

HOUSING NEED – MIX STATEMENT.

Charlestown Works, Glossop.

Walbury Commercial Ltd.

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1. Introduction

Scope and Purpose

- 1.1. This report has been produced on behalf of Walbury Commercial Ltd and presents evidence upon housing mix. This is provided in support of an appeal to the refusal of planning permission for the proposed change of use from offices to 24 apartments and associated car parking at Charlestown Works, Charlestown, Glossop. The planning application (HPK/2022/O474) was refused on 31st May 2024.
- 1.2. The decision notice identified six reasons for refusal. The third reason stated:

"The development proposal would not provide for an appropriate range and size of housing types that can reasonably meet the requirements and future needs of a wide range of household types including for the elderly and people with specialist housing needs, based on evidence from the High Peak Housing and Economic Land Needs Assessment (HELNA) (or successor documents) and the National Described Space Standards (NDSS). Accordingly, the proposal is contrary to Policies SS1, S5 and H3 of the Adopted High Peak Local Plan 2016 and the National Planning Policy Framework."
- 1.3. This report provides evidence upon the appropriate range and size of housing for this scheme.

Site Location

- 1.4. The site is approximately 0.27 hectares and is located on the west side of Charlestown Road within Charlestown on the southern edge of Glossop. The site forms a prominent location at the southern gateway entrance into the town. Historically the site has been occupied and dominated by industrial buildings on either side of the road, but most buildings have now been demolished to make way for an ongoing residential development on an area of land extending to approximately 5 hectares of land.

Proposed Development

- 1.5. Permission was sought for the following:

"Proposed change of use from offices to 24 apartments and associated car parking".
- 1.6. The 24 apartments were proposed to include nine 1-bedroom apartments and fifteen 2-bedroom apartments across two blocks. Seven apartments will be affordable. The two blocks were formally consented as office blocks as part of a separate permission.

Report Structure

- 1.7. The remainder of the report is structured as follows:



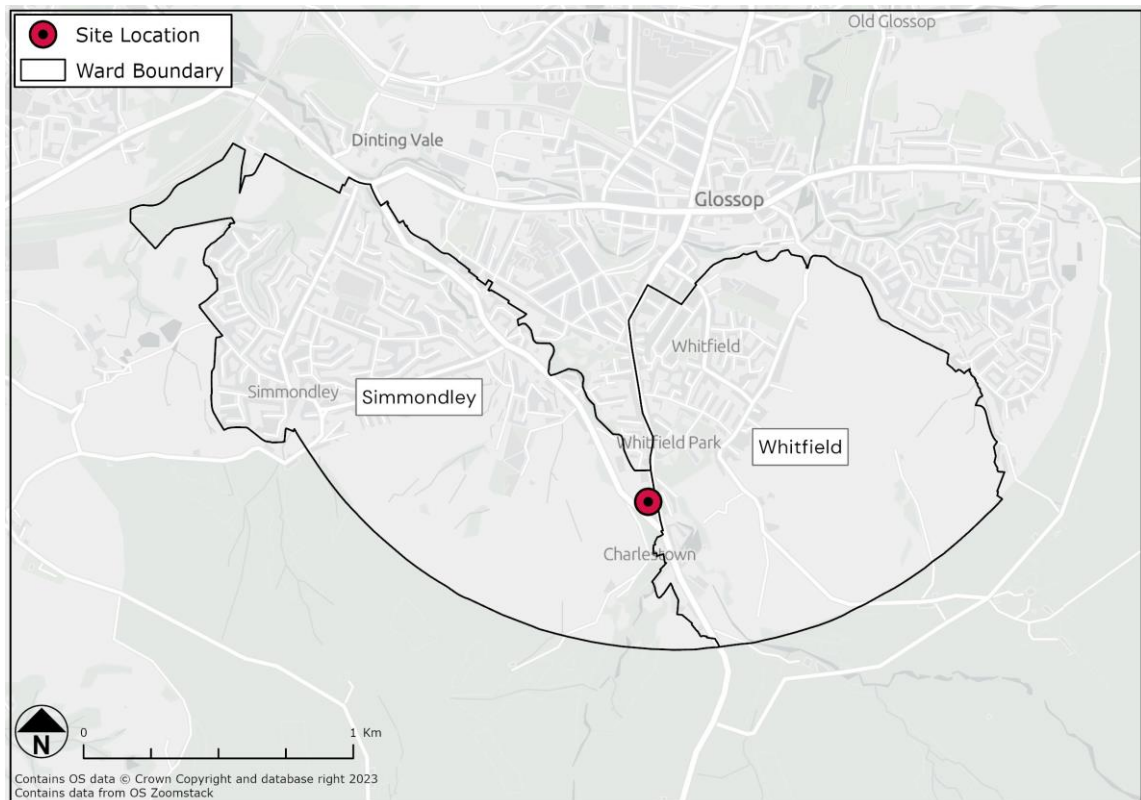
- **Section 2: Context** – describes the socio-economic character of High Peak and the site location with a particular emphasis upon population, housing and affordability.
- **Section 3: Policy and Evidence Review** – provides a review of national and local policy and the key local evidence base in relation to the need for the mix of housing within High Peak.
- **Section 4: Housing Delivery** – considers the delivery of housing within High Peak. This will include information upon completions within the different sub-areas of High Peak. At the time of writing this information is still awaited from the Council.
- **Section 5: Proposed Housing Mix** – Considers the proposed mix within the context of the wider former Charlestown Works redevelopment.
- **Section 6: Conclusions** – this section provides robust conclusions on the proposed mix based upon an analysis of the evidence contained within this report.

2. Context

Introduction

- 2.1. This section presents an analysis of socio-economic character of High Peak and the Site location with a particular emphasis upon population, housing and affordability. Where possible these indicators are assessed against ward, regional and national comparators.
- 2.2. The Site is located in the ward of Simmondley ward and is on the border of Whitfield ward. Given both these areas cover Charlestown, data at a ward level are presented for the combined area of Simmondley and Whitfield. Figure 2.1 shows the Site location.

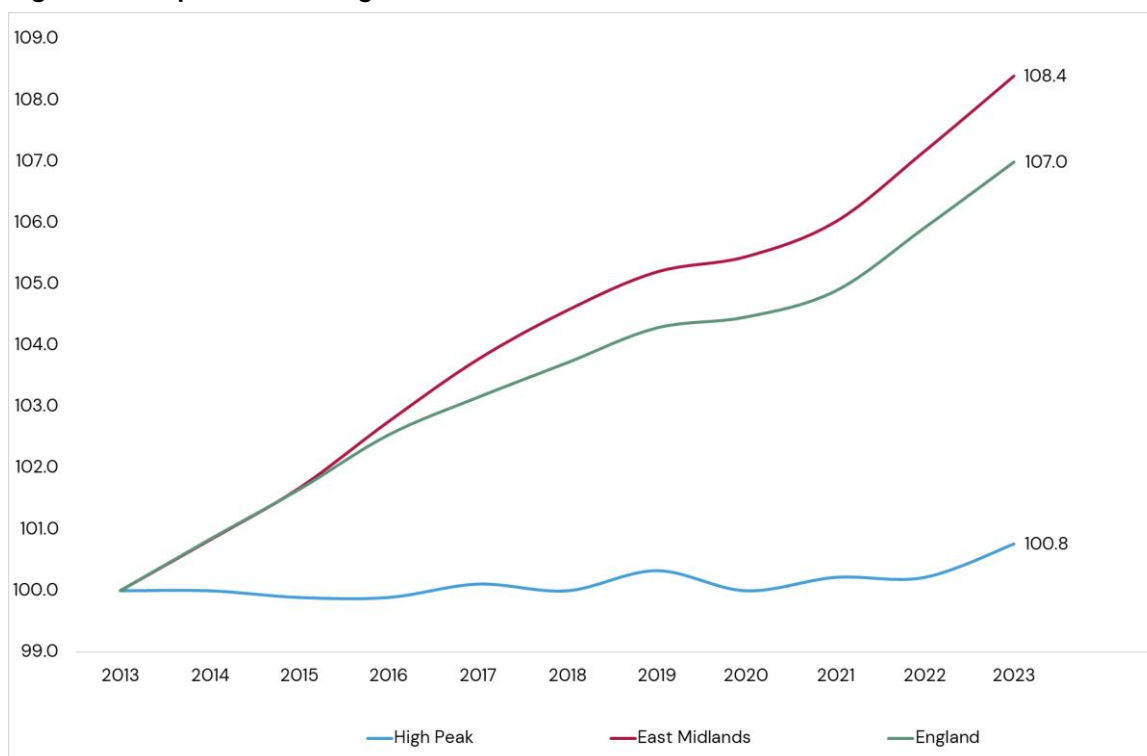
Figure 2.1: Site Location



Population

- 2.3. Mid-year population estimates published by the Office for National Statistics (ONS) show that as of 2023, the population of High Peak (where the scheme is located) was 91,600. The population of High Peak has grown by 0.8% (700) between 2013 and 2023. The population of the East Midlands and England grew at a higher rate over this period, increasing by 8.4% (386,800) and 7.0% (3.8 million) respectively (see Figure 2.2).

