



Overall Housing Need for Derbyshire Dales Local Plan

Final Report

Iceni Projects Limited on behalf of
Derbyshire Dales District Council

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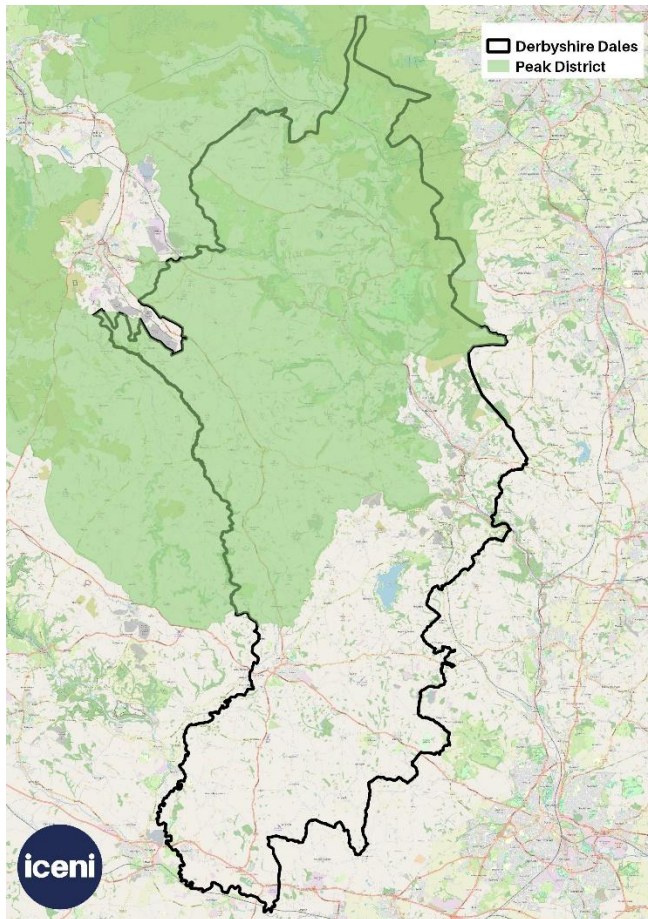
1. Introduction

- 1.1 Derbyshire Dales District Council is currently preparing a Local Plan Review which will cover those parts of the District which fall outside of the Peak District National Park. Once adopted, it will replace the current 2017 Local Plan.
- 1.2 The Council published a new Local Development Scheme (LDS) in January 2025 setting out a timetable for the Local Plan Review. This sets out that the Council will consult on a draft Local Plan (Regulation 18) in Q1 2026, and then prepare a Pre-Submission version for consultation in Q3 2026, before the Plan's submission to the Secretary of State in Q4 2026. The LDS envisages that the Plan will be adopted in Q3 2027. The plan period is expected to run to 2045.
- 1.3 Icenis has previously prepared reports to consider the District's housing needs. The Derbyshire Dales Housing & Employment Land Needs Assessment Update 2023 identified an overall housing need figure of 217 dwellings per annum across the District as a whole based on the 'standard method' set out by Government at the time of the report's preparation in 2023.
- 1.4 However, since the preparation of the 2023 HEDNA Update, Government has issued a revised NPPF in December 2024 and has revised the standard method alongside this. It is therefore necessary to review overall housing needs. This is the purpose of this report.
- 1.5 The revised Standard Method sets out a figure for housing need at a local authority district level, covering Derbyshire Dales District as a whole. However the Council's Local Plan Review will only address the housing needs of those parts of the District which fall within the 'plan area' and are outside of the Peak District National Park. The Peak District National Park Authority (PDNPA) is the planning authority for the National Park

and will prepare its own local plan separately. The District geography in this respect is shown in Figure 1.1 below.

- 1.6 A key building block of the Local Plan Review is the housing need for the plan area, and this report seeks to address what this is.

