

How the PDNPA responds to the NPPF requirement that LPAs are required to identify housing need and make provision to meet that need (NPPF para. 47)

National planning guidance

1. The Peak District National Park Authority (PDNPA) recognises the importance of the NPPF in guiding Local Planning Authorities (LPAs) towards sustainable development. The PDNPA also recognises the national crisis in levels of housebuilding and the need to facilitate economic growth. The PDNPA however also considers that the NPPF has to be read as whole. It considers that the requirements of the NPPF could only apply equally across all LPAs if there was no difference in terms of what the government expects LPAs to achieve across very different areas. This is clearly not the case, because if it were, previous governments and acts of parliament would not have granted the planning powers to National Park Authorities to further national park purposes of conservation and enhancement and of enjoyment of those areas by the public¹.
2. Whilst the National Park Authorities also have a duty to foster the social and economic well-being of its resident communities, it is a duty that is to be exercised in pursuing the purposes, as opposed to a duty to be exercised as an end in itself at the expense of conserving and enhancing the special qualities of these areas². Furthermore, National Park Authorities are not housing authorities: a fact that underpins the NPAs understanding of its role with regard to housing delivery.
3. It is clear therefore that the purposes of land use planning in a national park differ from the purposes that apply for most other LPAs. The NPPF supports this position. It makes it clear in paragraph 14 and footnote 9 that objectively assessed needs (OAN), which is a form of words only used in connection with housing and employment land, should be met unless specific policies in the Framework indicate development should be restricted. Paragraph 115 makes it clear that great weight should be given to conserving landscape and scenic beauty in National Parks and that the conservation of cultural heritage is an important consideration and should be given great weight. The footnote 25 to this paragraph takes us to the English National Parks and the Broads UK Government Vision and Circular 2010, which was not removed when the NPPF replaced the PPS guidance. This offers further guidance when it comes to the matter of the Governments expectations for housing provision in National Parks stating that *the government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them*. It goes on to state that *the expectation is that new housing will be focussed on meeting affordable housing requirements supporting local employment opportunities and key services*.
4. The NPA considers that these expectations can only be delivered if development is restricted to levels below that which would otherwise be acceptable were the area not a protected landscape. Clearly when read as whole, it is illogical to consider that paragraph 47 should be read in isolation of paragraph 14, footnote 9 and paragraph 115

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

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

and footnote 25 since these last two paragraphs are included specifically to cover the expectations for delivery in National Parks and create the flexibility within the National Framework to enable NPAs to achieve their statutory purposes.

Understanding and meeting housing need

5. The NPA nevertheless recognises that it needs to understand OAN in the National Park as the basis for formulating a policy position to address that need. The PDNPA methodology for assessing housing need and delivery is evidenced, justified and clear within the Core Strategy, the evidence base and the examination report.^{3 4}
6. Since the Core Strategy was adopted in October 2011, the NPA has monitored housing delivery across the spatial areas set down in that plan. This shows, at the half way point of the 20 year plan period, that the indicative figures are realistic and deliverable, and that they contribute in a sustainable way to the communities and businesses in the 'Park'. In the lead up to the Part 2 Document the Authority has engaged with all constituent councils on duty to co-operate matters, but particularly those for whom housing delivery to meet general demands is the most pressing and difficult challenge. (Derbyshire Dales, High Peak and Staffordshire Moorlands) The NPA understands the jigsaw of housing market areas that make up the National Park, and has taken steps to assist those constituent housing authorities in delivering OAN in a sustainable way and over the plan period up to 2026 and beyond.
7. This is important. The NPA understands that identifying sufficient sites to meet demand is difficult enough for these LPAs outside of the National Park area. The protected landscape planning context for housing delivery in the National Park part of their areas and the NPAs adopted policies means there is no site allocation in the National Park; and all new housing is delivered as an exception on exception sites, or via conversion and redevelopment of existing sites and building.
8. Any housing that is delivered inside the National Park is counted towards the identified housing need and targets in the constituent councils' plans, though not all choose to include an allowance in explaining how they will meet OAN. This approach means that the identified housing need is known across the area, but is addressed in a sustainable way in the National Park parts of the constituent council areas. In effect therefore the NPA is responding to target driven planning delivery of housing in line with OAN, but without creating, through a target of its own, pressure to deliver levels of housing that would damage the valued character of the built environments and landscape of the National Park.

