



Harlow District Council

Affordable Housing Sustainability Appraisal Report

Adopted
March 2007

Harlow Council
Planning Services
Civic Centre
The Water Gardens
Harlow Essex
CM20 1WG



Supplementary Planning Document
AFFORDABLE HOUSING

SUSTAINABILITY APPRAISAL
REPORT

March 2007

1. NON TECHNICAL SUMMARY

The purpose of this document is to assess the social, economic and environmental effects of the Council's SPD on Affordable Housing. The Affordable Housing SPD sets out a clear and consistent framework for seeking affordable housing from development and provides further clarification on Policy H5 and Policy H6 of the Replacement Harlow Local Plan (Adopted July 2006). The SPD will be a material consideration in the determination of planning applications.

This Sustainability Appraisal provides information on the assessments undertaken, potential effects, mitigation measures proposed, changes to the draft SPD that have occurred as a result of the appraisal findings, and any monitoring proposed. This SA Report will accompany the Affordable Housing SPD and will be subject to public consultation in tandem.

A key part of the Sustainability Appraisal Report consists of the formulation and assessment of reasonable alternatives to implementing the proposed SPD. Two alternative options were considered ('Business as usual' or 'SPD option'). The assessment is done against the Sustainability Objective taken from HDC Scoping Report (October 2006). Because the Local Plan policies to which the SPD relates are adopted, alteration/ recommendations cannot be made.

The Sustainability Appraisal shows that there is likely to be no significant detrimental sustainability impacts (either social, environmental or economic) arising from the Affordable Housing Supplementary Planning Document. There will, however, be a series of social benefits. These will primarily be related to the increased provision of affordable housing for those who need it, an increase in housing choice and the creation of more balanced and sustainable communities. In situations where there are uncertainties/ potential impacts, measures are taken to mitigate any potential detrimental impacts.

The Affordable Housing Supplementary Planning Document will be monitored through the Council's Annual Monitoring Report to ensure that the Supplementary Planning Document is operating effectively to meet housing needs within the Borough and achieving its intended purpose.

How to comment on the Sustainability Appraisal

The Council has produced this Sustainability Appraisal for consultation alongside the Affordable Housing Supplementary Planning Document. The consultation period will last for 6 weeks between December 2006 and January 2007. Comments on the draft SPD and this appraisal are welcomed and will be taken into account in finalising the SPD for adoption.

Comments can be sent to: Harlow Council, Forward Planning Team, FREEPOST ANG10461, Harlow CM20 1YQ, faxed to 01279 446639 or emailed to: planning.services@harlow.gov.uk

If you wish to speak to someone please phone the Forward Planning Team on 01279 446579.

2. INTRODUCTION

Local Development Document

- 2.1 In 2004 the Government introduced a new plan making system under the provisions of the Planning and Compulsory Purchase Act 2004. Accordingly, the Council is now in the process of replacing its adopted Local Plan with a Local Development Framework (LDF). The suite of Development Plan Documents (DPDs) within the Local Development Framework will form the new development plan to guide development within the Borough for the period up to 2017. Policies within the adopted Local Plan are for the time being saved, and will continue to apply until they are replaced by LDF documents or are withdrawn.
- 2.2 The key components of the Local Development Framework (LDF) are the Local Development Documents (LDDs) of which there are two main types: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The new system is designed to enable local authorities to decide which combination of documents best suit their needs.

Affordable Housing Supplementary Planning Document

- 2.3 The Affordable Housing guidance has been adopted as a Supplementary Planning Document (SPD) within the Local Development Framework. It will not form part of the development plan but will be an additional consideration to be taken into account when the Council considers planning applications.
- 2.4 The Affordable Housing Supplementary Planning Document (SPD) clarifies the policies relating to affordable housing in the adopted Replacement Harlow Local Plan. (Adopted July 2006), providing more detailed advice for putting them into practice for future housing provision.

Sustainability Appraisal

- 2.5 Sustainability Appraisal is an integral part of producing planning documents under the new Planning and Compulsory Purchase Act 2004. Local authorities must undertake Sustainability Appraisal for each of their Development Plan Documents and Supplementary Planning Documents as part of a fully integrated process.
- 2.6 Sustainability Appraisal is a means of assessing the potential social, economic and environmental effects of Development Plan Documents (DPDs) and Supplementary Planning Documents to ensure they reflect sustainable development principles. It also provides transparency in the plan preparation process

- 2.7 The approach to the Sustainability Appraisal in this report reflects the Government's sustainability agenda and guidelines for undertaking sustainability appraisals. Under Section 19(5) of the Town and Country Planning Compulsory Purchase Act 2004, Sustainability Appraisal is mandatory for all Local Development Documents, including Development Plan Document (DPD) and Supplementary Planning Document (SPDs). Sustainability Appraisal incorporates the requirements of the EU Directives 2001/42/EC- the Strategic Environmental Assessment (SEA) Directives.
- 2.8 This Sustainability Appraisal (SA) accompanies the affordable Housing Supplementary Planning Document (SPD) and both documents are published for consultation in tandem.

