

## HIGH PEAK LOCAL PLAN REVIEW

### PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT



	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements.	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence):</b></p> <p>The High Peak Local Plan is based on the 2012 NPPF. Part 2 of the PAS Toolkit has been completed to identify where updates to reflect the content of the 2021 NPPF are needed.</p> <p>The assessment table shows that many of the plan policies are broadly in line with the 2021 NPPF. However, there are areas that may either need to be updated to bring them in line with national policy and new evidence or potentially local priorities. These include:</p> <ul style="list-style-type: none"> <li>• High Peak Local Plan Policy S1a (Presumption in Favour of Sustainable Development) repeats the requirements set out in the 2012 NPPF. Para 11 of the 2021 NPPF states that Local Plans should reflect the presumption in favour of sustainable development. However, the NPPG confirms that there is no need for a plan to directly replicate the wording in paragraph 11 in a policy. Therefore, this policy is not required.</li> <li>• New NPPF and NPPG now requires more detailed consideration of viability at the plan making stage in order to reduce viability related debates during the determination of planning applications (as per NPPF paras. 34 and 58).</li> <li>• Policy S3 Strategic Housing Development establishes the average annual housing requirement of 350 across the Borough and specifies the distribution of development across the sub-areas. NPPF para. 62 requires that a Local Plan be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point. The Local Housing Need figure for High Peak as identified in the draft Housing and Economic Land Needs Assessment (HELNA) is 260 homes per year. A policy on jobs</li> </ul>

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			<p>growth scenario indicates a housing requirement of 364 is needed to boost growth in potential growth sectors. Neighbourhood Plan housing requirements for recently designated Neighbourhood Areas also need to be reflected in this policy.</p> <ul style="list-style-type: none"> <li>• Policy H3 (New Housing Development) should also include consideration of the specific types of housing need specified in NPPF Para 62 such as students, self-build housing and travellers. The draft HELNA and forthcoming Gypsy and Travellers Accommodation Needs Assessment (GTAA) identifies new information regarding the need for these groups.</li> <li>• The definition of affordable housing in the 2021 NPPF is not reflected in Local Plan Policy H4 (Affordable Housing). Para 63 states that provision of affordable housing should not be sought for schemes that are not major developments (i.e. 10+ dwellings / 0.5ha+) and on qualifying sites at least 10% of the homes should be available for affordable home ownership. The plan policy does not reflect this. Current policy also does not take account of the need for First Homes.</li> <li>• NPPF para. 83 requires the Local Plan to recognise and address the specific locational requirements of different employment sectors. Local Plan policies do not currently make this distinction. The new HELNA report does now provide some analysis of this that would inform future policy.</li> <li>• Policy EQ1 (Climate Change) states that the Council will adopt strategies to mitigate and adapt to climate change, will plan new development in locations and ways that reduce carbon emissions and will adopt the principles in the energy hierarchy. The policy is not prescriptive but seeks to encourage/support sustainable forms of development. The policy could be revised to ensure it is more in line with local priorities. Although it is not a strategic policy, it is still an extremely significant part of the response to the climate change emergency. To assist with this, the Council will use the Derbyshire Climate Change SPD note and assessment tool metrics. These are due</li> </ul>

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			<p>for completion in Summer 2022. They have been prepared by the Climate Change and Planning Officer sub group of Vision Derbyshire. The guidance note will provide an evidence base to inform the development of local plan policy. The note identifies opportunities for the future policy to be both more aspirational and specific than contained in the current Local Plan and the metrics is an assessment tool to indicate the degree development proposals have included climate change mitigation.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• Annual housing requirement in Local Plan = 350 dpa</li> <li>• Current annual local housing need = 260 dpa</li> <li>• New jobs growth scenario in HELNA = 364 dpa</li> </ul> <p>The current Local Housing Need figure is significantly less than that required in the Local Plan. However, whilst the Local Plan requirement takes account of, and plans for, jobs growth, the Local Housing Need figure is only based on the affordability of housing and demographic factors. The jobs growth scenario in the HELNA is broadly comparable with the current Local Plan requirement in that both are geared towards economic growth. However, HELNA indicates a modest increase in need to 364.</p> <p>Only a 4.79 year housing land supply can now be demonstrated (as at 1 April 2021). The Council has passed the Housing Delivery Test each year (135% in 2021 measurement) but this applies the local housing need figures rather than the higher Local Plan requirement.</p> <p>Furthermore, the annual housing requirement has only been met in 2 of the 5 years since the adoption of the Local Plan. Completions in 2020/21 (249) were the lowest since prior to the adoption of the Local Plan in 2015/16. If this trend continues, there is a risk that the Council will may not recover its 5 year housing land supply or pass the Housing Delivery Test in the coming years.</p>