³ Peak Sub Region Strategic Housing Market Assessment December 2008: Conclusions and Policy recommendations

http://www.peakdistrict.gov.uk/data/assets/pdf_file/0019/90172/shlaasection10.pdf

⁴ Population, household and labour force projections for the Peak District National Park Authority and East Midlands Regional Assembly November 17th 2006 Alan Marshall, Ludi Simpson Cathie Marsh Centre for Census and Survey Research, University of Manchester

9. The process of offering figures to constituent housing authorities is informed by trend of delivery; SHMA and SHELAA work by constituent councils that includes the National Park area⁵; and known potential opportunities for housing delivery that have been identified through carefully managed capacity work in settlement for which the National Park planning policies provide a presumption in favour of affordable housing on exception sites.
10. The result is that High Peak Borough Council, Derbyshire Dales District Council and Staffordshire Moorlands District Council have all constructed plans to address all of their OAN, and have included an assessment of need, and an allowance for that which can reasonably be expected to be delivered in the National Park⁶.
11. The following three tables illustrate that the National Park OAN has been calculated and that houses are being delivered to address that need. The figure of 95 specified in Figure 209 of the Derbyshire Dales evidence base is a 'policy off' figure, with advice to Derbyshire Dales planners to discuss and agree conclusions with the PDNPA.
12. The NPPF and the English National Park and the Broads Visions and Circular clarify the government's expectations for housing delivery in National Parks, making it clear that targets for housing delivery or delivery to meet general housing needs (OAN) are not appropriate objectives in the National Park. As table 5 on the following page shows, Derbyshire Dales' planners have agreed an allowance of 358 with the NPA, and this allowance has been factored into their housing trajectory.

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

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

- 17.66 **We identify an objectively-assessed need for 227 homes per annum within the Plan Area, and 95 homes per annum within those parts of the District which fall within the National Park.**
- 17.67 We would advise the Council to discuss and agree conclusions with the PDNPA, and to consider the likely supply (and by association any unmet need arising) in the National Park. The capacity to meet any unmet need will need to be tested through the plan-making process.

⁵ Derbyshire Dales District Council Strategic Housing and Employment Land Availability Assessment August 2016
http://www.derbyshiredales.gov.uk/images/documents/L/Local%20Plan%20evidence%20base%20docs%20July%202016/SHELAA_Report_August_16.pdf

Strategic Housing Market Assessment and Housing Needs Study Final Report High Peak Borough Council April 2014: Nathaniel Lichfield and Partners

<http://www.highpeak.gov.uk/sites/default/files/documents/pages/High%20Peak%20SHMA.pdf>

⁶ Assessment of Housing and Economic Development Needs Derbyshire Dales District Council Final Report September 2015 Prepared by GL Hearn

