profile adjustment	32.2%	26.7%	33.1%	8.0%
	Overall Mix	**59%**		**41%**	

Source: Lichfields Analysis using DLUHC/Census 2021 Data / 2014-based SNHP

9.35   It is stressed that much of this assessment of house type need is based on the historical relationship between demographics and housing supply using the existing household projections. If a higher level of housing growth is pursued, then it would be logical to provide more of the types and sizes of homes desired by working families. This could point to an even higher proportion of 3 and 4 bedroomed properties than is summarised in the Table above. In our view the delivery of larger homes would not necessarily price local residents out of home ownership, as it would potentially free up smaller and more affordable properties as households moved up the housing ladder into a dwelling that better suits their needs and aspirations.

Sub-Area Housing Mix

9.36   To assess future need in the local area, we have used 2021 Census data (at Output Area level where possible, and LSOA/MSOA otherwise) and the ONS 2014-based SNHP by type (Stage 2) to create a local projection. The approach to the calculation of a local projection applies a proportionate share for each of the three sub-areas together with an adjustment to take account of the current local profile as per the Census. Patterns of occupancy by household

type were then applied using local data for the collated geographies for the three sub-areas. By adopting this approach, it is possible to provide localised housing mix evidence.

9.37   The current occupancy patterns in market housing in each local area were applied to the projected household growth by type to establish the sub-area mix shown in Table 9.7.

Table 9.7 Sizemix for the Peak District National Park 's three Sub-Areas

			1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Dark Peak	Market Housing	Mix prior to adjustment	4%	27%	45%	24%
		Mix with 15% adjustment	3%	23%	48%	26%
		OVERALL MIX	**26%**		**74%**	
	Social Housing	Mix prior to adjustment	42%	33%	21%	3%
		Mix with 15% adjustment	36%	28%	27%	9%
		OVERALL MIX	**64%**		**36%**	
White Peak	Market Housing	Mix prior to adjustment	4%	26%	44%	26%
		Mix with 15% adjustment	4%	22%	46%	28%
		OVERALL MIX	**26%**		**74%**	
	Social Housing	Mix prior to adjustment	37%	33%	28%	2%
		Mix with 15% adjustment	31%	28%	34%	8%
		OVERALL MIX	**59%**		**41%**	
South West Peak	Market Housing	Mix prior to adjustment	5%	29%	42%	25%
		Mix with 15% adjustment	4%	24%	44%	27%
		OVERALL MIX	**28%**		**72%**	
	Social Housing	Mix prior to adjustment	42%	16%	38%	5%
		Mix with 15% adjustment	36%	13%	42%	9%
		OVERALL MIX	**49%**		**51%**	

Source: Lichfields Analysis using DLUHC/Census 2021 Data

9.38   This evidence maintains the clear orientation towards larger households requiring bigger properties in the private sector, indicating that 72% - 74% of private market housing should have three or more bedrooms.

9.39   Taking the change in different types of households and applying current occupancy patterns as set out above results in an estimated mix of market housing as shown in Table 9.8. This relates to the broad overall need and does not relate to any specific tenure, area, or site typology. It also does not attempt to take into account how future policy changes (for example, to encourage downsizing), social changes or economic changes might affect how households occupy housing. In this context, a narrow recommended range has been set around these percentages.

Table 9.8 Estimated overall need/demand by size and suggested mix for market housing in the Peak District National Park

Market Housing	1-bed	2-bed	3-bed	4+-bed
Estimated need / demand	4%	23%	46%	28%
Suggested range	5-10%	20-25%	40-50%	25-30%

Source: Lichfields Analysis using DLUHC/Census 2021 Data

Social Housing Property Type and Size Preferences

9.40   Data on affordable housing from the PDNPA's Housing Register as of March 2023 shows that of the 751 households on the waiting list (including those requesting a transfer), 58.2% had a requirement for a 1-bedroom property; 25.4% for 2-bedrooms; 13.4% for 3 bedrooms and just 3.0% for 4 or more bedrooms, as shown in Table 9.9.

9.41   The pattern is similar when the analysis is narrowed down just to those in priority need (i.e. in Bands A-C), making it clear that need in the affordable sector remains overwhelmingly for smaller dwellings.

Table 9.9 Housing Register bedroom preferences in the PDNP

	All bands (including transfers)	Band A-C	Band D
1 bedroom	437 (58.2%)	303 (58.3%)	134 (58%)
2 bedrooms	191 (25.4%)	123 (23.7%)	68 (29.4%)
3 bedrooms	101 (13.4%)	76 (14.6%)	25 (10.8%)
4 bedrooms	14 (1.9%)	10 (1.9%)	4 (1.7%)
4 bedrooms+	8 (1.1%)	8 (1.5%)	0 (0%)
Total	**751**	**520**	**231**

Source: Peak District National Park Officers: Housing Register data (extracted May 2023)

9.42   Table 9.10 shows preferences by number of bedrooms and sub-area. 378 (50.3%) preferences were for the Dark Peak, 343 (45.7%) for the White Peak and just 30 (4%) for the South West Peak. Preference for 1-bedroom homes is highest in the White Peak (63.6%), followed by the Dark Peak (50.3%) and South West Peak (33.3%).

Table 9.10 Housing Register Location Preferences in the PDNP

	Total	1 Bedroom	2 Bedroom	3 Bedroom	4+ Bedroom
High Peak (Dark Peak)	378 (50.3%)	209 (55.3%)	100 (26.5%)	57 (15.1%)	12 (3.2%)
Derbyshire Dales (White Peak)	343 (45.7%)	218 (63.6%)	80 (23.3%)	38 (11.1%)	7 (2%)
Staffordshire Moorlands (SW Peak)	30 (4%)	10 (33.3%)	11 (36.7%)	6 (20%)	3 (10%)
Total	**751 (100%)**	**437 (58.2%)**	**191 (25.4%))**	**101 (13.4%)**	**22 (29.3%)**

Source: Peak District National Park Officers: Housing Register data (extracted May 2023)

9.43   When compared with the SizeMix analysis set out in Table 9.11, it is apparent that the requirements of households on the PDNPA Housing Register are even more focussed towards the smaller end of the scale than the modelling might have suggested. Whilst the Waiting List indicates that around 83% of households requiring social housing need either 1 or 2 bedrooms, this falls to 59% based on SizeMix. Conversely, the need for larger 3, 4 and 5 bed properties is around 16% of all households based on the Housing Register, compared to 41% based on the modelling work alone. The analysis is not directly comparable as the SizeMix looks at future needs, whilst the Waiting List data reflects backlog, or existing requirements. Nevertheless, these are important considerations to be taken into account when specifying a target range.

Table 9.11 Comparable Mix Requirements for Social Housing

	Waiting List All Bands	Waiting List Bands A-C	Sizemix
1 bedroom	58%	58%	32%
2 bedrooms	25%	24%	27%

	Waiting List All Bands	Waiting List Bands A-C	Sizemix
1/2 bedrooms	**83%**	**82%**	**59%**
3 bedrooms	13%	15%	33%
4+ bedrooms	3%	3%	8%
3 bedrooms +	**16%**	**18%**	**41%**

Source: Peak District National Park Officers: Housing Register data (extracted May 2023) / Lichfields' modelling

9.44   Taking the change in different types of households and applying current occupancy patterns as set out above results in an estimating mix of social housing as shown in Table 9.12. This refers to the broad overall need and does not relate to any specific tenure, area, or site typology. It also does not attempt to take into account how future policy changes (for example, to encourage downsizing), social changes or economic changes might affect how households occupy housing. It should also be noted that applicants stipulate a maximum bedroom size, meaning some households may have chosen to select four or more bedrooms to increase their chances of finding housing, when smaller properties would also suit their needs.

9.45   In this context, a wide recommended range has been set around these percentages that balances the housing waiting list evidence (backlog need) against the SizeMix (future need) analysis. Between 55%-90% of the social housing provision should be for smaller 1 and 2-bed properties, with the majority of the remainder comprising 3 and 4-bed properties.

Table 9.12 Estimated overall need/demand by size and suggested social housing mix for the Peak District National Park

	1-bed	2-bed	3-bed	4+bed
Waiting List Bands A-C	58%	24%	15%	3.4%
Sizemix	32%	27%	33%	8%
Suggested range	35-55%	25-30%	15-30%	5-10%

Source: Lichfields based on DLUHC / ONS / Peak District National Park Officers: Housing Register data (extracted May 2023)

Summary

9.46   This section has explored the different types of housing which are likely to be required in the Peak District up to 2045. Our findings can be summarised as follows:

- In line with wider trends, younger single household groups are projected to see the fastest growth in the Peak District, increasing by 28% between 2021 and 2045. Older single household types are also expected to see a significant increase of 6%, whilst couples are expected to increase by 13%. The number of families with children is projected to increase by 15%. Other households are expected to increase by a substantial 20% over the same period, albeit from a low base.

- Based on overall household growth and existing occupancy patterns, our assessment indicates that housing need in the Peak District is predominantly made up of 2 and 3 bedroom dwellings. This takes into account the fact that although older households are likely to make up the majority of future household growth, these often remain in their large family home, are the least active in the housing market and tend to occupy housing larger than they 'need'.

- Housing waiting list information shows that most households in need of affordable housing required 1 or 2-bed dwellings; however, the waiting list and Census data both

show that overcrowding remains a problem. Within the social rented sector, there is likely to be some scope for more efficient use of the existing stock.

- In this context, it is recommended that for market housing, between 25% and 35% of housing should be for smaller 1 or 2 bed properties. For social housing, between 60%-85% of the social housing provision should be for smaller 1 and 2-bed properties, with the vast majority of the remainder comprising 3 and 4-bed properties.

10.0   Needs of Specific Groups

10.1   Paragraph 62 of the NPPF states that local authorities should assess the size, type and tenure of housing needed for different groups in the community, including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.

10.2   The PPG provides further advice on how plan-making authorities should identify and plan for the housing needs of these particular groups of people. This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.

10.3   The needs of these particular groups in the Peak District are set out in detail below.

Stakeholder Interviews

10.4   Lichfields undertook a detailed analysis of housing needs across the Peak District beginning with an overview of the current housing market, supported by discussions with key stakeholders and local commercial agents.

Commercial Agents

10.5   Discussions with commercial agents indicated the existing housing market has generally performed well in recent years. Agents described the Peak District as a "sure-fire area for sales" citing areas such as Baslow, Hathersage and Grindleford in Derbyshire Dales and Hope in High Peak, all with good access to existing trainlines connecting the Parishes to larger urban conurbations such as Greater Manchester to the North West and to Sheffield to the East. Furthermore, agents highlighted that the number of housing purchases in such areas across the National Park have increased notably as the UK economy continues to recover from COVID-19.

10.6   Lichfields asked whether agents expected this level of demand to persist moving forward. Generally, whilst residential property agents remained optimistic about the activity of the market, the feedback received did include two notable caveats. Firstly, agents highlighted that the performance of the future housing market will depend on the type of stock that comes forward. Desirable Parishes / towns such as those mentioned above are highly priced and are expected to remain so. This makes such desirable areas almost completely unaffordable to younger people and families. Anecdotally, one agent highlighted how the recent valuation of a 3-bed former local authority terraced house at £275,000 prevented a household of two teachers from remaining in the area and were forced to move back to Chesterfield. One agent further highlighted how they were currently listing a 3-bed apartment in Hathersage overlooking the trainline for £475,000 and moreover that buyers remained interested.

10.7   Secondly, discussion with residential agents continually highlighted the need to understand and appropriately accommodate the National Park's ageing population. Agents highlighted that bungalow properties sell strongly across many areas of the National Park but are not

being built at a rate to meet current and anticipated demand which only further inflates existing prices.

10.8   Lichfields asked whether there were any further barriers to housing, beyond those identified above. One agent highlighted how the existing occupancy clauses can cause a significant level of friction and/or delay in sales. All of the agents that Lichfields engaged with acknowledged the purpose and current importance of such occupancy requirements to ensure that those currently living in the area retain an improved level of access to housing but equally felt that the 10-year clauses in some properties could be overly restrictive. Discussions highlighted that many agents believe a 'middle-ground' compromise position should be reached, such as the existing 3-year occupancy clauses attached to properties in Derbyshire Dales.

10.9   In terms of the type and size of properties that are in most demand, agents highlighted how retirement properties, often located in typically idyllic towns across the National Park, generally in high demand. Agents highlighted how 10-15% of properties are consistently sold well above the initial asking price. Lichfields also asked whether the cost of upkeep or the associated Energy Performance Certificate [EPC] ratings of stock across the National Park had any adverse impact on demand or desirability for homes. In response, agents were quick to dismiss this as an issue at present, citing how the local market attracts households with sufficient capital to sustain this.

10.10   Agents were asked to comment on the housing needs for young people across the Peak District and, beyond the affordability issues cited above, whether there were any further challenges. A commonly cited theme in response was the lack of facilities commonly demanded by young people. As a result, many young people left the National Park to begin a career / move into Higher Education, but had no real incentives to move back to the National Park until they were much older. Key examples that were highlighted include a lack of community facilities, sports activities, and cultural venues.

10.11   Discussions also highlighted that there is a relative lack of demand for two-bedroom apartments/flats across the Peak District with any such properties often featuring internal lifts and accessibility fixtures more suitable to elderly residents than young professionals. Agents that Lichfields spoke to were not aware of any specific key worker housing facilities across the National Park.

10.12   The discussions with agents also focused on the extent to which the presence of second homes across the Peak District had any impact on the housing market and the opportunities or challenges that they presented. Discussions highlighted how second homes form an important part of business generation for property agents stating how "*a second home that is not rented out is relatively rare*", with such properties often comprising 2 or 3-bedroom picture postcard cottages. Another agent highlighted how, in their experience, there was no less frustration among residents with regards to second homes, as those wishing to climb the housing ladder are less likely to demand such housing and wanted larger properties. Discussions highlighted how there remains a more general frustration of a "*lack of housing supply at each rung of the housing ladder*".

10.13   Discussions with property agents also cited how NIMBYism remains a more significant challenge than the environmental conservation of the National Park; however, in general, agents remained optimistic that there remains scope to build small, localised, developments

in existing Parishes within the Peak District whilst minimising any negative impacts on the natural environment.

Derbyshire County Council – Adult Care Services

10.14   Lichfields liaised with Adult Care Services at Derbyshire County Council [DCC] to develop a wider understanding of the housing needs for the Peak District's elderly citizens and those with accessibility and/or care needs. The discussions involved analysing broader demographic changes before moving on to more specific housing needs, issues, and challenges.

10.15   Key demographic challenges that are particularly relevant to DCC Adult Care Services includes the significant increase in the National Park's elderly population as well as of those with increasingly complex illnesses such as Dementia and Alzheimer's.

10.16   **Discussions highlighted how attracting key workers and those likely to provide care to an ageing population has become increasingly difficult, with the number of those willing or able to travel from areas such as Manchester or Sheffield continuing to fall due to increasing costs.**

10.17   Furthermore, those who are more willing to move to the area and provide care are often prohibited from doing so due to a relatively poor public transport infrastructure that is unreliable or has been altogether removed due to viability challenges. DCC Adult Care Services highlighted that High Peak is an area with a particular shortage of key workers, followed by Derbyshire Dales.

10.18   The need for different types of housing has also changed in recent years. Discussions highlighted how there exists a greater desire for elderly residents to stay in their own homes for longer and they are hesitant in moving to residential care. The reasons behind this are complex and multi-faceted. In DCC's experience, when residential care is required, it is for a lot higher level of need such as for those with complex health problems and a range of comorbidities. For those with minor care needs there is less demand for such accommodation and a greater focus on supported living, specialist accommodation as well the renovation of existing properties.

10.19   Discussions with DCC Adult Care Services also highlighted how it has identified an explicit need for Extra Care and supported housing across the National Park. However, the existing restrictions on development has made it difficult to bring forward the level of development needed, creating viability issues, lengthy delays or preventing development altogether.

10.20   DCC Adult Care Services highlighted that the supply of specialist care housing remains a key challenge across the Peak District, particularly for accommodation that is accessible to those with mobility needs. Representatives also stressed that as much as it is important for supply to meet existing demand, there is an equal need to ensure such homes are built in appropriate locations so those with mobility needs can access suitable homes and local services with ease.

10.21   Representatives at DCC Adults Care Services also highlighted that fuel poverty remains a significant challenge across the Peak District. Many of the houses are not connected to the main gas grid and therefore require log or oil burners as their primary heating source. This

gives rise to a greater incidence of health problems; the homes are less cost efficient to run and this means that residents are less able to look after and heat their home effectively.

10.22   DCC also state that development viability remains a significant challenge across the National Park. It was suggested that Extra Care developers are often hesitant to develop on smaller sites in the Peak District, with viability the main hindrance. The schemes stack up better financially when there is a minimum site size threshold. Furthermore, properties are often worth more on the open market which further threatens long-term viability. This compels an increasing number of those seeking care to move outside of the National Park altogether. Representatives highlighted that parishes such as Bakewell and Ashford in the Water are particularly expensive due to their attractiveness and competition with property values on the open market, whilst smaller and more isolated rural settlements face significant viability challenges.

