



## **HOMES FOR THE FUTURE: MORE AFFORDABLE, MORE SUSTAINABLE GREEN PAPER**

**A response by the English National Park Authorities Association  
October 2007**

### **1. Summary**

1.1 The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is led by the Chairs of the nine Authorities, and this response therefore represents the overall view of the Authorities. The geography and social make up of the National Parks varies considerably, however, and therefore individual National Park Authorities may submit their own comments which will relate to their own specific circumstances.

1.2 In summary, whilst the issue of affordable housing in rural areas is identified in the Green Paper, it fails to adequately address the issues raised. ENPAA would welcome:

- recognition that small volume housing is no less important in the maintenance and support of vibrant communities;
- adequate resourcing of rural housing is critical to secure a future for sparse and very sparse areas of the country, much of which is protected landscape;
- recognition that cross subsidy is not the panacea for addressing housing problems in rural areas;
- long term perpetuity of affordable homes is essential in rural areas; and
- the setting up of a targeted fund for National Park's providing opportunities for National Park Authorities to lead innovative thinking in tackling affordable housing in sparse rural areas with partners.

### **2. General comments**

2.1 We welcome the opportunity to comment on the range of ideas and proposals contained within the Green Paper. The Green Paper asks for specific views on 6 separate questions. We believe the way in which these are framed means that there are other organisations better placed to express a view. Instead, our response concentrates on the main body of text and to those elements which are of most relevance to the National Park Authorities.

2.2 We welcome the acknowledgment in the Green Paper that in order to deliver affordable housing the Government must work in partnership with local government, developers and house-builders, Housing Associations, communities and tenant and resident groups, in order to gain a clear understanding of the range of issues which hinder the effective and efficient delivery of affordable housing. National Park Authorities often work in partnerships to provide strategic steer locally, to collect evidence base and to support initiatives such as Rural Housing Enablers.

- 2.3 We welcome the reference to the problems that first time buyers in rural areas face, and the recognition that despite the escalating need for affordable housing, the delivery of new housing must be done in a way that is sensitive to local needs.
- 2.4 We welcome the emphasis on making homes greener, the setting of new minimum water standards in new homes and the strengthening of building regulations to enable all new homes to be zero carbon from 2016.
- 2.5 Local and regional bodies are encouraged to engage with rural people and communities to better identify affordable housing needs and work in partnership to deliver homes where they are most needed. This supports the approach adopted by many National Park Authorities. A number of them, for example, host or support Rural Housing Enablers and work with partners.
- 2.6 Investment in affordable housing must be based on proper evidence of need and in the context of a wider strategy for the area. This endorses the stance made through Planning Policy Statement 3 and, for example, the draft Regional Spatial Strategy for the North West, and so provides the continuity and security which local authorities and housing developers require to assist in the continued delivery of rural housing provision.
- 2.7 We welcome the role Defra has to play in working with utility companies to ensure that wastewater infrastructure to support housing growth has a longer term planning framework; to ensure that housing plans, local resource availability, existing infrastructure capacity and the scope for demand management are all better taken into account. We hope that this approach offers enough flexibility to address the economies of scale.

### **3. Areas of concern**

- 3.1 The Housing and Planning Delivery Grant will reward those Councils who deliver high volumes of housing and have at least 5 years worth of sites ready for development. Where councils have not identified enough land, planning inspectors will be more likely to overturn their decisions and give housing applications the go ahead on appeal. Also the Secretary of State will not hesitate to use her powers to recover planning appeals and take decisions herself, in order to reinforce PPS3 land supply policies.
- 3.2 Whilst we appreciate it is necessary to optimise every development opportunity which will help to deliver affordable housing, we do not believe that it is either virtuous or sustainable to take the above approach in every circumstance. We seek assurances from the Government that the ambitious aims to deliver affordable housing do not prejudice the special circumstances which affect National Parks; our abilities to consider the sensitive needs of local communities; and the planning policies we currently have in place to address these issues. The planning system establishes a clear set of parameters in which planning applications are assessed. Any mechanism which has the potential to override this system could challenge the credibility of the planning process and the assurances it provides to developers.
- 3.3 ENPAA would welcome the recognition that small volume housing is no less important in the maintenance and support of vibrant communities.
- 3.4 The National Park Authorities will be disadvantaged by realignment of the Planning Delivery Grant towards high levels of housing provision. The Authorities will not be eligible for this element of the PDG despite them having a critical role to play in

providing affordable housing provision within very sparse rural areas. It is recommended that a targeted fund for National Parks should be established to allow National Park Authorities to lead innovative thinking in tackling affordable housing in sparse rural areas. It is proposed that a fund of £1M could achieve very considerable outcomes as it would be used to address issues specific to the particular circumstances in National Parks in partnership with The Homes Agency, local authorities and housing providers.