Housing Requirement 2016 to 2021		
A.	Total Objectively Assessed Need 2016 to 2021: 322 dwellings per annum x 5 years	1610
Shortfall in housing provision between 1st April 2013 and 31st March 2016		
B.	Dwellings required between 1st April 2013 and 31st March 2016 = 322 dwellings per annum x 3 years	966
C.	New dwellings completed between 1st April 2013 and 31st March 2016 in Local Plan Area	360
D.	New dwellings completed between 1st April 2013 and 31st March 2016 in Derbyshire Dales area of Peak District	42
E.	Shortfall between requirement (B) and total Completions (C + D) of 966 dwellings minus 402	564
F.	Combined housing requirement for period from 2016 – 2021 (A+E)	2174
G.	20% buffer applied to combined housing requirement	435
H.	Total housing requirement 2016 to 2021 (F+G)	2609
I.	Annual requirement over the period 1st April 2016 to 31 March 2021 (2,609 divided by 5 years)	522
Housing Supply 2016 to 2021		
J.	Commitments as at 31 March 2016 (Net)	1320
K.	Peak District Contribution	105
L.	Contribution from small windfall sites (5 years x 10 per annum)	50
M.	Contribution from large windfall sites (5 years x 5 per annum)	25
N.	Local Plans Allocations Potential (0 to 5 Years)	1265
O.	Major Permissions, as detailed below, granted awaiting Section 106	300
	i. Ashbourne Airfield (based on 30 dwellings a year starting on site 2018)	90
	ii. Land adjacent Bakewell Rd, Matlock (15/00814/OUT) granted 12/04/16	57
	iii. Land at Marston Montgomery granted 12/07/16	22
	iv. Land east of Bakers Lane, Doveridge (15/00389/OUT) granted 22/09/15	70
	v. Land at Coneygreave House, Wirksworth (15/00664/FUL) granted 15/12/15	31
	vi. Land at Haarlem Mill (15/00395/FUL) granted 03/11/15	30
P	Total Housing Supply 2016 to 2021 (J+K+L+M+N+O)	3065
Q.	Five Year Supply 2016 to 2021 expressed as years (P divided by I)	5.8 years

Table 4 - Derbyshire Dales 5 Year Supply Position 1st April 2016

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

Table 5 - Derbyshire Dales Housing Supply 2016-2033

13. The following table shows that In the first 4 years of the Peak District National Park Local Development Framework 203 new dwelling units were completed in Derbyshire Dales (50 per annum) of which 121 (30 per annum) were affordable. This shows that the

figure of 358, shown above for the period of 2016 – 2033 (21 per annum) is realistic. The NPA cautions that housing delivery over previous plan periods showed peaks and troughs as the economy strengthened or weakened. So it would be wrong to suggest that the figure of 50 completions per annum in the Derbyshire Dales is a realistic average figure.

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

14. For High Peak Borough Council, their examination report concludes the following with regard to understanding need across the Borough, and making provision to meet that need.

Housing market area

*32. The plan area relates to that part of the Borough that is outside the Peak District National Park. It comprises two areas separated by a section of the National Park. The smaller northern area is centred on Glossop and the larger part to the south around New Mills, Whaley Bridge, Chapel-en-le-Frith and Buxton. Only about 7% of High Peak's residents live in the National Park even though it comprises the major part of the Borough area. **The Council's assessment of housing needs is based on the Borough as a whole.** In that the adopted National Park Core Strategy does not include a housing target and that policies within that area are restrictive in the light of its overriding purposes, **this is a reasonable and justified approach for the Council to take.***

The Plan as submitted does not make sufficient provision within the Plan area to meet the Borough's full, objectively assessed housing needs (OAN) as identified in the April 2014 Strategic Housing Market Assessment and Housing Needs Study: Final Report (SHMA) produced by Nathaniel Lichfield and Partners (NLP).

10. In this context, the Council approached neighbouring authorities to ascertain whether they could accommodate some of the unmet needs in their areas. This process has not been assisted by the fact that the plans of neighbouring Councils are at different stages, with some already having adopted Core Strategies. Nevertheless, there were a number of positive outcomes.

*11. **The Peak District National Park Authority entered into a signed MoU whereby, based on past delivery rates, there would be an estimated contribution of 110 dwellings within that part of the National Park that is in the Borough, albeit that this would not be a target.***⁷

15. The figures for completions in the National Park shown in the previous table show that 20 have been delivered in the High Peak between 2006 and 2010 (5 per annum) which projected over a plan period of 20 years would add 100 to High Peak Borough's housing stock. The estimate based on trend of past delivery and permissions in the system is for between 126 and 131, which is not unrealistic given delivery to date, fluctuations in the economy and the fact that for half of the period 2006 – 2010 the UK economy was considered to be in recession. High Peak's plan expresses the National Park dwellings as a contribution and sets it in the context of their target.

