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**PEAK
DISTRICT
NATIONAL
PARK**

Message from the Chief Executive

27th January 2017

Briefing on planning and housing

Dear Members

I attach a discussion paper officers have prepared on planning and housing to assist our conversations with constituent authorities. I thought it would also be useful to assist your own conversations.

It outlines why we take the approach we do in the Peak District National Park.

It describes our pro-active work with officers in constituent authorities to help deliver local housing needs. For example, we work with District Councils on housing enabling and listening to local people's views through structured surveys and we undertake site searches with housing officers and parish councils.

It then prompts discussion as to how we might work with constituent authorities to explore future options, in a way that is sensitive to the very landscape that attracts people to live here and visit and invest in these areas.

Regards

Sarah Fowler
Chief Executive

Please share the content of this message with any colleagues who do not have access to email.

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Planning and housing in the Peak District National Park

National Parks in the UK

National Parks are a key mechanism established in law and used by the Government to protect our most important and treasured UK landscapes. Covering nearly 10% of the country, containing some of our most memorable landscapes, National Parks are national treasures at the heart of our national identity. The special qualities that can be found in these landscapes underpin the economic activities—from traditional upland farming to tourism, food and other businesses—that thrive in our National Parks. Conserving and enhancing these precious areas, for the benefit of current and future generations, is a vital role of the National Park Authorities.

What do national planning policies and principles say about National Parks?

National Parks were brought into being and designated with statutory purposes to protect landscapes of natural beauty and to offer people opportunities to be inspired by this beauty through quiet recreation. The Government's National Planning Policy Framework supports these statutory purposes by affording the highest level of protection in terms of landscape and scenic quality and in doing so:

- recognises that some parts of the country should not face the same pressure from growth and development, but should be valued, economically as well as spiritually for its special qualities.
- recognises that National Parks are not suitable locations for unrestricted housing and development and so does not provide general housing targets in National Parks
- recognises and allows constraint to be applied in National Parks in meeting Objectively Assessed Needs.
- attaches great weight to cultural heritage and wildlife.

This approach is given statutory weight in the Environment Act 1995 which places a duty on all public bodies operating within National Parks to keep sighted on the need to care and protect our National Park's landscapes and the need of people for open space, contact with nature and an appreciation of our heritage - which is vital in today's modern society.

The Peak District National Park

The Peak District National Park lies at the heart of the country. The first upland reached travelling from the South; it is the watershed of three of England's major water catchments and within one hour's drive of 20 million people. It is a living park with 38,000 residents, and many businesses, living in Bakewell and more than 140 villages and hamlets which benefit from over £1.5 billion tourism input into the economy each year.

The Peak District special qualities are its:

- Contrasting inspirational landscapes, breath-taking views and dark night skies
- Rich, rare and internationally important wildlife and habitats
- Tranquil and undeveloped places within reach of millions of people
- Distinctive settlements with strong communities and traditions
- A landscape shaped by people and industry since prehistoric times
- Exceptional opportunities for recreation, wonder and learning experiences
- Internationally significant historical features and rich cultural heritage
- Landscapes that provide benefits to society which stretch way beyond their boundary

Surveys show that residents have a strong connection with their local environment and landscape and high levels of community activity and awareness around Peak District cultural traditions. Some of the challenges for people living within the National Park are to maintain balanced and vibrant communities when faced with high house prices, low wages, an ageing population and inconsistent access to services. A high priority for most resident communities is the provision of affordable housing and this is a priority for the National Park Authority to work in

a way that supports local communities whilst caring for the unique qualities of the National Park that make it special for the nation.

The role of the Peak District National Park Authority

The Peak District National Park Authority is the local planning authority for the Peak District National Park. We work to balance the demands of sustaining a prosperous economy and vibrant communities with the needs and special qualities of this spectacular landscape.