Figure 2.2: Population Change, 2013–23 (2013=100)



Source: ONS, Mid-Year Population Estimates

- 2.4. Tables 2.1–2.3 show population change by age in High Peak, the East Midlands and England between 2013 and 2023. In all comparator areas, the fastest growing age group were those aged 65 and over. In High Peak, this cohort grew by 21.1%, an increase of 3,600 people. This was above the growth rate of the same age group in the East Midlands (18.2%) and England (16.1%). In High Peak, the number of people aged 0–15 and 16–64 decreased by 6.8% (1,100) and 3.3% (1,900) respectively between 2013 and 2023. To ensure sustainable population growth in High Peak, new development is needed to attract younger people and people of working age to the LPA.

Table 2.1: High Peak Population Estimates by age, 2013–23

	2013	2023	Absolute Change	% Change
0–15	16,200	15,100	–1,100	–6.8%
16–64	57,700	55,800	–1,900	–3.3%
65+	17,100	20,700	3,600	21.1%
Total	90,900	91,600	700	0.8%

Source: ONS, Mid-Year Population Estimates

Table 2.2: East Midlands Population Estimates by age, 2013–23

	2013	2023	Absolute Change	% Change
0–15	848,200	901,100	52,900	6.2%
16–64	2,920,900	3,103,100	182,200	6.2%
65+	835,400	987,100	151,700	18.2%
Total	4,604,500	4,991,300	386,800	8.4%

Source: ONS, Mid-Year Population Estimates

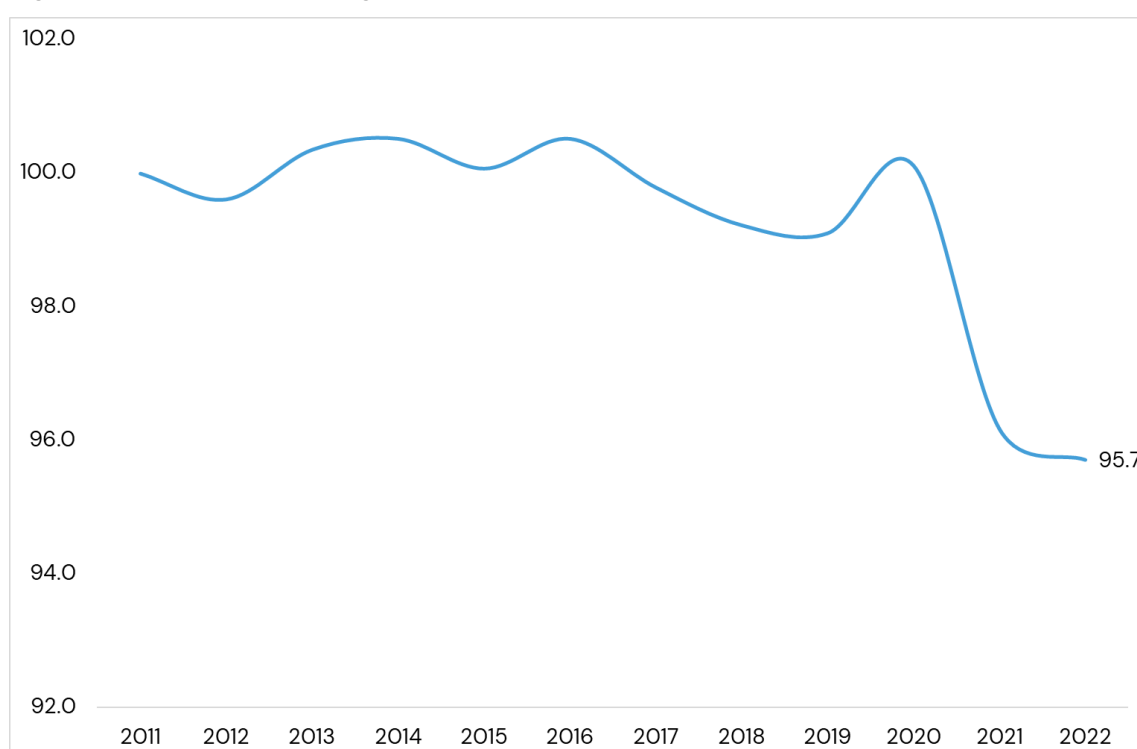
Table 2.3: England Population Estimates by age, 2013–23

	2013	2023	Absolute Change	% Change
0–15	10,180,500	10,648,400	467,900	4.6%
16–64	34,453,800	36,258,900	1,805,100	5.2%
65+	9,284,400	10,783,100	1,498,700	16.1%
Total	53,918,700	57,690,400	3,771,700	7.0%

Source: ONS, Mid-Year Population Estimates

- 2.5. At the time of writing, ward level data are not available for 2023. Figure 2.3 therefore shows ward population data between 2011 and 2022. In total, the population of Whitfield and Simmondley declined by 4.3% over this timeframe. Population had been fluctuating around the 2011 figure up until 2020, however it fell by 296 between 2020 and 2022.

Figure 2.3: Population Change in Simmondley & Whitfield, 2011–22 (2011=100)



Source: ONS, Mid-Year Population Estimates

- 2.6. Table 2.4 shows population change by age in Simmondley and Whitfield from 2011–22. Although the wards experienced a decline in population of 4.3%, the 65 and over age range saw an increase of 42.2% over the timeframe. This means that the population decrease was driven entirely by the 0–15 and 16–64 cohorts, which fell by 13.6% and 11.8% respectively.

Table 2.4: Simmondley & Whitfield Population Estimates by age, 2011–22

	2011	2022	Absolute Change	% Change
0–15	1,307	1,129	-178	-13.6%
16–64	4,424	3,902	-522	-11.8%
65+	977	1,389	412	42.2%
Total	6,708	6,420	-288	-4.3%

Source: ONS, Mid-Year Population Estimates

- 2.7. Tables 2.5–2.7 show the population projections for High Peak, the East Midlands and England between 2018 and 2038. Projections are not available at a ward level. The latest subnational ONS population projections (2018–based) were published in March 2020, and these indicate

that the population of High Peak is expected to increase by around 6,388 between 2018 and 2038 (a rise of 6.9%). The growth rates in the East Midlands and England are projected to be higher at 12.0% and 8.6% respectively in the same timeframe.

- 2.8. Looking at the population projections for High Peak in more detail, between 2018 and 2038 the number of people aged 16–64 is projected to decrease by 2.9% (1,641), whilst the number of people aged 0–15 is projected to decrease by 2.1% (330). The number of people aged 65+ is expected to increase by 43.3%, which would represent 8,360 more people in this age group over the 20-year timeframe (see Table 2.5).

Table 2.5: Projected Population Change in High Peak, 2018–38

	2018	2038	Absolute Change	% Change
0–15	15,696	15,366	–330	–2.1%
16–64	57,234	55,593	–1,641	–2.9%
65+	19,291	27,651	8,360	43.3%
Total	92,221	98,609	6,388	6.9%

Source: ONS, 2018-based Subnational Population Projections

Table 2.6: Projected Population Change in East Midlands, 2018–38

	2018	2038	Absolute Change	% Change
0–15	893,824	905,068	11,244	1.3%
16–64	2,983,294	3,149,389	166,095	5.6%
65+	927,031	1,326,829	399,798	43.1%
Total	4,804,149	5,381,271	577,122	12.0%

Source: ONS, 2018-based Subnational Population Projections

Table 2.7: Projected Population Change in England, 2018–38

	2018	2038	Absolute Change	% Change
0–15	10,748,458	10,370,237	–378,221	–3.5%
16–64	35,049,467	36,066,076	1,016,609	2.9%
65+	10,179,253	14,329,964	4,150,711	40.8%
Total	55,977,178	60,766,277	4,789,099	8.6%

Source: ONS, 2018-based Subnational Population Projections

- 2.9. Further analysis of the 16–64 working age population (Tables 2.8–2.10) identifies that there are projected to be decreases in most age groups across High Peak between 2018 and 2038. The age groups that are expected to increase in High Peak are ages 30–44, with the 40–44 cohort seeing the largest projected increase of 22.4%. On the other hand, the East Midlands and England are expected to see most age groups increase over the 20-year period. The only age group with a projected decline in all three comparator areas is the 50–54 cohort, with a decrease of 16.0% in High Peak, 4.6% in the East Midlands and 3.2% in England.
- 2.10. It is critical that High Peak sees new homes built, such as those provided by the Proposed Development, to attract working-age individuals looking to move into the area. This will help High Peak's population align more closely with regional and national changes.