⁷ Report to High Peak Borough Council by Mike Moore BA(Hons) MRTPI CMILT MCIHT an Inspector appointed by the Secretary of State for Communities and Local Government Date: 24th March 2016

Table 2 Net Housing Requirement⁸

Housing Target (2011 - 2031) 7,000 dwellings

Completions (2011 - 2014) - 445 dwellings

Commitments (as at December 2014) - 2,976 dwellings (vi)

Peak District National Park contribution (2011 - 2031) - 110 dwellings

Shortfall in housing provision since 2006 + 80 dwellings

Net housing requirement 3,549 dwellings

16. For Staffordshire Moorlands District Council (SMDC) the Staffordshire Moorlands SNHP Update January 2016 Revision produced by NLP in 25 January 2016 outlines the housing need for the District following an Inspector's requirement that evidence be updated following the adoption of the Core Strategy in 2015. Staffordshire Moorlands Plan evidence provided a range within which to deliver OAN and advocated that the upper end of the range would be deliverable in the event that the economy is able to sustain higher levels of housebuilding. It also suggested that the evidence of need for affordable housing is such that it might require significant uplift in the housing target overall in order to deliver the affordable housing needed. However it also recognises that supply side factors such as environmental constraints should also influence the eventual target set. This inevitably includes the National Park Part of the district. In light of this, Staffordshire Moorlands planners have worked with NPA planners to agree an indicative figure of 100 new dwelling units to be delivered over their revised plan period of 2012 – 2031. This reflects past trend of delivery over the last 25 years, moderated by the slowdown in delivery in recent years from 10 to 5 per annum.
17. The Core Strategy expectation is that between 60 and 160 houses are added to the Staffordshire Moorlands and other constituent councils housing stock in the South West Peak spatial area between the National Parks plan base date of 2006 and 2026.
18. Derbyshire Dales District, High Peak Borough and Staffordshire Moorlands District Council's population within the National Park comprise the majority of Park communities, so through the respective work with these LPAs the housing need of about 90% of the Park population is addressed. In all cases the figures expressed in constituent council plans for the National Park part of their area are not expressed as targets. The NPA point out that whilst they do not consider it justified to be target driven, neither do they consider it justified to impose an upper limit on delivery.
19. The other constituent council housing authorities: Cheshire East, Staffordshire Moorlands, Sheffield, Barnsley, Kirklees, North East Derbyshire, have much smaller populations and communities within the National Park, collectively accounting for the other 10%. These councils have expressed no expectation or aspiration that an element of their housing needs should be met within the National Park. Whilst the NPA has held duty to co-operate discussions and meeting with all these councils, no request has been made for the NPA to offer a figure towards their objectively assessed need. Nevertheless, the NPA makes the same offer to these councils, and delivery figures

⁸ High Peak Local Plan adopted April 2016

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

show that there are modest additions to housing stock in every constituent authority area⁹.

20. The commitment to communities and constituent council planners in these areas is no less than that given to communities in the Derbyshire Dales High Peak and Staffordshire Moorlands in terms of the Authority's support for neighbourhood planning, for assessment of affordable housing need and for work to understand capacity for housing development. For example, the Authority has supported designation of neighbourhood plan areas in the Parishes of Leekfrith (Staffordshire Moorlands); Saddleworth (Oldham); Holme (Kirklees), and Dore (Sheffield). All are cross boundary parishes. This is in addition to neighbourhood planning work undertaken or ongoing in Bakewell and Hartington (both in Derbyshire Dales) and the adoption of neighbourhood plans in Chapel en le Frith (High Peak) and Bradwell (Derbyshire Dales). The Authority has also supported housing site search work in Meerbrook (in Leekfrith Parish) and Waterhouses Parish both of which straddle the National Park boundary, and the work for which was done with Staffordshire Moorlands District Council Planners as part of neighbourhood plan work and Staffordshire Moorlands Local Plan work, where sites were allocated in the Waterhouses area outside of the National Park.
21. The housing need of the National Park is therefore understood and is addressed both by the constituent councils as housing authorities, and by the National Park Authority as the LPA for a protected area. High Peak has an up to date and adopted plan agreeing its approach with regards to assessing and addressing OAN. Derbyshire Dales has adopted exactly the same approach as High Peak and has submitted a publication version of its Local Plan for examination. Staffordshire Moorlands has agreed an indicative figure for delivery for their plan period of 2012 – 2031.