3. APPRAISAL METHODOLOGY

Approach adopted for the Sustainability Appraisal

- 3.1 As the baseline data is generic to the whole of Harlow District Council, the Scoping Report prepared to satisfy Stage A requirements for ALL Harlow District Council policies. The subsequent stages of the Sustainability Appraisal process are as follows:

Stage B	Developing and refining options and assessing effects
Stage C	Preparing the Sustainability Appraisal Report
Stage D	Consulting on draft Supplementary Planning Document and Sustainability Appraisal Report
Stage E	Monitoring the significant effects of implementing the Supplementary Planning Document

This is in keeping with the *Sustainability Appraisals of Regional Spatial Strategies and Local Development Documents - Guidance for Regional Planning Bodies and Local Planning Authorities, November 2005*.

When the SA was carried out

- 3.2 The Sustainability Appraisal was undertaken in November 2006 in anticipation of presenting the report to the Harlow District Council for consideration and consent to advertise for public comment in December 2006/January 2007.

Who carried out the Sustainability Assessment

- 3.3 The Harlow District Council Forward Planning team undertook the preparation of the Sustainability Assessment.

Difficulties encountered in compiling information or carrying out the assessment

- 3.4 The main difficulty identified throughout the process to date is the lack of existing examples of sustainability appraisals as the process is relatively new and untested. Secondly there were a number of issues within the guiding documents prepared by the Office of the Deputy Prime Minister, including inconsistent terminology and guidance between the text and appendices.

4. BACKGROUND

Purpose of the Sustainability Appraisal and the Sustainable Assessment Report

- 4.1 The purpose of this Sustainability Appraisal is to ensure that the proposed Supplementary Planning Document *Affordable Housing* is reviewed in compliance with the *Planning and Compulsory Purchases Act 2004*. Section 39(2) of the Act requires a mandatory sustainability assessment of Regional Spatial Strategy revisions and new or revised Development Plan Documents and Supplementary Planning Documents. This assessment ensures appropriate consideration of potential social, environmental and economic effects as required by European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and incorporated into English law by virtue of the Environment Assessment of Plans and Programmes Regulation (2004).

Plan objectives and outline of contents

- 4.2 The objectives of a Supplementary Planning Document sets out what it is aiming to achieve in spatial planning terms and set the context for development of options for the document. It is important for the objectives of the Supplementary Planning Document be in accordance with sustainability principles. The objectives should be tested for compatibility with the Sustainability Appraisal objectives. Where there is conflict between objectives, Harlow District Council will need to reach a decision on priorities.
- 4.3 The objectives of the Affordable Housing SPD are as follows:

- *Decent Affordable Homes*
- *To ensure that on allocated residential sites provision is made for a range and mix of dwelling types and sizes to meet the needs of all sectors of the Harlow community, including affordable housing, and special needs housing to create a mixed community.*
- *To maximise opportunities for the provision of affordable new homes in accordance with the Local Plan.*

These objectives reflect the status of the document and its specific purpose, as well as reflecting the wider objective of the Council' Corporate Objectives.

Compliance with the SEA Directive / Regulations

- 4.4 By undertaking the Sustainability Appraisal for the Affordable Housing Policy H5 and H6 (which was adopted as a final policy of Harlow District Council in July 2006) and the draft Affordable Housing SPD, the requirements of Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of certain plans and programmes on the environment have been complied with.
- 4.5 Policy H5 and H6 is classified as 'saved plan' because it has been adopted as a policy of Harlow District Council. This means that, although it requires comparison with the Sustainability Objectives for context, there is no requirement to make recommendations for change. The SPD however, as a draft Supplementary Planning Document, is not only required to be assessed against the sustainability objectives but, where identified and justified, may warrant modification to the draft version considered by Council and if approved will then be the subject of public consultation.

5 SUSTAINABILITY OBJECTIVES, BASELINE AND CONTEXT

- 5.1 Both the Guidance on Sustainability Appraisal of Local Development Frameworks (LDFs) and the SEA Directive require information to be set out on the relevant aspects of the state of the environment and its likely evolution without the implementation of the plan, together with the environmental characteristics of the area likely to be affected.
- 5.2 The collection of baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. Sufficient information about the current and likely future state of the area needs to be collected to allow the plan's effects to be adequately predicted.
- 5.3 A key aim of the process is to ensure that where possible each of the Sustainability Appraisal objectives is supported with comprehensive and up to date baseline information. The collection of baseline data for the appraisal needs to be coordinated with the development of the information base for the plan itself.
- 5.4 The information required by the Guidance for this chapter was undertaken through the preparation of a separate document finalised by Harlow District Council in 2006. Rather than repeat the content of the report below the reader is directed to the *Integrated SEA/SA of the Harlow Local Development Framework - Scoping Report 2006*. The following subsections are dealt with in detail in the Scoping Report which may be viewed as a PDF (Portable Document Format) on the Harlow District Council website: www.harlow.gov.uk . From the 'Home' page click on 'Living' then 'Environment' then 'Planning' then 'Local Development Framework' and scroll down to the 'Sustainability Appraisal Scoping Report' at the bottom of the page (appendices are located below the report).

