



YORKSHIRE DALES
National Park Authority

Sustainability Appraisal & Strategic Environmental Assessment

Issues & Options Appraisal Report



Pen-y-ghent

for the

Housing Development Plan Document

Draft for Consultation – January 2008

Part of the Yorkshire Dales Development Framework
2006 – 2021

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Abbreviations

AMR	Annual Monitoring Report (Measurement of the impact of planning policy)
DPD	Development Plan Document (A part of the Yorkshire Dales Development Framework that is subject to examination by a Planning Inspector)
LDF	Local Development Framework (the replacement for Local Plans and County Structure Plans)
LDS	Local development Scheme (the Authority's project plan for the YDDF)
MPS	Minerals Planning Statement (National Planning Policy for Minerals)
PPG/PPS	Planning Policy Guidance and Planning Policy Statements (National Planning Policy)
RSS	Regional Spatial Strategy (The regional plan for Yorkshire and the Humber)
SA	Sustainability Appraisal (Requirement of 2004 Planning & Compulsory Purchase Act. The process by which sustainability considerations are incorporated into the planning policy preparation)
SEA	Strategic Environmental Assessment (Requirement of European Directive 2001/42/EC. The process by which effects of plans and policies upon the environment are assessed)
SCI	Statement of Community Involvement (The Authority's strategy to engage the public in planning policy and planning applications)
SPD	Supplementary Planning Document (detailed policy guidance and explanation)
YDDF	Yorkshire Dales Development Framework (the LDF for the National Park)

1. Introduction

1.1 This report constitutes the second part of the sustainability appraisal (SA) process for the Housing Development Plan Document (DPD). It follows on from an initial scoping report which establishes the context and framework for the SA.

1.2 The appraisal process is split up into five key stages (below). The scoping report corresponds with Stage A, while the present report makes up the first element of Stage B.

Stage A – Setting the context and objectives, establishing the baseline and deciding on the scope;

Stage B – Developing and refining options and assessing effects;

Stage C – Preparing the Sustainability Appraisal Report;

Stage D – Consulting on the preferred options of the DPD and the SA Report;

Stage E – Monitoring the significant effects of implementing the DPD.

1.3 The purpose of this report is to appraise in broad terms the sustainability effects of the various options identified for the DPD. This part of the SA informs the development of this document, having particular regard to whether it promotes sustainable development. The remainder of Stage B will appraise in more detail the effects of selected preferred options.

1.4 In accordance with government guidance, three distinct appraisal stages were undertaken:

- The first involved testing the sustainability objectives identified in the scoping report against one another to ensure internal compatibility. This is an important stage since incompatibility of sustainability objectives could undermine the whole appraisal process.
- Secondly, the sustainability objectives and DPD objectives were appraised in terms of compatibility to ensure that the overall direction of the DPD accorded with principles of sustainable development.
- Finally, individual options were appraised against the sustainability objectives, allowing a more detailed assessment of how performance varied according to the various options proposed.

The methodologies and findings of each of these stages are identified below.

2. Appraisal Methodology

2.1 Matrices of compatibility were produced for each of the three stages of appraisal identified above. A simple scoring system was adopted to assess performance against sustainability objectives:

- + Positive effect
- Negative effect
- O Neutral effect
- ? Uncertain effect

2.2 The chosen scoring system was intentionally simplistic given the difficulties in making precise judgements at such a strategic level of policy, where outcomes would be subject to a broad range of pressures and potential mitigating factors. For the same reason, it was often necessary to use more than one symbol in combination to highlight instances where outcomes could not be easily categorised or predicted.

2.3 Alongside the scoring, a commentary has been included for each option to expand on some of the assumptions used and relationships that were found to exist. Full matrices can be found in Appendix 1, however, a brief summary of the appraisal of each of the issues is given in the individual sections below.