How has the Core Strategy performed?

22. The evidence of delivery from the first 10 years of the NPA core strategy by spatial area shows the following.

Net Completions by Occupancy Type: Core Strategy Period 2006-2016

Type of Occupancy	White Peak & Derwent Valley	South West Peak	Dark Peak & Eastern Moors	Grand Total
Agricultural	20	5	2	27
Agricultural or Holiday		2		2
Ancillary	22	16	1	39
Ancillary or Holiday	3	2	2	7
Holiday	105	64	29	198
Local Needs	166	15	4	185
Open Market	189	17	34	240
Student	2			2
Grand Total	507	121	72	700

⁹ PDNPA 2015/16 Annual Monitoring Report

23. By constituent authority, in the 10 year period 2006 - 2016 there has been 498 completions in the Derbyshire Dales; 93 completions in the Staffordshire Moorlands; 65 completions in the High Peak; 31 completions in Cheshire East; 6 completions in Kirklees; 4 completions in Barnsley; 2 completions in North East Derbyshire and 1 completions in Sheffield.
24. Of these completions, 75% have been by conversion or change of use, and 25% have been by new build. The ratio of market housing (including worker dwelling and ancillary dwellings but excluding dwelling with sole holiday occupancy use), to affordable housing is 2.71:1 across the whole National Park. In the White Peak and Derwent Valley, the vast majority of which is Derbyshire Dales, the ratio is 2.4:1. In the Dark Peak and Moorland fringes the ratio is 10.5:1; whilst in the South West Peak the ratio is 3.8:1. Across the National Park the ratio of holiday lets to affordable housing added to stock since 2006 is 1:07:1 with around 50% of the holiday lets in the White Peak and Derwent Valley and around 90% of the affordable housing also being in the White Peak and Derwent Valley.
25. In terms of the indicative figures for the spatial areas identified in the Core Strategy the completions for the White Peak and Derwent Valley in the first 10 years of the Development Plan is 507, which is 50% of the figure at the top end of the range for the whole period (1015) as shown in the Core Strategy and within 168 of the figure at the lower end of the range for the whole Plan period. (675)
26. The completions for the Dark Peak and Moorland Fringes is 72 which is already 65% of the figure at the top end of the range for the whole plan period (110) and already exceeds the figure at the lower end of the range (70)
27. The completions for the South West Peak is 121, which is already 75% of the figure at the upper end of the range for the whole plan period (160) and already comfortably exceeds the figure at the lower end of the range (60)
28. The figures overall include 212 holiday home completions, (where the sole use permitted is holiday use) of which 105 are in the White Peak and Derwent Valley; 29 are in the Dark Peak and Moorland Fringes; and 64 are in the South West Peak. Whilst these are in Use Class C, constituent authorities often choose to discount these because they do not offer permanent residential accommodation and therefore do not address OAN. If these figures are removed from the completions total for the spatial areas we find that the figure for the White Peak and Derwent Valley drops to 402, which is still 39% of the upper end figure for the plan period and 60% of the lower end figure. For the Dark Peak and Moorland fringes the figure drops to 43, which is 39% of the upper figure, but 61% of the lower figure. For the South West Peak the figure would drop to 57, which is 36% of the upper figure and 95% of the lower figure.
29. There is a further 311 dwelling units that are either not started or under construction, of which 111 would have sole holiday use. So 200 (311 -111) in addition to the 502 would give a figure of 703 in total. Even having discounted the holiday lets, this represents, at halfway through the 20 year plan period 89% of the figure at the lower end of the range for the whole National Park (805) and 56% of the figure at the top of the range (1285)