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			<p>Annual housing completions:</p> <p>2011/12 – 102</p> <p>2012/13 – 207</p> <p>2013/14 – 36</p> <p>2014/15 – 100</p> <p>2015/16 – 160</p> <p>2016/17 – 330</p> <p>2017/18 – 498</p> <p>2018/19 – 380</p> <p>2019/20 – 305</p> <p>2020/21 - 249</p> <p>There are no formal agreements in place for High Peak to accommodate any unmet housing needs from neighbouring authorities.</p>
A3.	You have a 5-year supply of housing land	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Council has a 4.79-year housing supply as at April 2021. Full details can be found on the Council's website at:  <a href="https://www.highpeak.gov.uk/media/7175/High-Peak-5-year-Housing-Land-Supply-April-2021/pdf/High_Peak_5_year_Housing_Land_Supply_April_2021.pdf?m=1645518690143">https://www.highpeak.gov.uk/media/7175/High-Peak-5-year-Housing-Land-Supply-April-2021/pdf/High_Peak_5_year_Housing_Land_Supply_April_2021.pdf?m=1645518690143</a></p>

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A4.	You are meeting housing delivery targets	Disagree	See commentary for A2.
A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.	Disagree	<p>i) <u>Affordable Housing</u></p> <p>Whilst providing an appropriate mix of housing types, sizes and tenures in sustainable and accessible locations that meets the needs of all residents in the Borough is a plan objective, the Local Plan does not contain an affordable housing target for the plan period. The 2014 SHMA's estimate of affordable housing needs for the Borough indicates that High Peak has a net annual need of 878 dwellings per annum (dpa) based on the gross household formation approach. It is clearly not possible to deliver this level of affordable housing, particularly as the annual housing requirement set out in the Local Plan is only 350 dpa.</p> <p>Looking at affordable housing completion trends in the Council's Annual Monitoring Reports since the Local Plan was adopted:</p> <p>2016/17 – 49                  2017/18 – 44                  2018/19 – 118                  2019/20 – 23                  2020/21 – 45</p> <p>18% of housing completions in 2020/21 were for affordable units.</p> <p>ii) <u>Commercial Floor Space</u></p> <p>Looking at new employment floor space completion trends in the Council's</p>

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			<p>Annual Monitoring Reports since the Local Plan was adopted, there have been significantly more floorspace losses than gains for B Class uses:</p> <ul style="list-style-type: none"> <li>• 2014-17 – 2459m<sup>2</sup> completed [however a net loss of 10733m<sup>2</sup> when floorspace losses also taken into account]</li> <li>• 2017/18 – 2746m<sup>2</sup> completed [no losses]</li> <li>• 2018/19 – 403.58m<sup>2</sup> completed [however 3823.42m<sup>2</sup> net loss overall]</li> <li>• 2019/20 – 6181.9m<sup>2</sup> completed [2278.9m<sup>2</sup> net gain overall after deducting losses]</li> <li>• 2020/21 – 9618m<sup>2</sup> completed (4150m<sup>2</sup> net gain after losses)</li> </ul> <p>The Local Plan makes provision for an additional 35.6ha of employment land by 2031. A majority of the employment allocations in the plan are not coming forward. The issues vary depending on location but the principal reason is that most of the allocated sites are too complex/time consuming for a business to develop themselves (multiple ownerships, ransom strips etc). This means that there isn't an easy option of buying the land and then submitting a planning application – and that is even where a business has the capacity/desire and money to build their own – many would simply prefer a turn-key option with immediate availability. Some land-owners may have unrealistic expectations on land values and delivery.</p> <p>New employment floor space coming forward tends to be in the countryside on 'windfall' sites, for example Pennine Aggregates between Buxton and Dove Holes. Harpur Hill and Chapel-en-le-Frith have also seen completions on windfall sites.</p> <p>The Local Plan also includes support for the provision of additional retail convenience space at New Mills and Harpur Hill as part of a Local Centre. The Council recently resolved to approve an application for a mixed-use scheme, including an Aldi foodstore at the Harpur Hill Local Centre.</p>