The National Park Authority approach to development and housing in the National Park aims to fulfil the Government national planning principles. The spatial strategy recognises that:

- all development shall be consistent with the National Park's legal purposes and duty
- development is to be of a scale that relates well to the landscapes within which it sits.
- it is not appropriate to permit new housing simply in response to the significant open market demand to live in its sought after environment.
- it is important to address affordable housing need sustainably in a way that supports and cares for the special qualities of the national park
- support is provided for the delivery of additional homes and business where this drives the conservation and enhancement of the National Park (such as former industrial sites, conversion schemes and replacement dwellings).
- essential worker housing for agriculture and other rural enterprises is supported where justified by the needs of a rural business; and
- other ancillary accommodation (annexes and outbuildings) is supported where this supports family connections and farming succession

The National Park covers parts of nine District and Unitary Council Housing Authorities. We work with local authorities to help us to understand the true picture of housing need using the Objectively Assessed Need model (OAN). Once this need is established we work with the local authority to meet as far as possible this objectively assessed need, only applying constraints where we consider development should be restricted to fulfil the Government's objective of recognising the high levels of protection afforded to National Parks.

What does this mean for housing need and supply in the Peak District National Park?

What does the evidence suggest is required?

From all evidence it is reasonable to assume there is an annual need for approximately 100 affordable houses per annum across all 9 district and unitary council housing authorities within the National Park boundary. In the Derbyshire Dales alone the evidence¹ from the OAN suggests 95 homes (market and affordable) per annum are required within the National Park up to 2033.

What does the Core Strategy allow for?

The Core Strategy in 2011 supports the need for new build affordable housing, in principle, in 63 settlements across the National Park. These settlements are considered to be the most sustainable places for new housing². Virtually every parish has at least one of the 63 settlements, or is adjacent to a parish that has one or more of the 63 settlements, so the housing need of every community can, in principle, be met relatively close to the source of that need. This is considered a sustainable way to address housing need and conserve the National Park. In addition further homes may be permitted in countryside locations via change of use, conversion and ancillary developments.

Since the adoption of the Core Strategy in 2011, work to establish capacity for development in the larger villages in the National Park, plus adopted neighbourhood plans, suggests there may

¹ Assessment of Housing and Economic Development Needs, GL Hearn, September 2015

² See Appendix 3 Core Strategy

be marginally less scope for new housing on some sites than was evident in 2011. This is because the community-led approach to planning in the National Park have resulted in housing numbers anticipated for sites in Bakewell, Bradwell and Hartington being reduced following local community input into planning decisions or into Neighbourhood Planning.

The Core Strategy estimates delivery of between 615 and 1095 homes in designated settlements by 2026 with an additional 190 estimated outside these settlements (e.g. agricultural dwellings and change of use or conversion). This presents an estimate of between 805 to 1285 additional dwellings to 2026.

The indicative contribution of the National Park to housing need across the three most populated constituent authorities is broken down as follows:

- Derbyshire Dales to be 400 to 2033,
- High Peak to be 110 to 2031
- Staffordshire Moorlands to be 100 to 2031

What does this mean for communities in the National Park?

It is evident that the need for housing far exceeds the environmental capacity of the National Park to deliver housing. The National Park Authority recognises this challenge and will positively seek to address local housing needs and explore opportunities to enhance the valued characteristics of the area, but will not meet it where there is a conflict with National Park purposes.

What has been delivered in housing provision across the National Park?

Net figures from 2015/16 Annual Monitoring Report show 700 homes (including 198 holiday homes) have now been completed between 2006 and April 2016. Holiday homes are included in housing figures as policy provides scope for these to be permanently occupied through change of condition in future (subject to criteria). 240 of these were market houses and 185 were for local need with a further 168 committed across both types (with planning permission) some of which are also under construction.

There are large fluctuations in the housing stock completions levels with no trend making it difficult to set precise average annual figures. Fluctuations reflect, for example, changing economic cycles, government spending programmes and the speculative nature of larger redevelopment opportunities driven by our conservation and enhancement purposes. During 2015/16 permissions have already been realised on 3 key brownfield sites at Bradwell (55 homes including 12 affordable, supported by the Neighbourhood Plan process), Hartington (24 homes including 4 affordable) and the Bakewell Riverside (redevelopment approved for business, hotel and other commercial uses).

Why don't we set strategic allocations for housing?

The National Park Authority is not a Housing Authority and so does not have legislative responsibility to meet housing need. In response to our statutory purposes, guidance in the National Parks Vision and Circular 2010 and national policy we do not:

- invite development pressure by allocating housing sites; or
- set a target to meet an OAN figure³.