Figure 1.1 Derbyshire Dales and Peak District Boundaries



Source: Icen Projects

2. Revised NPPF and Standard Method

Housing Need and the Housing Requirement

- 2.1 National government policies and guidance require housing need to be assessed as part of the plan-making process. As set out in Planning Practice Guidance (PPG):

“Housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this.”¹

- 2.2 Housing need is thus expected to be assessed upfront as part of the plan-making process, leaving aside constraints. The plan-making process (and testing of development options within this) then tests whether the housing (and other development) needs identified can be sustainably met in defining what the housing requirement should be.

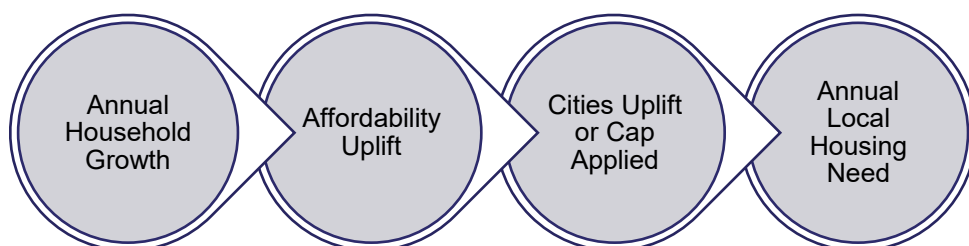
- 2.3 The emphasis within the NPPF is on plans meeting objectively assessed housing needs, unless national policies provide that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development; or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (NPPF Para 11b).

¹ PPG Para ID: 2a-001-20241212

The Previous Standard Method

- 2.4 The standard method was introduced in 2018 as a means of making the calculation of housing need simpler, quicker and more transparent; with the aim of speeding up the process of preparing local plans
- 2.5 The original methodology (as introduced in 2018) essentially took the average annual projected household growth from ONS 2014-based Household Projections, around which the method was designed, and then applies an uplift to this based on the latest average house price to earnings ratio in the local area, using the latest data available. In some areas the uplift is ‘capped’ to support its deliverability.
- 2.6 In 2020 the Government introduced an ‘cities and urban areas’ uplift whereby in the top 20 cities and urban areas nationally a further 35% uplift was applied as part of an intended framework to focus housing provision nationally on our larger cities and to deliver (in the aggregate) 300,000 homes across England. Figure 2.1 provides an overview of the methodology.

Figure 2.1 Overview of Previous Standard Method



- 2.7 The 2023 HEDNA Update ran this calculation, which generated a need for 217 dwellings per annum across Derbyshire Dales District. This was based on projected household growth of 156 per year, with a 39% uplift then applied based on the affordability ratio in 2022.

Government's Revisions to the NPPF and Standard Method

- 2.8 The Government through revisions to the NPPF in December 2024 has revised the standard method. Its ambitions in doing so are to increase housing delivery, delivering 1.5 million homes across England over the next 5 years with growth in all areas of the country.
- 2.9 The Government's Summer 2024 consultation² highlighted concerns with the increasing vintage of the 2014-based household projections around which the standard method was designed – arguing that the dataset is now over 10 years old and no longer fit-for-purpose; whilst highlighting the volatility of household projections and issues where projections can be artificially low in some areas as demographic trends are constrained by available housing supply.
- 2.10 The consultation therefore put forward a revised standard method with a view to providing stability and certainty to all stakeholders, whilst supporting the Government's ambition to deliver 1.5 million homes and achieving a distribution of homes across the country which balanced the need for higher supply in some of the least affordable areas of the country with ensuring that all areas contribute to meeting the country's housing needs.
- 2.11 It proposed to do so through use of a baseline (Step 1) set at a percentage of existing housing stock levels (reflecting the relative size of areas and in so doing to a) reinforce development in existing urban areas where there is existing infrastructure and b) to support some rebalancing of the national distribution to better reflect growth ambitions in the Midlands and North). A stronger affordability multiplier was then

