



## **Consultation on Housing and Planning Delivery Grant Allocation Mechanisms Years 2 and 3**

### **A response by the English National Park Authorities Association June 2009**

1. The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities, and our response represents the collective view of the Authorities. It has been prepared by officers, working within the policies established by the National Park Authorities (NPAs) and follows consultation within the National Parks Heads of Planning Group. Individual NPAs may submit separate comments, which will draw on the specific issues for their particular region.

2. Our response focuses specifically on the section regarding affordable housing and HPDG. National Park Authorities see the provision of local needs affordable housing as a key priority and hope that the HPDG, coupled with the work of the Homes and Communities Agency will help stimulate and facilitate such activity.

#### **Additional Issues – affordable housing**

Question 5: Do you think we should introduce an affordable housing element in year 3 and if so, which of the two options outlined or a combination of the two would you favour?

3. ENPAA strongly supports the second option expressed in paragraphs 51-54 of the consultation paper. We believe it is a positive response to previous concerns expressed by the National Park Authorities that the HPDG system has not offered real incentives to rural Authorities for delivery of affordable housing.

4. Option 2 introduces a system for rewarding Authorities that have proper processes in place and successfully deliver affordable housing. In contrast Option 1 simply rewards in terms of numbers of houses delivered. This is unfair for National Parks where there are particular challenges to delivery and where the focus is on meeting local needs affordable housing rather than volume building. The particular contribution that NPAs can make in terms of facilitating high quality, sustainably designed local needs affordable housing has been discussed with successive Housing Ministers. Each has recognised the wider public policy objectives operating in National Parks, the need for a targeted approach, and agreed that it would not be appropriate to seek volume house building in protected landscapes.

5. National Parks operate under their statutory purposes, established under the *National Parks and Access to the Countryside Act 1949* (as amended by the *Environment Act 1995*). These are to:

- conserve and enhance the natural beauty, wildlife and cultural heritage of the areas; and
- promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

6. In undertaking these statutory purposes, National Park Authorities have a duty to foster the social and economic well-being of their local communities. This establishes a conservation context, presenting particular complexities for delivery of new affordable housing due to site development constraints and an emphasis on high quality design. Housing numbers may be small in comparison to elsewhere but the challenges of provision are greater. For example, provision of affordable housing does not rely on cross subsidisation in most National Parks. It is particularly important for National Park Authorities, therefore, that there is recognition of the quality of the processes and extent of the efforts which go into delivery, rather than simply focusing on housing numbers. In this respect the criteria for HPDG rewards in option 2 are welcome and supported.

7. In terms of option 1 it should also be noted that National Park Authorities are not housing authorities and therefore do not submit housing returns to government. Any benefits accruing for numbers of affordable houses would accrue to the constituent District Housing Authorities only, unless a separate system was implemented to create data specific to national parks.

8. It is considered the £20,000 cap on the reward (paragraph 52) is disproportionately low. A figure of £35,000 would enable Authorities to fund a full time post to ensure the published delivery plans are implemented.

Question 6: Are you content with the criteria proposed for allocation of the additional empowerment funding? If not, could you propose an alternative approach?

9. ENPAA generally supports the approach, but would draw your attention to the fact that the reliance on criteria as to whether National Indicators (NI) have been incorporated into Local Area Agreements is disadvantageous to National Parks. This is because NPAs do not have their own Local Area Agreements but contribute to those of constituent Authorities. In these respects, therefore, National Park Authorities could not be measured and would presumably not be able to qualify for this funding when clearly they operate in the same manner as local authorities in their planning function.

10. The family of National Parks within England has set up its own measures of community engagement which could be substituted for the NI as far as National Parks are concerned. These include an annual satisfaction survey of planning applicants and agents. We would be happy to discuss this with the department if that would be helpful.