Table 2.8: Projected Population Change (16–64) in High Peak, 2018–38

	2018	2038	Absolute Change	% Change
Aged 16–19	3,904	3,720	-184	-4.7%
Aged 20–24	4,719	4,521	-198	-4.2%
Aged 25–29	5,356	5,201	-155	-2.9%
Aged 30–34	5,082	5,234	152	3.0%
Aged 35–39	5,222	5,474	252	4.8%
Aged 40–44	5,063	6,197	1,134	22.4%
Aged 45–49	6,857	6,717	-140	-2.0%
Aged 50–54	7,696	6,465	-1,231	-16.0%
Aged 55–59	7,226	6,271	-955	-13.2%
Aged 60–64	6,109	5,793	-316	-5.2%

Source: ONS, 2018–based Subnational Population Projections

Table 2.9: Projected Population Change (16–64) in East Midlands, 2018–38

	2018	2038	Absolute Change	% Change
Aged 16–19	222,533	249,577	27,044	12.2%
Aged 20–24	318,412	349,360	30,948	9.7%
Aged 25–29	310,058	328,667	18,609	6.0%
Aged 30–34	293,911	308,730	14,819	5.0%
Aged 35–39	292,697	298,238	5,541	1.9%
Aged 40–44	275,021	327,067	52,046	18.9%
Aged 45–49	330,618	344,822	14,204	4.3%
Aged 50–54	346,715	330,732	-15,983	-4.6%
Aged 55–59	319,161	320,624	1,463	0.5%
Aged 60–64	274,168	291,572	17,404	6.3%

Source: ONS, 2018–based Subnational Population Projections

Table 2.10: Projected Population Change (16–64) in England, 2018–38

	2018	2038	Absolute Change	% Change
Aged 16–19	2,492,829	2,713,677	220,848	8.9%
Aged 20–24	3,512,654	3,789,164	276,510	7.9%
Aged 25–29	3,815,924	3,995,005	179,081	4.7%
Aged 30–34	3,787,597	3,723,183	-64,414	-1.7%
Aged 35–39	3,717,483	3,483,926	-233,557	-6.3%
Aged 40–44	3,390,584	3,719,982	329,398	9.7%
Aged 45–49	3,799,242	3,878,474	79,232	2.1%
Aged 50–54	3,915,451	3,788,506	-126,945	-3.2%
Aged 55–59	3,573,329	3,676,051	102,722	2.9%
Aged 60–64	3,044,374	3,298,108	253,734	8.3%

Source: ONS, 2018–based Subnational Population Projections

Deprivation

- 2.11. The 2019 Index of Multiple Deprivation provides an indication of the average levels of deprivation for LSOAs across England. It also provides an assessment against domains of

deprivation. In total, England has 32,844 LSOAs, with 1 being the most deprived and 32,844 being the least deprived.

- 2.12. The Proposed Development falls within LSOA High Peak 004F, which has an overall rank of 31,451, placing it in the top 10% least deprived LSOAs in England. When looking at individual domains of deprivation, High Peak has its highest rank of 20,563 in the health and disability domain, placing it in the top 40% least deprived LSOAs for this domain. Its lowest rank is in the living environment domain where it ranks in the top 10% of least deprived areas at 31,162.
- 2.13. The full list of the individual domain rankings for High Peak 004F is set out in Table 2.11. The lower the number is, the more deprived the area is compared to the other LSOAs nationally and vice versa.

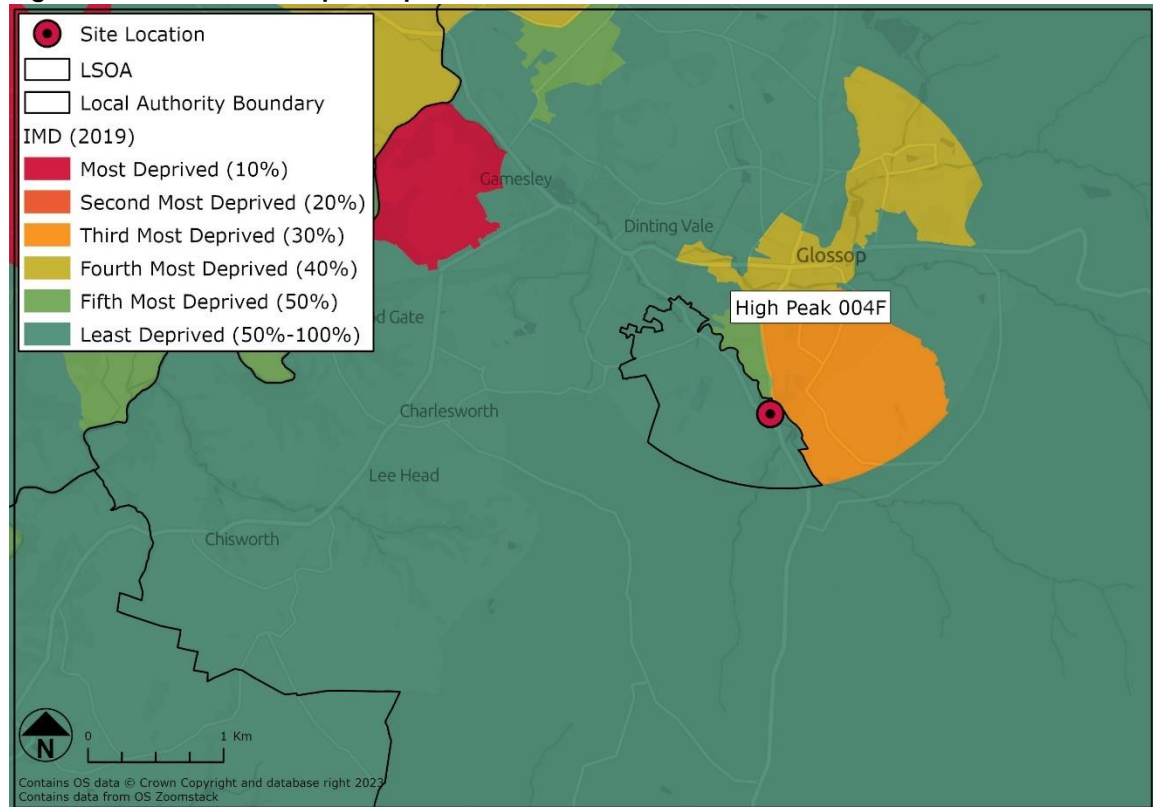
Table 2.11: High Peak 004F IMD 2019 Domain Rankings

IMD Domain	High Peak 004F Rank (out of 32,844, 1 being the most deprived)	Decile/Deprivation status
Overall IMD	31,451	Top 10% (least)
Income	29,044	Top 20% (least)
Employment	27,132	Top 20% (least)
Education	28,322	Top 20% (least)
Health and Disability	20,563	Top 40% (least)
Crime	31,048	Top 10% (least)
Barriers to housing and services	27,999	Top 20% (least)
Living Environment	31,162	Top 10% (least)

Source: Ministry of Housing, Communities & Local Government

- 2.14. Figure 2.4 shows the Index of Multiple Deprivation rank for the Site location and surrounding area. The LSOA in which the scheme is located (High Peak 004F) falls within the top 10% least deprived LSOAs in the country. There are areas of higher deprivation to the east and northwest of the Proposed Development.

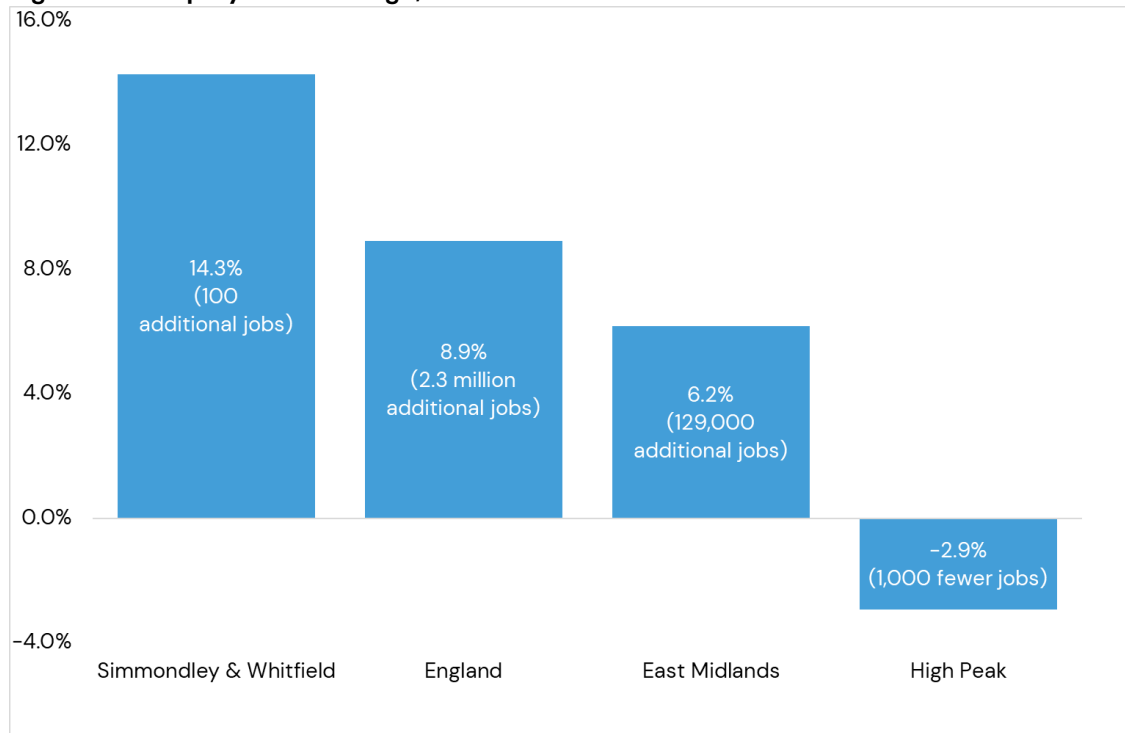
Figure 2.4: Index of Multiple Deprivation for the Site Location



Employment

- 2.15. Between 2015 and 2023, Simmondley and Whitefield saw employment increase by 14.3%, equating to 100 additional jobs (see Figure 2.5). Employment in the local authority of High Peak declined by 2.9%, an absolute decrease of 1,000 jobs. Employment in the East Midlands increased by 6.2% and in England it grew by 8.9% over the same period. The Proposed Development will support new opportunities for jobs on-site during the construction phase.