3. Public Consultation

- 3.1 An initial stage of public consultation regarding the issues and options has already been undertaken between June and August 2007. This was led by a series of five public meetings in June and July where the Authority introduced the various issues under consideration, followed by facilitated group discussions to establish whether there was any consensus. Public representations were then invited over a ten week period, closing on the 17th August 2007. A separate report has been produced outlining the results of these consultations.
- 3.2 Government guidance suggests that the SA findings should be made available alongside the public consultation on issues and options. Unfortunately, it was not possible to present detailed findings at this stage, although a summary of the advantages and disadvantages of each option were listed in the Issues & Options paper.
- 3.3 This report is being issued alongside the initial scoping report for consultation purposes. The Authority are required to consult a number of statutory bodies regarding the scope of the SA (please refer to this report), and are encouraged to make all material available to other consultation bodies and the wider community. Comments regarding either the scoping exercise, or the initial appraisal findings are therefore invited. In accordance with government guidance, a period of five weeks has been allowed for this stage of consultation, and responses are therefore required on or before Friday 15thth February 2008.

4. Next Steps

The findings of this appraisal will be used to inform the selection of preferred options for the Housing DPD. The preferred options will in turn be subjected to a more detailed appraisal to determine their performance in sustainability terms. This exercise will constitute the remainder of Stage B of the SA process outlined above.

5. Sustainability Objectives Compatibility Appraisal

- 5.1 Sustainability objectives were appraised against each other in order to assess internal compatibility. Clearly, were there to be serious conflicts between objectives, this would fundamentally weaken the whole SA process. A number of themes were identified from this process and are listed below.
- 5.2 It was found to be difficult to make accurate predictions about relationships at this level of generality. Although each objective focuses on a particular sustainability subject, their remit remains broad, affecting all areas of the Park and sharing multiple and complex relationships with other objective areas. There is subsequently a requirement for a number of generic assumptions to be made at such a strategic level.
- 5.3 Only a very small number of objectives shared little or no relationships. Around 40% of relationships were found to be largely compatible. The remainder, comprising just over half of all relationships, were deemed to be uncertain. This latter category is indicative of three key characteristics:
- There are a number of instances where, although outright or irreconcilable conflicts could not be assumed, outcomes were very much dependent upon appropriate mitigation or site specific factors. Ultimately individual judgements and detailed policy options will be responsible for addressing these tensions;
 - Some objectives, for example climate change and agriculture, are defined by uncertainty and change. Understanding and adapting to changing circumstances is therefore integral to these objectives, generating difficulties in predicting effects. There is a need to accept this uncertainty and incorporate the need for understanding and adaptation in responses.
 - It would be unrealistic to expect complete compatibility between objectives. Tensions and uncertainties are to be expected, since they reflect real world complexity and are arguably an inevitability when attempting to resolve such a broad range of issues and objectives. These conflicts are integral to the concept of 'sustainability', ensuring that all potential impacts are considered, and adjusting objectives accordingly.
- 5.4 The use of language in objectives was found to be a key consideration. Terms such as 'appropriate' and 'sustainable' immediately allow the assumption that all considerations will be integrated into decision making and that mitigation will be provided for as necessary.
- 5.5 It was noticeable how some objectives are fairly tightly focussed, and therefore have few direct relationships with other objectives. Conversely, some are cross-cutting and engage with all other objectives in some meaningful way.
- 5.6 A fundamental sustainability issue in National Parks occurs when considering National Park purposes and duties. The 1995 Environment Act sets out these purposes and duty, and is clear in stating that National Park Authorities should seek

to foster social and economic wellbeing of communities in pursuing the two main purposes. While, on the one hand, the purposes and duty seem collectively to address a broad range of sustainability concerns, the duty is actually a subsidiary to the purposes, with greater emphasis seemingly given to conservation and recreation interests.

6. Sustainability Objectives versus DPD Objectives

6.1 The second part of the process required the appraisal of DPD objectives against SA objectives to test compatibility. A summary of the findings is as follows:

6.2 Issue 1: Affordable housing target

DPD Objective: Set a target for affordable housing permissions over the plan period

The performance of this DPD objective against SA objectives is characterised by uncertainty. This is very much a strategic, Park-wide issue. Setting a target is a clear indication of intent in terms of the scale of the Authority's response, and will facilitate a plan-led approach to the problem. While this will create clarity in terms of the overall scale of provision that is being planned for, the implications of the objective are very much dependent upon the option pursued, the mechanisms for its delivery and any mitigation against negative effects.