The appropriate section and page number is provided here to assist in quickly finding the relevant section:

Links to other policies, plans and programmes and sustainability objectives and how these have been taken into account

- 5.5 Refer to Section 2.2 on pages 6-7 and Appendix 2.

Baseline Data - Description of the social, environmental and economic issues and problems identified

- 5.6 Refer to Section 3 on page 9 and Appendix 3.

Main social, environmental and economic issues and problems identified

5.7 Refer to Section 4 on pages 9-12 for Harlow District's identified issues under the categories Environmental, Sustainability, Social and Economy.

a. Limitations of the information, assumptions made etc

Refer to Section 3.3 on page 9.

b. The Sustainability Appraisal framework, including objectives, targets and indicators

Refer to Section 5 on pages 12-16

Review/Changes to Baseline Data

5.8 The SPD suggest that through time and the consideration of various options, the baseline data referenced in Section 4 may change as a consequence. As the baseline characteristics were approved by Harlow District Council a short time before this Sustainability Appraisal was undertaken (2006), the key issues and problems is considered premature in the context of this Sustainability Appraisal.

6. APPRAISAL OF THE AFFORDABLE HOUSING SPD OBJECTIVES

- 6.1 Central to the Sustainability Appraisal process is the testing of the objectives of the SPD guidance against a Sustainability Appraisal Framework. It is important that the overall SPD objectives are consistent with the concept of sustainable development. This has been assessed by testing whether the SPD objectives (Section 4.3) are compatible with the Sustainability Appraisal objectives.
- 6.2 The effects of the SPD objectives against the sustainability objectives will be recorded as being: + Compatible, 0 Neutral or - Potential Conflict. Table 1 below shows the results of the analysis.
- 6.3 Out of the 25 Sustainability Appraisal Objectives, the assessment demonstrates that the SPD objectives are either neutral or compatible with the sustainability objectives. There are no cases of potential conflict or inconsistency between the SPD and SA objectives. A mainly neutral impact is assessed on the environmental sustainability objectives. This is because the environmental objectives are more likely to be affected by the amount of housing and its design rather than by the tenure of the housing.
- 6.4 The SPD objectives are considered to be compatible with the following sustainability objectives:
- Re-use of previously developed land and existing buildings.
 - Reduced levels of crime and fear of crime.
 - Enhance the vitality and viability of town centre
 - To reduce poverty and social exclusion.
 - To raise educational attainment, skills and training opportunities for all.
 - To improve health and the well being of the population.
 - To improve and increase accessibility for all people of Harlow to a full range of services, amenities and facilities.
 - To provide everybody with the opportunity to live in a decent home.
 - To ensure high and stable levels of employment.
- 6.5 The proposed objective for the Guidelines is therefore recommended for inclusion into the draft SPD which will be the subject of public consultation in December 2006- January 2007.

TABLE 1 – APPRAISAL OF THE AFFORDABLE HOUSING SPD OBJECTIVE		
<ul style="list-style-type: none"> • <i>Decent Affordable Homes</i> • <i>To ensure that on allocated residential sites provision is made for a range and mix of dwelling types and sizes to meet the needs of all sectors of the Harlow community, including affordable housing, and special needs housing to create a mixed community.</i> • <i>To maximise opportunities for the provision of affordable new homes in accordance with the Local Plan.</i> 		
	SUSTAINABILITY OBJECTIVES (ADOPTED BY HARLOW DISTRICT COUNCIL IN JULY 2006)	Relationship between draft Objective for SPD and Sustainability Objectives
1	To conserve and enhance biodiversity in the District	0
2	To protect and enhance the natural landscape and townscape character, including historical and cultural heritage features.	0
3	To reduce vulnerability to the effects of climate change.	0
4	To maintain and enhance the integrity of river corridors and floodplains and reduce fluvial flood risk.	0
5	To reduce surface water flooding.	0
6	To enhance air quality and safeguard the urban and natural environment against air pollution.	0
7	To safeguard, and where possible, minimise the effects of noise pollution on the urban and natural environment.	0
8	To safeguard and where possible minimise source light pollution in the urban and natural environment.	0
9	To maintain soil quality and reduce the amount of contaminated soil.	0
10	To encourage more sustainable forms of transport to reduce the environmental impact.	0
11	To increase energy efficiency and use of energy from renewable sources.	0
12	To improve efficiency in land use through the re-use of previously developed land and existing buildings.	+
13	To minimise waste and consumption of resources and promote sustainable waste management.	0
14	To improve efficiency the river and groundwater quality, and to promote the sustainable use of water resources.	0
15	To achieve a safe and hospitable environment with reduced levels of crime and fear of crime.	+
16	To promote high quality spaces, places and buildings and ensure that good design principles are practised for all forms of	0