This provides strategic certainty to the development industry and serves to drive down land values which assists the delivery of affordable housing. If we were to allocate sites, government policy now dictates that we could not require affordable housing on schemes of 5 or fewer (the typical size of many village developments), and can only require commuted sums towards

³ English National Parks and the Broads Vision and Circular 2010 Paragraph 78 and 79

affordable housing on other sites when a scheme of between 6 and 10 is permitted. As such the retention of off-plan exception sites is crucial to our approach.

This means that seeking to deliver affordable housing through a site allocation process, in order to generate money to fund affordable housing, would mean permitting triple or quadruple that amount of housing under current affordable need. This would be unsustainable and it would be environmentally unacceptable to suggest this is a solution inside a National Park. Where other NPAs have recently gone down the route of allocating sites, they are now finding their options to permit affordable housing only are now limited.

What tools do the National Park Authority use to support delivery of sustainable affordable housing?

- **Settlement strategy:** permits new build affordable housing, in principle, in 63 settlements across the National Park. The settlements are considered to be the most sustainable places for new housing⁴. Virtually every parish has at least one of the 63 settlements, or is adjacent to a parish that has one or more of the 63 settlements, so the housing need of every community can, in principle, be met relatively close to the source of that need. This is considered a sustainable way to address housing need and conserve the National Park. In addition further homes may be permitted in countryside locations via change of use, conversion and ancillary developments.
- **Exception sites:** New housing on green field sites is permitted as an exception to normal policy of restraint where housing may be permitted solely to address the local need for affordable housing. National Park planning authorities can, and we do, restrict the use such of exceptions sites to 100% affordable housing. This is the most land efficient return and achieves a significant win-win for the National Park and its communities that cannot be achieved elsewhere.
- **Rural Housing Enabling:** via both in-house specialists in the Policy and Communities Service and via annual financial contribution to the Derbyshire Dales District Council Rural Housing Enabler. This work has resulted in numerous housing needs surveys and site search work which has subsequently led to schemes being delivered in many of the settlements named in policy. In the last few years exception site (greenfield) schemes have delivered affordable homes in Youlgrave, Calver, Elton, Baslow, Bakewell, Stoney Middleton, Hope and Bamford with specialist elderly people's accommodation being brought forward in Grindleford and Bakewell, and further contributions flowing from brownfield (enhancement sites) in places in like Eyam and Birchover. Further delivery is currently in progress for Bakewell, Winster and Taddington.
- **Partnership working:** through our own Housing Forums and working with groups like Midlands Rural Housing to engage on current issues and keep policies relevant and deliverable. The Authority has also signed a memorandum of understanding with both Derbyshire Dales District Council and High Peak Borough Council and works closely with all constituent authorities under the Duty to Cooperate on plan making.
- **Focus on the size and type of properties** to ensure modest homes are delivered that respond to various affordable housing models from true socially driven products (affordable rent and shared ownership) to private restricted properties (intermediate sector). All properties seek to address the overarching issue of affordability.

⁴ See Appendix 3 Core Strategy

Discussion paper for Constituent Local Authorities

- **Design standards** that help to integrate social housing into the fabric of the village, whilst respecting local character and driving higher sustainability.
- **Starter homes** have recently been added to the government definition of affordable housing options and the National Park Authority has included this as an additional route, but achieved through the conservation and enhancement policy rather than by exception sites. This is because such housing is heavily influenced by market forces, do not address the affordable housing needs of the area and must be regarded as a different form of housing provision in the context of the National Park.
- **Legal agreements** are applied to ensure these policy aims continue in perpetuity and between successive occupiers. Section 106 (legal agreements) control occupancy to people from the locality (using the parish and adjoining parish boundaries) as the starting point for connecting the site to the point at which need arises. Legal agreements also control future investment (such as extensions) to the property to ensure they remain affordable and set out the system for widening (cascading) the search for people in housing need on subsequent occupation.
- **Housing needs surveys** are continually being run and reviewed across National Park communities to understand levels of localised need. Once need is established we work with Parishes and the social housing providers to explore sites and make contact with land owners prior to the formal planning process.
- **Supplementary Planning documents** are prepared to add further detail to guide and inform the process for assessing needs.
- **Neighbourhood planning** is a resourced and prioritised area of the Authority's work enabling communities to set their own policies in response to localised issues and driving the conservation and enhancement of the area through positive development. In Bakewell the work includes an agreement to sensitively redraw the settlement boundary to plan for growth over the next 20 years.