Figure 2.5: Employment Change, 2015–23

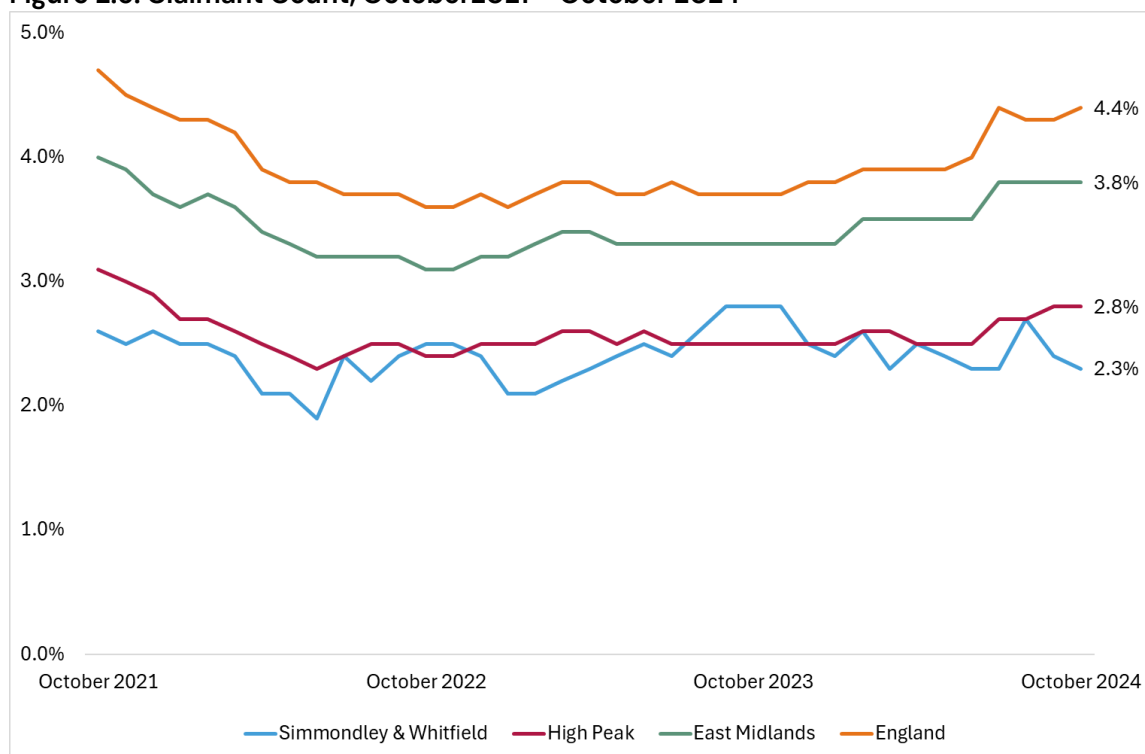


Source: ONS, Business Register & Employment Survey

Unemployment

- 2.16. The claimant count records the number of individuals claiming Jobseeker's Allowance (JSA) along with those claiming Universal Credit (UC), who are required to seek and be available for work. The most accurate measure of unemployment at the current time is the claimant count, which counts the number of people claiming JSA plus those who claim UC and are required to seek work and be available for work.
- 2.17. Figure 2.6 shows the monthly claimant count from October 2021 – October 2024, expressed as a proportion of residents aged 16–64. In October 2024, the claimant count was at 2.8% for High Peak, which was below the regional (3.8%) and national (4.4%) figures. Simmondley and Whitfield had a claimant count of 2.3%, below the rates for all other areas.

Figure 2.6: Claimant Count, October 2021 – October 2024



Source: ONS

Housing

- 2.18. This sub-section looks at housing-related data in High Peak. Where available, ward data are presented. Due to boundary changes, it is only possible to present ward data from the 2021 Census and not the 2011 Census.
- 2.19. Tables 2.12 and 2.13 show housing stock change from 2013 to 2023 for High Peak and England. In 2023, there were 43,974 dwellings within High Peak, representing a net increase of 2,898 dwellings over the last decade. Most of these properties are within the private sector. The rate of increase in the housing stock within High Peak (7.1%) is lower than the average for England (9.2%) over the period 2013 to 2023.
- 2.20. The local authority housing stock within High Peak shows a 6.3% decrease over decade, similar to the 6.6% decrease nationally. High Peak has a significantly larger growth in registered providers between 2013 to 2023 compared to England, showing a 39.9% increase compared to 10.6% nationally.

Table 2.12: Housing Stock Change – High Peak (2013 to 2023)

	Local Authority (incl. owned by other LAs)	Private Registered Provider	Other Public Sector	Private Sector	Total
2013	4,089	1,099	50	35,838	41,076
2023	3,832	1,528	1	38,613	43,974
Absolute change	-257	429	-49	2,775	2,898
% Change	-6.3%	39.0%	-98.0%	7.7%	7.1%

Source: Live table 100, DLUHC

Table 2.13: Housing Stock Change – England (2013 to 2023)

	Local Authority (incl. owned by other LAs)	Private Registered Provider	Other Public Sector	Private Sector	Total
2013	1,681,785	2,392,124	67,498	19,106,055	23,247,462
2023	1,571,456	2,645,328	31,268	21,148,395	25,396,447
Absolute change	-110,329	253,204	-36,230	2,042,340	2,148,985
% Change	-6.6%	10.6%	-53.7%	10.7%	9.2%

Source: Live table 100, DLUHC

Housing Tenure

- 2.21. Table 2.14 housing tenure across the four spatial ranges. The level of home ownership in Simmondley and Whitfield is relatively high at 74.9%, while the proportion of private rented properties is low at 10.3%.

Table 2.14: Housing Tenure, 2021

	Owns – outright or with a mortgage/loan or shared ownership	Private rented	Social rented	Living rent free
Simmondley & Whitfield	74.9%	10.3%	14.6%	0.2%
High Peak	71.6%	16.1%	12.2%	0.1%
East Midlands	66.3%	18.7%	14.9%	0.1%
England	62.3%	20.5%	17.1%	0.1%

Source: 2021 Census

Note: Figures may not sum due to rounding

Property Size

- 2.22. Table 2.15 shows property size in 2021 across the four spatial ranges. It can be seen that relative to High Peak, the East Midlands and England, the proportion of 1 bedroom properties in Simmondley and Whitfield (7.2%) is lower. The proportion of properties with 4 or more bedrooms is also higher in the two wards at 30.2%.

Table 2.15: Property Size, 2021

	Simmondley & Whitfield	High Peak	East Midlands	England
1 bedroom	7.2%	8.6%	8.0%	11.6%
2 bedrooms	23.3%	28.9%	25.9%	27.3%
3 bedrooms	39.3%	40.0%	44.0%	40.0%
4 or more bedrooms	30.2%	22.5%	22.0%	21.1%
Total	100.0%	100.0%	100.0%	100.0%

Source: 2021 Census

Accommodation Type

- 2.23. Table 2.16 shows accommodation type in 2021 across the four spatial ranges. Detached properties account for 35.2% of homes in Simmondley and Whitfield, higher than the other three areas. Purpose built blocks of flats account for 9.5% of properties in the two wards combined. This is higher than the corresponding figures for High Peak (7.3%) and the East Midlands (8.9%) but below the national average of 17.1%.