30. In terms of how the figures stack up against the average annual indicative figures for the main housing authorities, completions in the White Peak and Derwent Valley, in the Derbyshire Dales part, are running at an average of 50 dpa¹⁰ against an indicative figure for the Derbyshire Dales Plan of 21dpa. Removing holiday lets, the figure reduces to 40 dpa which is still comfortably above that allowed for in the Derbyshire Dales Local Plan.
31. In the Dark Peak and Moorland fringes, completions are running at 6.5 pa which is above the indicative figure of 5 pa agreed for the High Peak Local Plan however 2.9 pa are holiday lets which reduces this figure to 3.6 pa, which is below the indicative figure. In the South West Peak delivery is running at 9.3 dpa, which is comfortably above the 5 dpa anticipated, and the figure accepted by Staffordshire Moorlands District Council for their Local Plan period 2012 to 2031. However 6.4 dpa are holiday lets, which brings that figure down to 2.9 dpa, a figure which is below the indicative figure.
32. These figures show that the NPA is comfortably on target to deliver its indicative figures for housing delivery as a whole; that the spread of housing is in line with the figures indicated for each spatial area; and that the figures for holiday lets, whilst high, is not preventing the NPA from delivering houses that help address the OAN of constituent housing authorities.
33. There is a need for more permanently occupied houses in the Dark Peak and Moorland Fringes and the South West Peak, although fringe communities on the edge of the National Park, particularly for the Dark Peak and Moorland Fringes tend to accommodate most of the needs outside the National Park. In Staffordshire Moorlands however there are a number of communities whose needs are not catered for by larger towns and villages around the edges of the National Park, and this area's popularity with visitors means that development demand caters less for the resident population than it does the transient visitor population.
34. The Authority is already responding to this reality, having started by suggesting in the Core Strategy that different solutions should be explored where the DS1 settlement strategy leaves some communities under provided for, and continuing by providing policies that encourage greater use of the ancillary type of accommodation and greater flexibility, where residential amenity affords it, to use holiday accommodation interchangeably with permanent tenancies.

Keeping the Development Plan up to date and recognising and responding to changes to the external environment for housing delivery

35. Government advice offered through PAS in 2015¹¹, was that the Core Strategy Part 1 document was not up for examination (i.e. its policies and principles, and the evidence base behind them are not in question when Part 2 is examined) The evidence base for Part 2 document is therefore proportionate to the role of that document in adding detail to the principles laid down in part 1, and this paper is part of pulling together evidence to complete the picture for this 'post NPPF Part 2 Development Plan Document'

¹⁰ dpa – dwellings per annum

¹¹ PAS report 2015

36. In the event that the Part 2 document is adopted, the NPA would follow that up with scoping possible areas for review of the Part 1 Core Strategy. At the point of reviewing the Core Strategy the NPA would re-consider how best to establish OAN for the National Park for the next plan period. This may or may not include commissioning new evidence through SHMAA and SHELAA. The Authority is therefore very aware of the need to have an up to date plan. The NPA also has an up to date LDS¹² that factors in a review of the Core Strategy to ensure it remains fit for purpose for the remainder of the plan period to 2026.
37. Indications from figures for housing completions, and permissions not yet implemented for the first half of the plan period (base date 2006 – 2016) show that the indicative figures are on track to be delivered. This gives confidence to the figures included in High Peak, Derbyshire Dales and Staffordshire Moorlands Local Plans in terms of the levels of delivery they can expect in their parts of the National Park¹³
38. The NPA has been challenged by planning agents and developers on what they claim is a lack of understanding of housing needs in the context of the NPPF. The fact that the Core Strategy was adopted just prior to adoption of the NPPF gives such groups a technical reason to object to the Core Strategy (an assumption that any post NPPF Core Strategy cannot be considered to fit for purpose) The Authority predicted this and took the corporate step of proofing its Core Strategy against the NPPF in 2013¹⁴. The Authority determined that, in terms of the policies and their objectives, they were compatible with the NPPF requirement when the NPPF is read as a whole.
39. The Part 2 plan acknowledges that there is a need for around 100 affordable houses per year across the National Park but that such levels cannot be met in the National Park. In light of the NPPF and NPVC this is a sustainable position since constituent authorities are factoring this into their 'policy on' targets, and the picture of plan making across the area is directing development and growth away from a protected landscape. This is good spatial planning that recognises the need for economic growth in areas around the National Park, alongside sustainable development that protects the National Park itself as a high quality environment. A high quality environment in itself represents an economic benefit to the area as the Authority demonstrated in its Core Strategy evidence base¹⁵.
40. Furthermore, the problem of affordability extends across the council areas beyond the National Park boundary and all councils are clear that they are unable to accommodate an uplift in overall housing numbers in order to fund (cross subsidise) the level of affordable housing needed. The NPA would contend that if below OAN figures are being

