

Leekfrith Neighbourhood Plan: Comments relating to changes to the National Planning Policy Framework



1.0 Columns 1 and 2 on the table below , extracted from the Leekfrith Neighbourhood Plan (LNP) Basic Conditions Statement, demonstrate how Leekfrith Neighbourhood Plan conforms to the National Planning Policy Framework (NPPF) (2018).

2.0 Column 3, prepared by the Peak District National Park Authority and agreed by Staffordshire Moorlands District Council and Leekfrith Parish Council, highlights the changes made to the NPPF (2019) and contains an assessment of the significance of these changes in regard to LNP meeting Basic Conditions.

3.0 This assessment finds that the conclusion of LNP Basic Conditions Statement - *“It is considered that the Basic Conditions as set out in Schedule 4B of the Town and Country Planning Act 1990 have been met by Leekfrith Neighbourhood Plan”* - is sound.

NPPF 2018	Leekfrith Neighbourhood Plan (LNP)	Any change to corresponding part of NPPF 2019? Any effect on LNP meeting Basic Conditions?
Chapter 2 Sustainable Development		
<p>Para 13 Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.</p>	<p>LNP supports the delivery of strategic policies contained in the Peak District National Park Authority’s (PDNPA) Local Plan which comprises the Core Strategy (2011), the Local Plan (2001) and the Development Management Policies (2018), and Staffordshire Moorlands Local Plan.</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>
Chapter 3 Plan Making		
<p>Para 18 Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.</p>	<p>LNP contains only non-strategic policies.</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>
<p>Para 29 Neighbourhood plans should not promote less</p>	<p>LNP promotes development, in line with strategic policies, by:</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>

<p>development than set out in the strategic policies for the area, or undermine those strategic policies¹⁶.</p>	<ul style="list-style-type: none"> • promoting the redevelopment of an underused industrial site (Policy 1) • supporting the renting of ancillary holiday accommodation on the general rental housing market (Policy 2) 	
<p>Para 31 The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.</p>	<p>LNP recognises that the majority of the area’s planning issues are adequately addressed by the strategic policies. The 4 policies are derived from and supported by evidence derived from consultation with local people, and this is outlined in the consultation statement.</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>
<p>Para 32 Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.</p> <p>Footnote 17 The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.</p>	<p>LNP has been subject to a Habitats Regulation Assessment screening process which concluded that the risk of significant harm to designated European sites was not likely.</p> <p>LNP has been subject to a Strategic Environmental Assessment Screening process which concluded it is unlikely that LNP will have any adverse environmental effects.</p> <p>See section 6 for full details.</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>
<p>Chapter 5 Delivering Homes</p>	<p>The Plan provides for increased access to a variety of accommodation in the parish, through mixed housing at the Upper Hulme site and increased flexibility in the use of ancillary holiday accommodation. This should lead to an increased parish population and thus greater sustainability.</p>	<p>Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies (36), or against their local housing need where the strategic policies are more than five years old (37).</p> <p>The 2018 footnote 37 said:</p>