Table 2.16: Accommodation Type, 2021

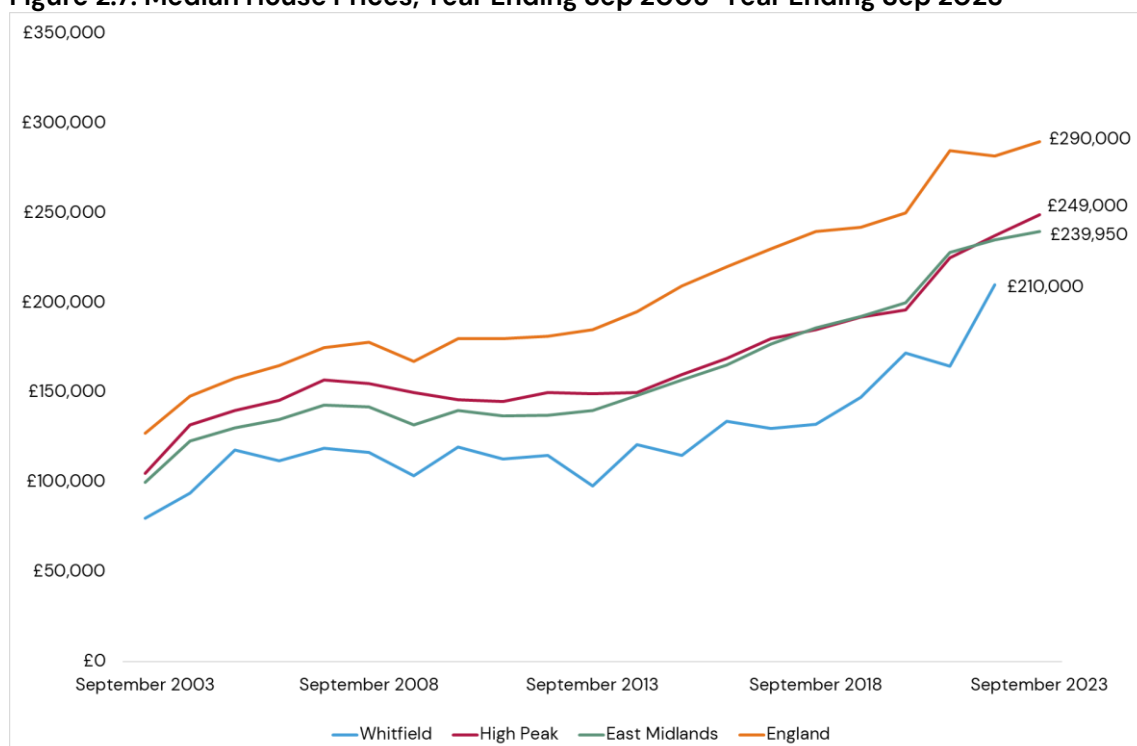
	Simmondley & Whitfield	High Peak	East Midlands	England
Detached	35.2%	24.0%	33.2%	22.9%
Semi-detached	23.5%	30.6%	35.7%	31.5%
Terraced	30.2%	33.1%	19.3%	23.0%
Purpose built block of flats	9.5%	7.3%	8.9%	17.1%
Other	1.6%	5.1%	3.0%	5.6%
Total	100.0%	100.0%	100.0%	100.0%

Source: 2021 Census

House Prices

- 2.24. Figure 2.7 shows median house prices between September 2003 and September 2023 for High Peak, the East Midlands and England. The median price of a house has risen dramatically in all areas. Across High Peak the median price stood at £249,000 in September 2023. Whilst cheaper than the England average of £290,000 this is higher than the regional average of £239,950. It is notable that High Peak is comparable to the East Midlands and has been closely aligned with it since 2003.
- 2.25. Data for wards are not yet available for 2023, so the figures for Whitfield are presented up to September 2022. Within Whitfield, the prices fell in 2020 to 2021, but this was followed by a significant rise of £45,450 the following year to 2022.

Figure 2.7: Median House Prices, Year Ending Sep 2003–Year Ending Sep 2023



Source: ONS

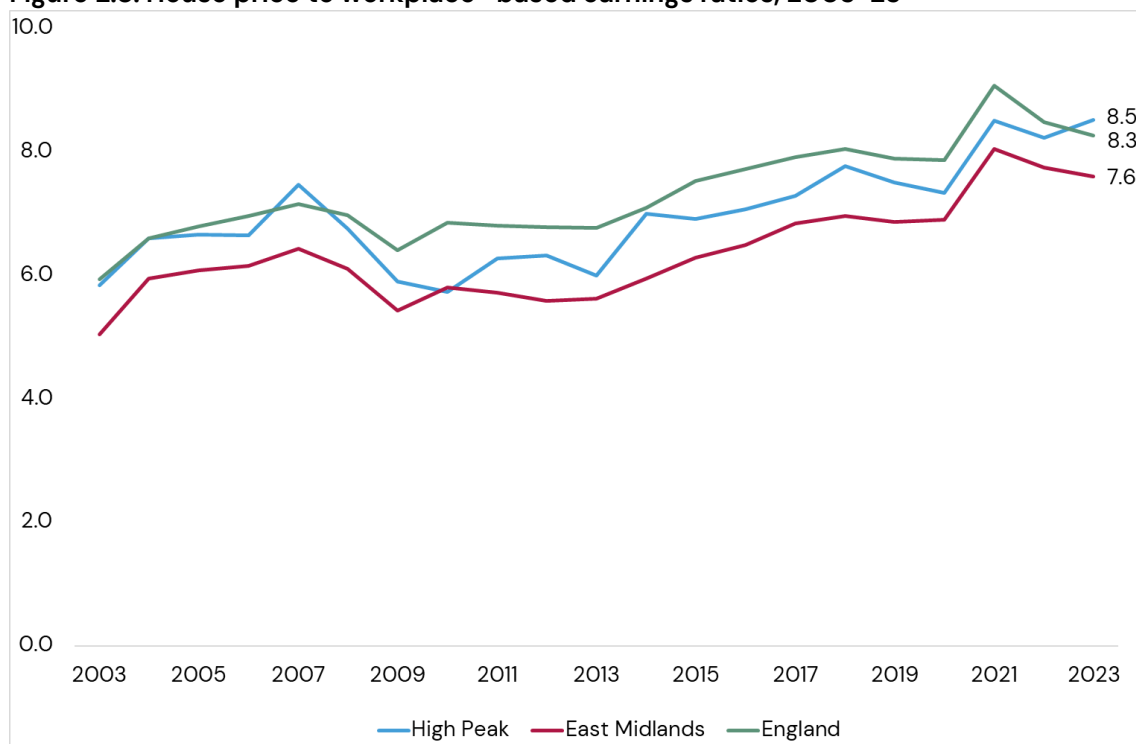
Affordability

- 2.26. An affordability ratio is calculated by dividing the median price paid for a house in an area by the median annual salary of the area. Figure 2.8 shows the affordability ratio in High Peak

alongside regional and national comparators from 2003 through to 2023. In 2003, the affordability ratio in High Peak was 5.8 and by 2023 it had risen to 8.5 – an increase of 2.7.

- 2.27. The affordability ratio in High Peak is currently above the ratio seen in the East Midlands (7.6) and England (8.3), therefore homes have become less affordable over time in each of the areas.

Figure 2.8: House price to workplace- based earnings ratios, 2003–23



Source: ONS, Affordability ratios

Occupancy Rating

- 2.28. In 2021 the majority of properties in Simmondley and Whitfield (80.1%) were under-occupied, having at least one spare bedroom. This was above the corresponding figures for England (68.8%), the East Midlands (75.1%) and High Peak (76.9%). Table 2.17 shows the most recent occupancy rating data from the 2021 Census in more detail.

Table 2.17: Occupancy rating for bedrooms, 2021

	2+ or more	+1	0	-1	-2 or less
Simmondley & Whitfield	44.6%	35.5%	18.4%	1.3%	0.2%
High Peak	40.3%	36.6%	21.5%	1.5%	0.1%
East Midlands	40.3%	34.7%	21.8%	2.6%	0.5%
England	35.6%	33.2%	26.8%	3.6%	0.7%

Source: 2021 Census

Home Working

- 2.29. Table 2.18 shows the method of travel to work distributions for Simmondley and Whitfield, High Peak, the East Midlands and England in 2021. Around one third of people in the two wards work mainly at or from home according to the data, above the proportions in the other

three areas shown in the table. It should be noted that the data were collected during the Covid-19 pandemic when the country was in lockdown, meaning the proportion of people in this category is likely to have gone down since restrictions were lifted.

Table 2.18: Method of Travel to Work, 2021 Census

	Simmondley & Whitfield	High Peak	East Midlands	England
Work mainly at or from home	33.9%	29.1%	25.8%	31.5%
Underground, metro, light rail, tram	0.2%	0.1%	0.2%	1.9%
Train	2.9%	1.7%	0.5%	2.0%
Bus, minibus or coach	0.8%	1.4%	3.2%	4.3%
Taxi	0.4%	0.4%	0.7%	0.7%
Motorcycle, scooter or moped	0.1%	0.3%	0.4%	0.5%
Driving a car or van	48.5%	51.9%	53.2%	44.5%
Passenger in a car or van	2.9%	3.4%	5.0%	3.9%
Bicycle	0.9%	0.8%	2.0%	2.1%
On foot	8.5%	10.1%	8.0%	7.6%
Other method of travel to work	0.8%	0.8%	0.9%	1.0%

Source: 2021 Census

- 2.30. During the coronavirus (COVID-19) pandemic there was an unprecedented increase in the number of individuals working from home. The ONS Opinions and Lifestyle Survey found that, despite the end of UK government guidance to work from home, in February 2022 more than 8 in 10 workers who had to work from home during the coronavirus pandemic said they planned to work both from home and in the workplace (hybrid work).
- 2.31. In 2019, 16.6% of workers in England worked from home. Between 2019 and 2022, the number of home workers increased by 102% to 33.1% of total workers. In the East Midlands, this increase was 98% (see Table 2.19).

