



**South Hams  
District Council**

# **SOUTH HAMS AFFORDABLE HOUSING DEVELOPMENT PLAN DOCUMENT (DPD)**

## **SUSTAINABILITY APPRAISAL**

**December 2007**

**Prepared by**

*enfusion*



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## SUSTAINABILITY APPRAISAL

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|----------------------|-----------------------------|--|
| <i>date:</i>         | December 2007               |  |
| <i>prepared for:</i> | South Hams District Council |  |
| <i>prepared by:</i>  | Liz Payne                   |  |
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# South Hams Affordable Housing Development Plan Document (DPD)

## Sustainability Appraisal

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## **1.0 NON TECHNICAL SUMMARY - SUMMARY AND OUTCOMES**

### **1.1 This Sustainability Report**

This Report documents the processes of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) for the South Hams Affordable Housing DPD (Submission Stage) as required by planning legislation and Government guidance. SA assists in promoting more sustainable development through an ongoing dialogue and assessment during the preparation of development planning documents. SEA considers the potential impacts of planning proposals on the environment and is a requirement of European legislation. In England, SEA is incorporated into the SA process and consideration of socio-economic issues is dealt with to the same level of detail as environmental. The Council commissioned consultants Enfusion to progress the SA work in January 2005.

### **1.2 Sustainability Issues, Problems and Opportunities**

During early 2005 a sustainability scoping process was carried out to help ensure that the SA covered the key sustainability issues that are relevant to the development planning system in South Hams. Relevant plans and programmes were reviewed to develop a wider understanding of the issues and priorities for South Hams, together with a description of the current and predicted social, environmental and economic characteristics of the District. From these studies, the key sustainability problems and issues were identified as affordable housing, local employment, the Sherford New Community, high design standards for development, protection of environmental quality, second homes, car usage, and accessibility.

### **1.3 Method for Appraising the Sustainability of DPDs & Consultation**

A Sustainability Appraisal Framework was compiled and included Objectives that aim to resolve the issues and problems identified. It was proposed to use these Sustainability Objectives to test the draft development plan documents as they were being prepared. This approach and the proposals for testing the development planning process was written up into a SA Scoping Report that was sent to a wide range of organisations and also made available on the Council's website. Comments were invited and received from a number of these organisations; this consultation helped improve the Appraisal Framework.

### **1.4 SA of Affordable Housing Development Plan Document (DPD)**

The SA comprises the following:

- Testing the objectives of the DPD for compatibility with the SA Framework objectives (Table 1)

- Testing the objectives of the DPD for compatibility with the SA Framework objectives (Table 2). This will identify in which areas the DPD will have most impact and inform the next stage of the process.
- Comments on each objective of the SA Framework, drawing out, and dealing with in detail, the areas where the DPD has specific potential impacts and highlighting short/long term effects, cumulative effects, and proposed mitigation ( Table 3).
- Comparison with the options of adopting more restrictive or less restrictive policies. The SEA Regulations and Guidance require that options and alternatives are given consideration, including “do nothing”.

A criteria-based assessment method was devised to ensure that this process complied with legislation and Government guidance with regard to spatial land use planning, and was consistent with the Objectives and Development Principles being developed for the DPD.

As part of the ongoing iterative SA process the Affordable Housing DPD has been subjected to SA at each of its three stages of production: Issues and Options, Preferred Option and this current Submission Stage. At each stage the policies were appraised using the SA Framework. Generally the policies were found to positively contribute towards the SA Objectives for Sustainable Development in South Hams, particularly balanced communities, housing and health with indirect benefits for the economy and employment. At Preferred Options a small number of recommendations were made as a result of the SA which aimed to improve the performance of the policies. These are related to sustainable construction, energy use and climate change and the location of rural affordable housing development. These suggested changes were considered by the Council, alongside other representations received on the Preferred Options stage of the document. The Council's response to the comments is outlined below.

## 1.5 Next Steps

This draft report on the SA incorporating SEA is now presented for public consultation, together with the Submission Stage DPD. Comments are invited as part of the Submission Stage consultation and any received will be passed on to the Planning Inspectorate for consideration. A Final SA Report that records the whole SA/SEA process will be published with the adopted DPD.