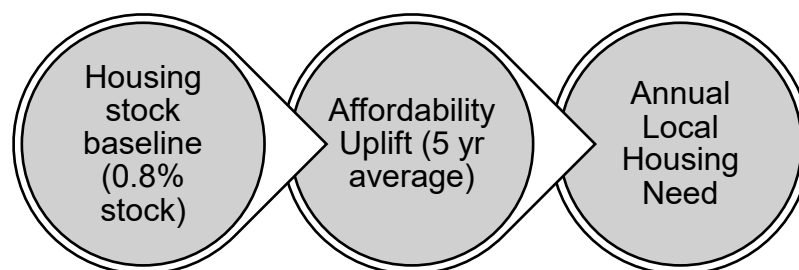
² MHCLG *Proposed reforms to the National Planning Policy Framework and other changes to the planning system*

proposed (Step 2) to reflect price pressures and market signals and direct homes to where Government considers they are most needed.

2.12 Government has taken this forward, introducing a **revised standard method** alongside the NPPF in December 2024. The PPG sets out the revised standard method in the section on *Housing and Economic Development Needs Assessments*.³

2.13 Para 2a-006 therein sets out the methodology, which takes a baseline of 0.8% of existing housing stock in the area (Step 1); to which an affordability adjustment is then applied (Step 2) which is calculated by taking the average affordability ratio figure over the 5 more recent years for which data is available, and applying a 0.95% increase for each 1% of which the averaged affordability ratio is above 5. Figure 5.2 provides an overview of the revised standard method.

Figure 2.2 Overview of Revised Standard Method



2.14 The 0.8% pa stock baseline removes the use of demographic projections (which can be volatile) and provides a baseline level of provision across all areas which is not dissimilar to the 0.89% annual increase in housing stock nationally over the last 10 years. The benchmark affordability ratio position of 5 is consistent with the ONS use of this level as a broad

³ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

indicator of affordability. With affordability uplifts applied to the stock baseline, the revised standard method supports provision of around 370,000 homes nationally which Government consider should be targeted to improve housing affordability over time.

2.15 Previously the NPPF provides scope to deviate from the standard method in assessing housing need in exceptional circumstances, enabling a 'justified alternative approach' to be advanced which reflects current and future demographic trends and market signals. The revisions to the NPPF in December 2024 have removed the scope to do so – they require housing need to be assessed using the standard method.

2.16 However the difference between the local housing need and a housing requirement remain, with scope to set a housing requirement below the need where it can be demonstrated that it not possible or would not constitute sustainable development to fully meet need (as set out in NPPF Para 11b). Equally a Local Plan can set a housing requirement above the minimum local housing need, as is noted in Para 69 in the NPPF, where a local planning authority chooses to do so – such as to reflect provision for neighbouring or reflect growth ambitions linked to economic development and infrastructure investment.

2.17 The 2023 HEDNA Update did consider more recent demographic projections (recognising the vintage of the 2014-based household projections used in the standard method at that time. It also considered whether the housing provision implied by the standard method at that time (217 dpa across the District) would provide sufficient workforce growth to support the District's economy. It found that in neither case did these factors point clearly to a higher housing need.

The Revised Standard Method for the whole District

2.18 It is a relatively straight forward exercise to calculate the local housing need using the standard method for the whole District. We set this out

below for context, before moving on in Section 3 to derive figures for the plan area. We address firstly the method, and then the results.

Step 1: Housing Stock Baseline

2.19 The stock baseline is expected to be drawn from the MHCLG Live Table 125. The PPG in Para 2a-005 directs that ‘the most recent data published at the time should be used.’ The latest data on the housing stock position is for 2023. The stock baseline is calculated as 0.8% of existing stock.