6.3 Issue 2: Delivering Affordable Housing

DPD Objective: Release sites in a way most likely to meet the affordable housing target

Once again this objective creates much uncertainty when assessing impacts upon sustainability objectives. A recurring theme relates to the objective wording, which carries the implication that the affordable housing target is the single most important determining factor in the way sites are released. Clearly, such a top-down approach will need to have regard to a whole host of other influencing factors, many of which are embodied in the SA objectives. Assessment of the performance of this objective has therefore resulted in emphasis upon the need to ensure that the affordable housing target is considered alongside impacts on other interests to ensure a sustainable approach, rather than being led by a simplistic target that may prove harmful. This point is particularly pertinent to the special qualities objective, where National Park purposes are brought to the fore.

6.4 Issue 3: Spatial Strategy

DPD Objective: Determine the sustainable locations for new house building and residential conversion

The objective wording is once again an important factor here, since the use of the term 'sustainable locations' can be interpreted in a number of ways. While, in theory, 'sustainable' should imply an approach where all interests are represented and considered on an equal footing, in a planning context the term has traditionally carried an emphasis on accessibility to services and reducing the need to travel. The use of the term in the latter sense does bring many sustainability benefits, particularly where community, employment and transport objectives are concerned. Care does however need to be exercised in respect of some sustainability objectives that are seemingly more remote from this definition, for example biodiversity and archaeology.

6.5 **Issue 4: Local Needs**

DPD Objective: Define the categories of local households in need of new housing

In a similar way to issue 1, this objective is more about process and less aspirational than some others. This objective also has limited relevance to the majority of sustainability objectives, because it is essentially a social concern. Where relationships do exist, these are largely compatible, notably where community objectives are concerned.

6.6 **Issue 5: Housing development boundaries**

DPD Objective: Use housing development boundaries, or an alternative tool, to manage the release of land for new housing

This objective suggests some form of containment and certainty, which can be useful when making assumptions about sustainability impacts, and indeed results in some positive relationships. Many uncertainties still exist however, particularly since such tools do not offer complete certainty about the scale and location of development, and other interests need to be considered. Indicative measures for release of housing land must always be tempered by some form of more detailed assessment of suitability, incorporating all relevant considerations.

6.7 **Issue 6: Housing density, size & type**

DPD Objective: Increase the number of small and medium sized houses in the National Park and make efficient use of land

The efficient use of land element of this objective carries the most relevance when considering sustainability impacts. As with issue 5, efficient use of land suggests containment of impacts in one sense, and yet this may have negative implications in other respects, for example design. Most significant relationships are likely to be with community objectives, although a fuller exploration of individual options will better elucidate the uncertainties identified at this stage.

6.8 **Issue 7: Design & sustainability**

DPD Objective: Pursue high quality design. Improve energy efficiency and renewable energy generation in new housing developments

Largely positive relationships have been identified, particularly where emphasis is placed upon the wider role of good design beyond simple aesthetics. A cautious approach may be warranted in view of some of the uncertainties exposed by the appraisal. These uncertainties are dominated by the impact caused by renewable technologies and contemporary design upon the National Park's special qualities. A notable difficulty with this objective is its application only to the DPD currently under consideration, since there appears to be merit in its application across the whole range of developments.

6.9 **Issue 8: Housing in the open countryside**

DPD Objective: Explore opportunities to enhance the landscape of the National Park through housing policy

Conflicts and uncertainties identified revolved around general acceptance that landscape enhancements were to be encouraged, and yet concerns that housing policy may not be an entirely appropriate vehicle to achieve this. The ability of such an approach to genuinely yield visual improvements without harming other sustainability interests is a particular weakness.

7. Sustainability Objectives versus DPD Options

7.1 The final stage involved appraisal of individual options against SA objectives to assess compatibility. The findings of this process are outlined below, however, it is first necessary to highlight some of the problems encountered in carrying out this exercise.

7.2 Problems Encountered

7.3 In contrast to the appraisal of objectives, individual option assessments allowed more informed judgements about effects and relationships. The options are however still largely strategic in nature, and therefore often demand broad assumptions, still leaving much room for uncertainty.

7.4 Appraising each issue in isolation presented difficulties, as most are not mutually exclusive, often having interrelationships with a number of other objective areas. The ways in which different options interact to give cumulative or synergistic effects is likely to be instrumental in how they perform against sustainability objectives. A prime example is the difficulty in assessing the implications of setting a particular affordable housing target in the absence of knowledge about how and where sites will be released. Where this is likely to be a factor, it is highlighted in the commentary for each option.