## 1.6 How the SA has influenced the DPD from Issues and Option to Submission Stage

On receipt of the draft SA, the Council decided to make changes to the document reflecting the recommendations made by Enfusion as shown below in a matrix [prepared by South Hams District Council]. The draft SA on the Preferred Options DPD was published with the Preferred

Options DPD. Following consideration of the consultation responses to the Preferred Options stage, additional changes were made. The Council's response to recommendations is provided below.

| <b>Sustainability Appraisal of the Affordable Housing Preferred Options – Initial Findings</b>  |  |   |   |
|---|--|---|---|
| <b>Recommendations from Enfusion</b>  | <b>Have taken comments on board</b><br>✓ Yes<br>X No | <b>Explanation</b>  | <b>Updates between Preferred Options and Submission</b>   |
| The policies build on the core strategy and give more detail but the following minor alterations could be made to take forward the sustainability objectives.   |  |   |   |
| Although the core development control policies (Preferred Options) contain a policy requiring residential development to meet the requirements of the Code for Sustainable Homes level 3, and it is understood that the LDF documents should be read as a whole, it would be preferable that this is explicit in the DPD. This would improve the policies' performance against energy, waste and water objectives. It will also ensure that the financial benefits of | ✓  | The reasoned justification has been amended to include reference to the emerging Development Control Core Policy and the Code for Sustainable Homes and the adopted Core Strategy policy CS11: 'Climate Change' | On further consideration of this point it was decided to not cross reference to specific policies in other documents. The Council's view is that the LDF must be read as a whole, and planning applications should be determined with regard to all relevant policies.<br><br>The need to avoid lengthy documents and the fast tracking of the AH DPD [which puts it in advance of the DC Core Policies] has informed this consideration. |

|  |          |   |   |
|--|----------|---|---|
| <p>sustainable construction and energy management are experienced by those on lower incomes.</p>   |          |   |   |
| <p>To improve the performance of policy AH2 it would be useful to expand on criterion (d) "be well related to community services and facilities" by indicating what an acceptable level of basic services would be e.g. primary school, Post Office/shop, village hall. This would potentially minimise the use of the private car for day to day needs.</p> | <p>✓</p> | <p>An explanation of criterion (d) "be well related to community services and facilities" has been added to the reasoned justification.</p> | <p>This policy addresses the needs of the community and not just the facilities available. It is the Council's view that the policy and text as written allow the flexibility needed by the Council to be able to respond to changing circumstances in the rural areas [for example the threatened closure of many post offices]. The Council may need to consider the provision of services across groups of villages in line with PPS3. Further work on defining rural communities will be undertaken a part of the Rural Areas DPD and the Council does not wish to pre-judge this work.</p> |

**2.0 Introduction**

2.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Documents (LDDs). This requirement is set out in Section 39 (2) of the Planning and Compulsory Purchase Act, 2004 and Planning Policy

Statement 12: Local Development Frameworks, 2004. Local Development Documents must also be subject to Strategic Environmental Assessment <sup>12</sup> (SEA) and it is advised<sup>3</sup> that an integrated approach is adopted so that the SA process incorporates the SEA requirements.

- 2.2 This document reports the Sustainability Appraisal of the Draft of the Affordable Housing Development Planning Document (DPD): Preferred Options. The Affordable Housing DPD expands upon Policy CS6 “Affordable Housing” of the adopted South Hams Core Strategy which was subject to full SA<sup>4</sup> and adopted in December 2006. The full Sustainability Framework is appended to this document and indicates the relationship between the SA and the SEA.
- 2.3 In preparing a DPD it is advised that broad strategic options are considered as opposed to detailed policy wording variants. To this end the SA of the DPD considers a do nothing option and the impact of less or more restrictive policies than those proposed.

#### **Policy CS6: Affordable Housing**

New residential development should provide affordable housing consistent with the overall strategic target of 50% from all sources and having appropriate regard to the:

- Identified local need;
- Nature and scale of the location and the development proposed;
- Characteristics of the site; and
- Economics of provision.