		<p>“Unless these strategic policies have been reviewed and found not to require updating”</p> <p>The 2019 footnote says:</p> <p>“Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.”</p> <p><i>The change is not material to Leekfrith Neighbourhood Plan as there is no requirement, either from the Peak District National Park Authority, or Staffordshire Moorlands District Council, for the neighbourhood plan to identify housing sites.</i></p> <p><i>The 2019 NPPF also has changes in the glossary relating to the definition of ‘deliverable’. This is not material to Leekfrith Neighbourhood Plan.</i></p> <p><i>The 2019 NPPF has changes to the definition of ‘local housing need’.</i></p> <p>2018: <i>“the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.”</i></p> <p>2019: <i>“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 60 of this Framework).”</i></p> <p><i>Policy 1 of Leekfrith Neighbourhood Plan regarding the re-use of Upper Hulme Mill refers to ‘acceptable uses (including) affordable local needs housing’. However it is not the purpose of the neighbourhood plan to define need, this is the responsibility</i></p>
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		<i>of the local housing authority so the changes to the NPPF are not material.</i>
<p>Para 58 it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay</p>	<p>Policy 1 supports the delivery of homes on an underused industrial site.</p>	<p>now para 59 No change. No effect on LNP meeting Basic Conditions.</p>
<p>Para 61 Within this (strategic) context, 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).</p>	<p>Policy 1 requires a mix of different houses depending on the needs of the site and the value or otherwise of the existing structures.</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>
<p>Para 65 Strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances</p>	<p>PDNPA strategic policies do not set out a housing target therefore there is no housing requirement for LNP.</p> <p>Staffordshire Moorlands Local Plan has an aspiration, based on historical data, that 4-8 “windfall” unplanned dwellings will transpire during the lifetime of this plan within the SMDC part of the parish. There is no requirement for this Neighbourhood Plan to identify specific plots.</p> <p>Policy 1 supports the development of more houses than are required by strategic policies.</p>	<p>No change to relevant part. No effect on LNP meeting Basic Conditions.</p>

that affects the requirement.		
Para 69 Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.	See above.	No change. No effect on LNP meeting Basic Conditions.
Chapter 6 Economy	Developments at the Upper Hulme site will provide opportunities for business entrepreneurship and a broad mix of housing stock, which will sustain the parish population. Flexibility in the use of ancillary holiday accommodation also has the potential to add to the local economy and sustain the parish population.	
Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship	Policy 1 supports the development of tourist accommodation, and A and B class business use.	No change. No effect on LNP meeting Basic Conditions.
Chapter 7 Vitality of Town Centres	This section is not applicable to LNP as there are no town centres within the neighbourhood area	
Chapter 8 Healthy & Safe Communities	The LNP area is almost entirely agricultural in nature, the land being dominated by small farms. The population is sparse, and the re-use of	

	land to provide housing and business units, plus flexibility on the use of holiday homes would bring newcomers to the area and thus enhance 'community health'. (LNP Section 7.1 Policy 1, LNP Section 7.2 Policy 2)	
Para 91 (a) Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;	Policy 1 supports the mixed use redevelopment of an underused industrial site.	No change. No effect on LNP meeting Basic Conditions.
Para 91 (b) Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and	Policy 1 and Policy 4 (proposing a temporary car park at a tourist 'honeypot') support the provision of high quality public spaces, including highways.	No change. No effect on LNP meeting Basic Conditions.
Para 92 (a) Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;	Policy 2 (supporting the renting of ancillary holiday accommodation on the general rental housing market provides) achieves this by making best use of existing facilities.	No change. No effect on LNP meeting Basic Conditions.
Para 92 (d) Ensure that established shops,	This is adequately addressed by strategic planning policies.	No change. No effect on LNP meeting Basic Conditions.

facilities and services are able to develop and modernise, and are retained for the benefit of the community		
Chapter 9 Sustainable Transport		
Para 102 (d) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.	Policies 3 (supporting suitable parking arrangements) and 4 (allocating temporary parking at a ‘honeypot’ site) address the impacts of transport.	No change. No effect on LNP meeting Basic Conditions.
Para 102 (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.	Policy 1 addresses this issue by requiring ‘parking requirements must be sufficient to ensure that parking on the main road through Upper Hulme is completely discouraged’.	No change. No effect on LNP meeting Basic Conditions.
Chapter 11 Effective use of land		
Para 121 (b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.	Policy 1 supports the mixed use redevelopment of an underused industrial site	No change. No effect on LNP meeting Basic Conditions.
Chapter 12 Well designed places		
Para 125 Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in	Policy 1 and the accompanying map set out the requirements of any development in terms of its relationship to existing buildings that are of architectural merit, and the use of traditional styles of building.	No change. No effect on LNP meeting Basic Conditions.