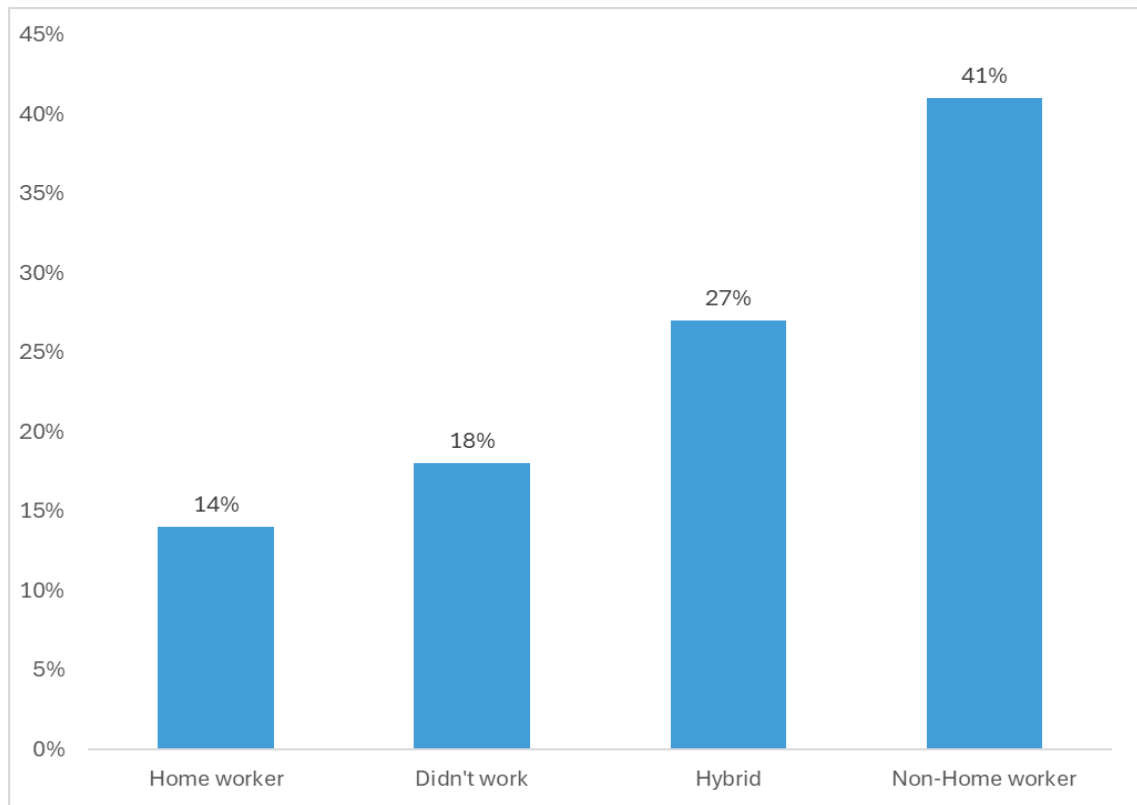
Table 2.19: Change in home workers between 2019 to 2022

	2019	2022	Absolute Change	% Change
England	4,203,000	8,503,000	4,300,000	102%
East Midlands	328,000	648,000	320,000	98%

Source: Labour Force Survey

- 2.32. More recent data are available at a national scale where Figure 2.9 shows the location of work in September 2024 across England. The number of home and hybrid workers in England accounts for 41% of total workers, matching the proportion of non-home workers. This shift towards flexible working arrangements highlights the growing demand for housing that accommodates this lifestyle.

Figure 2.9: Location of work in England, September 2024



Source: Opinions and Lifestyle Survey, ONS

Conclusions

- 2.33. The analysis indicates that High Peak has had some population and economic growth over the last decade, however this is lower than regional and national average rates of population, housing and employment growth. Also, all of the projected population growth is within the over 65 age group.
- 2.34. There needs to be a clear focus on delivering homes that are attractive to the younger age cohorts within the working age population who are looking to move into the area. This will help raise the population, housing and employment growth in High Peak towards the regional and national averages.
- 2.35. In terms of the housing market, High Peak has seen high growth in house prices and a worsening of the affordability ratio. This is indicative of a high demand for housing within the area. The combined effect of a need to attract younger age cohorts and worsening affordability makes critical that more homes are delivered in the area.
- 2.36. In terms of the housing stock, it is notable there is significant scope for 'down-sizing' given that the majority of properties within the area are under-occupied. Combined with the implications of worsening affordability, this suggests an emphasis upon smaller accommodation should be considered.

3. Policy and Evidence Review

- 3.1. This section provides a review of national and local policy and the key local evidence base in relation to the need for the mix of housing within High Peak.

National Policy and Guidance

- 3.2. National planning policy is set out within the NPPF. The most recent iteration was published December 2023. This version supersedes all previous versions of the NPPF. It should however be noted that there is no substantive change in relation to the issue of assessing the housing needs of different groups between the December 2023 NPPF and the preceding version.

- 3.3. The key NPPF paragraphs in relation to this study are paragraphs 60 and 63. Paragraph 60 states:

"To support the Government's objective of significantly boosting the supply of homes, 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. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community."

- 3.4. Paragraph 63 identifies that:

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

- 3.5. The NPPF is supported by guidance set out within the Planning Practice Guidance (PPG). In relation to the housing needs of different groups this is set out within section 67 of the guidance and section 63 which deals specifically with housing for older and disabled people.

Draft NPPF

- 3.6. The Government published its draft proposals for revisions to the NPPF on 30th July 2024. The consultation which followed this publication ended on 24th September 2024. Following consideration of the responses received during the consultation it is anticipated that the updated NPPF will be published early 2025. At the time of writing it remains unclear as to the extent that the proposed changes will be enacted.

- 3.7. The proposed amendments appear to have little practical impact upon the extant NPPF in relation to the size, type and mix of dwellings. The proposed amendments suggest:

"61. To support the Government's objective of significantly boosting the supply of homes, 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. The overall aim should be to

meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community."

"63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes."

Local Plan and Evidence

- 3.8. The extant Local Plan within High Peak is the High Peak Local Plan. This was adopted in April 2016 and it sets out the vision, objectives and development strategy for meeting the areas needs until 2031. The vision for the borough is that by 2031, High Peak will be widely recognised as a distinctive and successful rural area with vibrant market towns and villages, which reflect the special character and quality of the Peak District landscape.
- 3.9. In terms of strategic objectives to ensure the planned growth of High Peak stays on track several objectives have been developed, some of those relating to the size, type and tenure of dwellings are listed below:
- *SO9: To provide an appropriate mix of housing types, sizes and tenures in sustainable and accessible locations that meets the needs of all residents in the Borough.*
 - *SO12: To encourage the efficient use of previously developed land and buildings whilst minimising the use of greenfield land.*
- 3.10. The proposed development is located within the Glossopdale area which is identified to deliver between 27 and 35% of the 3,549 dwellings required to be identified through the plan. Policy S5 sets out the strategy for Glossopdale. In relation to housing it states that it will provide for the housing needs of the community by planning for sustainable housing and mixed-use developments. It identifies that it will support the development of new housing on sustainable sites within the built-up area boundary.
- 3.11. Policy H3: New Housing Development sets out the council's expectations in relation to housing mix and density, stating that proposals for new dwellings will be required to address the housing needs of local people by:
- a) Meeting the requirements for affordable housing within the overall provision of new residential development as set out in Policy H4
 - b) Providing a range of market and affordable housing types and sizes that can reasonably meet the requirements and future needs of a wide range of household types including for the elderly and people with specialist housing needs, based on evidence from the Strategic Housing Market Assessment or successor documents
 - c) Providing a mix of housing that contributes positively to the promotion of a sustainable and inclusive community taking into account the characteristics of the existing housing stock in the surrounding locality

- d) Ensuring new residential development includes a proportion of housing suitable for newly forming local households
- e) Supporting dwellings designed to provide flexible accommodation which is capable of future adaptation by seeking to achieve adequate internal space for the intended number of occupants in accordance with the Nationally Described Space Standard and delivered to meet accessibility standards set out in the Optional Requirement M4(2) of Part M of the Building Regulations.

3.12. The plan itself does not refer to a specific mix of house types and sizes but rather refers in part b of the policy to the Strategic Housing Market Assessment (SHMA) or successor documents. The policy is clear that whilst the SHMA and successor documents are important considerations their recommendations are not intended to be followed slavishly in all cases. This is apparent in the use of terms such as ‘reasonably meet’ and part c of the policy being clear that characteristics of local housing stock should also be taken into account.

3.13. The Council undertook a review of its local plan in June 2022. The review identified that policies Policy S3 (Strategic Housing Development), Policy S4 (Maintaining & Enhancing an Economic Base) and Policy H4 (Affordable Housing) were out of date. As discussed above Policy S3 relates to the overall need for housing.