### **3.0 Methodology**

- 3.1 The method used for the sustainability appraisal comprises the following elements:
- Identifying relevant baseline information and other plans or programmes
  - Testing the objectives of the DPD for compatibility with the SA Framework objectives (Table 1)
  - Testing the objectives of the DPD for compatibility with the SA Framework objectives (Table 2). This will identify in which areas the DPD will have most impact and inform the next stage of the process.
  - Comments on each objective of the SA Framework, drawing out, and dealing with in detail, the areas where the DPD has

<sup>1</sup> EU Directive 2001/42/EC

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> ODPM, 2005 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*

<sup>4</sup> SHDC, 2006 Sustainability Appraisal of South Hams Core Strategy Submission Document

specific potential impacts and highlighting short/long term effects, cumulative effects, and proposed mitigation ( Table 3).

- Comparison with the options of adopting more restrictive or less restrictive policies. The SEA Regulations and Guidance require that options and alternatives are given consideration, including “do nothing”.
- For the purpose of this SA, short-term is considered to be 3-5 years and longer-term to be 20 years ie the duration of the DPD.

3.2 The options have been assessed using professional judgment with the Sustainability Appraisal Framework and available information, including that presented in the Plan & Programmes Review and Baseline Conditions published with the SA Scoping Report in 2005. The SA Framework was developed in conjunction with the Council and stakeholders – a draft list of objectives was developed from the review of relevant plans and programmes and the baseline conditions of SHDC to reflect the issues for sustainability and spatial planning in the area. The SA Framework is presented in Annex 1 at the end of this report and it includes the changes made as a result of public consultation during the scoping stage.

#### **4.0 Local Plans, Programmes & Baseline Relevant to the DPD**

4.1 Baseline information taken from the Sustainability Appraisal Scoping Report 2005

- The district has a net shortfall of 330 affordable dwellings per annum.
- 1800 households on the Councils housing register
- The social sector equates to less than 10% of the district's housing stock therefore the majority of the existing housing stock is open market.
- A third of this social housing is for older people, therefore, there is a lack of social housing for young people.
- High proportion of second homes (12% rising to 50% in one settlement)

4.2 Key Plans and Programmes  
Regional Planning Guidance for the South West (RPG 10) to 2016  
Devon Structure Plan 2001-2016  
South West Regional Assembly, Regional Spatial Strategy (Submission Stage), June 2006  
South Hams LDF Adopted Core Strategy, December 2006  
South Hams Housing and Market Needs Assessment 2006  
South Hams Strategic Partnership's Sustainable Community Strategy 2007-2011  
South Hams Housing Strategy for the South Hams 2005-2010

## 5.0 Testing the objectives of the DPD for compatibility with the SA Framework objectives

**SO1:** Ensure that the current and future housing needs of the community are met;

**SO2:** Provide affordable housing to meet local needs;

**SO3:** Secure high quality, locally distinctive, sustainable housing developments which provide good quality living environments;

**SO4:** Promote mixed use, mixed type, mixed tenure schemes that promote socially balanced communities; and

**SO5:** Provide for housing at the highest densities suitable for the site.

- 5.1 The housing objectives expressed above obviously perform well against the communities and housing SA Framework objectives. The provision of good quality housing is also important for health and there will be indirect benefits to the economy and employment as housing is an important component of what makes an area attractive to both employers and employees. Whilst the objectives above refer to design there is a broad reference to “sustainable housing developments” which has been interpreted to cover location, sustainable construction, energy and water management of new developments. It is also hoped that good quality living environments will encompass open space and green infrastructure provision.