10.23   Regarding existing development restrictions, this often means that developers are less likely to come forward with proposals and the provision of any elderly or specialist care accommodation often comprises of conversions of existing properties as a result. Furthermore, discussions highlighted how purpose-built care accommodation often tends to be better quality, more cost effective in the long run, and more likely to meet need.

10.24   Such challenges were further emphasised when Lichfields enquired as to whether there were any such developments in the pipeline. Discussions highlighted how DCC was aware of just one site, at the 19th Century Newholme Hospital, that could be re-purposed to provide suitable specialist accommodation for the elderly alongside the development of a new Health Hub. This was yet to be confirmed at the time of writing.

Peak Parish Forum

10.25   The Peak Park Parish Forum [PPPF] was established in 1994 and works for and on behalf the constituent Parish or Town Councils within the Peak District. Its remit is to ensure effective working relationships between local councils and the PDNPA, and to provide a forum for the Council to exchange information and engage in important local matters. Lichfields liaised with the PPPF as part of this study to gather a collective assessment of how the various towns and parish councils consider the housing market to be operating across the Peak District.

10.26   As with the demographic trends highlighted above, the PPPF acknowledges the challenges facing the ageing population across the National Park and the impact this will continue to have on the need for public services, housing and transport. However, ambassadors also highlighted that, in some parts of the Peak District such as Bakewell, small housing estates have been developed with properties predominantly purchased by younger households. In contrast, and in the experience of the PPPF, most private market houses on the re-sale market tend to be purchased by more elderly buyers or by landlords looking to expand the holiday lettings market.

10.27   To take one example of efforts to future-proof the provision of housing for local residents, the Bradwell Springs development (brought forward via Bradwell Community Land Trust) provides a total of forty 3, 4 and 5-bedroom houses to be sold on the open market. This includes 12 properties secured as affordable homes and reserved for local residents. Ordinarily, developers are prevented from building open market houses within the National

Park; however, by including the 12 units available to the Community Land Trust on this site, both the community and developer can benefit.

10.28 The PPPF set out how they consider that much of the existing housing need can be met outside of the Peak District and that the focus should be on ensuring that existing villages within the National Park remain sustainably populated, with future residents having adequate access to housing and local amenities. Bradwell and Taddington were cited as two case study settlements where this has been successful, along with the ongoing brownfield development in Hartington (26 dwellings including 4 affordable units). The PPPF also acknowledged that this is not always the case in many other towns across the National Park.

10.29 PPPF representatives were asked to comment on the type of accommodation needed to meet the needs of elderly residents and those with specific care needs. Discussions highlighted that outside of the few existing sites in areas such as Hope, Hathersage and Bakewell, there remain few such homes across the National Park. The PPPF expressed concern as to how existing provision would be able to meet future need in the context of an ageing population and sustained levels of 'retirement tourism' (i.e. older people moving from outside the Peak District into the area to spend their retirement in a highly attractive environment).

10.30 The PPPF also highlighted an increasing problem of bungalows being bought on the open market and either being demolished and rebuilt as larger properties, or being otherwise converted. This results in an increasing number of homes becoming less suitable for elderly people or those with specialist needs who cannot manage stairs, and forces many in need of care to live outside of the National Park.

10.31 Moving on to the provision of care, discussions with the PPPF highlighted how care workers will often commute in from Chesterfield and Sheffield to the East rather than living within the borders of the National Park. As an example, Chatsworth Estate has recently forgone its existing key worker housing and relies on care workers living in Chesterfield and commuting in daily. This not only increases the dependency on Chesterfield for Chatsworth residents to receive care but, combined with often poor and infrequent public transport links, significantly threatens the long-term ability for those in more rural and central Parishes to provide care to residents in need.

10.32 Discussions with PPPF also highlighted how this extends to the provision of public services more generally across the National Park. Many of the firefighters active across the Peak District do so on a part-time/job-share basis and so face additional challenges of finding further employment in the area.

10.33 Local Plan Policy HC1: *New Housing* sets out how those employed in the agriculture, forestry and fishing industry can sometimes justify a new home in open countryside in addition to general provision. Members of the PPPF mentioned an anecdotal case study where certain groups of people that do not technically qualify as agricultural workers but still provide an important role economically, face extra barriers to housing. From experience, those in agriculture and construction (where apprenticeships are more common), face significant challenges to getting on the housing ladder and face high competition for homes purchased as holiday lets.

10.34   The PPPF considers that the existing occupancy requirements are a positive and necessary fixture of housing provision and accessibility across the National Park. However, it suggests that in practice, many of the homes are still sold on the open market as Right to Buy properties. Furthermore, representatives from the PPPF posited that when defining 'need' against the existing occupancy requirements, the definition could benefit from considering the wider community and social connections that come forward when development takes place.

10.35   One case study provided by the PPPF demonstrates the need for greater flexibility. An existing Tideswell household wanted to build two dwellings nearby their main residence that would be occupied by each of their children. One of the children fulfilled the criteria to live in a larger house suitable for raising a family whilst the other only met the criteria for a smaller sized house. The smaller property was subsequently refused planning permission on the grounds that that household already owned a house. Though a relatively niche example, this serves to highlight how a greater degree of flexibility may be prudent to help local families can stay together and Parish populations can be sustained.

10.36   Commentary was also provided on the incidence of conversions and purpose-built properties across the National Park. Discussions highlighted how most conversions come forward on the open market. The PPPF queried whether there was a workable mechanism whereby some of conversions can come forward for affordable homes. However, discussions also highlighted how the conversion of rural barns that have fallen into disrepair is generally welcomed and, sensitively done, can be a strong step to enhancing the landscape (although with the caveat that these are often bought as holiday lets).

10.37   Representatives from the PPPF drew comparisons to the ease with which a resident local to the Yorkshire Dales can convert a disused barn and how a similar mechanism could be put in place across the Peak District.

The Private Rented Sector

10.38   The PPG states that to assess the needs of households wishing to live in the Private Rented Sector [PRS], tenure data from the ONS can be used to understand the future need for PRS housing. However, this will be based on past trends. The level of changes in rents, (market signals), may reflect the demand in the area for private rented sector housing[75].

10.39   At a national level, PRS has been growing consistently since the mid-2000s, whilst the owner-occupied and social rented sectors have seen declines (as a share of all households). However, this long-term trend has shifted slightly of late; the proportion of households in the PRS has actually decreased since 2015-16, although it has remained stable between 2019-20 and 2020-21. In 2020-21, PRS accounted for 4.4 million (19%) of all households in England, unchanged from 2019-20, but lower than in 2015-16 (20%). Unsurprisingly, renting is more prevalent in London where 27% of households lived in PRS in 2020-21 (compared to 17% of households in the rest of England)[76].

10.40   Typically, PRS comprises those renting their home from buy-to-let landlords; however, as set out below in the 'Build to Rent' [BtR] sector (in which institutional investors build, let and manage) private rented homes are becoming increasingly common.

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[75] PPG: ID: 67-002-20190722
[76] Source: EHS 2020-21

10.41   As at 2021[77], there were around 2,448 households in the Peak District living in PRS, representing 15.2% of all households. This is a higher share than in 2011, when PRS accounted for 13.3% of all households in the National Park and represents an increase of 215 households or 9.8%. This reflects the strong growth in the sector seen nationally, with the number of households in PRS accommodation increasing by 29.9% over the same time period. It is currently slightly under-represented as a tenure (with 29.9% of households across England as a whole living in PRS compared to 15.2% in the Peak District).

10.42   Figure 10.1 suggests that this pattern is relatively uniform across the National Park, with a slightly higher share of PRS households in the White Peak at 15.5% compared to 14.8% in the South West Peak and 13.3% in the Dark Peak.

Figure 10.1 Household Tenure – the Peak District National Park by Sub-Area
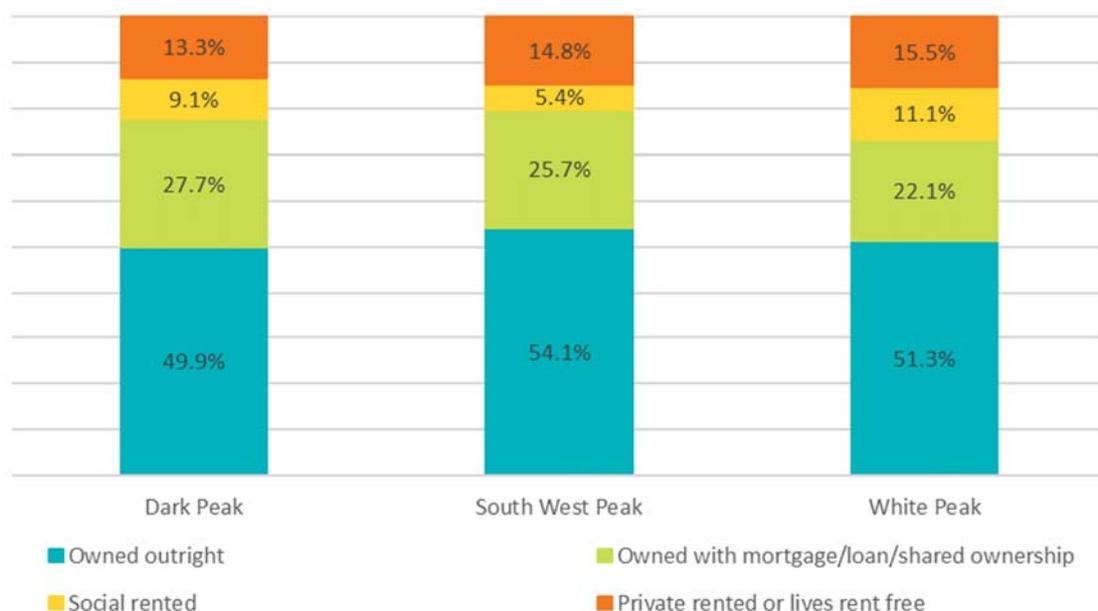
Source: Census 2021: RM136 - Tenure by household size by number of bedrooms

10.43   The composition of households living in PRS is different to the overall tenure composition, as shown in Figure 10.2. The sector has a particularly high proportion of single person households aged under 66, and households with children. The PRS has a lower proportion of older households and younger couples living in this tenure than the Borough overall, with few single residents or couples aged over 66 in PRS accommodation.

10.44   As might be expected, the data suggests that typical occupants in PRS are either young single person households (i.e. in need of smaller homes) or larger family households.

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[77] 2021 Census Table rm136

Figure 10.2 Household Composition – Peak District National Park - All households and Private Rented Households
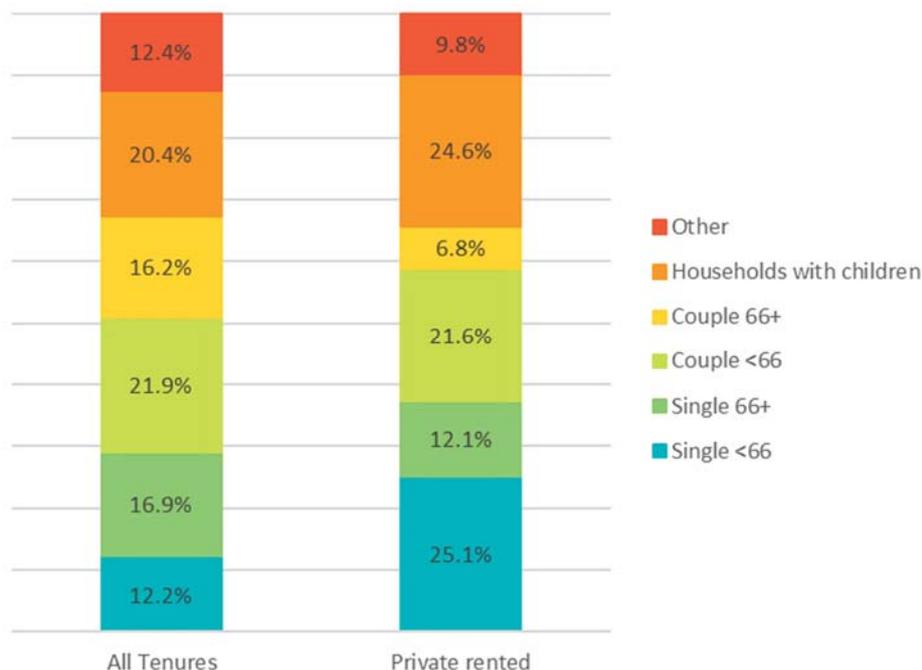
Source: Census 2021: RM135 - Tenure by household composition

10.45   As noted above, PRS in the Peak District has increased in size slightly in recent years and it is therefore may be necessary to review its future role.

10.46   According to the 2021/22 EHS, 21% of all households living in PRS have been resident in their current accommodation for less than a year, by far the highest of any form of tenure. Applying this figure to the number of households in PRS accommodation (2,448, as reported in the 2021 Census) implies an annual turnover of 514 private rented dwellings. This figure does not separate out the proportion of private rented properties that are likely to become available to households in receipt of housing benefit.

10.47   Data from the Department for Work and Pensions [DWP] in respect of the number of households eligible for Housing Entitlement under the new Universal Credit indicates that as of May 2023, there were 3,130 housing benefits claimants in High Peak, of whom 1,428 or 45.6% are currently meeting their needs in the private rental market in the Borough. In Derbyshire Dales, there were 1,730 claimants of which 487 or 28.2% lived in the PRS.

10.48   This indicates that there are likely to be a number of households living in private rented accommodation within the Peak District who are reliant to a greater or lesser extent on housing benefit.

10.49   It is not suggested that these figures should be 'netted off' the affordable housing requirements (due to a variety of reasons including the associated greater insecurity of tenure). It is not a designated form of affordable housing and it is not appropriate to subject many families to the increased uncertainty of tenure associated with private rented accommodation. Nevertheless, it is important to recognise that PRS plays a significant role in helping households in constrained circumstances to meet their housing needs independently, and for addressing the slack between affordable housing need and provision.

10.50   There is also a disparity between the level of Local Housing Allowance [LHA] and private sector rents in many parts of the Peak District. Figure 10.3 highlights the gap and issues in respect of meeting needs in the private rented sector. For 2 and 3-bedroom properties, lower quartile private sector rents in the National Park are £588 and £673 respectively, which compares to LHA rates of £483 and £575.

Figure 10.3 Comparison of Median / Lower Private Rents and Local Housing Allowance in the Peak District National Park
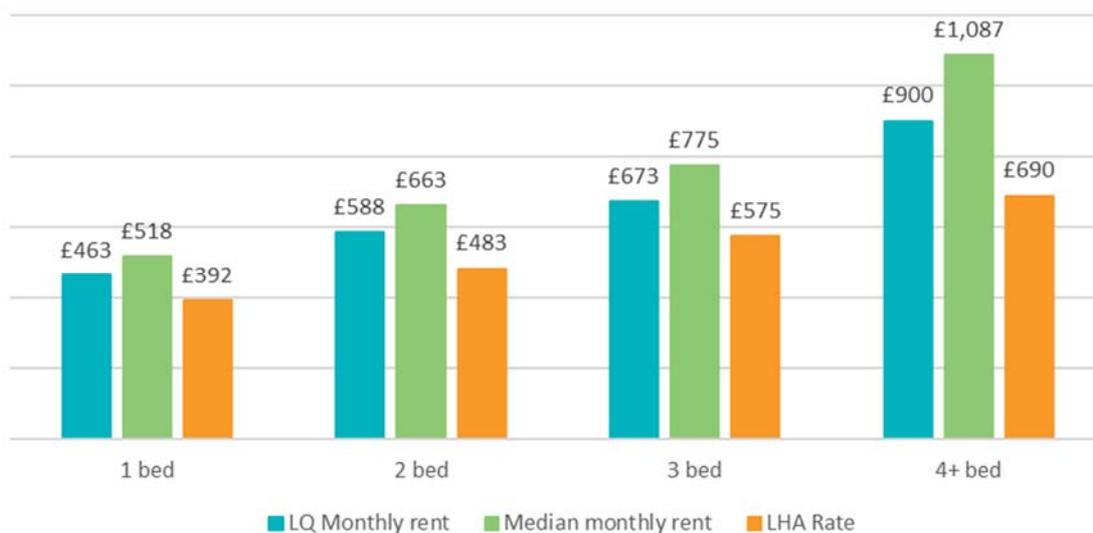
Source: ONS Private Rental Market Data (Oct 21 to Sep 22)/Directgov LHA rates (April 2023) BRMA = Broad Rental Market Area

Build to Rent

10.51   BtR is a distinct asset class within PRS and has been defined in the NPPF glossary to simplify its treatment within the planning system. The PPG states that as part of their plan making process, LPAs should use a local housing need assessment to consider the need for a range of housing types and tenures in their area including provisions for those who wish to rent[78].

