



Exeter City Council

AFFORDABLE HOUSING

Supplementary Planning Document

Sustainability Appraisal

August 2010

Affordable Housing - Sustainability Appraisal

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Non-technical Summary

The City Council has carried out a Sustainability Appraisal (SA) as part of the process of preparing the Affordable Housing Supplementary Planning Document (SPD). A Sustainability Appraisal assesses the economic, environmental and social effects of the SPD from the outset of the preparation process and allows decisions to be made that accord with sustainable development.

All SPDs are expected to be prepared with a view to contributing to the achievement of sustainable development (ODPM, 2004). This is defined in 'Securing the Future' - The UK Government's Sustainable Development Strategy (DEFRA, 2005) and aims to:

- Achieve a sustainable, innovative and productive economy that delivers high levels of employment;
- Secure a just society that promotes social inclusion, sustainable communities and personal wellbeing;
- Protect and enhance the physical and natural environment; and
- Use resources and energy as efficiently as possible.

The Sustainability Appraisal is an iterative process, which allows for environmental, social and economic issues to be identified as the SPD is prepared and for those issues to be addressed, if possible, in the final document. The Affordable Housing SPD was produced alongside the SA and therefore continuously amended as recommendations were made.

The appraisal concludes that in most respects the SPD is sustainable. However, concern is raised about the provision of affordable specialist or supported housing and housing adapted for wheelchair users on larger sites bearing in mind that in most cases these sites will be built on the edge of the City not necessarily close to facilities or bus routes. The desire to disperse affordable housing within these larger sites would appear to compound the problem. The appraisal concludes that this problem can be avoided by ensuring that strategic developments on the edge of the City are masterplanned through the Local Development Framework and include local facilities and amenities to meet the needs of the community.

1. Introduction

Purpose of this Document

- 1.1 This report is the Sustainability Appraisal that has been carried out to inform the preparation of the Supplementary Planning Document (SPD) 'Affordable Housing.'

Planning Policy Framework

- 1.2 The Planning and Compulsory Purchase Act requires that all documents that form part of the LDF should be subject to a Sustainability Appraisal (SA). The aim of the SA is to ensure that sustainable development is central to the preparation of the SPD and that the social, economic and environmental affects of the document are assessed from the outset.
- 1.3 The purpose of the SPD is to provide detailed guidance in support of affordable housing policy in the Exeter Local Plan First Review.
- 1.4 The SPD supplements Policy H6 of the adopted Local Plan First Review.
- 1.5 The Local Plan, including Policy H6, was subject to a Sustainability Appraisal that was prepared in accordance with previous government guidance.

2 Sustainability Appraisal and Strategic Environmental Assessment SEA

- 2.1 The Sustainability Appraisal has been carried out in line with government guidance set out in the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (ODPM, 2005).

- 2.2 The SA incorporates the requirement, under European legislation, to carry out a strategic environmental assessment (SEA). This is concerned with the effects of certain plans and programmes on the environment. The SA widens this assessment to include social and economic as well as environmental issues.

- 2.3 The Guidance outlines five main stages in the SA process in relation to SPD:

- Stage A – Setting the context and objectives, establishing the baseline, and deciding on the scope;
- Stage B – This encapsulates the body of appraisal activity – testing the SPD objectives against sustainability objectives, developing and refining options, assessing the likely sustainability effects of the plan, identifying mitigation measures and finalising proposals for monitoring;
- Stage C – Documenting the appraisal process in the sustainability report;
- Stage D – This includes consulting on the SA Report and the draft SPD, assessing any significant changes and, finally, adopting the SPD;
- Stage E – Monitoring the significant effects of implementing the SPD.

- 2.4 This document explains the evolution of the sustainability appraisal carried out on the Affordable Housing SPD, from Stages A through to E.

3. Stage A: Setting the context, establishing the baseline and deciding the scope

- 3.1 The Scoping report, published as part of the sustainability appraisal of the Council's emerging core strategy, meets the requirements of Stage A of the guidance in respect of this SPD. The report refers to relevant plans, programmes and sustainability objectives, summarises baseline information, identifies sustainability issues and develops sustainability objectives. The sustainability objectives identified are set out in Appendix I (Page 7).

4. Stage B: Testing objectives, developing options, predicting effects, mitigation and monitoring

(B1) Testing the SPD objectives against the SA Framework

- 4.1 The first part of Stage B is to ensure that the sustainability objectives and the SPD objectives are consistent with each other as far as possible.