## 6.0 Testing the individual policies contained within the DPD, for compatibility with the SA Framework.

- 6.1 Table 2 illustrates that there are no serious direct conflicts with the SA objectives and the basic analysis is built upon in Table 3 which looks at short and long term effects, cumulative impact and mitigation. The objectives relating to housing perform well. The high targets within Policy AH1 could act as a disincentive to development and could mean that much needed affordable housing is not brought forward. However, the DPD also refers to assessing the economic viability of sites which should avoid this situation arising.
- 6.2 The environmental implications are hard to assess as many will be dependant on location, however all allocated sites should have been subject to SA and windfall sites should be subject to equally demanding scrutiny.
- 6.3 Policy AH2 does raise issues about increases in the use of the private car as it promotes the provision of rural housing. A negative impact on air quality and energy use can be expected although it may enable some rural workers to work and live in the settlement and support the sustainability and self-containment of many rural communities. A minor issue arises about recycling in dispersed areas. There is also potential for adverse impact on the landscape unless carefully managed although, the landscape character approach being developed by the Council should ensure careful management of the landscape.

- 6.4 Although the core development control policies (Preferred Options Stage) contain a policy requiring residential development to meet the requirements of the Code for Sustainable Homes level 3, and it is understood that the LDF documents should be read as a whole, it would be preferable that this is explicit in the DPD. This would improve the policy's performance against energy, waste and water objectives.

## **7.0 Comparison with the options of adopting more restrictive or less restrictive policies or a “do nothing” scenario.**

- 7.1 In the case of this DPD the over arching purpose is “to secure a supply of housing for local people at affordable levels”. Key to this vision is the need to introduce clarity to developers and others on the implementation of Policy CS6 through the adoption of two further detailed policies and to ensure conformity with other government guidance on the provision of affordable housing. Therefore the content of the DPD is constrained and as such a strategic approach has been taken to the issue of options.
- 7.2 Given the housing crisis existing in the South Hams and the increasing problems of house prices and second home ownership, the option of doing nothing is unrealistic, will not conform to national planning guidance or the emerging Regional Spatial Strategy and can therefore be discounted. The Core Policy CS6 is a strategic policy setting out the requirement for 50% provision of affordable housing across the district.
- 7.3 Policy AH1 - more restrictive policy. As noted above there is a danger that making greater demands could lead to the provision of less affordable housing. This would mean the policy would not perform well against the most significant sustainability objectives relating to this DPD; balanced communities and housing. Indirect benefits to the economy would not be forthcoming. There is also a danger that too high a requirement for affordable housing may jeopardise contributions to other community needs and lead to developers seeking reductions in open space provision and the quality of design.
- 7.4 Policy AH1 – less restrictive policy. Lower targets would encourage the provision of market housing, but would not address the pressing need for affordable housing. Again the policy would not perform as well against the objectives for balanced communities and housing. Alternatively, lower targets could mean that there may be scope to seek a higher level of other benefits as well as affordable housing with benefits for health, the built environment and the landscape.
- 7.5 Policy AH2 – more restrictive policy. Rural housing brings with it the danger of increasing use of the private car and, therefore, has adverse impacts on energy use, air quality and climate change. A more restrictive policy would also limit impacts on the landscape and biodiversity but would not meet the objectives related to provision of housing for all and the maintenance of a working countryside.

- 7.6 Policy AH2 – a less restrictive policy. Whilst performing well against the housing objectives, this would increase the potential for adverse impacts on energy use, air quality, climate change, landscape and biodiversity.
- 7.7 There is balance to be achieved when seeking to bring forward sustainable development in its widest sense as illustrated in the Sustainability Framework objectives. Policies AH1 and AH2 try to find this balance whilst achieving a primary objective of the Council and the Strategic Partnership but improvements for sustainability could be incorporated in the policies as detailed in the conclusion.

## **8.0 Conclusion**

- 8.1 The policies build on the core strategy and give more detail but the following minor alterations could be made to take forward the sustainability objectives.
- 8.2 Although the Development Control Core Policies (Preferred Options Stage) contain a policy requiring residential development to meet the requirements of the Code for Sustainable Homes level 3, and it is understood that the LDF documents should be read as a whole, it would be preferable that this is explicit in the DPD. This would improve the policies' performance against energy, waste and water objectives. It will also ensure that the financial benefits of sustainable construction and energy management are experienced by those on lower incomes.
- 8.3 To improve the performance of policy AH2 it would be useful to expand on criterion (d) "be well related to community services and facilities" by indicating what an acceptable level of basic services would be e.g. primary school, Post Office/shop, village hall. This would potentially minimise the use of the private car for day to day needs.