	development.	
17	To sustain and enhance the vitality and viability of the existing town centre, neighbourhood centres and hatches.	+
18	To provide and enhance opportunities for access to, and recreation in, the District's open space and green wedges, the Stort Valley and surrounding countryside within Harlow.	0
19	To reduce poverty and social exclusion.	+
20	To raise educational attainment, skills and training opportunities for all.	+
21	To improve health and the well being of the population.	+
22	To improve and increase accessibility for all people of Harlow to a full range of services, amenities and facilities.	+
23	To provide everybody with the opportunity to live in a decent home.	+
24	To ensure high and stable levels of employment.	+
25	To encouraged economic diversity and enhance the image of the area as a business location	0

+ Compatible 0 Neutral – Potential Conflict

7. PLAN ISSUES AND OPTIONS

Main strategic options considered

- 7.1 The Guidance for the preparation of SPDs requires that options are considered, to assess and ensure that the chosen path is the most suitable for achieving the sustainability objective. The purpose of assessing alternative options is to compare the sustainability impacts of alternative ways of addressing the same issue and determine which option is likely to be most sustainable. The purpose of this exercise is to determine whether it is necessary to produce the SPD. To enable a comparison, two options are considered:

Option 1: Business as Usual (implementing adopted Harlow Local Plan 'Affordable Housing' without published detailed guidance)

Option 2: SPD Option (adopting the Guidance as SPD)

Appraisal of Alternative Options

- 7.2 The two options of 'Business as Usual' or 'SPD Option' on 'Affordable Housing' have been compared by assessing them against the 25 sustainability objectives. The likely effects have been recorded as being + positive, ? uncertain, - negative or 0 neutral. This is shown in Table 2 below.
- 7.3 In sustainability terms, producing the SPD is considered to have a positive effect with a number of the SA objective (5, 7, 11, 12, 15, 16, 17, 19, 20, 21, 23, 24). The Affordable Housing SPD, if adopted will provide further guidance on the implementation of the Council's affordable housing policy. It will set out the Council's percentage requirement for affordable housing on sites of a certain number of dwellings and more, the mix and type of affordable housing required throughout a site and the standards that should be met by the affordable housing units. In addition, the SPD provides guidance for developers on alternative to on-site provision through commuted sum or financial contribution.
- 7.4 On the other hand, if the Council decides to follow the 'Business as Usual' route and decide not to produce a SPD on Affordable Housing, the possibility of the process running smoothly will be much lower. The 'Business as Usual' approach would also be more time consuming and cumbersome. The Council's message on affordable housing delivery may appear confused in the absence of a draft SPD. therefore producing the SPD is necessary and supported.

TABLE 2- APPRAISAL OF ALTERNATIVE OPTIONS

	SUSTAINABILITY OBJECTIVES	Option 1: Business as Usual	Option 2: SPD Option	Comments
1	To conserve and enhance biodiversity in the District	0	0	
2	To protect and enhance the natural landscape and townscape character, including historical and cultural heritage features.	0	0	
3	To reduce vulnerability to the effects of climate change.	0	0	
4	To maintain and enhance the integrity of river corridors and floodplains and reduce fluvial flood risk.	0	0	
5	To reduce surface water flooding.	?	+	The SPD requires development to meet Housing Corporation Standard Development Scheme which impacts on surface water flooding.
6	To enhance air quality and safeguard the urban and natural environment against air pollution.	0	0	
7	To safeguard, and where possible, minimise the effects of noise pollution on the urban and natural environment.	?	+	The SPD requires development to meet Housing Corporation Standard Development Scheme which impacts on noise pollution.
8	To safeguard and where possible minimise source light pollution in the urban and natural environment.	0	0	
9	To maintain soil quality and reduce the amount of contaminated soil.	0	0	
10	To encourage more sustainable forms of transport to reduce the environmental impact.	0	0	
11	To increase energy efficiency and use of energy from renewable sources.	?	+	The SPD provides information on the more efficient use of resources.
12	To improve efficiency in land use through the re-use of previously developed land and existing buildings.	+	+	The policies emphasis on the need to supply affordable housing, which is considered to be an efficient use of land.