The objectives of the SPD are to:

- Enhance the effectiveness of planning policies requiring that affordable housing is provided as part of new residential developments;
- Ensure that new housing developments are as socially inclusive as possible, and
- Make sure that affordable homes are of good quality in terms of their construction, sustainability, appearance and the amenities they provide.

- 4.2 The SPD objectives have been tested against the sustainability objectives by means of a 'compatibility matrix' (Appendix II, Page 9). This allows for the identification of possible sources of conflict. However, the compatibility matrix demonstrates that there is no conflict between the SPD objectives and the sustainability objectives.

- 4.3 Where the SPD objectives have no bearing on sustainability objectives they are not included within the matrix. The Sustainability Objectives that are not included are listed in Appendix III (Page 10).

(B2-6) Developing the SPD options, predicting effects, mitigation and monitoring

- 4.4 These elements to Stage B are concerned with testing the draft policy options against the sustainability objectives, amending the draft SPD if appropriate, to address any negative effects identified and proposing measures to monitor the significant effects of implementing the draft SPD. Two options have been considered for assessment:

Option 1: Business as usual¹

Option 2: Adopt the draft SPD.

¹ Business as usual is defined here as sole reliance on Local Plan policies and Government guidance provided by Planning Policy Statement 3 on Housing (PPS3).

- 4.5 The 'appraisal matrix' in Appendix IV (Page 11) indicates the social, economic and environmental effects of each option using a scale from ++ to --.
- 4.6 Social inclusiveness, which includes the sustainability objectives 'to ensure the population have access to facilities' and 'to meet the educational needs of the local population,' is identified in the matrix as having a negative outcome under both options. This is because the level of housing demand in the City requires development on the periphery of the City, despite the policy of maximising development within the built up area. Those residents with special needs or disabilities, who generally have to rely on public transport, may therefore have reduced access to facilities and educational opportunities.
- 4.7 Residents ability to access sustainable public transport instead of using a car and their vulnerability to crime as a consequence of living on large remote estates is assessed as 'uncertain.'
- 4.8 The concerns set out above regarding people living on large estates on the periphery of the City are a consequence of the need to secure social inclusion in housing. The need for adequate access to facilities in new development on the fringes of the city is a matter that can be addressed through the emerging Local Development Framework, in particular Masterplanning work for the proposed strategic allocations. The draft SPD cannot, in itself, address these issues.
- 4.9 Economic objectives are assessed in the matrix for Option 1 as 'uncertain' because affordable housing requirements can have the affect of discouraging investment. However, the draft SPD (Option 2) includes arrangements to ensure that the Council's affordable housing requirements are subject to negotiation, with viability being an influential factor. A further positive outcome is that the provision of affordable housing can provide economic benefits by making housing available for key workers who are unable to afford market housing.
- 4.9 It is proposed that monitoring the significant effects of implementing the SPD will be undertaken annually through the Annual Monitoring Report (AMR). Baseline data already set out in the Core Strategy Sustainability Appraisal will be used to assess how well the SPD performs.
- 4.10 Overall, the matrix indicates that Option 2 (the draft SPD) promotes sustainable development to a greater degree than Option 1. The draft SPD is considered to be particularly beneficial from a housing point of view, because it supports policies aimed at improving the housing conditions of people with housing problems. In addition, the draft SPD requires that the affordable housing is of good design in terms of appearance, sound insulation, environmental impact and energy consumption.

5. STAGE C: Preparing the SA Report

- 5.1 The SA to accompany the draft SPD set out the conclusions above.

6. STAGE D: Consulting on the draft SPD and SA Report

(D1) Public participation on the SA Report and the draft SPD

- 6.1 The SA Report and the draft SPD were published for public consultation between 26 January and 11 March 2010.

(D2-3) Appraising of significant changes / Making decisions and providing information

6.2 Eleven responses were received in relation to the draft SPD and none in relation to the SA Report. These are set out in the Affordable Housing SPD Consultation Statement.

6.3 The draft SPD has been updated to reflect the responses, where appropriate, but none of the amendments are considered to be significant. As such, further appraisal of the SPD is not necessary.