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A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>As explained above, there are issues with lack of delivery of the employment sites allocated in the Local Plan and delivery of B class floorspace in general over the plan period. Feedback has indicated that the Local Plan is not meeting the needs of some of the businesses who wish to expand or relocate to other premises in the Borough. Concerns have been expressed with the Local Plan in terms of there being insufficient sites available for industry to grow and remain in High Peak.</p> <p>Emerging employment development requirements from the Housing and Economic Land Needs Assessment indicates a quantitative decline in needs.</p> <p>Where businesses wish to move to more modern premises, they are tending to move out of the Borough to neighbouring areas which can cater for this need, such as Greater Manchester and Cheshire East. Sites in these areas tend to be easier for them to develop, i.e. of an appropriate size, flat and with the ability to buy a single-land option with an on-board developer.</p> <p>Feedback indicates that some existing businesses in High Peak are having to constrain their growth due to lack of suitable sites in the Borough to meet their needs. Some are investing in second sites (primarily in Stockport or Poynton/Cheshire East). However, there is clearly a risk that they will move out of the Borough. There is also a lack of quality 'ready-made' office buildings in the Borough to suit smaller IT/ High Tech Businesses and companies are looking outside the Borough to fulfil this requirement.</p> <p>Although any long-term impacts of the COVID-19 pandemic are unknown, it may have longer term implications such as the demand for office space and home-working opportunities. The current Local Plan is based on a jobs growth scenario, which for the reasons given is not now being realised. Also, as explained above, in the response to A2, the current annual housing need for the Borough is significantly lower than the annual housing requirement in the Local Plan.</p> <p>Unless a sustainable balance between housing and employment growth can be</p>

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			<p>achieved, this may lead to an increase in out-commuting. This is likely to be to neighbouring Greater Manchester (where 30% of High Peak residents work according to the Council's Growth Strategy) and Cheshire East, leading to more pressure on infrastructure like road congestion and congestion on rail links. This will also impact upon air quality – (a recent AQMA has been designated on the A57 linking Glossop to Tameside) and on climate change in general.</p>
A7.	<p>There have been no significant changes affecting viability of planned development.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Council's Infrastructure Funding Statements, shows that the 30% affordable housing target for larger sites is generally being achieved with current schemes such as Leek Road, Buxton, Batham Gate Road, Peak Dale and Hayfield Road, New Mills demonstrating this.</p> <p>The IFS also shows the current position with other developer requirements and from the information provided these appear generally deliverable. In 2020/21, £540,669.22 was secured through S106 agreements on developments across the Brough for infrastructure. This included over £80k towards education from the Forge Works development and £319k towards education, £43k towards highways and c.£65k towards open space from the Hayfield Road, New Mills scheme.</p>