## **9.0 How the SA has influenced the DPD from Issues and Options to Submission Stage**

- 9.1 On receipt of the draft SA, the Council decided to make changes to the document reflecting the recommendations made by Enfusion as shown below in a matrix [prepared by South Hams District Council]. The draft SA on the Preferred Options DPD was published with the Preferred Options DPD. Following consideration of the consultation responses to the Preferred Options stage, additional changes were made. The Council's response to recommendations is provided below.

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| The policies build on the core strategy and give more detail but the following minor alterations could be made to take forward the sustainability objectives.   |  |   |   |
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|  |          |   |  |
|--|----------|---|--|
| <p>management are experienced by those on lower incomes.</p>   |          |   |  |
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**After Public Consultation on Preferred Options**

9.2 The public consultation on the South Hams Affordable Housing Development Plan Document (DPD): Preferred Options Sustainability

Appraisal did not bring forward any comments on the SA. Some changes were made to the policy as a result of consultation but these did not require further SA work or assessment to be carried out. The Preferred Options SA considered more or less restrictive policy options and a 'do nothing' option and followed the central government advice that when preparing a DPD broad strategic options should be considered as opposed to detailed policy wording variants.

- 9.3 South Hams District Council has now prepared the Affordable Housing Development Plan Document for the Submission Stage of the process. The revised document does not introduce any new issues which were not considered at the preferred options stage but continues to lay out a firm policy basis for the provision of affordable housing in the District. The submission document has introduced affordable housing targets for the Plymouth urban fringe, the area and local centres and the rural areas and introduced a sliding scale for provision which is dependant on site size.
- 9.4 These changes are not significant enough to make a material difference to the options considered to the extent that there should be further appraisal. The strategic intention is the provision of affordable housing on allocated and unallocated 'windfall' sites and rural exception sites and minor changes in policy and implementation do not impact on these broad policy objectives.
- 9.5 It is felt that the document still does not clearly identify the level of community facilities that should be present in a village being considered for exception site housing and this, as noted earlier, could result in an adverse impact on transport and climate change SA Framework objectives. However, the Council has considered this aspect again and confirms that the need for flexibility is important in this DPD and accordingly, this issue will need to be considered as part of the Rural Areas DPD and supporting evidence. It will be important that a clear link is made between the two DPDs.

## **10.0 Monitoring**

- 10.1 Monitoring the impact of the DPD will be mainly through the recording of the number of affordable housing units achieved. Conditions requiring landscaping proposals will indicate how many schemes have had a visual impact. The levels achieved under the Code for Sustainable Homes will provide a good indicator of impact on energy use, waste and water.

| TABLE 1  | SA Framework Objectives |           |            |                                 |           |               |                    |              |                          |   |                  |                                  |              |            |                 |           |           |
|--|-------------------------|-----------|------------|---------------------------------|-----------|---------------|--------------------|--------------|--------------------------|---|------------------|----------------------------------|--------------|------------|-----------------|-----------|-----------|
| LDF Core Strategy objectives specifically applicable to the AH DPD planning framework.   | 1. Balanced Communities | 2. Access | 3. Housing | 4. Quality of Built Environment | 5. Health | 6. Employment | 7. Economic Growth | 8. Landscape | 9. Land and Soil Quality |   | 10. Biodiversity | 11. Historic / Cultural Heritage | 12. Minerals | 13. Energy | 14. Air Quality | 15. Waste | 16. Water |
| <b>SO1:</b> Ensure that the current and future housing needs of the community are met;   | ++                      | +         | +/-        | +                               | ++        | ●/<br>+       | ●/<br>+            | 0            | 0                        | 0 | ●                | ●                                | ●            | ●          | ●               | ●         |           |
| <b>SO2:</b> Provide affordable housing to meet local needs;  | ++                      | +         | ++         | +                               | ++        | +             | ●+                 | -            | 0                        | 0 | ●                | ●                                | ●            | -          | -               | ●         |           |
| <b>SO3:</b> Secure high quality, locally distinctive, sustainable housing developments which provide good quality living environments; | ++                      | +         | ++         | ++                              | ++        | +             | +                  | ●            | ●                        | ● | ●                | ●                                | +            | ●          | ●               | +         |           |
| <b>SO4:</b> Promote mixed use, mixed type, mixed tenure schemes that promote socially balanced communities;                            | ++                      | +         | ++         | ●                               | ●         | +             | +                  | ●            | 0                        | 0 | 0                | 0                                | 0            | 0          | 0               | 0         |           |
| <b>SO5:</b> Provide for housing at the highest densities suitable for the site.  | 0                       | 0         | 0          | 0                               | 0         | 0             | 0                  | +            | ++                       | + | 0                | +                                | +            | 0          | +               | 0         |           |