Step 2: Affordability Adjustment

1.2 The affordability adjustment is then to be applied, based on the average median (workplace-based) house price to income ratio over the last 5 years, which at the current time is for 2020-24. The following formula is then used to calculate the affordability uplift:

$$Adjustment\ factor = \left(\frac{five\ year\ average\ affordability\ ratio - 5}{5} \right) \times 0.95 + 1$$

2.20 The final stage is to then multiple the housing stock baseline by the affordability adjustment factor.

2.21 The results of the revised standard method calculation using the latest published affordability and housing stock data for the District as a whole are shown in Table 2.1 below.

Table 2.1 Revised Standard Method Calculation: Whole District

	Derbyshire Dales District
Housing Stock, 2024	36,116
0.8% Stock Baseline	289
Average Median Affordability Ratio, 2020-24	10.21
Affordability Uplift	199%
Local Housing Need (dpa)	575

2.22 Comparing this to the previous methodology, the shift to using housing stock as a baseline results in an annual base need for 289 dwellings,

which is notably above the previous base figure using projected household growth (156 dpa). However as Table 2.2 shows, the stronger factor driving the substantial increase in the housing need is the adjustments to the affordability uplift which increase the scale of need by 225 dpa (369%). Ultimately however both elements of the revised method which contribute to the substantially greater scale of housing need shown.

Table 2.2 Factors affecting Scale of Increase in Local Housing Need

	Previous Approach	Revised Approach	Increase	% Increase
Baseline (Step 1) need	156	289	133	85%
Affordability Uplift	61	286	225	369%
Local housing need	217	575	358	165%

3. Local Housing Need for the Plan Area

- 3.1 An important consideration for the Derbyshire Dales Local Plan Review is that the plan area does not align to the District geography, as illustrated in Figure 1.1.
- 3.2 Planning Practice Guidance in Para 2a-014 addresses the use of the standard method where planning authority boundaries do not align to local authority boundaries. We have replicated this below.

Where strategic policy-making authority boundaries do not align with local authority boundaries, or data is not available, should the standard method be used to assess local housing need?

Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small, an alternative approach may have to be used.

Such authorities may continue to identify a housing need figure using a method determined locally. In doing so authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. In the absence of other robust affordability data, authorities should consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s).

For local authorities whose boundaries cross National Parks or Broads Authority areas, the proportion of the local authority area that falls within and outside the National Park or Broads Authority area should also be considered – for example where only a minimal proportion of the existing housing stock of a local authority falls within the National Park or Broads Authority area it may be appropriate to continue to use the local housing need figure derived by the standard method for the local authority area.

Paragraph: 014 Reference ID: 2a-014-20241212

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- 3.3 The circumstances described in Para 2a-014 in the PPG are applicable in Derbyshire Dales as the planning authority boundary (covering the area outside of the Peak District National Park) does not align with the local authority boundary (for Derbyshire Dales District). The scope to use a ‘method determined locally’ is therefore engaged.
- 3.4 The PPG then set out that in effect the broad approach advocated by the standard method should be used – using the ‘best available evidence’ of a) housing stock; and b) prices, earnings and affordability – these being the factors which feed into the affordability ratio.
- 3.5 The PPG then implicitly recognises potential issues with the robustness of affordability data available below a local authority level and sets out that authorities should consider the implications of using the affordability ratio for the wider local authority area. An important consideration is therefore there is robust data on affordability below the District level.
- 3.6 The final relevant consideration is the extent to which a local authority’s housing stock may fall within a National Park. This links back to the housing stock distribution.

Housing Stock Baseline

- 3.7 The baseline for the standard method is set as 0.8% of the existing housing stock in an area. The PPG in Para 2a-004 indicates that this should be drawn from MHCLG Table 125⁴ which uses Census estimates of dwelling stock as a baseline and then calculates changes forwards from this using data on net additional dwellings. This dataset showed a stock position in 2024 (the latest available data) of 36,116 dwellings.
- 3.8 The Council holds data on the District’s housing stock through its Council Tax Valuation dataset. This indicates a dwelling stock district-wide of
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⁴ Dwelling Stock Estimates by Local Authority District

35,569 dwellings in August 2024. This is very similar to the data from MHCLG Table 125, with a difference of 1% which is *de minimus*.