2014 Strategic Housing Market Assessment and Housing Needs Study (2014 SHMA)

3.14. The Council’s primary evidence base for its housing mix policy at the time of the local plan examination was the 2014 SHMA. This document, produced by Nathaniel Lichfield and Partners, on behalf of the Council. This document provided the following policy advice:

Table 3.1: SHMA Size Mix (2014 SHMA)

Property size	Percentage
1-bed	10%
2-bed	45%
3-bed	35%
4-bed+	10%

3.15. The 2014 SHMA was clear that the size mix of new development should be applied flexibly.

Housing and Economic Land Needs Assessment, 2022 (2022 HELNA)

3.16. The HELNA was published in September 2022 by Lichfields on behalf of the Council. This document was commissioned to inform the review of the Local Plan. The study provides an updated analysis of the housing mix required across the Borough as well as providing a housing mix across each of the Local Plan Sub-Areas. This includes Glossopdale within which the site is located.

3.17. The HELNA is considered by the Council to be a successor document to the SHMA, as referenced in Policy H3, and hence is used to determine housing mix requirements. It must, however, be recognised that this document has not been independently scrutinised in the same manner as the SHMA, through a local plan examination process.

3.18. The 2022 HELNA provides recommendations in relation to the mix of housing for both High Peak as a whole as well as Glossopdale, the sub-area in which the site is located. These are outlined within the table. In addition, recommendations with a market adjustment are also provided. This results in a reduction in the number of smaller (1-2 bed) dwellings and a commensurate increase in the number of 3- and 4 bedroom properties to reflect “...the very pronounced socio-economic shock precipitated by the pandemic and the strong (and what appears to be a permanent) shift towards homeworking and the need for larger properties to accommodate this.” (HELNA, para 12.34).

Table 3.2: High Peak HELNA recommended mix (2022 HELNA) – District-wide

		1-bed	2-bed	3-bed	4-bed	5-bed+
Market Housing	Mix prior to market adjustment	10%	37%	41%	9%	3%
	Mix following 15% market adjustment	8%	32%	44%	13%	3%
	Overall Mix	40%		60%		
Affordable Housing	Mix prior to market adjustment	48%	29%	22%	1%	0%
	Mix following 15% market adjustment	41%	25%	28%	7%	0%
	Overall Mix	65%		35%		

Table 3.3: Glossopdale sub-area recommended mix (2022 HELNA)

		1-bed	2-bed	3-bed	4-bed	5-bed+
Market Housing	Mix prior to market adjustment	7%	37%	46%	9%	1%
	Mix following 15% market adjustment	6%	31%	49%	12%	1%
	Overall Mix	37%		63%		
Affordable Housing	Mix prior to market adjustment	41%	36%	22%	1%	0%
	Mix following 15% market adjustment	35%	31%	28%	7%	0%
	Overall Mix	65%		35%		

3.19. In terms of the identified proportions Glossopdale has a lower proportion of 1-bed properties than High Peak as a whole, with and without the market adjustment. Glossopdale has the same

proportion of 2-bed and 5+ bed properties as High Peak and a very similar proportion of 4-bed properties. There are slightly higher levels of 3-bed properties in Glossopdale than High Peak.

- 3.20. Whilst the foregoing analysis provides useful information and guidance it should not be slavishly followed in every application. This is because sites will need to also consider local context and the sub-areas, like the district, is not homogeneous. This is demonstrated within section 2 of this report. The characteristics of the site are key considerations.

Conclusions

- 3.21. National policy and guidance require developments to respond to the need and demand for different types and sizes of accommodation from different elements of the community. Local policy and guidance are largely focused upon providing a good quality housing product which meets the needs of the local community.
- 3.22. The Local Plan largely follows national policy by providing a preferred mix of property size. Policy H3 does not set out a preferred mix, rather it refers to the 2014 SHMA or successor documents. In this case the 2022 HELNA is considered such a successor document. It is, however, notable that the 2022 HELNA has not been independently examined. The preferred mix is set out at both district and sub-area levels. These provide a useful starting point for considering the appropriate mix for individual applications.
- 3.23. Policy H3 does not require applicants to 'slavishly follow' the preferred mix. This is clear by reference to applications should 'reasonably meet' the mix in part b of the policy and part c of the policy being clear that characteristics of local housing stock should be taken into account. This should also include characteristics of the site.
- 3.24. Furthermore, whilst the 2022 HELNA is only 2-years old it is partially reliant upon information derived from the 2011 census. It is now more than 13-years since this data was collected and there has been an updated census in the interim. As discussed within section 2 of this report the 2021 census results suggest that there is significant scope for 'down-sizing' within the area given that the majority of properties within the area are under-occupied. The 2022 HELNA therefore presents a 'snapshot in time' of the evidence available at the time of publication. Clearly updated evidence, as provided throughout this report, should be considered in determining the appropriate housing mix for individual sites.

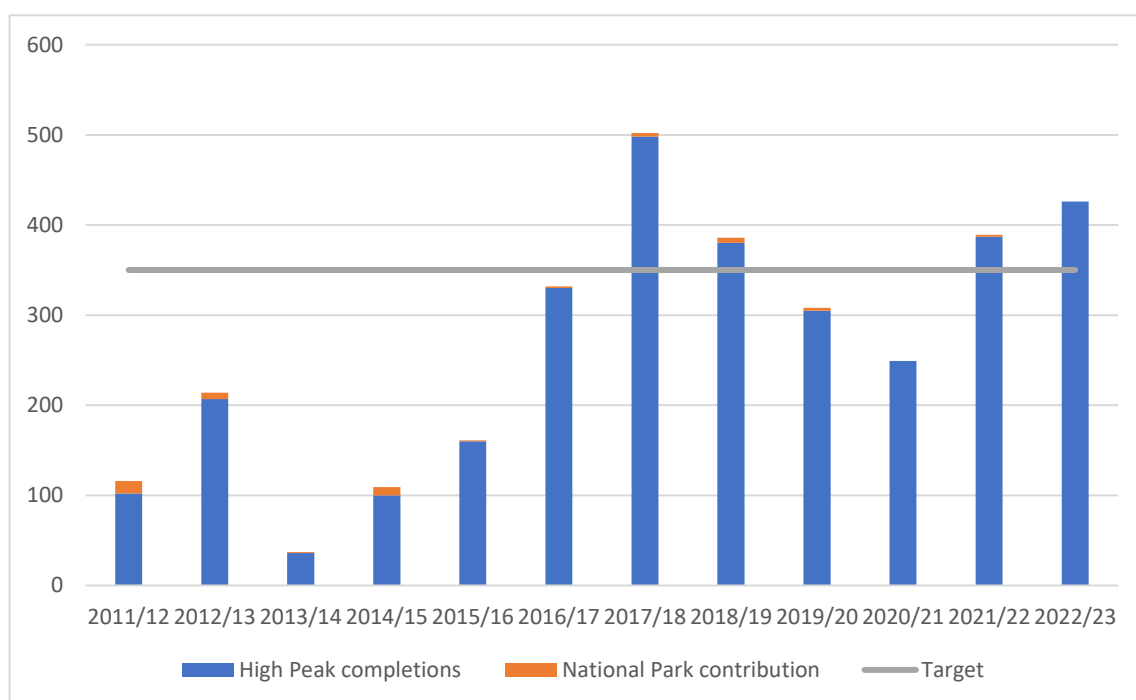
4. Housing Delivery

4.1. This section considers the delivery of housing within High Peak as well as permitted schemes.

Overall Delivery

- 4.2. Policy S3 of the High Peak Local Plan identifies that a minimum of 7,000 dwellings should be delivered over the plan period, 2011 to 2031. This equates to an average of 350 dwellings per annum (dpa). This figure is inclusive of the areas both within and outside the National Park. Since the start of the plan period in 2011 the council has failed to meet this requirement, delivering 3,229 dwellings up to 2022/23, falling 971 dwellings short of the cumulative annual average. The annual average rate of delivery has been equivalent to 269dpa.
- 4.3. Approximately 33% of the completions outside of the national park have been delivered within Glossopdale, this accords with the 27–35% identified for the sub-area within Policy S3.

Figure 4.1: Net Housing Delivery¹



Source: High Peak AMR

Completions and Permissions by Size

- 4.4. The Council does not publish data on the size and mix of new homes permitted and completed. A Freedom of Information (FoI) request has been made to the High Peak Borough Council to gather this information. This request was submitted on 7th October 2024, the statutory timescale of 20 working days ended on the 4th November 2024. The request was

¹ Data for monitoring year 2023/24 was not fully available at the time of writing.



chased on 5th November 2024. Whilst the Council acknowledged the delay and hoped to respond shortly after this date the information had not been received at the time of writing.

- 4.5. The request sought to identify the size of bedrooms permitted and completed across each of the delivery areas identified within the HELNA. The appellant reserves the right to update this section following the response to the Fol.

Conclusions

- 4.6. To be completed following receipt and analysis of the Fol request.

5. Proposed Housing Mix

- 5.1. The scheme seeks to deliver 24 apartments. The proposals provide a balance of 1- and 2-bedroom market properties. The proposed housing mix provides the following:
- 9 1-bedroom apartments,
 - 15 2-bedroom apartments.
- 5.2. The percentage split of each market apartment size is identified in table 5.1 below. The affordable homes provision will be provided on site, with a 30% affordable housing provision proposed. This will comprise 7, 1-bedroom properties.