identifying the special qualities of each area and explaining how this should be reflected in development.		
Para 127 (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development	Overall, long term quality is achieved through a balance between protection and limited growth (limited by the national park context and strategic policy); and where development is permitted, ensuring that it is of the highest quality, respecting both character and setting.	No change. No effect on LNP meeting Basic Conditions.
Para 127 (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping	Policy 1 and the accompanying map set out the requirements of any development in terms of its relationship to existing buildings that are of architectural merit, and the use of traditional styles of building.	No change. No effect on LNP meeting Basic Conditions.
Para 127 (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)	As above	No change. No effect on LNP meeting Basic Conditions.
Para 127 (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit	As above	No change. No effect on LNP meeting Basic Conditions.
Para 127 (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks	Policy 1 offers the opportunity to maximise use of a site in a mixed use redevelopment.	No change. No effect on LNP meeting Basic Conditions.
Chapter 14 Climate change & flooding	These issues are adequately addressed in strategic policy.	

<p>Chapter 15 Conserving & enhancing the natural environment</p>	<p>The Plan seeks to alleviate any inconvenience to local people caused by road congestion and parking on narrow lanes, by:</p> <ul style="list-style-type: none"> • Requiring, with regard to the redevelopment of Upper Hulme, that parking space is provided “sufficient to ensure that parking on the main road through Upper Hulme is completely discouraged.” (Policy1) • Requiring a transport statement for all proposed development (Policy3) • Proposing land for temporary parking at the Roaches (tourist/visitor site) under the 28 day rule. (Policy 4) <p>The Plan gives high priority to the use and regeneration of an existing business site at Upper Hulme.</p> <p>The Plan recognises that the Upper Hulme site is close to special environmental sites and the SEA and HRA documents form an important part of our submission.</p> <p>Any development of the Upper Hulme site must conform to PDNPA policies on climate change and carbon usage.</p> <p>Over the long term the Upper Hulme development will preserve and enhance the amenity of the listed buildings and the conservation area.</p> <p>Flexible use of existing holiday accommodation will preserve the vernacular structures and reduce the need for new build.</p> <p>The LNP area is rich in its natural environment. We are conscious of the proximity of the Upper Hulme site to protected European sites, and require that any development there must publish Preliminary Ecological Appraisal and a Habitat Regulations Assessment prior to any work commencing.</p> <p>We also discourage any parking, particularly heavy seasonal visitor parking, which damages the narrow lanes within the area, and want to encourage parking in designated areas.</p> <p>(LNP Section 71. Policy 1) (LNP Section 7.3 Policy 3)</p>	<p><i>Para 177 of the 2018 NPPF said “The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.”</i></p> <p><i>Para 177 of the 2019 NPPF says “The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”</i></p> <p><i>Leekfrith Neighbourhood Plan is consistent with the 2019 NPPF. A Habitats Regulation Assessment Screening Statement has been undertaken in accordance with regulations. Policy 1 of the plan requires that “Any application for development should be supported by a Preliminary Ecological Appraisal and a Habitat Regulations Assessment to determine if proposals would affect the South Pennine Moors Special Area of Conservation and Peak District Moors Special Protection Area.”</i></p>
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	(LNP Section 7.4 Policy 4)	
<p>Para 172 Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.</p>	<p>Leekfrith Neighbourhood Area is within the Peak District National Park. All policies within BNP conform to the NPA's strategic planning policies and protect and enhance the area's valued landscape and biodiversity commensurate with this status.</p>	<p>No change. No effect on LNP meeting Basic Conditions.</p>
<p>Chapter 16 Conserving and enhancing the historic environment</p>	<p>Policy 1 requires buildings of merit to be retained. The historic environment of the LNP area rests predominantly in its housing and farm buildings. There is little modern development. Flexible use of holiday homes, which are often ancillary buildings attached to small farms, will allow for the upkeep and maintenance of these buildings which otherwise could eventually fall into disuse and dis-repair. (LNP Section 7.2 Policy 2)</p>	