- 3.9 The Council has analysed the distribution of the dwelling stock between the National Park and the Plan Area, with the results shown in Table 3.1 below. 9,800 dwellings fall within the National Park which accounts for 27.6% of the District total. This is a scale which is not to be considered 'minimal' in the terms set out in PPG Para 2a-014 and it is relevant therefore to continue to seek to calculate a need for the plan area. The dwelling stock in the plan area is almost 25,800 dwellings.

Table 3.1 Distribution of Housing Stock between Plan Area and National Park, 2024

	Dwellings	% District Dwellings
Plan Area	25,765	72.4%
National Park	9,804	27.6%
District Total	35,569	100.0%

Source: Icení Analysis of Council Data

- 3.10 For consistency with the PPG, Icení consider that the % dwelling split between the Park and the Plan Area should be applied to the dwelling stock total from MGCLG Table 125. This marginally updates the dwelling stock estimates from Council Tax data to align with MHCLG Table 125.

Table 3.2 Calculating the Stock Baseline

	District Total	Plan Area	National Park Area
% Stock	100%	72.4%	27.6%
2024 Stock Estimates	35,960	26,048	9,912
0.8% Stock	288	208	79

Source: Icení Analysis of Council Data

Affordability Uplift

- 3.11 The next step is to consider the affordability uplift. There are essentially two components to calculating affordability ratios: the affordability ratios published annually by ONS take median house prices, which are derived from HM Land Registry data and then median incomes for full-time

workers, which is drawn from the ONS Annual Survey of Hours and Earnings (ASHE). The income data used in the standard method is 'workplace-based' in that it is using incomes for those working within the District (rather than the incomes of District residents). The standard method takes and averages the published affordability ratios for the last 5 years.

Median House Prices

- 3.12 The ONS data on house prices is originally derived from HM Land Registry (HMLR). HMLR publish data on house price transactions which feeds into this. IcenI has therefore analysed this. We have:
- a). Drawn down a dataset of all transactions over the 5 year period to September 2024 (the year to September being the time period used in the ONS median house price to earnings ratio dataset) from the HM Land Registry price paid dataset;
 - b). Used GIS analysis to attribute individual sales in the District to either the plan area or the national park;
 - c). Attributed sales to individual years to inform the calculation of the affordability ratios.
- 3.13 The table below shows the results. It indicates the median house price for the two areas within the District over the period to end of September each year.
- 3.14 The HM Land Registry dataset is live and therefore there may be minor differences between the transactions recorded when IcenI drew down the data and when ONS did; however these are unlikely to have a significant effect on the results.

Table 3.3 Calculating the Median House Price

	Peak District	Plan Area
YE Sept 2020	£315,000	£266,000
YE Sept 2021	£377,000	£292,750
YE Sept 2022	£378,500	£310,000
YE Sept 2023	£424,675	£332,747.5
YE Sept 2024	£392,500	£299,995

Source: HM Land Registry/Iceni Analysis

Median Incomes

- 3.15 The ONS does not publish data from the Annual Survey of Hours and Earnings (ASHE) below a local authority level. Iceni has contacted ONS who have indicated that they do not provide bespoke datasets on earnings for more local geographies.
- 3.16 We have therefore sought to consider what range of data is available on incomes below local authority level, which is limited; and how this can be used.
- 3.17 ONS published Admin-based income statistics in December 2022⁵ which provides income estimates for small areas over the tax year ending in March 2018. The outputs are available for Lower layer Super Output Areas (LSOAs). They however cover gross individual income on a residence-basis (rather than workplace-based), and so relate to those living in the District rather than working in it. They also appear to cover all residents aged 16+ rather than just those in full-time work, the effect of which is to reduce average earnings.

