

CONCLUSIONS FROM CRITICAL REVIEW OF YHA APPROACH TO DEVELOPING SPATIAL OPTIONS

Introduction

1. A critical review of the Assembly's approach to developing spatial options was carried out by testing the three elements of the approach – the scale of housing, the distribution of housing and sub-area options – against sub-questions and objectives of the SA framework. The review focussed on the most relevant sub-questions and objectives i.e. those that have spatial implications, given the scope of the RSS Update. It also had regard to sub-questions that are dependent on policy wording (e.g. reducing crime through design-measures). Although the RSS Update applies to housing numbers only, part of the role of the SA is to assess whether policies of the adopted RSS will need to be updated or refined as a result (e.g. public transport infrastructure provision).

Housing demand and supply

2. The focus of YHA's approach to developing spatial options is a range of evidence on housing demand. This seems appropriate given that the purpose of the update to RSS is to address the need for increased housing in the region as a result of growing demand and long term affordability issues. YHA's approach to reviewing the evidence base from NHPAU and CLG trend based population and household projections seems thorough and should ensure that options take into account the most appropriate levels of housing demand, including affordable housing needs. It will be helpful if the underlying assumptions about the factors driving housing demand are made explicit e.g. migration, age structure, occupancy levels, housing affordability.
3. There is also a need for evidence on housing supply issues to be made explicit alongside the spatial options, such as how vacant and underused buildings are likely to affect the scale and distribution of housing. Beyond the options stage there is a need to ensure that accompanying policies require housing of the right type and tenure will be provided to meet local needs.

Relationship between housing and employment

4. The approach to the scale and distribution of housing also looks at the implications of future levels of employment growth. As a result, consideration will be given to how closely the scale and distribution of housing will be aligned with employment. This will

endeavour to ensure that employment opportunities are available near where people will live, thus going some way towards reducing the need to travel. Reducing the need to travel is a complex issue, however, and there will be a need to study current commuting patterns and types of employment more closely to ensure the needs of local businesses can also be met.

Supply of housing land

5. YHA recognise that the supply of housing land is critical to determining the most appropriate distribution of new housing across the region and how long the current spatial strategy should be sustained given the projected scale of housing growth. Fundamentally, it is a crucial component of the evidence base when considering certainty of delivery. There is a need to understand the land requirements of the existing RSS and the distribution of the residual land supply available for further increases in housing as a result of the RSS Update.
6. Where data from Strategic Housing Land Availability Assessments and Annual Monitoring Reports is unavailable we recommend that assumptions are made about the likely capacity of urban areas in the settlement network to accommodate housing development. Linked to this, a range of development densities should be applied to the spatial options. This evidence will help to determine the likely greenfield/brownfield split which in turn will add certainty to a range of judgements to be made in the SA e.g. the degree to which land and natural resources will be used efficiently, the extent to which the built and natural environment will be protected.

Prioritising public transport

7. Prioritising public transport nodes and corridors in defining strategic opportunities is a welcome and positive element of YHA's approach to developing spatial options. This should go some way towards reducing reliance on use of the car and the unsustainable trends that result (e.g. increased congestion, increased greenhouse gas emissions, increasingly disparate communities). To make this assessment more robust, there is also a need for YHA to incorporate information on the capacity of public transport networks to accommodate increased numbers of passengers to ensure that best use of existing infrastructure is made in the first instance and a clear case for further investment can be made where it is needed. Incorporating this evidence should be part of the process of refining and testing the spatial options.

8. Prioritising public transport needs to be accompanied by a range of other measures through bold policies in the RSS on reducing car use and encouraging walking and cycling. At the preferred options stage, the SA will consider the extent to which policies of the current RSS are likely to meet this objective.

Prioritising opportunities and constraints

9. The “bottom up” approach to developing sub-area options also prioritises some key environmental constraints, such as international and national nature conservation designations and flood risk. Most of these would be expected to feature as high level constraints given the legislation and policy that underpins their protection.
10. YHA’s further review of strategic opportunity areas will look at a range of other opportunities and constraints. In order to ensure a complete range of sustainability issues are addressed through the options development process there is a need to clarify the definition of “other strategic environmental considerations” and “regeneration priorities” and include some additional layers of information where available such as historic assets and access to community services and facilities.
11. Moreover, there is a need to have a clear rationale for which factors are most appropriate for inclusion in this type of exercise at the regional scale (as opposed to the local level through the LDF process) and how their relative importance will be weighted in finalising strategic opportunity areas. Through the SA process, the aim should be to optimise the integration of economic, social and environmental objectives in the first instance. In reality, where there are competing priorities, this will not always be possible. Where certain objectives need to be prioritised and trade-offs need to be made, this should be made explicit and mitigation should be provided. The Spatial Options Appraisal Framework (SOAF) to be developed as part of the SA will help to make this process open and transparent.

Land Use Consultants

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