¹² Adopted October 2016

¹³ AMR 2015/16

¹⁴ <http://resources.peakdistrict.gov.uk/ctte/authority/reports/2013/130201Item8.pdf>

¹⁵ Contribution of the Peak District National Park to the Economy of the East Midlands SQW Consulting: Nov: 2008

http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0020/311735/contributiontotheeconomy2008.pdf

accepted as 'policy on' housing targets for adopted plans in council areas that do not benefit from national park designation, it would be perverse to plan for increases up to or above OAN for housing delivery in the National Park to compensate for under delivery outside of the National Park. The Authority does not therefore deny the problem of housing affordability across the National Park and beyond, but contends that in a protected landscape, it is unsustainable in land use terms to meet all housing need.

41. Government funding programmes administered through the HCA no longer enable previously active housing associations to build houses that housing needs evidence show as being needed (rented as opposed to shared ownership) and do not support small programmes of housebuilding that were possible under the HCA programmes that operated up to 2010. The local specialist housing association (PDRHA) is therefore reduced to bidding for underspend from much larger schemes under continuous market engagement element of the programme. Even this is not enabling development where sites are increasingly difficult to bring forward meaning transferability of grant between schemes is neither guaranteed to be possible or quick.
42. Where Housing Associations hold stock in the area they are often keen to sell it off to raise funds to invest in areas of lower land costs and lower build costs (outside protected areas) Whilst sale is restricted to other social housing providers, they are often not able or willing to take on further stock in the face of reduced receipts overall, which is due in no small part to government imposed benefit caps and caps on rent increases that Housing Associations are permitted to charge to their tenants.
43. The private sector, whilst permitted to build social housing, rarely has any interest in doing so unless a significant level of market housing is also permitted. Aside from using up scarce sites for a form of housing that worsens overall affordability, this route to social housing offers no assurance to local communities that market housing will be retained by the local community.
44. In terms of retaining houses for the local community, the Authority could introduce a local connection restriction and primary residence restriction on order to ensure the houses are lived in full time and by local people, but where government have introduced subsidised models of affordable houses such as Starter Homes, they have baulked at restrictions that prevent the owner from selling free of restriction after a specified period of time. The ongoing ability of market housing or even starter homes to address or meet local need for affordable housing is therefore extremely doubtful.
45. At the theoretical future point in time at which acceptable sites have been developed and affordability of housing overall has worsened on account of permitting housing that doesn't improve affordability, the Authority would have no sustainable land use options to permit more development.
46. Any move towards different models of delivery in terms of quantity, location and mix would also need to be reconciled with the Authority and communities' agreed view on what a sustainable community needs. For example if it is accepted as positive that 'new blood' into a community is positive, it could be seen to be counter-productive to restrict occupancy of any new market houses solely to people with a long held local connection.

Feedback from communities suggests that such restrictions would not necessarily be supported though they are frustrated that the price of local housing makes it too expensive for many local people to set up an independent household in the National Park.