10.52   BtR was launched by the Government in December 2012 in response to the Montague Report on barriers to institutional investment in private rented homes, and more specifically as part of the legacy of the Olympic Games in London with the conversion of the East Village into rental properties. Its purpose is to stimulate investment in large-scale development of homes built specifically for private rent by professional organisations. The Government maintains that BtR has a key role in helping to boost housing supply, and defines it as follows in the NPPF's glossary (Annex 2):

*"**Build to Rent:** Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control."*

10.53   Recent research by Savills indicated that a nationwide shortage of rental stock nationwide presents a huge opportunity for BtR investment. Their *UK Build to Rent Market Update*

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[78] ID: 60-001-20180913

(Q4 2021)[79] suggests that the Buy-to-Let sector is likely to be responsible for falling rental supply, with a growing number of mortgaged landlords selling up and exiting the market. As a result, new rental supply is not plugging the current supply gap and there is considerable scope for investors to deliver BtR across all locations and price points:

"Against the backdrop of falling rental supply, Build to Rent is fast becoming an important part of UK housing delivery. There were 14,660 BtR completions in 2021, 15% higher than the 2019-21 average. Rising BtR completions is nothing new and we estimate there will be 30,000 annual completions by 2026, 13.5% of annual supply. What has shifted recently however is distribution. Since the first Covid-19 lockdown, investors have realised the opportunity to become early investors in new markets. Build to Rent has been earmarked for an additional 29 local authorities since March 2020 meaning 38% of local authorities now have BtR in their pipeline, up from 20% in Q1 2017."

10.54   Savills research indicates that the fall in available homes to rent nationwide on Rightmove (97,000 fewer in Q4 2021 vs Q4 2019) far outweighs new BtR supply of c. 15,000 per annum in 2021. There remains considerable scope for new rental supply to enter the rental market up and down the country.

"The UK's BtR stock now stands at 70,785 completed homes with a further 42,100 homes under construction. The future pipeline currently stands at 99,300 homes, including those in the pre-application stage. This brings the total size of the sector to 212,200 homes completed or in development. Regional new home starts have continued to drive the construction pipeline. In 2021 nearly 13,500 homes started construction outside London. This is 47% higher than the three-year average (2019-21)."

10.55   The Savills research concludes that the sector continues to rebalance and shift towards regional towns and cities with strong fundamentals. 39% of local authorities are now planning BtR, more than double the number in Q1 2017 (18%).

10.56   Research by the British Property Federation [BPF] earlier this year found that the BtR sector pipeline grew by 8% in 2021 and showed construction in regional cities in the UK outpacing London. There has been notable investment activity driving investment levels in BtR upwards in the last two years, with various acquisitions and deals and many pension funds diversifying into the BtR market.

10.57   According to BPF/Savills' data on BtR schemes[80], as of Q2 2023 there are potentially 253,402 BtR homes in the UK, of which 88,100 are complete, 53,487 under construction and 111,815 in planning. Outside London, there are 156,108 units, the vast majority of which are located in existing towns and cities. Consequently, it is unsurprising perhaps that the Peak District has missed out on BtR to date.

10.58   **The BPF/Savills mapping suggests that the Peak District has yet to see any BtR schemes completed to date, and none have progressed through to the planning stage as of Q1 2022.**

10.59   The nearest schemes are in Stockport (such as Warren Street development for 563 PRS units which is currently in for planning, Stockport Interchange, which has 196 PRS units currently under construction and a further 117 units at The Mailbox, which is complete), Oldham (Fitton Hill, with 97 units currently in for Planning amongst several smaller schemes nearby) and numerous schemes in Sheffield (such as the 368 units West Bar

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[79] Savills UK | UK Build to Rent Market Update – Q4 2021
[80] https://bpf.org.uk/about-real-estate/build-to-rent/

Square which is currently under construction, and St Paul's Place, which has 250 PRS units currently in for planning).

10.60   Given the country's urgent need for extra homes, a key benefit of BtR is its ability to bring housing units to the market quickly and at scale. Unlike the build-to-sale model where the controlled release of housing to the market is commercially beneficial, there is a real incentive for BtR developers to construct their buildings and let units as soon as possible. By way of example, the rate at which homes can be sold is 1 a week in the regions and between 1.5 and 2 in London, whereas lettings' rates can be around 10 to 15 units per week[81].

10.61   It is important to note therefore, that the Government sees BtR having an important and long-term role in meeting the housing need of the nation, and the demand for BtR is likely to increase. As such, the PDNPA should recognise the contribution that BtR could make to local housing options for households unable to afford housing in the future and should consider the provision of 'BtR' elements in future housing mix, to ensure diversity in the types of housing. Such managed schemes, often on more secure tenancies, can provide an alternative rental option for buy-to-let landlords.

10.62   However, given the nature of these schemes and the type of sites available, it is likely to play a limited role within the Peak District's boundaries for the foreseeable future.

Households and Families with Children

10.63   Section 9.0 reviewed the likely need for different sized housing based on projected household growth; this included households with dependent children. The overall need associated with families is therefore implicit within the recommended range of housing mix set out. However, this section provides some additional information on the current and future needs of households with children.

10.64   Households with children most commonly live in housing which, on average, has 3 bedrooms. Table 10.1 shows that a relatively small percentage (13.9%) live in 1 / 2 bedrooms homes, whilst the majority live in homes with 3 bedrooms, with 1,568 of North the Peak District's 3,377 households with children living in such properties, with a further 1,339 or 39.7% living in 4+ bedroom properties.

Table 10.1 Households with children by number of bedrooms – Peak District National Park (2021)

	Total	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Households with children	3,377	8	461	1,568	1,339
	~	0.3%	13.6%	46.5%	39.7%

Source: Census 2021. Refers to households with dependent children

10.65   Existing rates of overcrowding in households with children are lowest in families – only 2.6% of households in this group are living in overcrowded conditions (as shown in Figure 10.4), rising to 18.7% of other household types with children.

10.66

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[81] Investment Property Forum (September 2015): *Mind the viability gap: achieving more large scale, build-to-rent housing: A Briefing Paper*

Figure 10.4 Overcrowding in family households and other households with dependent children
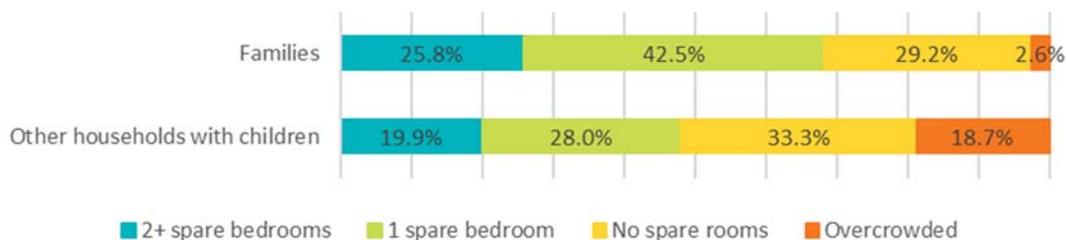
Source: Census 2021: Tenure by occupancy rating (bedrooms) by household composition

10.67 Table 10.2 illustrates what these overcrowding rates mean in terms of the number of households which are overcrowded for each tenure. It shows that the highest number of overcrowded households with children is in the social rented sector, equating to 42 households in total and is a higher percentage of the total of households in the sector (2.1%), compared to the private rented or owner-occupier sectors.

Table 10.2 Overcrowding and Under-occupancy – all households with dependent children

	2+ spare bedrooms	1 spare bedroom	No spare rooms	Overcrowded
Social Rented	3 (0%)	124 (30.2%)	242 (58.9%)	42 (10.2%)
Private Rented	70 (0.1%)	215 (37.8%)	254 (44.7%)	30 (5.2%)
Owned/SO	782 (0.3%)	1056 (44%)	503 (21%)	58 (2.4%)

Source: Census 2021

The 2014-based SNHP project the number of households with children in the Peak District to increase by 14.9%, from around 3,601 in 2021 to 4,138 in 2039. This results from a growth of 16.5% in households with one child, 13.7% in households with two, and 12.8% in households with three. Much of this projected growth is expected to occur after 2032, before which there is a small projected decline in the number of two- and three- child households.

Figure 10.5 Projected growth in households with dependent children: Peak District National Park – 2021-2045
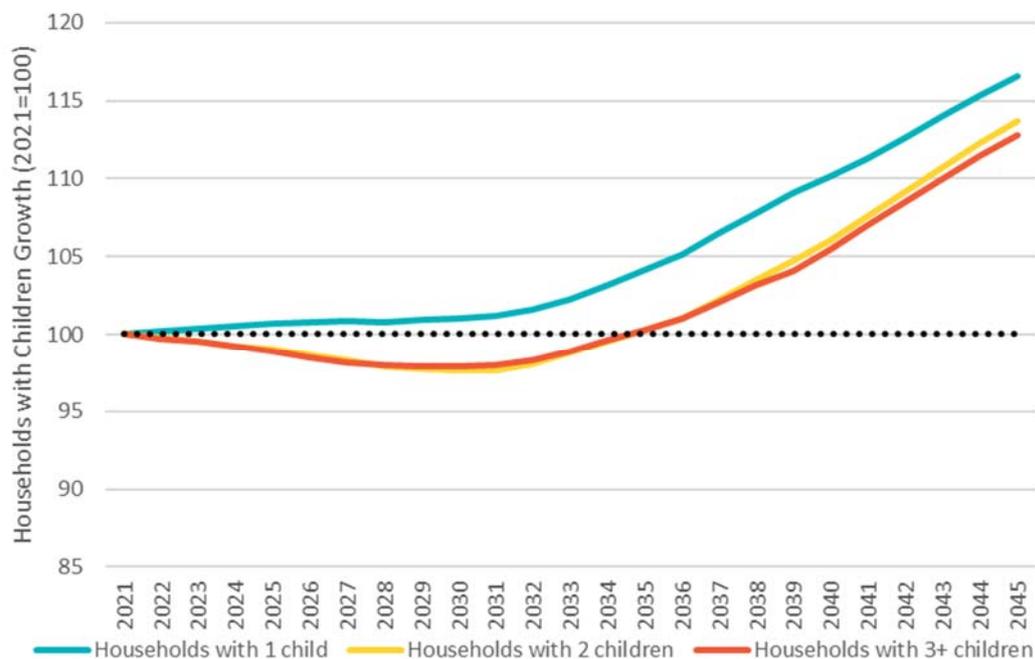
Source: Lichfields' analysis, based on the 2014-based SNHP

The wider role of family housing in the market

10.68   Beyond the specific needs of families in the Peak District identified above, there is widespread evidence to further show the importance of family housing within the wider housing market. The provision of additional housing supply has impacts throughout the housing ladder, as vacated dwellings become homes for other households. This process has been widely studied as one of the possible applications of the 'Markov Chain Model'.

10.69   The Markov Chain Model, and specifically its application to the housing market, suggests that a new vacancy at the top of the housing ladder generates a statistically expected number of subsequent household moves. This is because as a newly-built larger home is occupied, a smaller home is left vacant for a new household (e.g. a family), whose move would in turn free up a home for a smaller/new household. Whilst longitudinal datasets on households' moves are not available in England, analysis on Swedish housing data shows that there were between 3.1 and 4.4 moves per new home built between 2000 and 2002[82], with vacancies created at larger multi-family homes creating the longest vacancy chains. The study also found that vacancies initiated by owner occupier moves generated longer vacancy chains compared to those initiated by renters.

10.70   For the purposes of illustrating, in a simple manner, the potential role of larger housing within a vacancy chain model in the open market, two scenarios have been considered at Figure 10.6 and Figure 10.7. These are both simplified for effect and are not a representation of precise moves within a local market but represent in broad terms the dynamics at play.

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[82] Magnusson Turner, L. (2008): *Who Gets What and Why? Vacancy Chains in Stockholm's Housing Market, International Journal of Housing Policy, 8(1), pp. 1-19*

10.71   Figure 10.6 illustrates the potential impact of building a 2-bedroom home in an area where there is already a need/demand for larger housing.

Figure 10.6 Housing ladder outcomes: Scenario A – building a 2-bed house
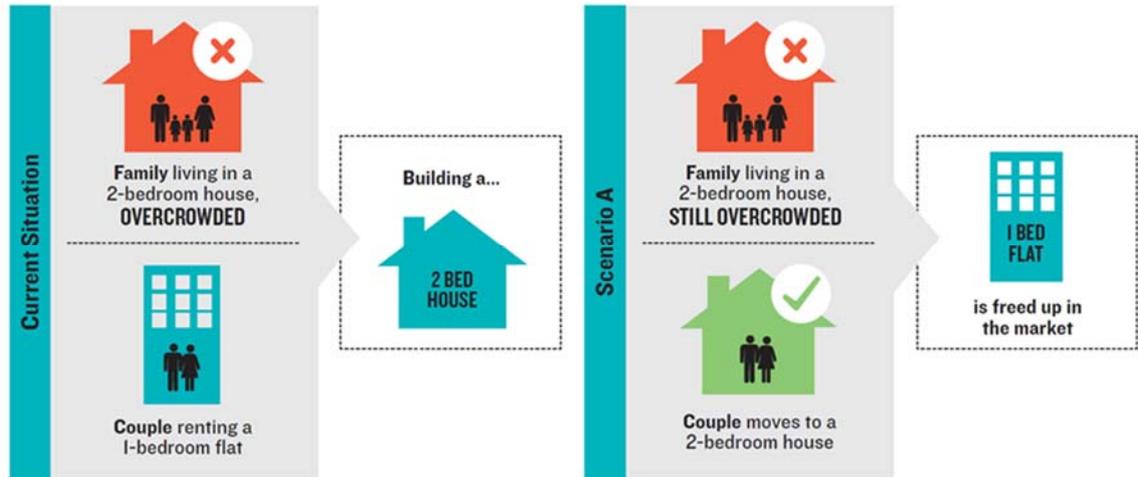
Source: Lichfields

10.72   This scenario indicates that erecting smaller homes will not necessarily meet the needs and demands of the overall population as it only facilitates movement between smaller dwellings in the housing market.

10.73   Figure 10.7 demonstrates the potential impact of building a 4-bedroom home in this same housing market scenario.

Figure 10.7 Housing Ladder outcomes: Scenario B – building a 4-bed house
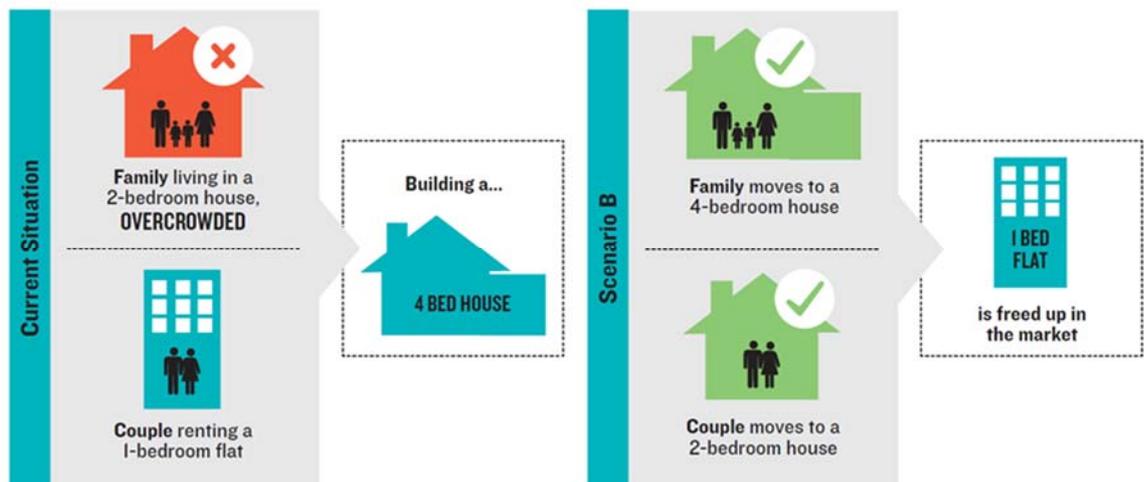
Source: Lichfields

10.74   Under this scenario, the result is movement up the housing ladder for both households (with the family moving into larger accommodation and the couple moving from a flat into a house). It still results in the release of a smaller dwelling (a flat) back into the market to cater for newly forming/smaller households.

10.75   Ultimately, larger housing provision can help play a two-fold role within meeting the wider needs of household growth across the Peak District by:

1   Meeting the **needs** of households, in terms of current overcrowded households who are in need of larger housing – this in turn means that the needs of smaller, newly forming households can be met as smaller housing is freed up further down the ladder; and,

2   Meeting the **demands** of households, in terms of smaller households aspiring to buy/upsize within the market – this again also results in the freeing up of smaller housing further down the ladder.