Table 5.1: Proposed market housing mix (appeal)

Size	% Market Housing		
	HELNA Range ²		Proposal ³
	District-wide	Glossopdale	
1 bed	8-10	6-7	12
2 bed	32-37	31-37	88

- 5.3. The proposed mix of housing proposed within the application clearly varies from that identified within the HELNA. This variance solely relates to the inclusion of a greater number of 1- and 2-bedroom market and affordable properties compared to the recommendations of the HELNA. However, this fails to recognise that the site forms part of the wider redevelopment of the former Charlestown Works site.
- 5.4. The development is located within the Whitfield ward on the southern edge of Glossop. The site lies within the built-up area boundary for Glossop and is part of a mixed-use housing/employment allocation in the High Peak Local Plan, identified as an 'Industrial Legacy' site under Local Plan Policy E5.
- 5.5. The site has previously been in industrial use as part of the former Charlestown Works complex. In 2014 an outline application was approved (HPK/2013/0597) for a mixed-use scheme (100 dwellings and 1660m² of B1 commercial floor space). This was followed by a reserved matters approval (HPK/2016/0520) for 96 dwellings and office uses. The two approved office blocks have not been fully constructed. This appeal proposes to construct residential apartments in their place. This element of the wider site has always been referred to as phase 3.
- 5.6. The officers report to Development Control Committee on 20th May 2024 recognises that the proposal sits within the wider consented site and that this element of the wider site was referenced as phase 3. The proposed mix on the proposal should, therefore, be considered within this context rather than in isolation.
- 5.7. The approved reserved matters application did not include any affordable housing provision. The mix of 96 dwellings is set out in table 5.2 below.

² Range based upon HELNA data pre and post market adjustment

³ Doesn't add due to rounding

Table 5.2: Housing Mix: Remainder of former Charlestown Works site

Size	% Market Housing		
	HELNA Range ⁴		Proposal ⁵
	District-wide	Glossopdale	
1 bed	8-10	6-7	1 (1)
2 bed	32-37	31-37	32 (31)
3 bed	41-44	46-49	55 (53)
4 bed	9-13	9-12	11 (11)
5 bed	3	1	0 (0)

- 5.8. The approved mix of the 96 dwellings within the reserved matters application (HPK/2016/0520) provides a slightly larger quantum of 3-bed properties than indicated within the HELNA range but a lower quantum of 1-bed properties than recommended in the HELNA.
- 5.9. Table 5.3 identifies the combined market mix across the whole of the former Charlestown Works site, including the appeal proposals. As can be seen whilst this does show a marginally higher number of 2-bed market properties than the identified Glossopdale range and a lower proportion of 1- and 4+-bed properties. The lower number of 1-bed properties is somewhat balanced by the 7 affordable 1-bed properties proposed which was indicated in the 2022 HELNA to be the greatest need within Glossopdale and wider High Peak. The lower number of 4+-bed properties is extremely marginal.

Table 5.3: Market Housing Mix: Proposed Mix across whole of the former Charlestown Works site

Size	% Market Housing		
	HELNA Range ⁶		Proposal ⁷
	District-wide	Glossopdale	
1 bed	8-10	6-7	3 (3)
2 bed	32-37	31-37	41 (46)
3 bed	41-44	46-49	47 (53)
4 bed	9-13	9-12	10 (11)
5 bed	3	1	0 (0)
Overall Mix			
1 & 2 bed	40	37	43 (49)
3+ bed	60	63	57 (64)

- 5.10. As discussed within section 3 of this report Policy H3 identifies that applicants should seek to 'reasonably meet' the mix in the SHMA or its successor document (HELNA). As demonstrated within table 5.3 above the proposed mix across the whole of the former Charlestown Works site closely resembles the range identified within the HELNA. Given the size constraints of the permitted office buildings the slight variation away from this range should be considered

⁴ Range based upon HELNA data pre and post market adjustment

⁵ Doesn't add due to rounding, brackets are actual numbers

⁶ Range based upon HELNA data pre and post market adjustment

⁷ Doesn't add due to rounding, brackets are actual numbers



acceptable. Indeed, the HELNA itself acknowledges (para. 12.39) that its recommendations do *“...not attempt to take into account how future policy changes (for example, to encourage downsizing), social changes or economic changes might affect how households occupy housing.”*

6. Conclusions

- 6.1. This section pulls together the foregoing analysis and evidence. The evidence currently presented provides clear justification for the housing mix proposed in the development. The reasons for this conclusion are set out below.

Proposed Mix

- 6.2. Section 5 of this proposal clearly illustrates that when the proposals are considered alongside the wider former Charlestown Works proposals there is only a marginal difference between the proposed mix and the range identified for Glossopdale within the HELNA. This variance relates to a slightly greater proportion of 2-bed market properties with a commensurate lower provision of 1, 4 and 5+ bed properties. The lower number of 1-bed market properties is off-set by the provision of 7 1-bed affordable properties. The 2022 HELNA identifies the greatest need for this size of affordable property both with Glossopdale and High Peak.
- 6.3. Policy H3 identifies that applicants should seek to 'reasonably meet' the mix in the HELNA. Given the de minimis difference it is considered that the proposals 'reasonably meet' the HELNA mix.
- 6.4. Furthermore, the nature of the proposals, being restricted by the proposed office blocks is a contributing factor to the appropriateness of the proposals.

Population

- 6.5. Within section 2 of this report, we discuss the population structure and growth within High peak. Whilst the authority has had some population and economic growth over the last decade, this is lower than regional and national average rates of population, housing and employment growth. It is also noted that the projected population growth is mainly within the over 65 age group.
- 6.6. In terms of the Simmondley and Whitfield wards a decline in population of 4.3% has been experienced over the period 2011-22. However, the 65 and over age range saw an increase of 42.2% over the timeframe. This means that the population decrease was driven entirely by the 0-15 and 16-64 cohorts, which fell by 13.6% and 11.8% respectively.
- 6.7. Considering population projections between 2018 and 2038 for High Peak the number of people aged 16-64 is projected to decrease by 2.9% (1,641), whilst the number of people aged 0-15 is projected to decrease by 2.1% (330). The only age cohorts within the 16-64 age group anticipated to increase over this period are the 30-44 age groups. The number of people aged 65+ is expected to increase by 43.3%, which would represent 8,360 more people in this age group over the 20-year timeframe. It is notable that East Midlands and England are expected to see most age groups increase over the 20-year period.
- 6.8. To address these issues there is a clear need to attract and retain younger households (16-30) through the provision of appropriate 'starter' accommodation. This would typically be smaller 1- and 2-bed properties. Similarly by providing opportunities for the older-age groups to downsize this would free up larger accommodation for larger family households, typically the 30-44 age cohorts.

Employment

- 6.9. Between 2015 and 2023, Simmondley and Whitefield saw employment increase by 14.3%, equating to 100 additional jobs. This was despite a borough-wide decrease over the same period. Providing a range of accommodation suitable for those seeking employment within the area, including smaller 'starter' properties would reduce travel distances.

Housing / Household Size

- 6.10. Table 2.15 above shows property size in 2021. This clearly shows that relative to High Peak, the East Midlands and England, the proportion of 1- and 2- bedroom properties in Simmondley and Whitfield wards (7.2%) is lower. Consequently, the housing mix proposed in this scheme would bring the proportion of 1- and 2- bed properties in the ward closer to the proportions in Glossopdale and High Peak and the HELNA recommendations for market housing.
- 6.11. The Council's Planning Policy team acknowledged this point within their response to the refused application on 8th June 2023. Within their discussion upon housing mix they state:

"The Census data showing existing housing stock in Simmondley ward shows that there is a much lower proportion of 1-bed properties in the ward than Glossopdale and High Peak. There is an even bigger difference in the proportion of 2-bed properties in Simmondley ward than High Peak and Glossopdale – it is much lower. Consequently, the housing mix proposed in this scheme would bring the proportion of 1 and 2 bed properties in the ward closer to the proportions in Glossopdale and High Peak and the HELNA recommendations for market housing."

Clearly recognising the issues with household size within this area of Glossopdale.

- 6.12. It is also worth noting that in 2021 the majority of properties in Simmondley and Whitfield wards (80.1%) were under-occupied, having at least one spare bedroom. This was above the corresponding figures for England (68.8%), the East Midlands (75.1%) and High Peak (76.9%). It is understood that some of this under-occupancy will be used by those working from home. However, when considered alongside the fact that the area has a high proportion of over 65s it provides clear evidence that there are significant opportunities for downsizing within the area.

Delivery

- 6.13. As discussed within section 4 of this analysis this information is not currently available, despite a timely Fol request. The appellant reserves the right to provide an update to this assessment upon receipt of this data.

Overall Conclusions

- 6.14. Based upon the analysis provided in this report it is considered that the housing mix identified for the proposed development is appropriate. This conclusion is made without the benefit of the Fol data in relation to housing completions by size and sub-area.

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