- 3.5 The concept of Eco-towns is worthy of support, as any new housing should be seen as a solution to climate change not part of the problem. The National Park Authorities do not advocate the need for a new town (based on the threshold size quoted in the Green Paper), but do think that once again the economies of scale preclude National Park Authorities from partaking in this particularly innovative scheme. We will have to rely on strong local planning policies to provide bold statements as to how we require new housing to be green developments, rather than being given the opportunity to provide a lead for a scheme appropriate to the National Park. We would encourage the Government to consider a scheme which is more inclusive.
- 3.6 The programme of New Growth Points will be extended to cover the northern regions and additional finances will be available through the Communities and Local Government funding regime. The National Park Authorities are extremely concerned that housing developers and housing associations will focus their efforts in areas outside the National Parks and as a consequence the housing targets within National Parks could be increasingly challenged. It is important that the budget for the delivery of rural housing addresses this and provides the resources to facilitate the engagement of housing providers on an equitable basis.
- 3.7 Rural planning authorities, particularly those with a sparse or very sparse profile, such as the National Park Authorities, are faced with significant challenges to achieve sustainable communities. Rather than dealing with a large volume of housing, a single new affordable property or a small number can make a huge difference to a rural community and the sustainability of that community. Sparse rural areas equate in a majority of instances to protected landscapes where there is further attention to design and materials. ENPAA stresses the need for adequate resourcing of rural housing to help secure a future for such areas and the proposed fund advocated in paragraph 3.4 would be an important part of the approach to delivering this scale of housing.
- 3.8 It is also important for Government to recognise that in National Parks, we cannot rely so much on the private sector to deliver affordable housing because of the small number of houses concerned. Furthermore there is not the opportunity for cross-subsidy on sites because the National Parks do not have general open market housing allocations in the same way as district councils, indeed it would be very damaging to landscapes and contrary to regional and national policy to allow this scale of development. Thus, to meet affordable local needs within National Parks, NPAs rely on virtually 100% public subsidy. This should be properly accounted for within The Homes Agency's budgets and through a specific fund as advocated in paragraph 3.4.
- 3.9 Local Planning Authorities will be required to demonstrate sound infrastructure planning to support the proposals set out in statutory Local Development Documents. The proposal to allow the Planning Inspectorate to consider the demonstration of infrastructure availability and planning as part of the test of soundness of a Development Plan Document will present many challenges for NPAs. While ENPAA recognises that a consistent approach towards infrastructure

planning is fundamental to support the ambitious levels of housing growth, the delivery of infrastructure rests with other organisations. And whilst NPAs advocate effective partnership working, they cannot influence the schedules of other key partners.

- 3.10 An examination of housing policies in the Lake District provides a good example of the situation identified above and is typical of many other National Parks. Housing within the Lake District National Park is currently permitted where it contributes to meeting the identified housing need of the locality and is designed to support and maintain a rural community without putting any additional strain on the existing planning infrastructure. The LDNPA will endeavour to address within its Local Development Framework sound infrastructure planning to support its policies for the delivery of affordable housing within a rural area. And the Authority will continue to work closely with those partners whose responsibility it is to provide these services. Yet the LDNPA has no direct influence over infrastructure providers. And this situation is replicated elsewhere. ENPAA seeks assurances from the Government that NPAs will not be penalised within their LDFs if, in reality, the necessary infrastructure is not readily available to support new housing schemes. The circumstances afforded by National Parks often restrict housing delivery to small schemes and this may present a challenge to those service providers in relation to timetabling and investment due to the scale of development. The likelihood is they will concentrate on larger schemes.
- 3.11 One aspect that the Green Paper does not address is the long term perpetuity of affordable housing. This is critical in National Parks, and other rural areas. The National Park Authorities ask for a new statutory scheme whereby National Park Authorities can impose covenants on approved housing to restrict house price index against wages in the locality. The means of trying to restrict price indirectly for future occupants, let alone future generations is proving extremely difficult and certainly not guaranteeing a stream of affordable houses within National Parks over the long term. We would be happy to discuss this proposal with you further.
- 3.12 We would be particularly keen to work with The Homes Agency, its Rural Housing Advisory Group (on which we are represented), CLG and Defra to develop further the idea of a small, targeted fund to enable further high quality provision of affordable homes in National Parks as advocated in summary in paragraph 3.4.