13	To minimise waste and consumption of resources and promote sustainable waste management.	0	0	
14	To improve efficiency the river and groundwater quality, and to promote the sustainable use of water resources.	0	0	
15	To achieve a safe and hospitable environment with reduced levels of crime and fear of crime.	+	+	Both options can help in the reduction of crime or the fear of crime.
16	To promote high quality spaces, places and buildings and ensure that good design principles are practised for all forms of development.	+	+	The SPD seeks innovative design solutions for affordable housing.
17	To sustain and enhance the vitality and viability of the existing town centre, neighbourhood centres and hatches.	0	0	
18	To provide and enhance opportunities for access to, and recreation in, the District's open space and green wedges, the Stort Valley and surrounding countryside within Harlow.	0	0	
19	To reduce poverty and social exclusion.	+	+	The SPD will help to ensure that affordable housing is targeted at those in greatest need therefore reducing social exclusion and poverty.
20	To raise educational attainment, skills and training opportunities for all.	+	+	The knock- on effect of the SPD will ensure affordable homes for families, which will create security and in turn children will perform and achieve better in schools.
21	To improve health and the well being of the population.	+	+	The production of the SPD will ensure that affordable housing is provided for those in need. This will ensure the reduction of poor health caused by poor quality / inadequate affordable housing provision.
22	To improve and increase accessibility for all people of Harlow to a full range of services, amenities and facilities.	0	0	

23	To provide everybody with the opportunity to live in a decent home.	+	+	Both options requires that everyone with Harlow should live in a decent home
24	To ensure high and stable levels of employment.	+	+	By the provision of adequate supply of affordable housing, key workers will be retained in the area. This will help to sustain a skilled workforce in the Borough.
25	To encouraged economic diversity and enhance the image of the area as a business location	0	0	

+ Positive impact 0 Neutral (no impact) - Negative impact

8. PLAN POLICIES

Significant Social, Environmental and Economic Effects of the Preferred Option

- 8.1 It is appropriate to appraise the sustainability of the preferred option in detail, to analyse any adverse effects that are seen to be likely, and where appropriate, identify what mitigation measures may be required to prevent and reduce or offset these effects. Ways of maximising the beneficial effects of the preferred option should also be considered.
- 8.2 Table 3 below shows the results of the effects of the preferred option(s), as it is assessed against SA Objectives. The likely effects are recorded as having '+ positive, ? uncertain, 0 zero or - negative effects'. The effect was then assessed in terms of longevity (i.e. short, medium or long term, positive or negative effect). Other factors relating to the justification are included in the final right hand side column. Where a need for change to ensure sustainability was identified (for the SPD only) the reasoning and a recommendation were included.
- 8.3 The findings of this assessment will identify the changes to incorporate sustainability and recommendations for modification of the SPD. Conclusions on the overall sustainability effect of the preferred option should be documented, including the likelihood of effects occurring, and the scale and nature of the impacts predicted.

TABLE 3- APPRAISAL OF THE PREFERRED OPTION (AFFORDABLE HOUSING SPD)

Sustainability Objectives (taken from HDC Scoping Report October 2006)		Does the SPD affect the implementation of the objective?	Assessment of effect if Draft SPD are <u>not</u> modified			Justification for assessment noting:
			Short Term	Medium Term	Long Term	*Geographical scale: All Harlow Dwellings *Whether temporary or permanent: Permanent where applicable *Secondary, Cumulative or Synergistic Effects: Secondary > Recommendations for mitigation / improvement
Environment						
1	To conserve and enhance biodiversity in the District	Uncertain Effect	?	?	?	Generally the SPD will not impact upon this objective, as the subject land will have already been environmentally assessed as suitable for residential purposes under earlier approvals. However, where present, consideration of maintaining or enhancing biodiversity should be acknowledged in the assessment process. Recommendation: The local plan seeks to prevent loss of biodiversity. Wording in the SPD to make reference of this.
2	To protect and enhance the natural landscape and townscape character, including historical and cultural heritage features.	Zero Effect	0	0	0	Not applicable to the SPD
3	To reduce vulnerability to the effects of climate change.	Zero Effect	0	0	0	Not applicable to the SPD
4	To maintain and enhance the integrity of river corridors and floodplains and reduce fluvial flood risk.	Zero Effect	0	0	0	Not applicable to the SPD
5	To reduce surface water flooding.	Positive Effect	+	+	+	The SPD makes reference to development meeting Housing Corporation Scheme Development Standard. This will control surface water flooding caused by development