|           |  |
|-----------|--|
| <b>++</b> | Likely to contribute considerably to the achievement of the sustainability objective |
| <b>+</b>  | Likely to contribute somewhat to the achievement of the sustainability objective     |
| <b>-</b>  | Likely to conflict somewhat with the achievement of the sustainability objective     |
| <b>--</b> | Likely to conflict considerably with the achievement of the sustainability objective |
| <b>●</b>  | Negligible effect on the achievement of the sustainability objective                 |
| <b>0</b>  | No identifiable relationship with the sustainability objective                       |

| TABLE 2   |            | SA Framework Objectives |           |            |                                 |           |               |                    |              |   |   |                          |   |                  |                                    |              |            |                 |           |           |
|---|------------|-------------------------|-----------|------------|---------------------------------|-----------|---------------|--------------------|--------------|---|---|--------------------------|---|------------------|------------------------------------|--------------|------------|-----------------|-----------|-----------|
| Draft Affordable Housing DPD Policies (Preferred Options Stage) |            | 1. Balanced Communities | 2. Access | 3. Housing | 4. Quality of Built Environment | 5. Health | 6. Employment | 7. Economic Growth | 8. Landscape |   |   | 9. Land and Soil Quality |   | 10. Biodiversity | 11. Historic and Cultural Heritage | 12. Minerals | 13. Energy | 14. Air Quality | 15. Waste | 16. Water |
| 1   | Policy AH1 | ++                      | +         | +/-        | +                               | +         | +             | +                  | 0            | 0 | 0 | ●                        | ● | ●                | ●                                  | ●            | ●          | ●               | ●         | ●         |
| 2   | Policy AH2 | ++                      | -         | ++         | +                               | +         | +             | +                  | -            | 0 | 0 | ●                        | ● | ●                | -                                  | -            | -          | -               | ●         | ●         |

|           |  |
|-----------|--|
| <b>++</b> | Likely to contribute considerably to the achievement of the sustainability objective |
| <b>+</b>  | Likely to contribute somewhat to the achievement of the sustainability objective     |
| <b>-</b>  | Likely to conflict somewhat with the achievement of the sustainability objective     |
| <b>--</b> | Likely to conflict considerably with the achievement of the sustainability objective |
| <b>●</b>  | Negligible effect on the achievement of the sustainability objective                 |
| <b>0</b>  | No identifiable relationship with the sustainability objective                       |

TABLE 3

| <b>1. Building Communities</b>  |   |   |
|---|---|---|
| <b>Comment</b>  | <b>Short/long term effects</b>  | <b>Cumulative effects and mitigation</b>  |
| <p>A stated aim of this objective is the creation of balanced communities with a range of housing size and tenure and the reduction of social exclusion. The clarification of matters such as provision, and the integration of affordable housing with market housing will be fundamental to achieving these aims. The RSLs have an important role in building communities, particularly on large sites.</p> <p>The DPD also seeks and defines "intermediate" affordable housing which will normally take the form of shared ownership or equity homes. Certainty of provision, and its' retention in perpetuity will be achieved through the DPD requirement for a section 106 agreement. Removal of permitted development rights will ensure that the scale of the dwellings means that interim housing will remain affordable.</p> <p>Provision of affordable housing in rural communities will assist in addressing the balance between local people and new residents and owners of second homes.</p> | <p>The provision of good quality affordable housing (in all forms) should improve social cohesion and reduce social exclusion.</p> <p>Clarity of expectations and procedure for developers should expedite provision the short and long term.</p> | <p>The DPD requires that affordable housing should be indistinguishable from, and integrated with, market housing This should avoid any cumulative impacts of the stigmatisation that can arise through concentrations of affordable housing.</p> |