10.76   Taking account of housing ladder dynamics and the Markov Chain Model, it is clear that the provision of larger homes can play a key role in facilitating movement throughout the local housing market. It can help to address issues of overcrowding and concealed families[83].

Households and Families with Children Summary

10.77   The number of families and other households with children is expected to increase by around 15% in the Peak District by 2045, with growth expected in one- two- and three-child households In the owner-occupied sector, the rate of overcrowding amongst families is low (although the absolute number of overcrowded owned occupied properties with families is highest in absolute terms), and families tend to live in homes which are larger than they 'need' to have extra space. The estimated overall scale of demand for larger housing across the National Park in meeting the needs of families was discussed in Section 9.0.

10.78   In the social rented sector, the rate of over-crowding among families is higher, and the PDNPA should consider how more effective use of existing stock and new development can help address this. Waiting list data suggests that the need is predominantly for small units; however, this is not exclusively the case and there remains a need for a modest amount of much larger properties in the social sector, including 4- and 5-bed, to address existing problems of severe overcrowding in the market.

The need for specialist accommodation for Older People

10.79   The PPG recognises that the need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million.

10.80   It states:

"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking"[84].

10.81   In line with these national trends, the number of older people living in the Peak District is projected to increase by 2,755 or 25.8% by 2045. The projected growth also rises moving towards older age brackets, with the population aged 90+ projected to increase by 1,174 or

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[83] A concealed family is one living in a multi-family household in addition to the primary family – for example, a young couple living with parents.
[84] PPG: 63-001-20190626

230.6% by 2045. In the context of ageing both more widely and across the National Park specifically, meeting needs of older people will be a key element of meeting overall needs over the period to 2045 (and beyond).

Table 10.3 Projected population change by broad age group (elderly population)– Peak District National Park

	2021	2045	Change	Change (%)
65-74	5,713	4,661	-1,052	-18.4%
75-79	2,196	2,733	538	24.5%
80-84	1,427	2,576	1,149	80.5%
85-89	826	1,771	946	114.5%
90+	509	1,684	1,174	230.6%
TOTAL Over 65s	**10,670**	**13,425**	**2,755**	**25.8%**

Source: Lichfields using PopGroup and ONS 2014-based SNPP/SNHP

10.82   The specific accommodation needs of older people fall within two different groups:

1   Those in need of communal establishment accommodation (i.e., bedspaces), including residential care homes or specialist nursing homes; and,

2   Older people living in private housing (and are recorded in the household projections) who do not require care home facilities but may have specific needs, for example for adaptable and accessible homes, or those living in self-contained units as individual households but where some degree of care is provided (e.g., extra care or sheltered housing).

Occupancy patterns and housing market activity

10.83   As shown in Figure 10.8, older households across the Peak District typically (and significantly) under-occupy homes with as many as 63.4% of households in the area over the age of 66 having at least 2 bedrooms more than is considered necessary – a figure greater than across the West Midlands (60.7%), the East Midlands (58.9%) and England and Wales as a whole (57.3%).

Figure 10.8 Occupancy rating among households over the age of 66 – Peak District National Park and Comparator Areas.
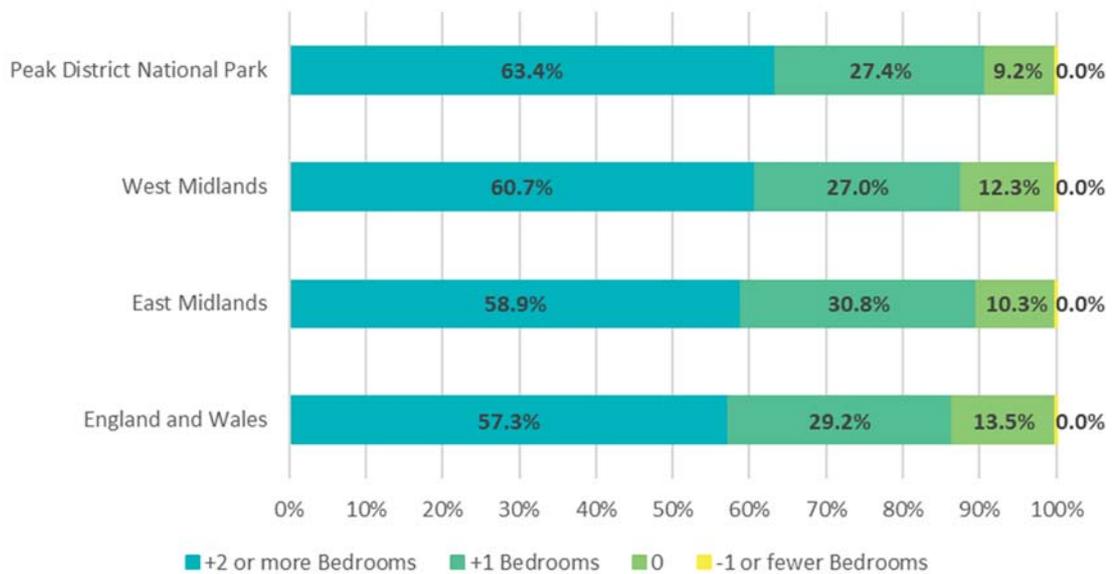
Source: Census (2021) RM098 – occupancy rating (bedrooms) by household composition

10.84   Figure 10.9 illustrates the level of over-occupancy amongst households over the age of 66 across the Peak District, by sub-area. The South West Peak has the largest level of under-occupancy with 68.4% of households aged 66 and over having at least two more bedrooms than is strictly necessary. This is above the 63.4% National Park average. Elderly households across the Dark Peak and Moorland Fringes are also slightly more likely (64.1%) to have at least two bedrooms more than necessary than the National Park average, whilst the White Peak and Derwent Valley has slightly lower levels, at 62.1%.

10.85   Conversely, just 9.2% of households are considered to appropriately occupy their home across the Peak District. This compares to just 6.4% in the South West Peak, 9.1% across the Dark Peak and Moorland Fringes, and 9.7% across the White Peak and Derwent Valley.

Figure 10.9 Occupancy rating among households over the age of 66 – Peak District National Park sub-area.
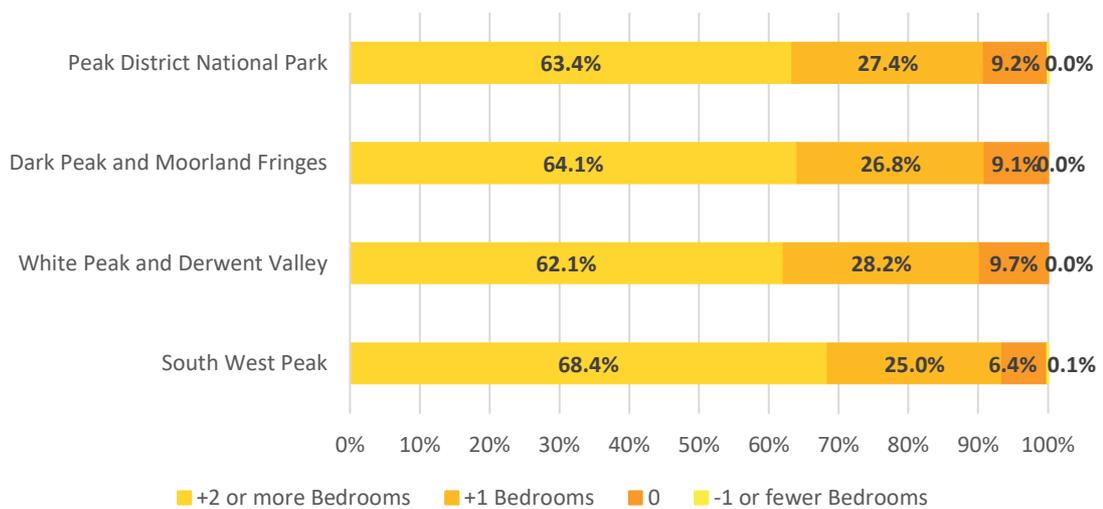
Source: Census (2021): RM098 – Occupancy rating by household composition / Lichfields analysis

10.86   In addition to being the amongst the most significant under-occupiers of housing, older household are amongst the least likely to move. As shown in Figure 10.10. the likelihood of moving house dramatically decreases with age. The 2020/21 EHS regarding elderly households shows that the likelihood of moving each year is 41.5% for those aged 16 to 24, reducing to 2% for those aged 75 and over. For those aged 65 and over, the rate has remained slightly lower at around 1-2%.

Figure 10.10 Number of Bedrooms among Households over the age of 66 – Peak District National Park and Comparator Areas
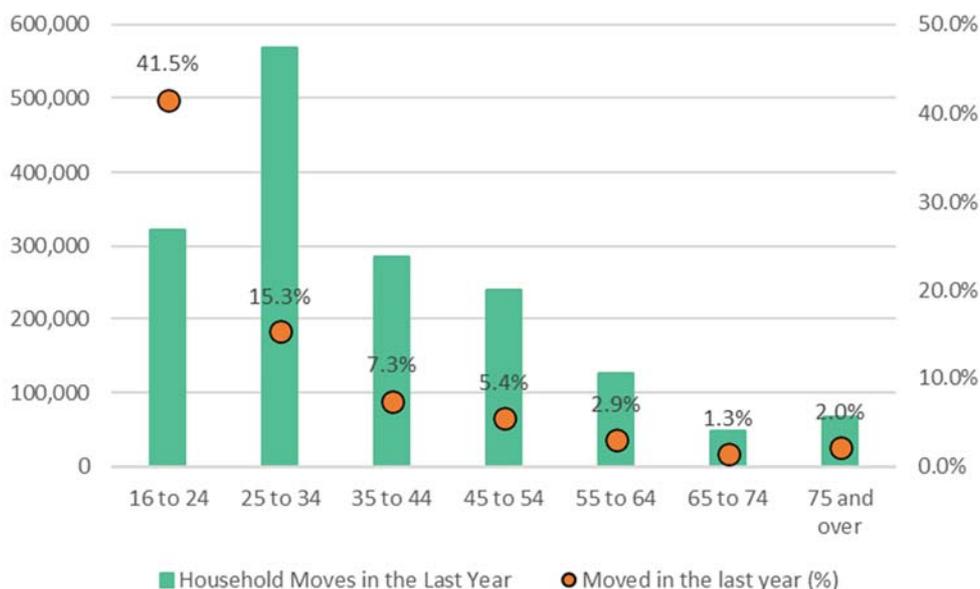
Source: EHS (2020/21) – Table FA4121

10.87   However, there has been a nationally recognised shortage in housing targeted specifically at older residents for many years. It is possible that the low proportion of movers amongst older residents reflects the historic lack of housing choice available to older residents, who would prefer to stay in their home (even if it were too difficult to manage) rather than move. It would be reasonable to assume that, with a concerted effort nationally to boost the supply of specialist housing catered towards the different needs of elderly residents, we would see elderly households become more active in housing market than they currently are.

Accommodation for older people and housing supply

10.88   The SNHP (and therefore the LHN which has been derived from them) already remove a certain proportion of older people who are projected to be living in communal establishments (in the case of older people, those living in residential care homes). The projected need for bedspaces in care homes is therefore outside the SNHP and so the identified need, expressed in terms of bedspaces, is in addition to the LHN. For the purposes of this HNA, this accommodation is referred to as 'C2' uses.

10.89   For planning purposes, some forms of housing which provide an element of care could also fall under C2 use, for example some of the numerous accommodation types falling under the term 'extra care housing'. However, as these may provide self-contained units for occupation by households, they are considered part of general housing needs, i.e., C3 for

the purposes of assessing housing need in this HNA. These units meet the needs associated with households, and therefore are included within the SNHP (and the LHN). Supply of these types of housing units can therefore be counted as housing supply against the LHN.

10.90   The PPG[85] states that all types of housing provided for older people, including homes (such as sheltered housing or adaptable homes) and communal accommodation (such as nursing homes) can be counted against the housing requirement:

"Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data".

10.91   However, the approach of counting non-conventional housing supply against the housing requirement has been clarified in the High Court in 'Exeter City Council v (1) Secretary of State for Communities and Local Government and (2) Waddeton Park Limited and (3) The R B Nelder Trust [2015] EWHC 1663' referred to as Exeter. This judgment dealt with the inclusion of student accommodation as a component of housing supply when it has not been utilised in the formation of an appropriate housing requirement, however the principles of this judgment are just as applicable to bedspaces in nursing homes. The need for such a component of supply to be reflected in the requirement figure is set out in paragraphs 41 to 42 of the judgment, with the relevant conclusion as follows:

"it would be irrational to include student accommodation [or elderly people C2 accommodation] in housing supply as meeting an adopted housing requirement, where such accommodation does not feature in that requirement".

10.92   In this context, because the need for bedspaces in care homes does not feature within the LHN for the Peak District, the supply of this accommodation would be additional to the local housing need calculated.

10.93   To reiterate therefore, although Extra Care housing and other types of accommodation which provide self-contained units (which have a kitchen, bathroom, and bedroom/s) are sometimes recorded as C2 use, as they are meeting needs associated with households, supply of this accommodation can be counted against the local housing need.

10.94   As has been widely recognised, categorizing different types of specialised housing is far from straightforward. Aside from creating ambiguity and confusion around moving for older people themselves and complexity for the planning process, this also acts as a barrier to the creation of rigorous statistics definitions do not necessarily accord with the assumptions within a planning context with the diagram below illustrating the blurred lines between many products.

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[85] PPG: 63-016a-20190626

Figure 10.11 Different residential options for older residents

Source: Best and Porteus (2012), as reproduced in Cambridge Centre for Housing and Planning Research (April 2021): Understanding Supply, demand and investment in the market for investment housing communities in England

10.95　　The Elderly Accommodation Council National Housing Database (2014) refines this 'long list' down to the following types of specialist accommodation for older people – albeit as expanded upon subsequently these definitions do not necessarily accord with the assumptions within the planning context:

Figure 10.12 Different types of elderly accommodation

Source: Elderly Accommodation Council National Housing Database (2014)

10.96   Many providers simplify this list still further into three categories of specialised housing distinguishing between housing 'without support', 'with support', and 'with care':

- **Housing without support:** age-restricted (and therefore not mainstream housing) but offers no other services.

- **Housing with support:** might have some communal facilities, and dedicated housing managers.

- **Housing with care:** might offer more extensive on-site facilities, including the option of personal care offered by an on-site provider.[86]

10.97   Within the planning system there is no fixed or agreed definition of the different types of housing for older people. The main distinction lies in the difference between Use Class C3 (Residential) and C2 (Residential Institutions).

10.98   However, there has been an inconsistent treatment of such facilities by appeal Inspectors:

1   In one appeal for retirement apartments for over 55s[87], the Inspector considered the use class to be C3 because they were wholly self-contained and noted that, whilst they were serviced, this is different from care.

2   In a separate case[88], the Inspector considered that assisted living units were C2 because, whilst they were self-contained, they were accessed via communal spaces and residents had access to communal facilities. Occupants had to be over 60 and receive a minimum of two hours care per week, albeit the definition of care was very broad.

3   In two cases relating to Extra Care provision, both Inspectors concluded these were C2 uses. In the first instance[89] this was because residents were provided with a care package and in the second case[90] because, whilst the units were self-contained, they did not represent independent living.

10.99   Key issues in determining the appropriate Use Class include the levels of care provided and the extent of shared facilities.

10.100   This issue was recently considered in the High Court case of *Rectory Homes v Secretary of State for Housing, Communities and Local Government*[91]. Although the central question of this case – which was dismissed on all grounds – was whether a proposal for 78 open market extra care dwellings and a communal residents centre fell within the scope of the development plan policy that required schemes for 3 or more dwellings to provide affordable housing, it includes a helpful exploration of the Use Class of care facilities and whether they can constitute dwellings.

10.101   It was common ground between Rectory Homes and South Oxfordshire Council that the whole scheme fell within use Class C2. The difference relates to the accommodation could be categorised as comprising "dwellings". Paragraph 26 of the judgement states:

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[86] Cambridge Centre for Housing and Planning Research (April 2021): *Understanding Supply, demand and investment in the market for investment housing communities in England*

[87] Sandhurst Lodge, Wokingham Road, Crowthorne, Berkshire (APP/R0335/W/15/3128812) 7 March 2016.

[88] Balcombes Hill, Goudhurst, Cranbrook, Kent (APP/M2270/W/16/3161379) 14 June 2017.

[89] Stable Field, Kirdford Road, Wisborough Green (APP/L3815/W/17/3180078) 16 March 2018.

[90] Land at West End Farm, Brackley Road, Buckingham (APP/J0405/W/17/3181140) 5 April 2018.

[91] (2020), EWHC2098 (Admin)

"The essence of the Claimant's case before the Inspector and before this court is that the use of the word "dwellings" in the affordable housing policy…Because it was agreed between the parties that the entirety of the proposed development fell within the C2 Use Class, the Claimant contended that it had to follow that no part of the development could fall within the C3 Use Class and so could not amount to a 'dwelling'."