						Recommendation: No Change
6	To enhance air quality and safeguard the urban and natural environment against air pollution.	Zero Effect	0	0	0	Not applicable to the SPD
7	To safeguard, and where possible, minimise the effects of noise pollution on the urban and natural environment.	Positive Effect	+	+	+	The SPD makes reference to development meeting Housing Corporation Scheme Development Standard. This will control the effects of noise pollution caused by development Recommendation: No Change
8	To safeguard and where possible minimise source light pollution in the urban and natural environment.	Zero Effect	0	0	0	Not applicable to the SPD
9	To maintain soil quality and reduce the amount of contaminated soil.	Zero Effect	0	0	0	Not applicable to the SPD
10	To encourage more sustainable forms of transport to reduce the environmental impact.	Uncertain/Zero Effect	?/0	?/0	?/0	Although the SPD is not site specific, it should seek to specify approach to reduce the need to travel especially for the elderly. Recommendation: Wording in the SPD to make reference to location of affordable housing close to local facilities and public transport
11	To increase energy efficiency and use of energy from renewable sources.	Positive Effect	+	+	+	The SPD provides information on the more efficient use of resources. It helps to ensure that developers meet the target of providing a minimum of 50% of affordable homes for each scheme to achieve an eco-rating of 'excellent' and 'very good as the lowest acceptable level. Recommendation: No Change
12	To improve efficiency in land use through the re-use of previously developed land and existing buildings.	Positive Effect	+	+	+	The need to supply affordable housing is considered to be an efficient use of land. Recommendation: No change
13	To minimise waste and consumption of resources and promote sustainable waste	Zero Effect	0	0	0	Not applicable to the SPD

	management.					
14	To improve the river and groundwater quality, and to promote the sustainable use of water resources.	Zero Effect	0	0	0	Not applicable to the SPD
Social						
15	To achieve a safe and hospitable environment with reduced levels of crime and fear of crime.	Positive Effect	0/?	+	+	The integration of affordable housing within private development is likely to result in a reduction in crime levels compared to a situation where affordable housing is grouped together in a site or in a community. Recommendation: No change
16	To promote high quality spaces, places and buildings and ensure that good design principles are practised for all forms of development.	Positive Effect	0/?	+	+	The SPD makes reference to development meeting Housing Corporation Scheme Development Standard. The standard encourages high quality sustainable design in development. Recommendation: No change recommended as detail is covered elsewhere.
17	To sustain and enhance the vitality and viability of the existing town centre, neighbourhood centres and hatches.	Positive Effect	0	0	0	
18	To provide and enhance opportunities for access to, and recreation in, the District's open space and green wedges, the Stort Valley and surrounding countryside within Harlow.	Zero Effect	0	0	0	Not applicable to the SPD
19	To reduce poverty and social exclusion.	Positive Effect	+	+	+	The SPD provides affordable housing to those in housing need within the local community. This contributes towards reducing exclusion to those needing accommodation and reduces poverty.

						Recommendation: No change
20	To raise educational attainment, skills and training opportunities for all.	Positive Effect	+	+	+	The knock- on effect of the SPD will ensure affordable homes for families, which will provide a balanced home life and positively contribute to children performing and achieving high grades at school. Recommendation: No change
21	To improve health and the well being of the population.	Positive Effect	? /+	+	+	There is likely to be an indirect beneficial impact on health. For many local people on the housing register or those looking to find more suitable affordable housing accommodation, the provision of affordable housing will ensure the reduction of poor health caused by poor quality / inadequate affordable housing provision. Recommendation: No change
22	To improve and increase accessibility for all people of Harlow to a full range of services, amenities and facilities.	Zero Effect	0	0	0	Not applicable to the SPD
23	To provide everybody with the opportunity to live in a decent home.	Positive Effect	+	+	+	The SPD expands on the existing policies, providing additional detail about quantity, type, design and layout of affordable housing and gives details about the types of households that require affordable housing Recommendation: No change
Economy						
24	To ensure high and stable levels of employment.	Positive Effect	? /+	? /+	+	By the provision of adequate supply of affordable housing, key workers will be retained in the area. This will help to sustain a skilled workforce in the Borough Recommendation: No change

25	To encourage economic diversity and enhance the image of the area as a business location	Zero Effect	0	0	0	Not applicable to the SPD
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Cumulative, Secondary and Synergistic Effects

- 8.4 In addition to the direct impacts of the plan it is also important to consider secondary, cumulative or synergistic effects of the SPD.

Secondary effects occur where there are a number of effects which are not a direct result of the plan but occur away from the original effect or as a result of a complex pathway.

Cumulative effects occur where several developments each have an insignificant effect but together have a significant effect.

Synergistic effects occur where effects interact to produce a total effect greater than the sum of the individual effects.