Who do we work with?

- **Communities:** The NPA works with communities to survey housing needs in the first instance and then to find the best sites for housing where there is an evidence of need for affordable housing. The view on whether this is enough or insufficient to sustain a healthy community is mixed. Our approach does not enable housing need to be met in full and we do not claim that it could. This may appear harsh to communities, but the alternatives are unsustainable for the National Parks built and natural environments and the ongoing enjoyment of those environments by visitors.
- **Constituent housing authorities:** we work with constituent housing authorities to understand our contribution to their housing supply. From their 'policy off' figures for objectively assessed need (OAN)⁵, they produce targets for housing for their whole area based on a 'policy on' position – meaning their housing target reflects such things as jobs growth required, or environmental constraints as articulated in their land use plans. In the event that this means OAN cannot be met, the constituent authorities need to agree with other councils (through the duty to cooperate) where the houses will be built (since government requires that OAN has to be met somewhere). We do not offer to take all the housing that this area needs. The logic is simple – for National Park purposes and duty to

⁵ National methodology for assessing need that doesn't take into account local plan objectives
<http://www.pas.gov.uk/documents/332612/6549918/OANupdatedadvicenote/f1bfb748-11fc-4d93-834c-a32c0d2c984d>

be upheld as required by the Environment Act⁶, the NPA has to start from a position of prioritising conservation objectives over and above social and economic wellbeing. We have always said we will address housing need (not meet it). We recognise and have sympathy that the impact of this on constituent authorities is particularly challenging.

- **Registered Social Landlords (RSL's):** In particular Peak District Rural Housing Association (PDRHA), established in 1990 to work within the policy context of the National Park and respond to challenge of affordability by building and managing homes all with planning controls ensuring affordability in perpetuity. PDRHA remains a key partner and manages some 250 affordable homes across the Peak District.

Working together on a future way forward?

There is a gap in the ability of the country to plan strategically, created by the removal of regional spatial planning. This means that objectively assessed need is virtually undeliverable in areas containing protected landscapes because the welcome protection afforded to these landscapes constrains the capacity to deliver houses. A win-win would be for government to accept a different approach in National Parks which ensures that funding for social housing is ring fenced to address the local need for affordable homes.

Another welcome approach would be for a different spatial objective to be set for National Parks and for areas around Parks. It is more logical that higher development expectations are placed on large urban areas around the Parks and lower development expectations are accepted in relatively poorly connected rural areas. The former regional planning framework highlighted this scenario well and established differential development expectations within a set of high level spatial objectives (including the need to respect the statutory purposes of the National Park), without pitching one authority against another. The Localism Act 2011 whilst providing excellent opportunities for parish level planning, also reduced the ability to plan strategically (putting in place the Duty to Cooperate), meaning that the clarity that had previously been set out no longer exists and each Authority having to plan for its own need.

Attempts have been made via National Parks England to better articulate the expectations on National Park Authorities as a result of the NPPF and Objectively Assessed Need (OAN). A stepped approach to taking account of National Park purposes in OAN was agreed across the National Parks but CLG have resisted agreeing this formally. Therefore the goal of the NPA's remains to focus on delivery of affordable housing and that to meet the full market and affordable housing needs (as set out in para 47) would conflict with the other very clear policies in the NPPF which seek to protect NPs and identify them as areas where development should be restricted.

Issues regarding the future health and vibrancy of National Park communities can also be driven forward and through the review of the National Park Management Plan which can then set a strategic context for the review of the Local Plan.

A future review of the full Local Plan and its spatial strategy could further explore the scope to be responsive to demographic issues (such as the ageing population) and also explore more proactive ways of identifying brownfield (conservation and enhancement led development). It is essential however that the exploration of options to widen scope for development in the National Park still reflects the priority to conserve and enhance the special qualities of the area for future generations. To be consistent with national policy it would not be appropriate or logical to promote development in areas that would not be promoted outside the National Park, e.g. by virtue of capacity, landscape sensitivity or a range of normal sustainability criteria. National Park settlements are inherently small, sensitive in character and deeply rural in location.

⁶ Section 62 Environment Act 1995: <http://www.legislation.gov.uk/ukpga/1995/25/section/62>