10.102   The Council *"maintained that residential accommodation could be provided within a C2 development as dwellings, (so long as the use of each such dwelling did not fall within the C3 Use Class)"* [paragraph 33]. The Secretary of State also argued that dwelling should be given its normal meaning in this policy context. In this context, reference was made to the Gravesham and Moore cases[92]:

"It has become well-established that the terms "dwelling" or "dwelling house" in planning legislation refer to a unit of residential accommodation which provides the facilities needed for day-to-day private domestic existence" [paragraph 53].

10.103   The judgement notes at paragraph 57 that Class C4 *"use of a dwelling house by no more than 6 residents as a 'house in multiple occupation'"* demonstrates that C3 does not cover all circumstances where a property has the physical characteristics of a dwelling as defined in the Gravesham case. Furthermore, while certain institutions that fall within use class C2 are unlikely to include dwellings, the first sentence of use class C2 does not require the institution to be a traditional one – it could be an organisation managing a development. The specific exclusion of C3 uses from residential accommodation in the definition of use class C2 implies that properties with the physical characteristics of dwellings can fall within C2:

"Accordingly, a Class C2 development may include accommodation in the form of dwellings, for example flats and bungalows, each of which has facilities appropriate for private, or independent, domestic existence. But their use would only fall within the C2 Use Class if 'care' is provided for an occupant in each dwelling who is in need of such care" [paragraph 62].

10.104   This is on the bases that *"on a proper interpretation of the Use Classes Order, Class C2 may include residential accommodation in the form of dwellings as part of the primary use, subject to the provision of care and restrictions on occupation…"* [paragraph 90].

Extra Care and Sheltered Accommodation (C3)

10.105   Collectively, Extra Care and Sheltered Housing specifically targeted at older households are referred to as 'elderly housing' for the purposes of this study. The PPG clarifies what type of evidence plan-makers need to consider when identifying the housing needs of older people:

"The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people"[93].

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[92] Gravesham p. 146; Moore v Secretary of State for the Environment, Transport and the Regions (1998) 77 P and CR 114
[93] PPG: 63-004-20190626

10.106   DCC produced its updated "*Older People's Housing, Accommodation and Support*" Commissioning Strategy for 2019-35 in August 2020. The Strategy and Delivery Plan builds on DCC's *Strategic Vision for Older People's Housing and Accommodation*, which outlines the increasing demand for housing and accommodation that is tailored to meet the needs of older people in Derbyshire. The Strategy considers all types of housing and accommodation from age designated housing and housing with care through to residential and nursing care provision through to 2035.

10.107   The Strategy does not provide a specific breakdown for the National Park, but does provide information on the Boroughs of Derbyshire Dales and High Peak. It reports that High Peak had a total of 157 permanent admissions to nursing and residential care for people aged 65 and over between March 2019-2020 (out of 1,243 across the County as a whole, excluding Derby City). This equates to 795.4 permanent admissions to nursing and residential care for people aged 65 and over by local authority area per 100,000 population, which is the third highest of any district in Derbyshire County behind only Bolsover (842.9 per 10,000) and Chesterfield (806.4 per 10,000)[94].

10.108   As for Derbyshire Dales, this had a total of 131 permanent admissions to nursing and residential care for people aged 65 and over between March 2019-2020. This equates to 665.1 permanent admissions to nursing and residential care for people aged 65 and over by local authority area per 100,000 population, which is the third lowest of any district in Derbyshire County ahead of only South Derbyshire (569.8 per 10,000) and Amber Valley (600.6 per 10,000)[95].

10.109   DCC's Locality Analysis for High Peak reported the following:

- High Peak's rural characteristics means that innovative and small-scale initiatives to meet demand are required.

- **An additional 386 units of age-designated housing tailored to the needs of older people (increasing from 792 in 2016 to 1,178 in 2035). This falls to 208 units between 2020 and 2035.**

- **According to Table 10.4, there is a need for an additional 222 units of housing with care to 2035.**

- There are six HPBC sheltered housing schemes in the south of the Borough and there is low demand for some units as they include smaller bed sit units.

- Provision is currently concentrated in the Buxton area (for example, DCC, working alongside Housing and Care 21, has opened Thomas Fields Extra Care and Residential Care Home in Buxton), so exploring opportunities in the other main towns within High Peak as well as larger villages would be welcomed.

- The Residential care market is well provided for, and the modelling suggests that fewer beds will be required by 2035. However, an **additional 406 nursing care beds are required** and the development of affordable provision without top-ups would be encouraged in this part of Derbyshire.

- A range of mixed tenure extra care or care ready housing schemes is encouraged as viability is better in High Peak than in some other areas of Derbyshire.

- There is scope for additional extra care housing provision in the key market towns, such as New Mills, Glossop and Chapel-en-le-Frith.

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[94] DCC (August 2020): Older People's Housing, Accommodation and Support" Commissioning Strategy for 2019-35, page 14
[95] DCC (August 2020): Older People's Housing, Accommodation and Support" Commissioning Strategy for 2019-35, page 14

- Affordable Extra Care housing schemes for rent needs to be incorporated into mixed schemes to avoid deterring potential older downsizers from age designated social rented housing.

- There is also a market for private retirement housing in some locations in High Peak.

- There are two nursing homes that have dementia as a specialism and there are four nursing homes currently rated as 'good' by the Care Quality Commission. Opportunities to develop affordable nursing care provision would be encouraged, particularly hybrid approaches incorporating an extra care scheme.

- Nursing provision is focused on the main towns so innovative approaches in smaller Towns and villages would be welcomed.

10.110   As for Derbyshire Dales:

- There is a need for additional units of age designated housing suitable for an older population and provision in smaller communities needs to be considered. A total provision of 355 units of housing with care, including extra care, is required in the area by 2035. Whilst 100 additional beds are required by 2025, the overall demand for residential care remains broadly similar to 2035. A further 285 nursing are beds are required by 2035.

- In this part of the county ensuring appropriate affordable provision is important as is exploring innovative models of care which also enable a local workforce to live nearby.

- The authority will encourage development of bungalows and smaller units and make the best use of brownfield sites for older people's housing.

- There is a need to encourage the development of additional affordable extra care housing at appropriate scale in key towns, especially Matlock and Ashbourne.

- Nursing care provision is required in locations which support the sustainability of the overall market and potentially via a mixed hybrid care ready housing and nursing care scheme.

- There is a gap in provision of nursing care in Ashbourne due to a recent home closure. Residential care provision is focused around Matlock and Darley Dale so developments would be encouraged in other parts of the district.

- There are a low number of care homes, which 'require improvement'.

- There is a need for affordable provision that supports people with more complex needs and also provides respite beds.

- There is a need to focus on developing affordable provision of nursing and residential care across the locality.

Table 10.4: Additional Need for Age-Designated Housing Units in High Peak Borough and Derbyshire Dales District

		2016	2018	2020	2025	2030	2035	Additional need to 2035
High Peak	Additional need for age-designated housing units	792*	947	970	1,046	1,109	1,178	+386
	Additional need for additional housing with care units	n/a	n/a	98*	202	256	320	+222
	Additional need for residential care beds	n/a	n/a	526*	394	361	320	-206
	Additional need for nursing care beds	n/a	n/a	235*	532	582	641	+406
Derbyshire Dales	Additional need for age-designated housing units	1,281*	1,386	1,442	1,625	1,826	2,069	+788
	Additional need for additional housing with care units	n/a	n/a	164*	212	268	328	+164
	Additional need for residential care beds	n/a	n/a	427*	412	378	328	-99
	Additional need for nursing care beds	n/a	n/a	279	557	610	655	+376

Source: DCC (August 2020): Older People's Housing, Accommodation and Support: Commissioning Strategy for 2019-35
*Current Baseline provision

10.111   DCC also provides a weekly update to the current care home vacancies across High Peak and Derbyshire Dales, taken from the NHS Care Homes Capacity Tracker, which is updated by the care homes themselves. The data for w/c 25th August 2023 indicates that there are 3 Care Homes with Nursing (Registered for Nursing and Residential Care) in High Peak, of which two (Portland Nursing Home and Haddon Hall, both in Buxton) have vacancies. There are 14 Residential Care Homes in the Borough, of which 12 currently have vacancies. All of these appear to be outside the Peak District itself.

10.112   As for Derbyshire Dales, as of w/c 25th August 2023 there are 6 Care Homes with Nursing (Registered for Nursing and Residential Care), all of which have vacancies. Three of these (Bakewell Cottage and Burton Closes Hall in Bakewell, and Thornhill House in Great Longstone, are actually located in the Peak District itself. There are a further 10 Residential Care Homes in the Borough, of which 9 currently have vacancies. Two of these are within the National Park (the Old Vicarage in Bakewell and Moorland House in Hathersage).

Current Need

10.113   There are currently 4,981 people over the age of 75 living in the Peak District (based on Census 2021 data) of whom 3,436 (69.0%) live in the White Peak and Derwent Valley, 963 (19.3%) live in the Dark Peak and Moorland Fringes, and 582 (11.7%) live in the South West Peak. Based on the Elderly Accommodation Counsel [EAC] national supply rate of 139.2[96] specialised units per 1,000 residents over 75, this equates to a need for **693** specialist units across the whole of the National Park.

10.114   Table 10.5 illustrates this need by Spatial Zone, with 134 units needed in the Dark Peak and Moorland Fringes, 478 in the White Peak and Derwent Valley, and 81 in the South West Peak.

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[96] Source: Elderly Accommodation Council (2015)

Table 10.5 Existing need for specialist C3 accommodation for older people in the Peak District National Park

Sub-Area	Population over 75 (2021)	Type of Accommodation	Rate per 1,000 population over 75 (EAC national prevalence rate)	Need (EAC National Prevalence Rate)		Rate per 1,000 population over 75 (HLIN standard)	Need (HLIN standard rate)	
Dark Peak and Moorland Fringes	963	Sheltered	123	118	134	125	120	164
		Extra Care	16.2	16		45	43	
White Peak and Derwent Valley	3,436	Sheltered	123	423	478	125	429	584
		Extra Care	16.2	56		45	155	
South West Peak	582	Sheltered	123	72	81	125	73	99
		Extra Care	16.2	9		45	26	
Peak District National Park	**4,981**	**Sheltered**	**123**	**613**	693	**125**	**623**	847
		Extra Care	**16.2**	**81**		**45**	**224**	

Source: Lichfields analysis, based on Census 2021 Population data, EAC 2015. Totals may not sum due to rounding.

10.115   Alternatively, and based on the higher Housing Learning and Improvement Network [HLIN[97]] national standard of 170 units of specialised accommodation (other than registered care home places) per 1,000 people aged over 75[98], the National Park need would increase to **847**. Splitting this need across the Spatial-Zones results in a need of 164 units needed in the Dark Peak and Moorland Fringes, 584 in the White Peak and Derwent Valley, and 99 in the South West Peak.

Current Supply

10.116   There are currently a number of specialist facilities within the Peak District. Statistics published in 2023 by the EAC, which are publicly available and provide robust and reasonable baseline dataset, demonstrate that the supply of sheltered and retirement housing in the National Park is currently below the national average, with 135 units at an average of 27.1 units per 1,000 residents aged 75+, compared to the national average of 117. There are currently no facilities in the South West Peak Area, with 70 of the 135 units (or 52%) located in the White Peak area of the National Park.

10.117   The Peak District also performs poorly in terms of assisted living and extra care facilities, with just eight units at one facility currently present in the National Park, or 1.6 per 1,000 residents aged 75+, compared to a rate of 15.7 nationally. The only Extra Care facility is located in the White Peak sub-area.

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[97] As set out in the PPG (63-004-20190626): *"The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people"*

[98] Extra Care housing – what is it in 2015? – HLIN (November 2015)

Table 10.6 Supply of elderly accommodation (specialist housing) for Peak District National Park as of 2023

		Population aged 75+ (2021)	Units	Per 1,000
Retirement Homes / Close Care / Sheltered Housing	Dark Peak and Moorlands Fringes	963	70	72.7
	White Peak and Derwent Valley	3,436	65	18.9
	South West Peak	582	0	0.0
	Peak District Total	**4,981**	**135**	**27.1**
Age Exclusive / Sheltered Housing / Retirement Housing	England*	4,837,157	567,463	117.3
Assisted Living and Extra Care Housing	Dark Peak and Moorlands Fringes	963	0	0.0
	White Peak and Derwent Valley	3,436	8	2.3
	South West Peak	582	0	0.0
	Peak District Total	**4,981**	**8**	**1.6**
Housing with Care	England*	4,837,157	76,156	15.7

Source: Elderly Accommodation Counsel (EAC): National Database of Housing for Older People, April 2023
*EAC Stats December 2019 including units under construction

10.118 Based on the national EAC prevalence rate, Table 10.7 illustrates that this current supply suggests that there is a residual need for 478 additional Sheltered units in the Peak District. 358 of these units or 74.9% of need is required in the White Peak and Derwent Valley, followed by the South West Peak (72 units / 14.9%) and the Dark Peak and Moorlands Fringe (48 units / 10.1%). The unmet need is higher, at 488 units, with the HLIN standard.

10.119 There is currently an undersupply of Extra Care units across the Peak District, with a residual need for 73 units based on the EAC prevalence rate or 216 using the HLIN rate.

Table 10.7 Existing residual need for specialist C3 accommodation for older people

Location	Type of Accommodation	Current Supply	EAC national prevalence rate		HLIN National Standard	
			Existing Need	Residual Need	Existing Need	Residual Need
Dark Peak and Moorlands Fringes	Sheltered	70	118	48	120	50
	Extra Care	0	16	16	43	43
	Total	**70**	**134**	**64**	**164**	**94**
White Peak and Derwent Valley	Sheltered	65	423	358	429	364
	Extra Care	8	56	48	155	147
	Total	**73**	**478**	**405**	**584**	**511**
South West Peak	Sheltered	0	72	72	73	73
	Extra Care	0	9	9	26	26
	Total	**0**	**81**	**81**	**99**	**99**
Peak District Total	**Sheltered**	135	613	478	623	488
	Extra Care	8	81	73	224	216
	Total	**143**	**693**	**550**	**847**	**704**

Source: EAC / Lichfields Analysis. Totals may not sum due to rounding.

10.120 This analysis highlights that there is currently some unmet need for specialist older persons accommodation in the Peak District which is not being addressed. It is, however, important to note that there are numerous facilities in towns just beyond the National Park boundary which are likely to address much of this need, alongside the need of the individual districts they are located within. Across the nine local towns assessed in Table 10.8, there are 39

facilities with 1,338 bed spaces[99].

Table 10.8 Existing facilities near to the Peak District National Park

Closest Peak District Sub-Area	Location	Facilities	Sheltered Beds	Extra Care Beds	Total Beds
Dark Peak and Moorlands Fringes	Buxton	14	429	107	536
Dark Peak and Moorlands Fringes	Glossop/Hadfield	6	202	0	202
Dark Peak and Moorlands Fringes	Chapel-en-le-Frith	1	38	0	38
Dark Peak and Moorlands Fringes	Whalley Bridge	1	42	0	42
Dark Peak and Moorlands Fringes	Hayfield	1	27	0	27
South West Peak	Leek	6	129	88	217
White Peak and Derwent Valley	Matlock/Darley Dales	4	165	0	165
White Peak and Derwent Valley	Ashbourne	6	111	0	111
Total		**39**	**1,143**	**195**	**1,338**

Source: Lichfields search of EAC (accessed August 2023) https://housingcare.org/

10.121   It will be for the PDNPA to work alongside High Peak Borough, Staffordshire Moorlands District and Derbyshire Dales District Councils to understand whether these facilities have sufficient capacity to take on board some or all of the Peak District's unmet needs.

Emerging Need

10.122   Between 2021-2045, the number of residents aged 75 and over living in the Peak District is projected to increase by 3,806 or 76.8% (using the 2014-SNPP, rebased to the 2021 Census). Applying both the EAC and HLIN ratios to the net increase in residents suggests that between 2021 and 2042, the estimated need for elderly C3 housing units would be **between 530 and 647 units** in the National Park.

10.123   Table 10.9 apportions this need out by sub-area and illustrates that a need for elderly C3 housing units of between:

- 101 – 124 in the Dark Peak;
- 338 – 413 in the White Peak;
- 90 – 110 in the South West Peak; and,
- 530 – 647 in the Peak District overall.

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[99] Where the number of beds is not available, the number of rooms has been used. Many of these facilities offer two-bedroom rooms, meaning the number of bed spaces is higher than reported in this study.