TABLE 5- AFFORDABLE HOUSING POLICY SPD				
Type of Impact	Receptor	Cause	Effect	
Cumulative	Developers, Local Communities Registered Social Landlords	Affordable Housing design requirements	-	If design demands are too high, developers may be discouraged from developing. This could potentially create a mix of social problems.
Secondary	Local family, children and schools	Provision of affordable housing	+	Family security of having an affordable home may provide a balanced home life and positively contribute to children performing and achieving high grades at school.
	Low income groups	Provision of affordable homes	+	Reduced housing pressure on low income families may result in improved well-being and health.
	Local economy	Maintained skilled workforce	+	Access to affordable home for key workers will ensure a skilled local workforce and contribute to maintaining a buoyant local economy.
Synergistic	None Identified	None Identified	-	None Identified

+ Positive impact 0 No Impact Identified - Negative Impact

Significant Social, Environmental and Economic Effects of the 'Saved' Affordable Housing Policy

- 8.5 The ODPM's guidance states that 'where the SPD has been prepared on the basis of a DPD or saved plan, policy or policies which have not been subject to SA, then the authority will need to carry out a SA of that policy or policies and report on those¹. It goes on to state, however, that 'it is not necessary for a SA of a SPD to document the significant effects of the ...saved plan as a whole or of alternatives to the saved policy.'²
- 8.6 Because this SPD has been prepared on the basis of 'saved' Local Plan policies, which have not been subject to a SEA under the requirements of the SEA Directive or an SA under the Planning and Compulsory Purchase Act 2004, the policies have been appraised against the 25 SA objectives to comply with this advice. As the policies are 'saved' and have already been adopted by the Council, there is no requirement to make recommendations for change.
- 8.7 The policies to which this assessment relates are Policy H5 and H6. These policies have been appraised together because they overlap to some extent and are all concerned with affordable housing and therefore are unlikely to have different impacts. This assessment has been provided in Table 4 below. The effects have been expressed in terms of '+ positive, ? uncertain, 0 zero effects, - negative'. The effect was then assessed in terms of longevity (i.e. short, medium or long term). Other factors relating to the justification are included in the final right hand side column.

¹ Paragraph 4.1.6 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (November 2005) ODPM

² Paragraph 4.1.11

TABLE 4- APPRAISAL OF THE 'SAVED' AFFORDABLE HOUSING POLICY (H5/ H6)

Sustainability Objectives (taken from HDC Scoping Report October 2006)	Do the Policies affect the implementation of the objective?	Assessment of the effect			Justification for assessment noting:	
		Short Term	Medium Term	Long Term	*Geographical scale: All Harlow District Council	
					*Whether temporary or permanent: Permanent	
					*Secondary, Cumulative or Synergistic Effects: Secondary	
					Note that NO recommendations for change are proposed to H5 and H6 as the plan has been adopted by Harlow District Council (i.e. it is a Saved Plan)	
ENVIRONMENT						
1 To conserve and enhance biodiversity in the District	Uncertain/Zero Effect	?/0	?/0	?/0	Not applicable	
2 To protect and enhance the natural landscape and townscape character, including historical and cultural heritage features.	Zero Effect	0	0	0	Not applicable	
3 To reduce vulnerability to the effects of climate change.	Zero Effect	0	0	0	Not applicable	
4 To maintain and enhance the integrity of river corridors and floodplains and reduce fluvial flood risk.	Zero Effect	0	0	0	Not applicable	
5 To reduce surface water flooding.	Uncertain/Zero Effect	?/0	?/0	?/0	Not applicable	
6 To enhance air quality and safeguard the urban and natural environment against air pollution.	Zero Effect	0	0	0	Not applicable	
7 To safeguard, and where possible, minimise the effects of noise pollution on the urban and natural environment.	Uncertain/Zero Effect	?/0	?/0	?/0	Not applicable	

8	To safeguard and where possible minimise source light pollution in the urban and natural environment.	Zero Effect	0	0	0	Not applicable
9	To maintain soil quality and reduce the amount of contaminated soil.	Zero Effect	0	0	0	Not applicable
10	To encourage more sustainable forms of transport to reduce the environmental impact.	Zero Effect	0	0	0	Not applicable
11	To increase energy efficiency and use of energy from renewable sources.	Zero Effect	0	0	0	The policies have no significant impact on the objective. However, it is worth noting that design of new developments can incorporate energy efficiency.
12	To improve efficiency in land use through the re-use of previously developed land and existing buildings.	Positive Effect	+	+	+	The need to supply affordable housing is considered to be an efficient use of land.
13	To minimise waste and consumption of resources and promote sustainable waste management.	Zero Effect	0	0	0	Not applicable
14	To improve the river and groundwater quality, and to promote the sustainable use of water resources.	Zero Effect	0	0	0	Not applicable
SOCIAL						
15	To achieve a safe and hospitable environment with reduced levels of crime and fear of crime.	Positive Effect	+	+	+	The potential to integrate affordable housing with private housing will contribute to reduced fear of crime.
16	To promote high quality spaces, places and buildings and ensure that good design principles are practised for all forms of development.	Positive Effect	+	+	+	The policies have no significant impact on the objective. However, it is worth noting that design of new developments can incorporate good design.

