



Reinvigorating the Right to Buy and one for one replacement

Response from the English National Park Authorities Association (ENPAA)

February 2012

1. The English National Park Authorities Association (ENPAA) supports the policy-making process by co-ordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and follows internal consultation amongst the All Parks Heads of Planning Professional Group. We are happy for our response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.
2. In November 2011 the Government published 'Laying the Foundations: A Housing Strategy for England', which outlines a number of measures to be introduced by the Government to get the housing market moving.
3. Whilst much of the document appears to offer a sound strategy to housing delivery and reform, there is a fundamental limitation to the effectiveness of aspects of the strategy in a National Park context. ENPAA is particularly concerned that an increased take-up of Right to Buy will significantly hinder the ability of National Park Authorities to meet the affordable housing needs of local communities.

The National Park context

4. All of England's National Parks possess the highest quality landscape and environment. This inevitably leads to the potential for significant challenges in accommodating new development, without resulting in adverse impacts upon their natural beauty, wildlife and cultural heritage.
5. Average property prices are significantly out of the reach of households on local average wages. This is causing a wide range of social and economic problems within the National Parks, affecting community viability and sustainability. It is of the utmost importance that the existing affordable housing stock is retained in perpetuity to meet local needs. In particular, housing need surveys have revealed a key need for affordable rented accommodation. Even if the right to buy did not remove local occupancy restrictions, it risks removing an important element of housing stock that cannot be replaced without further new housing development which is necessarily restricted in areas of high landscape value such as National Parks.

6. National Park Authorities (NPAs) are the Local Planning Authority for their area, but are not strategic housing authorities with statutory housing responsibilities or housing providers and therefore do not manage any social housing stock. NPAs do nevertheless have a duty to seek to foster the economic and social well-being of local communities – principally achieving this through effective strategic planning policies and development management.

7. When facilitating new housing, our statutory duty is translated into a requirement within adopted planning policies for most new housing to have controlled occupancy. This is in line with the 'English National Parks and the Broads' UK Government Vision and Circular 2010; paragraph 78 of this key piece of guidance states that;

'The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services'.

8. The Secretary of State for Environment, Food and Rural Affairs confirmed last year that the Circular remains a statement of the Coalition Government's policies with respect to National Parks. The position in the Circular recognises that new housing developments need to contribute to redressing the significant disparity between local incomes and house prices, because the environmental capacity is such that opportunities to grant planning permission for new homes is severely limited, despite the high level of local need for affordable housing.

An example of potential impacts – Lake District National Park

9. The Lake District National Park Authority (LDNPA) adopted its Core Strategy in October 2010. This commits the LDNPA to facilitating the delivery of 900 new dwellings by 2025, all of which will be to meet local and local affordable needs, with prioritisation being given to the latter. This target matches the identified affordable housing need across the Park at the time of the Core Strategy examination, which was just over 900.

10. In order to provide effective facilitation of housing delivery, the LDNPA is currently seeking to allocate land throughout the Lake District National Park for affordable housing. Extensive site assessment work and community engagement has taken place, and it is apparent that it will not be possible to identify sufficient suitable, available and deliverable land for 900 houses. It is anticipated that when a final pre-submission Allocations DPD is published, land for in the region of 500 houses is more realistic, having full regard to the environmental limitations and the strength of local objection on some sites, and concerns expressed more widely from across the country.

11. Meanwhile, the local housing authorities which operate within the Lake District National Park have confirmed that in total there are in excess of 1000 existing affordable homes within the National Park which could be lost from the affordable housing stock if the proposed Right to Buy reforms take place. This could potentially mean that if the LDNPA is successful in facilitating 900 new homes by 2025, this development will not result in any

tangible benefits, because the number of affordable homes (and therefore the ability to meet the level of local affordable need) may not see a net increase.

An example using experiences in the Peak District National Park

12. The proposal's potential impacts in the Lake District National Park mirror the impacts experienced in the Peak District National Park which resulted from the original introduction of the right to buy council houses in 1980.

13. In the Peak District National Park around half of its 2000 council houses were sold between 1980 and 1985. The consequence of this severe loss of affordable housing stock has meant that all new affordable housing which has been delivered in the Peak District has effectively offered no net increase in the supply of much needed affordable housing. Yet there has been the challenge to allow development in a highly valued and nationally designated landscape in an attempt to redress the greater imbalances caused by the right to buy regime.

14. Through a recent strategy review, the Peak District National Park Authority has shown that the capacity simply does not exist to repeat this without harm to landscape. Whilst this in itself is adequate justification to reconsider the approach to Right to Buy, it would also undermine established and effective planning policies which prioritise affordable housing. Communities in National Parks are determined to ensure their needs are met in perpetuity, and to permit the loss of affordable housing would undermine confidence and trust in the system in which we operate.

Recommended amendments to the Right to Buy reforms

15. As the above examples illustrate, it would be perverse to allow eligibility for Right to Buy within National Parks, as it would prevent National Park Authorities from fulfilling their statutory duty to seek to foster the economic and social well-being of local communities. It would also mean that new affordable housing developments which take place in sensitive areas with a severely restricted finite land supply, offer no net long term benefit to local communities, disadvantaging those who are already in need of affordable housing.

16. **ENPAA therefore requests that social housing in National Parks should be excluded from the Right to Buy and Preserved Right to Buy. This can be achieved simply by including National Parks in the 'Exclusions' section in paragraph 40 of the consultation document.**