Table 10.9 Specialist C3 Accommodation Required in the Peak District National Park (2021 – 2045)

	Type of Specialist Accommodation	EAC Rate (units/1,000 people aged 75+)	EAC Units required (2021-2045)	HLIN Rate (units/1,000 people aged 75+)	HLIN Units required (2021-2045)
Dark Peak and Northern Fringes: 659 additional residents over 75	Sheltered	123	90	125	91
	Extra Care	16.2	12	45	33
	Total	**139.2**	**101**	**170**	**124**
White Peak and Derwent Valley: 2,225 additional residents over 75	Sheltered	123	299	125	304
	Extra Care	16.2	39	45	109
	Total	**139.2**	**338**	**170**	**413**
South West Peak: 610 additional residents over 75	Sheltered	123	79	125	81
	Extra Care	16.2	10	45	29
	Total	**139.2**	**90**	**170**	**110**
Peak District: 3,494 additional residents over 75	Sheltered	123	468	125	476
	Extra Care	16.2	62	45	171
	Total	**139.2**	**530**	**170**	**647**

Source: Lichfields analysis / 2014-based SNPP, rebased to Census 2021 / 2023 EAC. Totals may not sum due to rounding.

10.124   In addition to this, research undertaken by consultants DLP in their *Older Persons Housing Needs Model* (April 2022) aims to fully consider past under-provision which has not kept pace with the ageing population since the early 1990s and is substantially below international comparators (such as the United States, Australia, and New Zealand).

10.125   The DLP model considers 10, 20 and 30-year trends in the rate of provision by typology and tenure and relates these back to the 75+ population to calculate prevalence rates. Three typologies were considered for each of the three time periods: average annual growth rate, which calculates the percentage growth between each year and then averages the changes over each period; an exponential growth projection; and the application of the average annual build rate. DLP's proposed future national prevalence rate for sheltered housing and extra care combined is 275 per 1,000 residents over the age of 75.

10.126   Table 10.10 applies DLP's proposed national prevalence rates going forward as a sensitivity test and illustrates a potential emerging need over the next 20 years as high as 2,778 C3 Sheltered / Extra Care units across the Peak District. Apportioning this to the three sub-areas indicates an emerging need of up to:

- 200 in the Dark Peak and Northern Fringes;

- 669 in the White Peak and Derwent Valley;

- 178 in the South West Peak; and,

- 1,047 in the National Park overall.

10.127   Most of this need would be Sheltered Accommodation rather than Extra Care.

Table 10.10 Specialist C3 accommodation required in the Peak District National Park 2021 – 2045 (DLP Sensitivity)

	Type of Specialist Accommodation	DLP Rate	EAC Units required (2021-2045)
Dark Peak and Northern Fringes: 729 additional residents over 75	Sheltered	202	147
	Extra Care	73	53
	Total	**275**	**200**
White Peak and Derwent Valley: 2,432 additional residents over 75	Sheltered	202	491
	Extra Care	73	178
	Total	**275**	**669**
South West Peak: 646 additional residents over 75	Sheltered	202	131
	Extra Care	73	47
	Total	**275**	**178**
Peak District: 3,806 additional residents over 75	Sheltered	202	769
	Extra Care	73	278
	Total	**275**	**1,047**

Source: Lichfields' analysis / 2014-based SNPP, rebased to Census 2021 / 2023 EAC. Totals may not sum due to rounding.

10.128   The figures in Table 10.9 and Table 10.10 does not consider the current levels of supply in Sheltered / Extra Care accommodation within the Peak District and nearby towns.

10.129   **When combined together, the current undersupply – plus the likely future need – could range from between 1,080 (550 + 530) and 1,351 (704 + 647) across the whole of the Peak District.** The level of undersupply by sub-area is between:

- -165 (64 + 101) and 218 (94 + 124) in the Dark Peak;

- 743 (405 + 338) and 924 (511 + 413) in the White Peak; and,

- 171 (81 + 90) and 209 (99 + 110) in the South West Peak.

10.130   The numbers would be commensurately higher if the proposed national prevalence rate used by DLP for determining future needs is applied. The figures do not incorporate any facilities in nearby towns outside the National Park's boundaries.

Care / Nursing Home Beds (C2)

10.131   As noted above, the population over 75 years of age living in the Peak District is expected to increase by 3,806 (to 8,764) between 2021 and 2045 (using the 2014-SNPP, rebased to the 2021 Census). Growth is expected to be particularly strong amongst the over 90s, an age group expected to grow by 1,174 residents, or 230.6%, over the next 24 years.

Figure 10.13 Projected change in population age 75+ in Peak District National Park – 2021-45
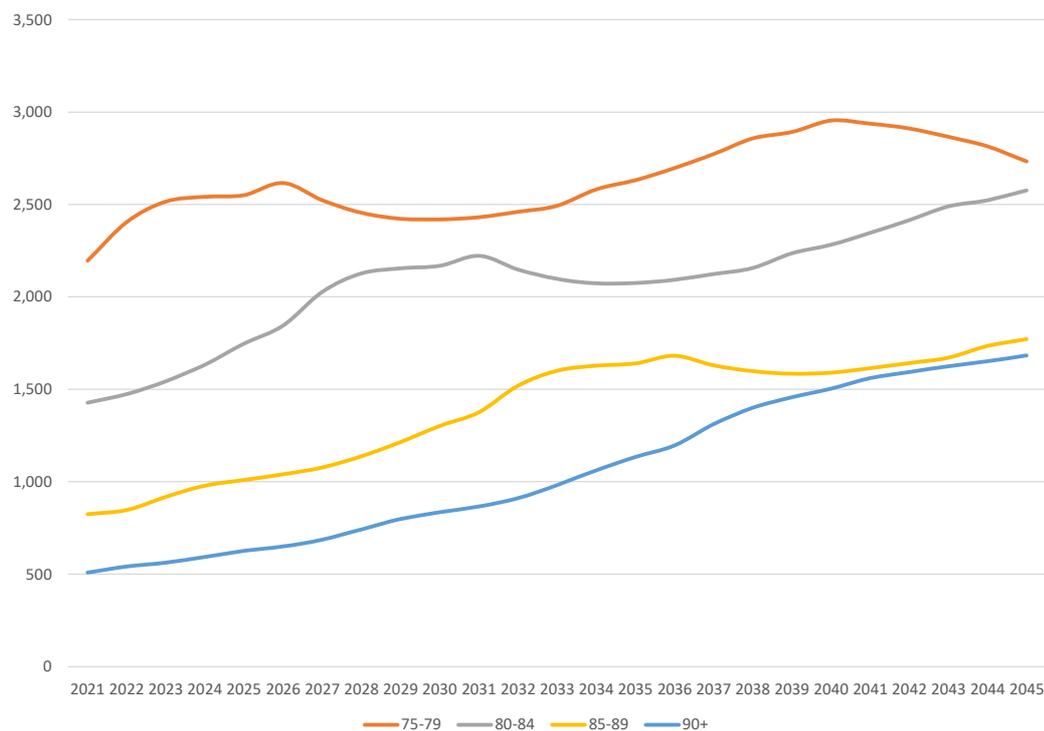
Source: Lichfields using PopGroup, incorporating the 2014-based SNPP re-based to the 2021 Census

10.132   Residential care homes are defined by EAC as a residential setting where a number of older people live, usually in single rooms, and have access to on-site care services. A home registered simply as a care home will provide personal care only – help with washing, dressing and giving medication. Some care homes meet a specific care need, for example dementia or terminal illness.

10.133   The 2021 Census identified that there were 159 people who were residents in care homes in the Peak District[100]. 82 (51.6%) of these people lived in care homes without nursing, whilst the remaining 77 (48.4%) lived in care homes with nursing.

10.134   Nursing homes are homes registered for nursing will provide personal care (help with washing, dressing and giving medication), and will also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention from a nurse.

10.135   The 2023 EAC data indicates that there are currently five residential care homes within the Peak District, all of which are located in the White Peak sub-area. These five facilities have 189 bed spaces between them, with 25 of these being in a care home without nursing and 164 of being in care homes with nursing.

10.136   The SNHP considers the findings of the (2011) Census, and for those residents aged 75+ assumes that a given proportion will be living in C2 communal establishments. This projected rate of residents living in communal establishments has been applied to the 2014-based SNHP (re-based to the 2021 Census) to assess the likely future need for care home bedspaces. The 2014-based SNHP estimated that between 2021 and 2045 there would be a

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[100] Census 2021, TS048

need for 367 additional communal bedspaces for residents aged 75+ between 2021 and 2045 in the Peak District. Based on the current split of residents living in care homes with and without nursing (48:52), this would suggest a need to 2045 for a net additional:

- **177** bedspaces in care homes with nursing; and,

- **189** bedspaces in care homes without nursing.

Medical and Care Establishments (C2) for under 75s

10.137   At the time of writing, the available Census 2021 data allows for a breakdown of communal establishment residents by type, but not by age. An age breakdown of communal establishment residents is available at MSOA level; however, including all MSOAs which cross into the National Park may give an inaccurate prevalence rate due to the classification including urban areas which technically lie outside the Peak District.

10.138   There are four MSOAs for which at least 50% of the population resides within the National Park. Collectively, these areas account for 64.7% of the population of the national park, and as such are deemed to be reasonable representations of the Peak District prevalence rate as a whole. The prevalence rate for age bands under 75 within these MSOAs have therefore been applied to the Peak District population.

10.139   Table 10.11 indicates that there are potentially 101 Peak District residents under the age of 75 living in communal establishments. 48 of these residents are between the ages of 50 and 74. The prevalence rate for the 35-49 age group is zero. Similarly, it is estimated that there are 13 residents aged 0-15 and 40 residents aged 16-34 that live in communal establishments of some type within the National Park. Assuming that no residents below the age of 34 live in residential care homes, applying the Peak District split of care home residents by type would indicate that there are around 25 people aged between 50 and 74 that require beds in care homes without nursing, and 23 people aged 50 to 74 that require beds in care homes with nursing.

Table 10.11 Peak District National Park residents in communal establishments aged under 75

	0-15	16-34	35-49	50-74
Total population	**4,891**	**5,223**	**5,391**	**15,410**
Communal establishment population	13	40	0	48
Prevalence rate	0.27%	0.76%	0.00%	0.31%
Care homes without nursing (50-74)	**0**	**0**	**0**	**25**
Prevalence rate	0.0%	0.0%	0.0%	51.6%
Care homes with nursing (50-74)	**0**	**0**	**0**	**23**
Prevalence rate	0%	0%	0%	48.4%

Source: Census 2021 / Lichfields analysis

10.140   The Census-adjusted 2014 SNPP indicates that the number of Peak District residents aged 50-74 will fall by 4,173 between 2022 and 2045, suggesting that the requirement for care home beds for under 75s will fall by around 13 residents over this period. There is therefore no need for additional provision over and above the 366 additional care places identified for the over 75s above.

Adaptable and Accessible Homes

10.141 In addition to the needs of residents living in communal establishment accommodation (C2), there is a need to ensure that suitable provision is made for those living in private housing who do not require care home facilities but may have specific needs, for example for adaptable and accessible homes.

10.142 The PPG[101] states that the provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives. Unsuitable or un-adapted housing can have a negative impact on disabled people and their carers. It can lead to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities:

"Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives. Without accessible and adaptable housing, disabled people risk facing discrimination and disadvantage in housing. An ageing population will see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime."

10.143 The PPG[102] states that there is a wide range of evidence that can be used to identify the housing needs of people with disabilities including the Census, DWP on the numbers of Personal Independence Payment [PIP] (replacing Disability Living Allowance) / Attendance Allowance benefit claimants; and Applications for Disabled Facilities Grant [DFG].

10.144 LPAs have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Where an identified need exists, plans are expected to make use of these optional technical housing standards in the Building Regulations to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

- M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement);

- M4(2) Category 2: Accessible and adaptable dwellings; and,

- M4(3) Category 3: Wheelchair user dwellings.

10.145 As set out in the Building Regulations[103], optional requirement M4(2) will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users [page 10].

10.146 Regarding wheelchair user dwellings, the Building Regulations state that that optional requirement M4(3) will be met where:

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[101] PPG ID: 63-002-20190626
[102] PPG ID: 63-005-20190626
[103] HM Government (2021): The Building Regulations 2010 Access to and use of buildings, Volume 1: Dwellings, 2015 edition incorporating 2016 amendments

"A new dwelling makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling or use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants" [page 23].

10.147   Based on their housing needs assessment and other available datasets, the PPG[104] states that it will be for LPAs to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which LPAs can consider and take into account, including:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings);

- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);

- the accessibility and adaptability of existing housing stock;

- how needs vary across different housing tenures; and,

- the overall impact on viability.

10.148   Part M4(2) will be of particular relevance to housing older people, and the requirement will be met where:

"...a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users." (Building Regulations 2010 Approved Document M).

10.149   The PPG[105] states that there is a wide range of evidence that can be used to identify the housing needs of people with disabilities including the Census, DWP on the numbers of Personal Independence Payment (replacing Disability Living Allowance) / Attendance Allowance benefit claimants; and Applications for Disabled Facilities Grant [DFG].

10.150   LPAs have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Where an identified need exists, plans are expected to make use of these optional technical housing standards in the Building Regulations to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

- M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement);

- M4(2) Category 2: Accessible and adaptable dwellings; and,

- M4(3) Category 3: Wheelchair user dwellings.

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[104] PPG ID: 56-007-20150327
[105] PPG ID: 63-005-20190626

10.151   As set out in the Building Regulations[106], optional requirement M4(2) will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users [page 10].

10.152   Regarding wheelchair user dwellings, the Building Regulations state that that optional requirement M4(3) will be met where "*a new dwelling makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling or use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants*" [page 23].

10.153   Table 10.12 shows that 17.1% of Peak District residents are classified as disabled under the Equality Act, which is a slightly lower proportion than the national rate of 17.1%. 6.4% of Peak District residents have their day-to-day activities limited a lot by their disability, compared to 7.3% across England, whilst 10.7% have their day-to-day activities limited a little, compared to 10.0% across England.

Table 10.12 Proportion of disabled residents in the Peak District

	PDNP	England
Total Residents	35,901	56,490,048
Disabled under the Equality Act	6,155	9,774,510
	17.1%	17.3%
Disabled: Day-to-day activities limited a lot	2,298	4,140,357
	6.4%	7.3%
Disabled: Day-to-day activities limited a little	3,857	5,634,153
	10.7%	10.0%

Source: Census 2021

10.154   Table 10.14 shows households in the Peak District with at least one disabled resident broken down by housing tenure. It indicates that the proportion of households with disabled residents is much greater in the social rented sector at 52.7% when compared with owner-occupiers (28.9%) and the private rented sector (28.2%). This pattern is also seen nationally. Overall, 31.4% of households in the Peak District have at least one disabled resident, which is similar to the national rate of 32.0%.

Table 10.13 Households with disabled residents by tenure

	PDNP			England
	All households	1 or more disabled resident		1 or more disabled resident
Owner-occupiers	12,114	3,501	28.9%	28.7%
Social rented	1,783	939	52.7%	51.3%
Private rented	2,350	662	28.2%	26.1%
Total	**16,246**	**5,102**	**31.4%**	**32.0%**

Source: Census 2021 (based on MSOAs)

10.155   Table 10.14 shows the number of households in the Peak District with at least one disabled resident, broken down by household composition. The highest proportion of homes with at

[106] HM Government (2021): The Building Regulations 2010 Access to and use of buildings, Volume 1: Dwellings, 2015 edition incorporating 2016 amendments

least one disabled resident is seen in all adult households at 42.1%, with the lowest proportion seen in single person under 65 years of age households at 23.8%.

Table 10.14 Households with disabled residents by composition

Household composition	Peak District			England
	All households	1 or more people disabled in household		1 or more people disabled in household
Single 65+	2,710	1,030	38.0%	39.7%
Single <65	2,143	509	23.8%	27.8%
Couple only	3,408	840	24.7%	25.4%
All adult household	4,399	1,850	42.1%	42.5%
Households with dependent children	3,524	852	24.2%	26.4%
Other households	54	18	33.5%	28.1%
Total	**16,238**	**5,100**	**31.4%**	**32.0%**

Source: Census 2021

10.156 As previously noted, the Peak District is expected to see strong growth in the elderly population to 2045, with a likely associated increase in the number of disabled residents who require adapted housing. Table 10.15 applies these incidence rates to the projected household growth in the Peak District between 2021 and 2045. It indicates an additional need for around 707 accessible homes to 2045, with 200 of these relating to couples only (and likely elderly) households.

Table 10.15 Projected households with at least one disbabed resident 2021 - 2045

	Net Change 2021-2045		Projected households with disabled residents	
Single 65+	134	5.8%	51	38.0%
Single <65	800	27.7%	190	23.8%
Couple only	812	13.4%	200	24.7%
All adult household	-204	-16.7%	-86	42.1%
Households with dependent children	537	14.9%	130	24.2%
Other households	172	20.0%	58	33.5%
Total	**2,251**	**13.3%**	**707**	**31.4%**

Source: Lichfields using PopGroup, incorporating the 2014-based SNPP re-based to the 2021 Census

10.157 Whilst this would, taken at face value, suggest that there is a significant need for adaptable and accessible homes, the PDNPA should note that:

- In the private sector there is likely to be some degree of overlap between households living with a disability and those living in sheltered or extra care housing. Such forms of assisted living are likely to contribute to meeting the needs of older households who have disabilities (whilst not needing to be in C2 accommodation).