47. In terms of capacity to build houses, site search work with communities, and with the knowledge and support of parish councils in some of the largest villages in the Park including Hathersage Tideswell and Bakewell, and some of the smaller villages including Litton, Taddington and Youlgrave has shown, by consensus, that there are few sites that could be developed without harm to the built and natural environment¹⁶. It is therefore more than simply speculation to say that the housing needs of the local community cannot be met in full, especially for the larger more sustainable settlements. This was submitted as evidence to the Core Strategy as justification for Development Strategy policy DS1¹⁷. This makes the option to cross subsidise affordable housing with market housing unsustainable because the NPA and communities do not have the option, within National Park purposes, to agree release of large areas of landscape to meet future housing needs.

48. Appeal decisions since the NPPF have generally supported the Authority's application of its own adopted policy and the NPPF in the context of protected landscape designation. Accordingly, Inspectors have generally disagreed with the agents and developers' understanding of what is reasonable to expect of an LPA and planning decisions in a National Park, in particular with regards to issue of housing numbers and types.

49. The Authority therefore considers that it understands, through its constituent authorities, the need for housing, and that, in the context of protected area status, it offers those authorities a positive planning framework that results in continuous small additions to housing stock of a type most needed by those communities, whilst it continues to conserve and enhance the National Park and its special qualities including the built environment.

Conclusion

50. The Authority understands its responsibility with regard to understanding and meeting the housing needs of its communities. The main constituent housing authorities in terms of population within the National Park have agreed indicative figures for delivery from the National Park area to help them to meet their targets for housing market areas that collectively cover the Park and include Park communities. The other constituent

¹⁶ Ashford in the Water, Bakewell, Bamford, Bradwell, Castleton, Chelmorton, Edale, Grindleford, Hathersage, Hayfield, Litton, Monyash, Rowsley, Taddington, Tideswell, Youlgrave,

¹⁷ The Core Strategy Appendix 3: Amended Settlement Matrix final column indicated, for each DS1 settlement, the potential to develop without harm to the valued characteristics of settlement and its landscape setting.

Settlement summaries and recommendation for development strategy: This paper provides a snapshot of the settlements named in the development strategy (DS1) It pulls together the evidence and opinion and uses this to outline development expectations for each settlement

http://www.peakdistrict.gov.uk/data/assets/pdf_file/0006/90159/settlement-summaries-and-recommendation.pdf

authorities have not requested that any of their housing need be met in the National Park part of their housing market areas.

51. The affordable housing needs of National Park communities are being met in so far as is possible given capacity for development and the availability of funding for social housing. Delivery figures are considerably lower than the need in terms of affordable housing, however this situation is common across the constituent councils outside the National Park, none of whom are meeting affordable housing need through cross subsidy methods (owing to viability of schemes downgrading the percentage of schemes that are affordable); none of whom have set targets to meet all of their OAN; but all of whom are setting plan targets for areas with no protected landscape status.
52. The NPA is committed through its NPMP review to consider, in the context of its objectives for vibrant thriving communities alongside landscape protection, whether any more can reasonably be done through planning to improve the affordability of housing across the National Park or move closer to meeting the need for affordable housing. At that point, the Authority would be reviewing its Core Strategy housing policies and re-considering options last explored in the lead up to the Core Strategy. As part of this work, the Authority and its partners in reviewing the National Park Management Plan (NPMP)¹⁸ would consider what other solutions might ease the combined tasks of planning authorities delivering housing to meet OAN in rural areas and protected landscapes. The objectives of planning policy will be driven by the NPMP as well as the Environment Act 1995 Purposes and Duty, NPPF, NPPG, the English National Parks and the Broads UK Government Vision and Circular 2010 and any relevant Written Ministerial Statement.

Ian Fullilove October 2016

¹⁸ Defra Review of English National Park Authorities consider this to be the most important plan for a National Park and NPAs need to have such a plan and review it at least every 5 years