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A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance with the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p>	<p>Disagree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>Key site allocations have generally delivered to date. In terms of spatial distribution, the AMR 2020/21 data shows that since 2011, 36% of the housing completions have been in Glossopdale, 19% in Buxton and 44% in the Central Area. It is notable that Buxton completions are lagging behind the other sub-areas at present. However, there are several large sites in the Harpur Hill area of Buxton that will help to address this trend in the short term.</p> <p>The Council has taken a pro-active approach to delivery through its 'Accelerated Housing Delivery' programme which targets 6 of the allocated sites all in the ownership or part ownership of the Council. Two of these – Granby Road B/Land west of Tongue Lane and Market Street Depot are in Buxton. Work is ongoing to secure development of these sites.</p> <p>However, there is still a risk that delivery may tail off in the future. The target of 350 housing completions per annum, was exceeded in 2017/18 and 2018/19 but has dropped to 249 in 2020/21. This decline may in part due to the impact of the Covid-19 pandemic.</p> <p>Some of the more complex sites like Paradise Street, Adderley Place and Land off Melandra Castle Road Glossop, Padfield Main Road, Hadfield, Market Street, West of Tongue Lane/Granby Road B and Hogshaw Site have not yet come forward. Most of these are owned by the Borough Council, who are undertaking work (such as soft market testing and Homes England funding) to help bring them forward. The construction of the Fairfield roundabout will help to unlock the sites clustered to the north of Buxton. However, the recent advice regarding nutrient neutrality is likely to mean that sites without full planning consent in the Buxton area will experience delay and additional development costs to mitigate phosphate output to the River Wye. This could undermine the viability of some sites.</p> <p>There has been a lack of progress on a couple of small sites allocated in the Chapel-en-le-Frieth Neighbourhood Plan – Pickford Meadow and Park Road Factory and Bungalow.</p>

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A9.	There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The detail given below explains that there have been significant changes in the local environmental context since the Local Plan was adopted.</p> <p>A Climate Change Emergency has been declared by the Council</p> <p>Two Air Quality Management Areas have been designated in Glossopdale.</p> <p>Nutrient neutrality must now be demonstrated by developments within the catchment of the Peak District Dales SAC (River Wye).</p> <p>The 2021 Environment Act introduces a mandatory requirement for 10% biodiversity net gain from development from late 2023.</p> <p>Local Plan policy requires strengthening to reflect these designations, provide an appropriate policy response and to ensure mitigation measures for future development.</p> <p>The Environment Agency point out that flooding events have recently occurred in High Peak and the Council would need to update its Strategic Flood Risk Assessment as part of any review of the Local Plan. All of these factors could influence future patterns of development in High Peak. In terms of heritage, the new Heritage Action Zone for Buxton Town Centre could be incorporated into Local Plan policy as well as reference to the specific heritage assets. For instance, Melandra Castle is now on the Heritage at Risk Register.</p>

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A10.	There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>Although there have been some windfalls on larger sites in High Peak, they are not vast sites and certainly not large enough to undermine the spatial strategy.</p> <p>A Strategic Housing and Economic Land Availability Assessment is underway to assess the potential capacity of sites for both housing and employment uses which may identify some opportunities.</p>
A11.	Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>Critical infrastructure generally is considered to be on track.</p> <p>The A6 roundabout at Fairfield is essential to support housing and employment land allocations in the current Local Plan at Hogshaw, Tongue Lane and Granby Road. The roundabout was approved by DCC in 2020 and construction is due to commence.</p> <p>The A57 link road project (formerly known as the Trans-Pennine Upgrade) is identified in the current Local Plan as a scheme which may address traffic issues on the A57 and A628. The project is classified as a Nationally Significant Infrastructure Project (NSIP) for which a Development Consent Order (DCO) application is currently being considered by the Planning Inspectorate following the end of the recent examination. The Inspector must submit their recommendations to the SoS by 16<sup>th</sup> August. The SoS will then determine the application.</p> <p>Developer contributions towards infrastructure deemed necessary to support the Local Plan such as improvements to local schools and local highways improvements such as the five ways junction in Buxton have been collected in line with policy and the Infrastructure Delivery Plan.</p> <p>However, other measures such as improvements identified in the 2014 A6</p>

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			<p>Corridor Study (additional parking at stations etc.) has yet to come forward. Work is ongoing to determine and deliver improvements to the Glossop/Hadfield line, including the scope for Gamesley Station.</p>