17	To sustain and enhance the vitality and viability of the existing town centre, neighbourhood centres and hatches.	Uncertain Effect	?	?	?	Not applicable
18	To provide and enhance opportunities for access to, and recreation in, the District's open space and green wedges, the Stort Valley and surrounding countryside within Harlow.	Zero Effect	0	0	0	Not applicable
19	To reduce poverty and social exclusion.	Positive Effect	+	+	+	The policies will help to ensure that affordable housing is targeted at those in greatest need therefore reducing social exclusion and poverty.
20	To raise educational attainment, skills and training opportunities for all.	Positive Effect	+	+	+	The knock- on effect of the policy will ensure affordable homes for families, which will provide a balanced home life and positively contribute to children performing and achieving high grades at school.
21	To improve health and the well being of the population.	Positive Effect	+	+	+	The indirect effect of the policies is that everyone will have access to an affordable, decent, home which positively benefits the health and well-being of the Districts population
22	To improve and increase accessibility for all people of Harlow to a full range of services, amenities and facilities.	Zero Effect	0	0	0	Not applicable
23	To provide everybody with the opportunity to live in a decent home.	Positive Effect	+	+	+	The policies seek to balance the housing market and provide a range of affordable homes to meet a spectrum of housing need within the District.
ECONOMY						
24	To ensure high and stable levels of employment.	Positive Effect	+	+	+	By the provision of adequate supply of affordable housing, key workers will be retained in the area. This will help to sustain a skilled workforce in the Borough
25	To encourage economic diversity and enhance the image of the area as a business location	Zero Effect	0	0	0	Not applicable

How social, environmental and economic problems were considered in developing the policies and proposals

- 8.8 The draft SPD and saved plan policy H5 and H6 have been assessed separately against the Sustainability Objectives which were developed and approved by Harlow District Council through the finalisation of the Scoping Report. By requiring all new affordable housing to be subject to Housing Corporation Scheme Development Standards, certain sustainability objectives will inevitably be impacted upon, in particular social and environmental concerns. Therefore there are only two significant factors, which may require mitigation in the draft SPD before it goes out to the community for public comment.

The main issues that have been identified through the Sustainability Appraisal exercise are:

- i. The lack of detail providing information and advice in relation to biodiversity.
- ii. The SPD does not promote more sustainable forms of transport to reduce environmental impact.

Proposed Mitigation Measures

- 8.9 Table 3 includes recommendations for mitigating the problems identified in section 8.6 above. This generally involves the inclusion of additional text within the draft SPD to ensure that Affordable Housing provided in the District is sustainable.

Below are the proposed texts to be inserted into the Affordable Housing

Section 5 'Design':

"Affordable housing should ideally be located close to local facilities and public transport". Sites that are close to town or local centres and have good access to public transport are well suited to certain types of affordable housing, particularly where the provision is for the elderly. The proximity to services, facilities and access to public transport will be taken into account in deciding upon the level and type of affordable housing".

Section 4 'other requirements':

"All affordable dwellings will be required to conform with the general standards of development set out in the Local Plan, these include biodiversity, open space, energy efficiency, etc".

Uncertainties and risks

- 8.10 Without testing the proposed changes on actual applications, the uncertainties and risks of the proposed changes are that the SPD may be interpreted in a way that is not consistent with the intent of the changes. Secondly, as a consequence of not being too prescriptive (to allow for a variety of innovative sustainability measures) there is a risk that assessing planners may not have enough guidance to undertake an informed assessment of the proposal in terms of variations to allow for the identified social and environmental problems.

9. IMPLEMENTATION AND MONITORING

Links to other tiers of plans and programmes and the project level (EIA, design guidance etc)

- 9.1 The guidance within the SPD links to, and is consistent with, the requirements of national, regional and district level planning policies. The Affordable Housing SPD forms part of the Local Development Framework for Harlow and is tied to, and supplements, policies H5 and H6 (Affordable Housing) of the Replacement Harlow Local Plan. (Adopted July 2006) which is a saved plan. The SPD also has strong links with the Council's Corporate Strategy.

Proposals for Monitoring

- 9.2 Monitoring the significant sustainability effects of implementing the SPD is an important ongoing stage of the SA process. Policy H5 and H6 are likely to be the Council policies on the provision of affordable housing for the next three years and monitoring the implementation of the SPD can ensure that the sustainability objectives of the SA framework of relevance to the SPD are being achieved.
- 9.3 Harlow District Council produces the Annual Monitoring Review, which must be completed by the end of the calendar year each year. The draft SPD would need to be monitored in the AMR in terms of any significant effects. The indicators have to be looked into to help give a useful picture of the effect the policy and SPD are having. This includes Total number of affordable housing completed per annum and composition of affordable housing. By examining the impacts of implementation, it will be possible to determine whether any amendment to the guidance is required to mitigate again.