We have sought to categorise LSOAs as those predominantly in the Park area and the Plan area; to consider the population in each LSOA aged 16+ based on 2018 ONS Mid-Year Population Estimate data, and used this to calculate average earnings. This points, as Table 3.4 shows, to

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<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/articles/adminbasedincomestatisticsenglandandwales/taxyearending2018>

slightly lower earnings of residents in the Plan Area; but the differences are very marginal.

Table 3.4 Average Annual Income (Aged 16+)

	Population Age 16+	Total Individual Income	Income Per Head
Peak District	21,631	£370,584,791	£17,132
Plan Area	38,727	£654,057,603	£16,889

Source: Icen analysis of ONS MYE 2018 and Admin Based income statistics 2018 (Gross Individual LSOA)

- 3.18 The issues with this dataset are that a) it is for all people aged 16+ rather than earnings of full-time workers; b) it relates to a period which is now 7 years ago and is therefore quite dated; and c) it is only available for an individual year. Moreover the dataset is characterised by ONS as 'Experimental Statistics' which are considered to be in development and are of limited use for decision-making. Having regard to these issues, we do not consider that the data is reliable. This is the key test identified in the PPG.
- 3.19 ONS do also model-based Income estimates for Small Areas.⁶ Here the latest data available, as published in October 2023, relates to incomes in the financial year ending March 2020. There are however again problems with this dataset for the purposes of considering affordability on a consistent basis to the standard method. The data relates to net household incomes, on a residence-basis. It does not relate to the earnings of full-time workers; nor consider earnings for those working in different parts of Derbyshire Dales District. Overall it is not therefore helpful, and the dataset would not be reliable for the purpose intended here.
- 3.20 The other potential data source we are aware of is CACI income data. However this is gross household income from all sources (including

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<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/smallareamodelbasedincomeestimates/previousreleases>

earnings, benefits and investments). Again it will be based on residents (rather than those working in the District) and relates to households rather than those in full-time work, and is therefore not comparable with the ASHE data used in calculating the affordability ratios in the standard method.

- 3.21 Having researched alternative sources, we find that there is no equivalent income data available below local authority level. The local authority data on earnings – the ASHE data as published - must therefore be considered. This is shown below. The data for 2024 is drawn from the ONS Median House Price to Workplace-based Earnings dataset.

Table 3.5 Earnings of Full-time Workers (Workplace-based) – Derbyshire Dales District

	Median Earnings
2018	27,130
2019	27,749
2020	25,940
2021	27,761
2022	31,457
2023	30,181
2024	34,265

Source: ASHE

Housing Affordability

- 3.22 Taking the two components of the affordability ratio: the median house price and median earnings for FT workers working in the District, we have sought to calculate in the tables below the affordability ratio for the Peak District area, the Plan area and an updated ratio for the whole of Derbyshire Dales for the year ending (YE) September 2024.
- 3.23 This analysis shows a lower affordability ratio (and better affordability) in the plan area – which averages 10.05 – compared to the National Park area – which averages 12.65. The ratio for Derbyshire Dales as a whole sits in the middle of these although slightly skewed towards the lower end at an average of 10.21. This is consistent with the greater proportion of population and house sales being in the plan area.

Table 3.6 Affordability Ratio – Plan Area

	Median House Price	Median Earnings FT Workers	Affordability Ratio
YE 2020	£266,000	£25,940	10.25
YE 2021	£292,750	£27,761	10.55
YE 2022	£310,000	£31,457	9.85
YE 2023	£332,747.5	£30,181	11.03
YE 2024	£299,995	£34,265	8.76
Average			10.05

Source: Icenl

Table 3.7 Affordability Ratio – Peak District Area

	Median House Price	Median Earnings FT Workers	Affordability Ratio
YE 2020	£315,000	£25,940	12.14
YE 2021	£377,000	£27,761	13.58
YE 2022	£378,500	£31,457	12.03
YE 2023	£424,675	£30,181	14.07
YE 2024	£392,500	£34,265	11.45
Average			12.65