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A12.	All policies in the plan are achievable and effective including for the purpose of decision-making.	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>In order to assess the effectiveness of plan policies for decision making, feedback has been sought from colleagues who use the policies e.g. Development Management and Legal. They have identified issues with some of the policies including suggested minor wording amendments for clarity, updates to reflect changing circumstances (e.g. impacts of COVID-19, new designations like HAZ in Buxton) and identification of policies which could be amended so that they work more effectively.</p> <p><u>Policies which could be amended so they work more effectively</u></p> <p>Feedback received indicates that wording in Policy EQ1 (Climate Change) could be more pro-active to make a difference. Currently, it is not clear what the policy requirements are and the BREEAM standards have not been used. It is considered that in connection with the Council declaring a 'Climate Change Emergency' policy provisions should be a requirement not just encouraging / supporting sustainable developments. The policy needs to be completely revised to ensure it is effective. Although it is not a strategic policy, it is still an extremely significant part of the response to the climate change emergency. The wording needs to be clearer on policy requirements with objective, measurable standards where possible, so as to be more robustly implemented through development control decisions. Splitting it into separate sub-categories to cover key themes would be appropriate, e.g. Zero carbon development / minimising greenhouse gas emissions in new development, District Heating, Renewable Energy and Climate Change Adaptation - measures to be resilient to the impacts of climate change (such as retrofitting, water efficiency, sustainable design and construction and electric vehicle charging points).</p> <p>Feedback has indicated that policy wording could be improved to make the relationship between strategic policies and policies to protect the character of the countryside (EQ2, EQ3 and H1) clearer and more explicit.</p> <p>The wording in Policy H4 (Affordable Housing) could be improved. It is</p>

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			<p>frequently used to assess planning applications. As well as requiring updates to reflect the 2021 NPPF, there is confusion with some aspects of the policy wording. Feedback has indicated that there is a need to change/check the size of the site area included as a threshold for 20% affordable housing. There is confusion around whether to use the site size or dwelling number to assess applications. It is also considered that the Policy should provide additional detail and clarification on the bedspace criterion and commuted sum calculation.</p> <p>Policy H5 (Rural Exceptions Sites) has been raised as an area of concern by policy users. The AMR shows that there have been no applications submitted for rural exceptions sites for the last two monitoring periods, however officers are concerned that the scale of development under this policy requires clarification. They consider that schemes of 30+ dwellings are not appropriate as exceptions schemes and query whether a size threshold should be included in the policy. They also query whether applicants should be asked to provide information on which RSL is involved and the funding in place.</p> <p>Town centres and retailing is seeing rapid change which is likely to be accelerated by the COVID-19 pandemic. Policy CF1 (Retail and Town Centres) in line with national policy seeks to maintain and enhance the vitality and viability of town centres. Feedback indicates that a lot of applications are being received for changes of use in the town centres so flexibility would be welcomed to allow for more of a mix of uses. It has been suggested that alternative uses should be welcomed where it adds vitality and footfall to the centre. For example, new leisure, office, food/drink and clean micro-manufacturing uses and upper floor conversions as long as it creates jobs, footfall and does not impact negatively on neighbouring retail uses. They also suggest that new build residential accommodation could be welcomed in town centres where it adds vitality and footfall and would not inhibit the function of the area as a centre for business, leisure and retail. The retail core of the town centre may need to shrink to respond to these trends. This would allow for changes of use of peripheral/edge of area retail units where there is no longer retail demand and / or the vacancy rate is high to allow residential or other uses. In the current local plan, the town centre boundaries have in many cases increased in size to encompass the entire retail area of the town and as retail</p>