7.5 A fuller exploration of cumulative effects at this stage would have been desirable, however, we have already highlighted the significant role of uncertainty in the assessments made. Given that uncertainty exists within each option according to a number of factors, attempting to define cumulative impacts brings the risk of a multiplier effect. In these circumstances, combining uncertainties only compounds the difficulties in assessing performance and leads to a greater potential for error. Such an assessment of cumulative effects can be more satisfactorily carried out in the assessment of preferred options, where a fuller exploration of impacts can be conducted, therefore allowing greater certainty in predicted outcomes.

7.6 Summary of Appraisal Findings

7.7 Issue 1 – Affordable housing target

In this option, judgements worked on the assumption that in setting a target, this volume of housing will subsequently be delivered. Similarly, since this issue is concerned only with overall provision, rather than where and how, this will inevitably be restrictive upon the detail of judgements made.

A sliding scale of four options are presented, beginning with a target roughly corresponding with current delivery and ending with the total required to overcome the deficit identified by available evidence. The general inference here is that, the larger the affordable housing target, the greater the overall impact upon the sustainability objective, whether it be a positive or negative effect.

Assumptions about the impacts of the lowest target are relatively easy to make, given that this is the situation that currently exists. In this scenario, impacts are on

the whole not significant, although the option fundamentally fails to address community and employment objectives. At the opposite end of the scale, a target of 88 affordable dwellings a year would constitute a significant shift in overall provision, and the implications for a number of the objectives become very marked. The only likely positive benefits would be in relation to community and employment objectives.

7.8 Issue 2 – Delivering affordable housing

Pursuing an option of allocating sites in addition to the use of exceptions and windfalls will give both flexibility and, specifically through the allocations route, a more planned approach to affordable housing. Uncertainty is far more of a feature in the options concerned solely with exceptions or windfalls, as these methods are generally less proactive. In combination, they also constitute a continuation of a strategy similar to that already in place, which, to date, has failed to deliver sufficient affordable housing.

7.9 Issue 3 – Spatial strategy

Retaining the current list of settlements appears to present the most sustainable option, although not without a number of uncertainties. Judgements about a review of the list of settlements are difficult given that the ultimate direction of this approach is unclear, particularly whether the list of settlements would be expanded or not, and the criteria that would be used in this process. While a relaxed barn conversion policy may yield limited benefits, it is considered to have the potential for largely detrimental impacts.

7.10 Issue 4 – Local needs

Some limitations of the current local need criteria are recognised by the Authority, and therefore a review could offer benefits in terms of better targeting this policy at the particular social and economic needs of the National Park. Much however depends on the nature of this review and the detailed amendments that are pursued, which may act to improve upon or undermine the overall strategy.

7.11 Issue 5 – Housing development boundaries

While a definite link between development boundaries and overall affordable housing provision should not inevitably be made, it is perhaps reasonable to assume that a more restrictive approach may result from this option. It would also limit opportunities for the more positive, planned approach of allocating sites for affordable housing. Conservation interests may benefit from this restrictive approach, although there is still scope for impacts. By contrast, reviewing or dispensing with development boundaries brings much greater potential for harm to conservation interests, while promoting greater flexibility in site selection and ultimately affordable housing delivery. A carefully considered review of development boundaries does however offer more control at policy formulation stage unlike the removal of boundaries which is far more likely to result in speculative approaches at planning application stage.

7.12 **Issue 6 – Housing density, size & type**

The options presented here are not directly comparable since they deal with different facets of house sizes and densities. Where options can be compared, the approaches presented are relatively discrete, yielding only marginal differences in impacts on sustainability objectives. In overall terms these options are less strategic than some others dealt with above, being more concerned with detailed policy. As a result, their potential for significant sustainability impacts is restricted.

7.13 **Issue 7 – Design & sustainability** **Issue 8 – Housing in open countryside**

Options were not presented for these particular issues. Instead, a number of questions were posed as means of generating debate and obtaining some initial feedback around the issues raised. It is not therefore possible to appraise these sections.