| <b>2. Access</b>  |   |  |
|---|---|--|
| <b>Comment</b>  | <b>Short/long term effects</b>  | <b>Cumulative effects and mitigation</b>   |
| <p>The majority of affordable housing will be located on larger sites which, in line with the Core Strategy, will necessarily have good access to community facilities and employment opportunities.</p> <p>Although policy AH2 states that rural housing should be well related to community services and facilities it would be useful if the DPD made it explicit what constitutes the minimum level of services acceptable.</p> | <p>Dependant on the level of available services, the provision of rural housing can increase use of the private car for access to wider services. This can be exacerbated by the loss of local services in the short and long term.</p> | <p>If rural housing is confined to settlements with community services as stated in the policy, this should minimise the need for the car to service day to day needs.</p> |

| <b>3. Housing</b>   |  |   |
|---|--|---|
| <b>Comment</b>  | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>  |
| <p>The provision of good quality housing for all, including affordable housing, is an objective stated throughout the Council's policy objectives and strategies. Again the provision of a mix of accommodation to meet all needs is fundamental to achieving this aim and is expressed clearly in the DPD. The DPD also seeks and defines "intermediate" affordable housing which will normally take the form of shared ownership or equity homes and further widen the opportunities to provide for the needs of all. Certainty of provision and its retention in perpetuity will be achieved through the DPD</p> | <p>Bringing forward affordable housing through the allocation of, and granting permission for, larger sites may mean delay in provision. Therefore some beneficial effects of provision will probably be felt in the short term with increasing impact as the larger sites are built out; the DPD may speed up delivery by adding certainty and reducing the number of lengthy S106 negotiations. The high targets set could lead to developers holding back development land until there may be a change of policy.</p> | <p>There should be no adverse impacts or need for mitigation. Encouraging the construction of homes that are accessible to everybody and where the layout can easily be adapted to fit the needs of future occupants are aims of both the Code for Sustainable Homes and Lifetime Homes, both of which could be added to the DPD.</p> |

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| <p>requirement for a section 106 agreement. The required split between social rented and intermediate affordable will address the need for housing to meet different circumstances.</p> |  |  |
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**4. Quality of the Built Environment**

| <b>Comment</b>  | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>                          |
|---|--|---|
| <p>The provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on the built environment. The affordable housing component of sites should be as carefully designed as the market housing and the DPD requires that the affordable housing be integrated.</p> | <p>There should be no significant effects in the short or long term.</p> | <p>There should be no adverse impacts or need for mitigation.</p> |

**5. Health**

| <b>Comment</b>   | <b>Short/long term effects</b>  | <b>Cumulative effects and mitigation</b>                          |
|--|---|---|
| <p>The relationship between good housing and health is clearly recognised by the Council. Affordable housing should have good access to all community facilities, including doctor's surgeries and sporting facilities. The involvement of the RSLs can help to improve physical &amp; mental health through their support and advice for example on energy, affordable warmth, and debt management.</p> | <p>Increasing benefits to health should be seen over time as more good quality affordable homes are provided.</p> | <p>There should be no adverse impacts or need for mitigation.</p> |

| <b>6. Employment<br/>7. Economic Growth</b>  |  |  |
|--|--|--|
| <b>Comment</b>   | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>                   |
| The provision of both affordable rented and shared equity housing may assist in retaining a young workforce which currently cannot enter the housing market and therefore leave the area. Flexible homes including home working and more affordable housing will have positive impacts in respect of reducing benefit dependency, avoiding benefit trap, and promoting economic activity. The provision of rural affordable housing will assist the objective of achieving a year round working countryside. | The time scale for provision will dictate the effects but the long term effects for the economy should be positive; in the short term benefits should also occur as a result of the DPD as delivery could be speeded up. | There should be no adverse impacts or need for mitigation. |