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			<p>has changed, this has left small edge of centre shops long term vacant. Supporting these to be converted to housing improves appearance of gateways, reduces our vacancy rates, and would still protect the central area as would only apply for peripheral locations.</p> <p>Policy CF2 (Primary Shopping Frontages) needs to be updated to reflect the fact that there are now so many permitted changes under the GPDO including the recent introduction of a new E class covering commercial, business and service uses, which has replaced use classes A1, A2 and A3 (amongst others). This change will address some of the flexibility issues raised, e.g. in Buxton town centre there have been applications raising concentration issues which have not been policy compliant. This would now no longer apply as a change of use between A1 and A3 is now permitted development. Also, where the policy states: "Proposals for residential use at ground floor level in primary frontages will not be supported" this doesn't take into account that there are some permitted changes to residential. Neither of the policies support housing on the upper floors of buildings in town centres and this is supported in the NPPF.</p> <p><u>More Minor Wording Amendments Required</u></p> <p>Internal feedback has identified that other policies in the plan would benefit from minor re-wording and additional points of clarification to assist with interpretation as well as factual updates to reflect changing circumstances. For example, Derbyshire County Council have stated that they would wish to see some minor amendments to the wording of the Adopted Plan's policies relating to education provision to be carried forward into a new Local Plan to reflect updated information.</p>

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A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>In November 2020, the Council consulted with all Duty to Co-operate bodies relevant to High Peak. Each body was asked whether they considered there were any issues the Council should consider as part of a new Local Plan in addition to the strategic issues previously identified in the Council's 2014 Duty to Co-operate Statement which was used as evidence in the 2016 Local Plan Examination. Neighbouring authorities were also asked whether they are able to meet their own Local Housing Needs entirely in their plan area.</p> <p>Of those who responded, Cheshire East, Kirklees and Greater Manchester Combined Authority (through the Greater Manchester Spatial Framework - GMSF) have confirmed that they are able to meet identified housing needs in their plan area. The recently submitted "Places for Everyone" strategic plan for Greater Manchester (excluding Stockport) seeks to meet Local Housing Need across the plan area.</p> <p>Tameside MBC also request that any updated High Peak Local Plan continues to consider and support a full Mottram, Hollingworth and Tintwistle by-pass road.</p> <p>High Peak Borough shares a common Green Belt boundary with the Greater Manchester Green Belt that adjoins it in parts of Tameside and Stockport Metropolitan Boroughs. Green Belt and the potential need for Green Belt Review is a key strategic cross-boundary issue that will require collaboration between HPBC and DCC (and adjoining authorities in Greater Manchester) through the preparation of a new Local Plan.</p> <p>Cheshire East agree with the list of existing strategic issues and highlight ongoing work with their Local Transport Plan. They also state that investigations are being undertaken with partners in relation to recorded flood events which took place in their area in June / July 2019 during a period of extreme weather and point out that sustainable water management and the reduction of flood risk are naturally key considerations that should be part of the preparation of any Local Plan.</p>

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			<p>Derbyshire County Council, Derby City Council, all the district and borough councils in Derbyshire (including HPBC) and the Peak District National Park Authority have agreed in principle to work jointly and collaboratively to prepare a non-statutory Strategic Planning Framework for Derby and Derbyshire. It is intended that the Framework will set out a consensus of agreed key strategic objectives and priorities for how Derbyshire will grow over the next 30 years to 2050 and will also inform the Derbyshire local planning authorities' approach to strategic issues in the Local Plan reviews that emerge in the next few years. This project was paused until further details of the Government's reforms for planning were known.</p> <p>Derbyshire Dales District Council and the Peak District National Park Authority are both in the early stages of their own respective Local Plan reviews. It is too early to determine if their Local Plans will have a material impact on High Peak. Nevertheless, co-operation will be needed with the National Park Authority in particular on matters such as housing delivery, nutrient neutrality, landscape protection, green infrastructure and potentially biodiversity net-gain.</p>