Source: Icenl

Table 3.8 Affordability Ratio – Derbyshire Dales

	Median House Price	Median Earnings FT Workers	Affordability Ratio
YE 2020	£267,000	£25,940	10.3
YE 2021	£295,000	£27,761	10.6
YE 2022	£320,000	£31,457	10.2
YE 2023	£330,000	£30,181	10.9
YE 2024	£310,000	£34,265	9.0
Average			10.21

Source: ONS Median House Price to Workplace-based Earnings Dataset

Affordability Uplift

3.24 The affordability calculation can then be made using this data to generate a ‘bottom up’ assessment of local housing need for the Plan Area and the Park Area. This is shown in Table 3.9 below and is based off a mean average of the median affordability ratio as required by the standard method. It shows a local housing need for the Plan Area of 408 dpa and

for the area of the District within the National Park of 187 dpa, this is based on Council tax data.

- 3.25 When aggregated this approach generates a higher housing need (595 dpa) than undertaking the calculation at a District-wide level (575 dpa) using equivalent data. This reflects the application of separate affordability calculations.

Table 3.9 Standard Method Calculation for the Plan Area and Park Area

	Plan Area	Park Area	Derbyshire Dales
Stock baseline	26,048	9,912	35,960
0.8% stock	208	79	
Average median affordability ratio	10.05	12.14	
Affordability uplift	196%	236%	
Local housing need	408	187	595

Source: Icen analysis of Council data

- 3.26 For plan-making purposes this is more problematic, and it may make more sense how a District-wide calculation can be disaggregated. This is therefore considered in the next section.

4. Alternative Approach using District-wide Affordability Ratio

- 4.1 An alternative approach, which the PPG sets out 'should be considered' is to use the District wide affordability ratio; the effect of which is – in effect – to disaggregate the District wide need standard method based on the proportion of stock.
- 4.2 The table below shows how need could be proportioned based on the housing stock in each area. The figures arising are consistent with applying the District-wide affordability ratio – and generate a need for 415 dpa in the Plan Area, and 158 dpa in the Park.

Table 4.1 Housing Need Calculation using District Affordability Ratio

	Plan Area	Park Area	District
Stock baseline	26,048	9,912	36,116
0.8% stock	208	79	289
Average median affordability ratio	10.2	10.2	10.2
Affordability uplift	199%	199%	199%
Local housing need	415	158	575

- 4.3 Compared to the 'bottom up' calculations set out in Section 3, these calculations show a marginally higher need in the Plan Area (415 dpa against 410 dpa) and lower need in the Park (158 dpa as against 195 dpa).

5. Drawing the Analysis Together

- 5.1 Drawing the analysis together, a local generated approach could, in theory, be used which takes account a) of the distribution of stock and b) the lower house prices (relative to the District average) in the plan area. This generates a plan-area need for 410 dpa.
- 5.2 This approach takes account of the factors identified as considerations in the PPG – stock, prices, earnings and affordability – albeit that there is a lack of robust data on earnings. It does however capture the impact of house price differentials between the Park and Plan area which are likely to be key considerations driving the different affordability position.
- 5.3 The disadvantage of this approach is that at a district-wide level it generates a higher need. Any unmet need arising from the National Park would be a consideration in setting a housing requirement within the Local Plan Review.
- 5.4 An alternative approach, which would be equally robust from a technical perspective and supported by the PPG, would be to use the District affordability ratio in the calculation, which generates a marginally higher need of 415 dpa for the plan area. Whilst the plan-area need is marginally higher with this approach, the trade off is an approach which provides a consistent baseline which can inform Duty to Cooperate discussions.
- 5.5 The District Plan Review, as per the NPPF, needs to consider the scope to meet the needs arising from the plan area *and* any unmet needs, which would include any unmet need arising from the National Park. This supports the case for using an approach which sums to the figures arising from the standard method applied at a district level at 575 dpa. **This would be our recommended approach** and results in a figure for the plan area of 415 dpa.
- 5.6 It would be advisable to agree the approach to take forwards with the National Park Authority.