- Similarly, in the social rented sector there is likely to be some overlap between the need for adaptable and accessible dwellings for older people and the need for M4(3) wheelchair user dwellings (see below).

- Whilst 31.4% of households in the Peak District have a disabled resident, 62.7% of disabled residents in the National Park have their day-today activities limited a little, whilst 37.3% are limited a lot. Those who are limited 'a little' are likely to have a lesser requirement for home adaptations.

- The Census shows that households with disabled residents are not equally spread across tenures, with a far greater percentages of older residents in social rented housing living with disabilities. In this context, the PDNPA should seek a greater proportion of M4(2) dwellings within affordable housing than in private housing.

- Although older couple only households make up most of the (net) household growth in the Peak District over the plan period, many of these will be households already living in housing (e.g. the family home) who are unlikely to move during old age. Therefore, new housing which is adaptable and accessible might not directly be meeting these needs, but will nevertheless be an important addition to the housing stock to meet the longer term needs associated with ageing.

10.158   On the basis of the above, with up to 31% of future household growth potentially needing accessible and adaptable homes, but with some of that need being met through Part M4(3) as below and reflecting that some retirement type products might reduce the relative need for general housing to meet accessible and adaptable standards, it is recommended that **c.25%** of new general housing is provided to Part M4(2) standards, subject to viability, and that this offer should be focussed towards social housing developments. It is important to note that there will be overlap between the need for adaptable and accessible homes and the identified need for elderly housing (i.e. Extra Care and Sheltered Housing).

M4(3) – Wheelchair user dwellings

10.159   The PPG[107] states that:

"Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

10.160   In this context, the need for wheelchair accessible homes has only been assessed in reference to the affordable sector.

10.161   Whilst estimating the specific needs for wheelchair user dwellings is difficult to do accurately, we can make a broad estimate based on the disabling conditions identified of those currently claiming disability living allowance in the Peak District.

10.162   Current information on those in the Peak District claiming PIP has been analysed. This provides residents with help regarding extra living costs if they have both:

- a long-term physical or mental health condition or disability; and,

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[107] PPG: ID: 56-009-20150327

- difficulty doing certain everyday tasks or getting around because of your condition.

- There are two parts to the PIP:

- a daily living part – if residents need help with everyday tasks; and,

- a mobility part – if residents need help with getting around.

10.163 PIP is replacing the Disability Living Allowance [DLA] for most adults[108] and provides a breakdown of the age of these claimants and the type of condition they have. PIP claims with entitlement statistics show a total for all entitled cases. It presents both the number of people in receipt of PIP and those with entitlement where the payment has been suspended (for example if they are in hospital at a point in time). These have been grouped by mobility as shown in Table 10.10.

10.164 This demonstrates that 90.5% of all PIP claimants are claiming either for enhanced or standard mobility issues.

Table 10.16 PIP claimants by mobility award– Peak District National Park July 2023

	Total	%
Mobility Award - Enhanced	747	64.8%
Mobility Award - Standard	297	25.8%
Mobility Award - Nil	109	9.5%
Total	**1,153**	**100.0%**

Source: stat-xplore.dwp.gov.uk/

10.165 On this basis, there is likely to be some overlap with the identified need for adaptable and accessible homes in the social rented sector and wheelchair user dwellings in the social rented sector.

10.166 Regarding all properties, national data is available from research by Habinteg Housing Association and London South Bank University (supported by the then Homes and Communities Agency [HCA] now Homes England) '*Mind the Step: An estimation of housing need among wheelchair users in England*' (2010), which can be drawn upon. The report provides information at a national and regional level, although more weight is given to the national data.

10.167 The report estimated that the number of wheelchair user households in England with unmet housing need was 78,300. Broken down to regional level, it estimated for the East Midlands, the proportion of all households that are wheelchair user households was 3.0% and 3.4% in the West Midlands.

10.168 The report concluded that across England as a whole, around 13% of all wheelchair user households had an unmet need for specially adopted properties. This figure falls 10% for the East Midlands, but rises to 15% in the West Midlands.

10.169 Applying the average of these figures to the SM2 demographic projections for the Peak District indicates a current unmet need for 68 wheelchair accessible homes (as of 2021), rising to 77 by 2045. This would equate to circa 3.2% of identified future housing need based on the SM2 scenario (100 dpa).

10.170 This is higher than the number of households on the current Housing Register that require Wheelchair-accessible accommodation. This totals 24 in Bands A-D (and 19 in Bands A-C),

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[108] Claimants still keep receiving DLA if they are under 16 or they were born on or before 8th April 1948

with 9 seeking accommodation in the White Peak sub-area, and the remaining 15 in the Dark Peak sub-area.

Self-build and Custom build

10.171   The Government is keen to encourage more people to build their own homes and wants to make this form of housing a mainstream development option. A self or custom-build project is defined as housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing and is intended to help diversify the housing market and increase consumer choice.

10.172   Paragraph 62 of the NPPF requires LPAs to plan for a mix of housing for people wishing to commission or build their own homes, whilst the PPG states that LPAs should consider how the needs of such groups can be addressed within the constraint of the overall need identified:

"*Assessment of local housing need as a whole should be conducted using the standard method in national planning guidance. Within this context, the size, type and tenure of housing needed for different groups should be assessed including people wishing to self-build or custom-build their own homes.*

LPAs should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the housing and economic development needs guidance), to understand and consider future need for this type of housing in their area. Secondary sources can include data from building plot search websites, enquiries for building plots recorded by local estate agents and surveys of local residents. Demand assessment tools can also be utilised.

Plan-makers will need to make reasonable assumptions using the data on their register to avoid double-counting households.[109]"

10.173   Each council is required to maintain a 'Self-Build and Custom Build Register' for its area, as set out in the section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), which can include local eligibility tests for the Register[110]. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing [NPPF footnote 28].

10.174   In respect of planning for such demand, the PPG therefore sets out that LPAs should use the demand associated with the Register, and other applicable secondary data sources, to understand and consider future need for this type of housing in their area[111]. It goes on to state that this assessment can be supplemented with the use of existing secondary data sources such as building plot search websites, 'Need-a-Plot' information available from the Self Build Portal and entries for building plots from local estate agents[112].

10.175   In the context of the Peak District, as of the end of March 2023, the Council had **32 individuals on the register**. Going forward, consideration needs to be given to regularly

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[109] PPG ID: 57-011-20210208
[110] PPG ID: 57-001-20170728
[111] PPG ID:57-011-20210208
[112] PPG ID: 67-003-20190722

updating the Self-Build Register to determine if people have found a plot elsewhere; whether they have built a property in already; or whether they no longer wish to be on the register. It is important that the Register contains an accurate and up to date picture of the demand for self-build plots as this evidence feeds into a number of PDNPA functions including assessing planning applications (and wider functions including housing strategies; regeneration strategies, land disposal plans etc). Notwithstanding this, given the number of entries in the self-build register PDNPA may wish to consider the provision of self-build plots as a part of its overall housing mix.

Service Families

10.176   HPBC re-signed the Armed Forces Covenant on 7th March 2019. This is a promise by the nation ensuring that those who serve or who have served in the armed forces, and their families, are treated fairly. Derbyshire Dales and Staffordshire Moorlands are also signatories. In particular, the Covenant sets out 2 key principles:

- Those who serve in the Armed Forces, whether regular or reserve, those who have served in the past, and their families, should not face any disadvantage compared to other citizens in the provision of public and commercial services.

- Special treatment is appropriate in some cases, especially for those who have given most such as the injured or the bereaved.

10.177   By signing the Covenant those authorities have signed up to a number of commitments. By way of an example HPBC has:

- appointed the Mayor of the Borough as its Armed Forces Champion.

- Is a member of the Derbyshire Armed Forces Covenant Partnership. This group meets regularly to discuss the Covenant and implementing an action plan.

- Promoted the Armed Forces Covenant Fund, which is a National grant scheme totalling £10 million each year.

- Promoted the aims of the Covenant and ensure that HPBC staff who deal with members of the public are aware of these commitments.

- Supported its employees who are members of the Reserve Forces and cadet organisations recognising the need to be flexible with regard to leave for training, supporting any mobilisations and deployment.

10.178   All three areas have been awarded the Armed Services Covenant Employer Recognition Scheme Bronze Award.

10.179   There are currently no military bases in the Peak District, whilst the Council Tax Base Statistics for 2022 identifies that there is no armed forces' accommodation in the three main Boroughs of Derbyshire Dales, High Peak or Staffordshire Moorlands. Furthermore, the Ministry of Defence's [MOD] Annual Personnel Location Statistics for 2023 indicates that there are currently no military or civilian personnel stationed anywhere in Derbyshire Dales, High Peak or Staffordshire Moorlands.

10.180   There is therefore no need to identify any specific requirements for Service Families in the Peak District.

11.0   Conclusions and Recommendations

11.1   This Population Projection Update and Housing Needs Assessment has been undertaken on behalf of the Peak District National Park Authority to identify future housing needs in the area for the period up to 2045, and to understand what different population outcomes may result when tested against different levels of house building. The work was last undertaken in 2018 and has been updated in accordance with the NPPF and PPG in order to inform options for future policy development. The document allows the Authority to test whether it is possible or desirable to challenge trends that may be regarded as potentially damaging to the Authority's ambition to maintain thriving and sustainable communities in the National Park, in the context of the constraints on development that derive from the National Park's purposes to conserve and enhance natural beauty, wildlife and cultural heritage.

11.2   The report has two main outputs:

1   Population projections up to 2045 that reflect different migration, population and dwelling-led scenarios; and,

2   A Housing Needs Assessment. This includes an approach to local housing need that is tailored to the purposes of the Peak District National Park and the Authority's duty under the 1995 Environment Act, backed up by evidence, and in accordance with the NPPF test of soundness.

11.3   The key conclusions of the analysis and recommendations are summarised below.

Housing Market Area

11.4   The Peak District National Park does not comprise of a single homogenous housing market area; rather the evidence suggests that a number of HMAs operate across the area, with strong migratory and commuting linkages between Manchester to the north and west, Buxton in the centre, Sheffield to the east, Stoke-on-Trent to the south and Chesterfield to the south-east. Indeed, 2011 Census data suggests that the National Park is covered to a greater or lesser extent by as many as eight TTWAs. As a consequence, analysis of the data indicates that the Peak District has a relatively low level of self-containment in terms of local housing market dynamics, as well as commuting and migration patterns.

11.5   The updated information reinforces the conclusion of the 2008 SHMA that whilst the Peak District cannot reasonably be considered a single HMA, the Peak District elements of High Peak, Derbyshire Dales and Staffordshire Moorlands districts are nevertheless united by common housing issues apparent throughout the area.

11.6   The analysis in the report has aligned with the Peak District Core Strategy segmentation of the National Park into three distinct areas comprising:

- The Dark Peak – the less populated upland moorland areas and their associated fringes;
- The White Peak and Derwent Valley – the most populated lower-lying limestone grasslands and limestone dales and the Derwent Valley; and,
- The South West Peak – the sparsely populated mixed moorland and grassland landscapes of the south west.

Area Portrait

11.7 The Peak District has seen a declining population over the past ten years, with its population falling from 37,905 in 2011 to 35,897 in 2021 – a decline of 2,008 or 5.3% over that period. Similarly, the number of households living in the National Park has also declined, although very slightly, by 301 households or -0.2%. Given that the number of residents living in the Peak District fell by a much greater proportion, this indicates that average household size is declining in the National Park, with more people living alone or in smaller households than ten years previously.

11.8 The only growth in Peak District's population has been in the older age groups, which increased by 1,809, or 20% over the past ten years, from 8,938 to 10,747. In contrast, the number of working age residents living in the National Park fell from 23,007 in 2011 to 20,259 in 2021, a fall of 2,748 or -12% (compared to a growth of 3.4% nationally). Similarly, the number of young people living in the Peak District declined by 1,069, or 17.9%, from 5,960 in 2011 to 4,891 in 2021. Any population growth has been driven solely by net migration (on those occasions when it has been positive). Natural change has been consistently negative over the past 15 years.

11.9 In terms of the housing stock, a disproportionate number of households in the Peak District own their homes outright (51.3%) compared to just 35.4% across the East Midlands, 34.4% across the West Midlands and 32.8% across England and Wales. This trend is reversed for all other major types of tenure across the National Park. Social rented properties comprise just 10.0% of properties across the Peak District, well below the national level of 17.1%.

11.10 Regarding housing delivery, 1,096 homes have been constructed between 2006/07 and 2020/21 in the National Park, of which 39% have been for open market sale, 24% for 'local needs', and 25% as holiday homes. The PDNPA does 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. The vast majority of recent delivery (92% over the past three years) has been located in the administrative area of Derbyshire Dales District. There are relatively few house transactions in the Peak District, with an average of 545 sales per year (the vast majority of which have been in the White Peak sub-area).

11.11 As of 2022, lower quartile house prices average £291,250 in the Dark Peak, £275,000 in the White Peak, and £293,500 in the South West Peak sub-areas. Overall, the 2022 lower quartile house prices average £277,500 over the Peak District. In terms of private rental properties, across the Peak District lower quartile rents were £760, with a median of £1,050 and upper quartile rents of £1,250. Most properties had two or three bedrooms, with just a small handful of one and four bedroom properties available.

11.12 As for vacant and second homes, levels are unsurprisingly high in the Peak District, with some 2,131 dwellings unoccupied as a primary residence as of 2021, equal to **11.6%** of the total number of dwellings in the National Park. For each sub-area, this ranges from 8.2% in the Dark Peak, to 12.4% in the White Peak and as high as 12.8% in the South West Peak sub-area.

11.13 Moreover, these high figures are unlikely to be fully representative of the number of holiday homes in the Peak District given that there is only a partial cross-over with the recent boom

in popularity of short-term lets such as AirBnB. According to AirDNA, there are currently 5,195 holiday rentals in the Peak District, of which 67% are listed on the rental platform AirBnB. This is slightly lower than the level to let in comparable national parks such as the Lake District.

11.14   Whilst there is no single dataset that enables us to definitively understand how many properties in the Peak District that could be used as permanent homes are instead in use as holiday homes/short term lets at present, there remains a clear issue with a reduction in the stock of permanent dwellings in the National Park that would be available to local residents to move into, due to the loss of a high proportion of homes to the holiday lettings and second homes market.

Local Housing Need

11.15   The population of the Peak District is an outcome of policy rather than a target. Nevertheless, it is important for the PDNPA to understand what different population outcomes may result when tested against different levels of house building.

11.16   As context, instead of housing targets the Core Strategy provides indicative figures which are an estimate of the level of housing that could be built without harm to the landscape or other special qualities. They are used to assess the effectiveness of policy and any houses built 'count' towards the housing targets of the Peak District's constituent authorities.

11.17   This study has undertaken different assessments of housing need: one that is in accordance with the standard method and other 'alternative approaches' appropriate to the Peak District's purposes. This includes the consideration of up-to-date population forecasts, net migration and household formation rates, as well as dwelling-led scenarios.

11.18   The methodological approaches were as follows:

1   The Standard Method [SM2] 'top down' assessment has housing need distributed on a 'fair share' basis using population data from the 2021 Census for the three main districts straddling the Peak District. This totals 100 dpa.

2   The second scenario modelling includes a 'bottom-up' assessment, which uses the PopGroup demographic tool to project the Peak District's population based on changes in births, deaths, and migration to project future growth. This was calculated based on three migration scenarios projecting forward balanced flows of migration, and 15- and 6-year historical trends.

3   A zero-population growth scenario was projected to determine the number of dwellings required to stabilise the current (rapidly ageing) population.

4   The final set of scenarios took a dwelling-led approach which was tailored for the purposes of the Peak District (i.e. to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public) and the limited availability of housing land. This also reflected the duty on National Park Authorities to seek to foster the economic and social well-being of local communities. This involved modelling the population change derived from 0, 48, 95 and 150 dpa over the Local Plan period, split across the three main sub-areas on the basis of their proportionate share of population size (as of 2021).