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A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>High Peak Borough Council’s most recent Corporate Plan, which post-dates the adoption of the Local Plan. The Council declared a Climate Change Emergency and pledges to work towards a carbon neutral High Peak by 2030. This is within the current Local Plan period (which runs to 2031). As explained in the response to A12 of this document, Policy EQ1 (Climate Change) could be more closely aligned to the declaration.</p> <p>In response to the Council’s consultation with Duty to Co-operate bodies, Derbyshire County Council has stated that climate change should be a more prominent consideration in the Local Plan and should be included on the list of key strategic issues, recognising the need to take a county-wide approach to reducing emissions in line with the Paris Agreement and the legal requirement to reduce emissions by 100% by 2050, as set out in the Derbyshire Environment and Climate Change Framework to which HPBC is party to. Aligned to this is the fact that DCC will be developing a county-wide Natural Capital Strategy which has implications for biodiversity net gain that will need to be reflected in the policy approach in the new Local Plan.</p> <p>Another theme of the Corporate Plan is an increased emphasis on thriving town centres. As detailed in the response to A12, Town Centre and Retail Policy in the plan would benefit from an update to offer a more flexible approach to maintain the vitality and viability of town centres in the Borough.</p> <p>Another Corporate Plan priority is the increased supply of affordable housing. In response to A12 it is acknowledged that the Local Plan affordable housing policy (H4) would benefit from amendments to ensure it is working effectively. The response to A5 states that affordable housing completions are tailing off in High Peak, though does point out that there are likely to be increased numbers coming forward as a result of recent planning approvals.</p> <p>The High Peak Growth Strategy was also published after the adoption of the Local Plan. One of its purposes is to act as a delivery plan for some of the key allocations in the Local Plan to help drive investment into the High Peak</p>

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			<p>economy. This is through accelerated housing and enterprise growth. To accelerate the delivery of housing sites, the Growth Strategy proposes that the Council takes a proactive lead through the mechanism of planning (an open for business approach), finance (maximising the benefits of Council resources), inward investment and property development (cross subsidising the development of residential sites in the Council's ownership).</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p><b>If no go to question A16.</b></p> <p><b>If yes,</b> you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p><b><u>Decision:</u> Update plan policies</b></p> <p><b>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</b></p> <p>In light of the responses above, an update to plan policies is recommended. The housing requirement in the Local Plan differs significantly from the latest Local Housing Need figures and is less than the equivalent job-growth scenario in the Housing and Economic Land Needs Assessment. The Council can also no longer demonstrate a five year supply of housing land. There are several subjects where the 2021 NPPF introduces new national policy which is not reflected in the Local Plan. Furthermore, whilst many other aspects of the Local Plan are still broadly in line with the 2021 NPPF, it is considered that some policies will benefit from an update to reflect wider changes such as the</p>		

	<p>designation of AQMAs, the Council’s declaration of a climate change and biodiversity emergency and the need to demonstrate nutrient neutrality in the Buxton area. Potential amendments to the development requirements and allocations may also necessitate changes to the spatial strategy and wider development management policies.</p>		
	<b>B. POLICY UPDATE FACTORS</b>	<b>YES/NO (please indicate below)</b>	<b>Provide details explaining your answer in the context of your plan / local authority area</b>
<b>B1</b>	<b>Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements/ the overall evidence base.</b>	<b>YES</b>	Local housing need is 260 homes per year rather than 350 as set out in the adopted Local Plan. Conversely, the jobs growth housing scenario is higher than the Local Plan requirement at present.
<b>B2</b>	<b>The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.</b>	<b>NO</b>	There is no current over-riding evidence to confirm that the spatial strategy must be revised. However, this will need to be kept under review in light of consideration of the availability of suitable and available sites, infrastructure and the implications of nutrient neutrality.
<b>B3</b>	<b>Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.</b>	<b>YES</b>	The potential for new development requirements and new priorities is likely to affect the strategic policies of the Local Plan and may have consequential impacts on other policies and sites.
	<b>You have answered yes to one or more questions above.</b>	<b>YES</b>	<b>You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.</b>
	<b>You have said no to <u>all</u> questions (B1 to B3) above</b>		<b>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</b>
<b>B4</b>	<p><b>Decision: Full Update of Plan Policies</b></p> <p><b>Reasons for scope of review:</b></p>		

- The current housing (including affordable housing) and employment land requirements can be considered out of date. A re-assessment of development requirements and other strategic policies may have consequential impacts on other elements of the Local Plan and it should therefore be considered holistically.
- Our assessment of policies and feedback from consultees suggests that several key policy areas would benefit from an update even when they can be considered broadly in line with the 2021 NPPF