| <b>8. Landscape</b>   |  |   |
|---|--|---|
| <b>Comment</b>  | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>  |
| Much of the provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on the landscape. However rural and windfall sites should be subject to appraisal. | There should be no significant effects in the short or long term with the more urban sites but the rural sites could have an adverse impact as they will probably be greenfield sites. | There should be no adverse cumulative impacts but any landscape impact of rural affordable housing should be subject to mitigating landscaping if necessary when no better sites are available. |

| <b>9. Land and Soil Quality</b>   |                                |  |
|---|--------------------------------|--|
| <b>Comment</b>  | <b>Short/long term effects</b> | <b>Cumulative effects and mitigation</b>                   |
| The majority of the housing will be provided on sites which are already being developed so no extra impact experienced. | No strategic impacts.          | There should be no adverse impacts or need for mitigation. |

  

| <b>10. Biodiversity</b>  |  |  |
|--|--|--|
| <b>Comment</b>   | <b>Short/long term effects</b>                                   | <b>Cumulative effects and mitigation</b>                   |
| Most of the provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on biodiversity through part of the site being affordable housing. Rural housing will also be subject to specific development policy. | There should be no significant effects in the short or long term | There should be no adverse impacts or need for mitigation. |

  

| <b>11. Historic Environment and Cultural Heritage</b>  |   |  |
|--|---|--|
| <b>Comment</b>   | <b>Short/long term effects</b>                                    | <b>Cumulative effects and mitigation</b>                   |
| Most of the provision will be on larger sites which should be subject to appraisal and/or policies which have been appraised and there should be no further significant impact on biodiversity through part of the site being affordable housing. Rural housing will also be subject to specific development policy. | There should be no significant effects in the short or long term. | There should be no adverse impacts or need for mitigation. |

| <b>12. Minerals –</b>  |  |   |
|--|--|---|
| <b>Comment</b>   | <b>Short/long term effects</b>                         | <b>Cumulative effects and mitigation</b>                            |
| Unrelated but will be dependent on the use of PDL and on site recycling of building materials. | Minor short/long term impact in terms of material use. | Adopting best practice in relation to site management of materials. |

| <b>13. Energy</b>   |   |  |
|---|---|--|
| <b>Comment</b>  | <b>Short/long term effects</b>  | <b>Cumulative effects and mitigation</b>                   |
| Although the policies will be used in conjunction with other plan policies, and it could also be a Housing Association requirement, it may be beneficial to make it explicit that affordable housing will also be expected to achieve Code for Sustainable Homes level 3. | If the level 3 requirements are implemented there should be positive short and long term impacts both in terms of energy efficiency and running costs for those on lower incomes. | There should be no adverse impacts or need for mitigation. |

| <b>14. Air quality</b>  |  |   |
|---|--|---|
| <b>Comment</b>  | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>  |
| Rural housing inevitably relies on the private car in absence of good public transport. | Dependant on the level of available services, the provision of rural housing can increase use of the private car for access to wider services. This can be exacerbated by the loss of local services in the short and long term. | If rural housing is confined to settlements with community services as stated in the policy, this should minimise the need for the car to service day to day needs. |

| <b>15. Waste</b>  |  |  |
|---|--|--|
| <b>Comment</b>  | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>   |
| As part of a larger site there should be no problem with kerbside recycling collections. Where possible composting facilities should be provided. More dispersed development in rural areas can make recycling expensive. | There are cost implications to providing dispersed recycling services which will have both short and long term implications. | Rural sites should have access to recycling facilities if it is not possible to have kerbside recycling. |

  

| <b>16. Water</b>  |  |  |
|---|--|--|
| <b>Comment</b>  | <b>Short/long term effects</b>   | <b>Cumulative effects and mitigation</b>   |
| Although the policies will be used in conjunction with other plan policies, and it could also be a Housing Association requirement, it may be beneficial to make it explicit that affordable housing will also be expected to achieve Code for Sustainable Homes level 3. | If the level 3 requirement is implemented there should be positive short and long term impacts in terms of sustainable water management. | There should be no cumulative impact or need for mitigation if sustainable homes standards are followed. |

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