11.19   The findings are summarised in the Table below:

Table 11.1 Summary of the Modelling outputs for the Peak District National Park

2021-2045	Population change	Job growth	Dwellings	Dwellings per annum
A: Standard Methodology	5,479	1,881	2,406	**100**
B: 2014-based SNPP	-186	-1,177	40	**2**
C: 2018-based SNPP	239	-164	491	**20**
D: Balanced Flows	-5,469	-2,482	-3,474	**-145**
E: 15-year history	-3,254	-1,243	-2,490	**-104**
F: 6-year history	-3,477	-1,310	-2,606	**-109**
G: Zero Population Growth	0	-342	382	**16**
H: Zero Dwellings	-838	-731	0	**0**
I: 48 dpa	1,731	623	1,152	**48**
J: 95 dpa	4,247	1,950	2,280	**95**
K: 150 dpa	7,191	3,502	3,600	**150**
L: Past Housing Delivery	3,079	1,378	1,762	**73**

Source: Lichfields using PopGroup and ONS 2014/2018-based SNPP/SNHP

11.20   The 12 scenarios provide a wide range of future housing needs, from -145 dpa based on balancing net migration levels, to as high as +150 dpa based on a dwelling-led constraint. The 100 dpa figure that aligns with the SM2 approach represents an uplift of 27 dpa from past delivery rates going back to 2006/07, but would see a net increase of around 5,480 residents over 24 years, countering the loss of 2,008 residents over the past ten years and resulting in an increase in potential jobs of around 1,880.

11.21   It is for the PDNPA to consider the evidence contained in this HNA when identifying a local housing figure which would support the strategy underpinning the emerging plan, and having considered whether an adjustment to meet affordable housing needs is appropriate.

11.22   The PPG suggests an increase in the total housing figures included in a Local Plan may need to be considered by the Authority where it could help deliver the required number of affordable homes. It is for the PDNPA to consider the evidence contained in this HNA when identifying a housing requirement which would support the strategy underpinning the emerging plan and whether an uplift is appropriate.

Affordable Housing Needs

11.23   The net annual need based on current data over the period 2021 to 2044 amounts to **between 114 and 150 dpa for affordable/social rent** (depending on the income multiplier used). This reflects gross household formation and therefore does not account for household dissolutions, with the implication that needs are likely to be 'worst case' under this approach as it could include some double counting. It also assumes that the backlog need will be addressed in full in the first 5 years of the Plan. If this is addressed over the full 24-year period in the Plan, this would **fall to between 55 and 91 dpa**.

11.24   Strongest levels of affordable housing rental need are identified for the White Peak and, to a lesser extent, the Dark Peak sub areas. The South West Peak has much lower levels of need, reflecting its smaller population size.

11.25   Once the need for intermediate affordable housing for sale (including first homes) are included in the calculation, then the overall need increases to **171 dpa** based on 4x / 25%income multipliers, falling to **151 dpa** based on 4.5x / 30% income multipliers and **147 dpa** based on 33%.

Table 11.2 Peak District National Park Affordable Housing Need Calculation – To Rent and Purchase. Backlog addressed over 5 years

Stage and step in calculation	Peak District Total			Dark Peak			White Peak			South West Peak		
	25% income	30%	33%	25%	30%	33%	25%	30%	33%	25%	30%	33%
Net Annual Affordable Housing Need for **Rent**	**150**	**125**	**114**	50	45	43	81	65	58	19	15	13
Net Annual Affordable Housing Need for **Sale**	**21**	**26**	**33**	9	10	11	12	15	19	0	1	2
Overall Net Annual Affordable Housing Need	**171**	**151**	**147**	59	55	54	93	80	77	19	16	15

Source: PDNPA, Local Authority Live Tables, CORE Data and Lichfields analysis. Sums may not add due to rounding errors.

11.26   Again, the level of need identified above aims to remove the existing backlog in full within the first 5 years of the Plan. Whilst this would be the ideal approach, if the PDNPA were to decide to aim for an alternative approach that addressed the backlog gradually over the length of the Plan, this could reduce the overall level of need significantly to **between 88 and 112 dpa** depending on the income multiplier.

Table 11.3 Peak District National Park Affordable Housing Need Calculation – To Rent and Purchase. Backlog addressed over the full Plan period

Stage and step in calculation	Peak District Total			Dark Peak			White Peak			South West Peak		
	25% income	30%	33%	25%	30%	33%	25%	30%	33%	25%	30%	33%
Net Annual Affordable Housing Need for **Rent**	**91**	**67**	**55**	21	17	15	54	38	31	16	11	10
Net Annual Affordable Housing Need for **Sale**	**21**	**26**	**33**	9	10	11	12	15	19	0	1	2
Overall Net Annual Affordable Housing Need	**112**	**93**	**88**	30	27	26	66	53	50	16	12	12

Source: PDNPA, Local Authority Live Tables, CORE Data and Lichfields analysis. Sums may not add due to rounding errors.

11.27   The PPG is clear that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, considering the probable percentage of affordable housing to be delivered by eligible market housing led developments.

11.28   In line with the approach envisaged by the NPPF and PPG, the affordable housing needs are an important component of the overall need for housing and PDNPA should seek to use its planning policy to maximise delivery of affordable housing given the scale of need identified.

11.29   The current Core Strategy suggests that around 62% of homes delivered across the Peak District would be expected to be locally-needed affordable homes. If the suggested LHN of 100 dpa were to be taken forward as discussed in Section 7.0, then this would result in the

delivery of around 62 affordable homes per annum, which is below the lower end of affordable housing required (88-112 dpa).

11.30   Clearly 100dpa is unlikely to deliver the level of affordable housing that is needed in the Peak District. It is understood that the Authority is not minded to prevent the delivery of market housing as this is the PDNP's main delivery mechanism for conserving and enhancing valued vernacular and listed buildings, and delivering enhancement (e.g. brownfield sites). As a consequence, this may add weight to the PDNPA's current policy position of 100% affordable housing on greenfield exception sites, with the aim of maximising affordable/social rent on brownfield land, although this would be a policy choice for the Authority to make.

11.31   the PDNPA's current strategy is to deliver 100% affordable for local needs on exception sites and maximise affordable housing for local needs on enhancement sites, which the evidence suggests remains an appropriate one to follow going forward.

11.32   The PDNPA also intends to split out historic delivery of affordable housing on enhancement and exception sites to assess whether the current approach is appropriate at a later date.

11.33   Regarding the split of social/affordable rented properties and shared/discounted ownership, it is recommended that this should comprise of **65% of affordable homes to rent, and 35% affordable homes to purchase**. This seeks to balance the national guidance on first homes delivery (which remains the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations) and the high house prices in the National Park, which means that social rented properties, and to a lesser extent, affordable rented properties, are the only means by which many households in need can afford suitable accommodation.

Housing Size and Type

11.34   In line with wider trends, older couple household groups are projected to see the fastest growth in the Peak District, with single person households over the age of 65 expected to grow by 800 households or +27.7 to 2045. Furthermore, much of the projected change in the number of single 65+ and all adult households occurs before 2035, after which time both household types begin to stabilise. Growth in households with dependent children and other households picks up in the 2030s, whilst the number of single <65 households is expected to fall to c.2035 before returning to growth over the remainder of the plan period.

11.35   Based on overall household growth and existing occupancy patterns, our assessment indicates that housing need in the Peak District is predominantly made up of 2- and 3-bedroom dwellings. This reflects the fact that although older households are likely to make up the majority of future household growth, these often remain in their large family home, are the least active in the housing market and tend to occupy housing larger than they 'need'.

11.36   Housing waiting list information shows that most households in need of affordable housing required 1 or 2-bed dwellings; however, the waiting list and Census data both show that overcrowding remains a problem. Within the social rented sector, there is likely to be some scope for more efficient use of the existing stock.

11.37　In this context, it is recommended that for market housing, between 25% and 35% of housing should be for smaller 1 or 2 bed properties. For social housing, between 60%-85% of the social housing provision should be for smaller 1 and 2-bed properties, with the majority of the remainder comprising 3 and 4-bed properties.

Housing Needs of Specific Groups

11.38　In the Peak District there has been no Build to Rent **[BtR] schemes** completed to date, and none have progressed through to the planning stage at the time of writing. Nevertheless, the Government sees BtR having an important and long-term role in meeting the housing need of the nation, and the demand for BtR is likely to increase. Build to Rent [BtR] schemes could cater for needs in the private rented sector, particularly for those on low to middle incomes who may desire and alternative to traditional rental options (i.e. buy-to-let landlords).

11.39　As such, the PDNPA should recognise the contribution that BtR could make to local housing options for households unable to afford housing in the future and should consider the provision of 'BtR' elements in future housing mix, to ensure diversity in the types of housing. That said, it is likely that any BtR schemes in the Peak District will be very modest in scale, potentially focused in the larger settlements, and should be broadly weighted towards meeting the needs of smaller households suited to single person households (although the needs of smaller households with one or more children should not be overlooked). 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build-to-rent scheme.

11.40　Due to the limited presence of students in need of PBSA in the National Park, there is currently no need for additional **purpose-built student accommodation**.

11.41　The number of **families and other households with children** is expected to increase by around 15% in the Peak District by 2045, with growth expected in one- two- and three-child households In the owner-occupied sector, the rate of overcrowding amongst families is low (although the absolute number of overcrowded owned occupied properties with families is highest in absolute terms), and families tend to live in homes which are larger than they 'need' to have extra space. The estimated overall scale of demand for larger housing across the National Park in meeting the needs of families is significant, particularly for 3 bed dwellings which should make up between 40 and 50% of overall need for market properties in the National Park.

11.42　In the social rented sector, the rate of over-crowding among families is significant, and the PDNPA should consider how more effective use of existing stock and new development can help address this. Waiting list data suggests that the need is predominantly for small units; however, this is not exclusively the case and there remains a need for a modest amount of much larger properties in the social sector, including 4- and even 5-bed, to address existing problems of overcrowding in the market.

11.43　The number of **older people** living in the Peak District is projected to increase by 2,755 or 25.8% by 2045. The projected growth also rises moving towards older age brackets, with the population aged 90+ projected to increase by 1,174 or 230.6% by 2045. In the context of ageing both more widely and across the National Park specifically, meeting needs of older people will be a key element of meeting overall needs over the period to 2045.

11.44　Between 2021 and 2045, the estimated need for elderly C3 housing units is likely to be **between 1,080 and 1,351 units in total**. This analysis highlights that there is currently some significant unmet need for C3 Sheltered and Extra Care specialist accommodation in

the National Park which is not being addressed, with the majority of need focused in the White Peak sub-area. In addition, it is projected that a further **366** additional elderly residents will need to reside in communal establishments (in C2 care homes with and without nursing).

11.45   In addition to the needs of residents living in communal establishment accommodation (C2), there is a need to ensure that suitable provision is made for those living in private housing who do not require care home facilities but may have specific needs, for example for adaptable and accessible homes. **It is recommended that c.25% of new general housing is provided to Part M4(2) standards**. It is important to note that there will be overlap between the need for adaptable and accessible homes and the identified need for elderly housing (i.e., Extra Care and Sheltered Housing).

11.46   Given the ageing population over the Plan period, we also recommend that **around 5%** of new affordable homes should meet the M4(3) requirement for wheelchair users, albeit this is likely to overlap with some of the need for adaptable and accessible homes for older people.

11.47   Regarding **key workers**, discussions with local stakeholders highlighted how attracting key workers and those likely to provide care to an ageing population has become increasingly difficult in the National Park, with the number of those willing or able to travel from areas such as Manchester or Sheffield continuing to fall due to increasing costs. DCC Adult Care Services highlighted that High Peak is an area with a particular shortage of key workers, followed by Derbyshire Dales.

11.48   In this context, and as part of rural exception sites focused on existing main centres with facilities for schools, GPs and other services that serve a wider area should make provision for key worker accommodation. These sites should be proportionate in scale to the size of the settlement, its function in the hierarchy of settlements and the level of services it sustains.

11.49   Regarding **self/custom build** in the Peak District, as of the end of March 2023, the Council had **32 individuals on the Register**. Going forward, consideration needs to be given to regularly updating the Self-Build Register to determine if people have found a plot elsewhere; whether they have built a property in already; or whether they no longer wish to be on the register. It is important that the Register contains an accurate and up to date picture of the demand for self-build plots as this evidence feeds into a number of PDNPA functions including assessing planning applications (and wider functions including housing strategies; regeneration strategies, land disposal plans etc). Notwithstanding this, given the number of entries in the self-build register the PDNPA may wish to consider the provision of self-build plots as a part of its overall housing mix in the Local Plan.

11.50   Finally, there are currently no military bases in the Peak District, whilst the Council Tax Base Statistics for 2022 identifies that there is no armed forces' accommodation in the three main Boroughs of Derbyshire Dales, High Peak or Staffordshire Moorlands. There is therefore no need to identify any specific requirements for **Service Families** in the Peak District.

Appendix 1 PopGroup Modelling Assumptions

	2014-based SNPP Rebased to 2021 Census	2018-based SNPP Rebased to 2021 Census	Migration Trend Scenarios	Zero Population Growth	Dwelling led scenarios (0 dpa, 48 dpa, 95 dpa, 150 dpa)	Past Housing Delivery	SM2 Housing Target 100 dpa
Model period	2021-2045, in line with the emerging plan period.						
Base population	2021 Census figure of 35,891 split by gender and single year of age, projected forward						
Births	Calculated by PopGroup using Total Fertility Rate [TFR] from 2014-based SNPP	Calculated by PopGroup using TFR from 2018-based SNPP					
Deaths	Calculated by PopGroup using Standardised Mortality Ratio [SMR] from 2014-based SNPP	Calculated by PopGroup using SMR from 2018-based SNPP					
Domestic Migration	Number of in and out internal and cross border migrants (by age and gender) inputted from 2014-based SNPP	Number of in and out internal and cross border migrants (by age and gender) inputted from 2018-based SNPP	• Balanced flows: the number of residents migrating out of the Peak District on an annual basis, equals the number moving in, resulting in net zero migration.	Calculated by PopGroup to achieve population growth required to reflect the stated population / economic / housing constraints.			
International Migration	Based on number of in and out international migrants (by age and gender) inputted from 2014-based SNPP; PopGroup applied adjustment to reflect population constraint.	Based on number of in and out international migrants (by age and gender) inputted from 2018-based SNPP; PopGroup applied adjustment to reflect population constraint.	• Long term migration assumptions based on Peak District MYPE and births/deaths data from ONS between 2005/06 and 2019/20. • Short term migration assumptions based on Peak District MYPE and births/deaths data from ONS between 2014/15 and 2019/20.	Calculated by PopGroup to achieve population growth required to reflect the stated population / economic / housing constraints.			
Household formation rates	2014-based Household formation rates	2018-based Household Formation rates					2014-based Household formation rates.
Population not in households	Institutional population taken from 2014-based SNHP. Figures provided as absolute numbers for those up to and including the age of 74 and percentages for people over that age. This allows for changes in the elderly population in institutional care where	Institutional population taken from 2018-based SNHP. Figures provided as absolute numbers for those up to and including the age of 74 and percentages for people over that age. This allows for changes in the elderly population in institutional care where there is a change in the population over the age of 75.					Institutional population taken from 2014-based SNHP

	2014-based SNPP Rebased to 2021 Census	2018-based SNPP Rebased to 2021 Census	Migration Trend Scenarios	Zero Population Growth	Dwelling led scenarios (0 dpa, 48 dpa, 95 dpa, 150 dpa)	Past Housing Delivery	SM2 Housing Target 100 dpa
	there is a change in the population over the age of 75.						
Second home / vacancy rate	Adjustment for second and vacant homes based on an assessment of 2021 Census data for unoccupied homes as a percentage of all dwellings, by output area. The rates identified in the Census – 8.2% for the Dark Peak, 12.4% for the White Peak, and 12.8% for the South West Peak - have been held constant throughout the modelling period.						
Economic activity rate	Age and gender specific economic activity rates based on projections that were published by the Office for Budget Responsibility in July 2018 and adjusted to reflect the local baseline rates of economic activity.						
Labour Force (LF) ratio	The labour force ratio is worked out using the formula: (A) Number of employed workers living in area less unemployed ÷ (B) Number of workers who work in the area (number of jobs). It therefore implicitly captures both commuting patterns and 'double-jobbing' (where one person may occupy more than one job). Applying the economic activity rates to the base population in 2021 gives an estimate of the total labour force as at 2021. This is then compared with the total number of jobs (as given by Experian in its 2023 projection) to create the labour force ratio which is held constant across the period. For the Dark Peak sub area, the labour force ratio equates to 0.98; for the White Peak, 0.97, and for the South West Peak, 1.53.						
Unemployment	The unemployment rate from 2021 is taken from the 2021 Census, equating to 3.1% in the Dark Peak; 3.0% for the White Peak; and 2.2% for the SW Peak. This is held constant.						
Constraints	Population constrained to reflect 2014-based SNPP, rebased to 2021 Census.	Population constrained to reflect 2018-based SNPP rebased to 2021 Census	No constraints applied after 2021 Census.	Population growth held constant at 35,891 (2021 level).	Dwellings constrained to 0 dpa, 48 dpa, 95 dpa and 150 dpa respectively.	Dwellings constrained to reflect Past housing delivery in the Peak District (73 dpa).	Dwellings constrained to reflect LP SM2 target for each individual authority, split on a proportionate basis

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