7. STAGE E: Monitoring the significant effects of implementing the SPD

7.1 Monitoring the effects of the SPD will be undertaken as described in paragraph 4.9 above.

8. Conclusions

8.1 It can be concluded that, in most respects, the SPD is sustainable. The SA Matrix raises concern about the provision of affordable specialist or supported housing and housing adapted for wheelchair users on larger sites bearing in mind that in most cases these sites will be built on the edge of the City not necessarily close to facilities or bus routes. The desire to disperse affordable housing within these larger sites would appear to compound the problem. However, this problem can be avoided by ensuring that strategic developments on the edge of the City are masterplanned through the Local Development Framework and include local facilities and amenities to meet the needs of the community.

Sustainability Appraisal Objectives

A. Social Progress which Meets the Needs of Everyone	
Themes	Objectives
Housing	1. To ensure everyone has the opportunity of a decent home.
Social Inclusiveness	2. To ensure that all groups of the population have access to the services that are required, in terms of the number of facilities and being able to reach them. 3. To provide for education, skills and lifelong learning to: <ul style="list-style-type: none"> a. meet the needs of the local population, and b. meet local employment needs.
Population and Health	4. To improve the population's health.
Urban Liveability	5. To reduce crime and fear of crime. 6. To reduce noise levels. 7. To maintain and improve cultural, social and leisure provision.

B. Effective Protection of the Environment	
Themes	Objectives
Built Heritage and Landscape	8. To maintain and enhance built and historic assets. 9. To promote the conservation and wise use of land and protect and enhance the landscape character of the City. 10. To maintain the local amenity, quality and character of the local environment.
Biodiversity	11. To conserve and enhance the biodiversity of the City.
Transport	12. To reduce the level in growth of car usage.
Air and water quality	13. To maintain a high quality environment in terms of air, soil and water quality.
Climate Change	14. To contribute towards a reduction in local emissions of greenhouse gases. 15. To ensure that there is no increase in the risk of flooding.

C. Prudent Use of Natural Resources	
Themes	Objectives
Energy Consumption	16. To ensure energy consumption is as efficient as possible.

Waste	17. To promote wise use of waste resources whilst reducing waste production and disposal.
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D. Maintenance of High and Stable Levels of Economic Growth and Employment	
Themes	Objectives
Economic Growth	<p>18. To maintain sustainable growth of employment for the City, to match levels of jobs with the economically active workforce.</p> <p>19. To maintain and enhance the vitality and viability of the City Centre.</p> <p>20. To encourage and accommodate both indigenous and inward investment.</p>

Compatibility of Objectives

		SPD OBJECTIVES		
		A. Enhance effectiveness of affordable housing policies.	B. Socially inclusive as possible.	C. Good quality construction, sustainability, appearance and amenities.
✓ COMPATIBLE × CONFLICT ? UNCERTAIN				
SA / SEA OBJECTIVE	1. To ensure everyone has the opportunity of a decent home.	✓	✓	✓
	2. To ensure that all groups of the population have access to the services that are required, in terms of the number of facilities and being able to reach them.	✓	✓	✓
	3. To provide for education, skills and lifelong learning to: a) meet the needs of the local population, and b) meet local employment needs.	✓	✓	✓
	4. To improve the population's health.	✓	✓	✓
	5. To reduce crime and fear of crime.	✓	✓	✓
	6. To reduce noise levels.	✓	✓	✓
	8. To maintain and enhance built and historic assets.	✓	✓	✓
	12. To reduce the level in growth of car usage.	✓	✓	✓
	13. To maintain a high quality environment in terms of air, soil and water quality.	✓	✓	✓
	14. To contribute towards a reduction in local emissions of greenhouse gases.	✓	✓	✓
	16. To ensure energy consumption is as efficient as possible.	✓	✓	✓
	20. To encourage and accommodate both indigenous and inward investment.	✓	✓	✓

Screened Out Sustainability Objectives

The Sustainability Objectives that are not included in the appraisal matrix are:

- 7.** To maintain and improve cultural, social and leisure provision.
- 9.** To promote the conservation and wise use of land and protect and enhance the landscape character of the City.
- 10.** To maintain the local amenity, quality and character of the local environment.
- 11.** To conserve and enhance the biodiversity of the City.
- 15.** To ensure that there is no increase in the risk of flooding.
- 17.** To promote wise use of waste resources whilst reducing waste production and disposal.
- 18.** To maintain sustainable growth of employment for the City, to match levels of jobs with the economically active workforce.
- 19.** To maintain and enhance the vitality and viability of the City Centre.

Sustainability Appraisal Matrix

The options that will be assessed through the Sustainability Appraisal of the SPD for Affordable Housing are:

Option 1: No change – rely on existing national, regional, sub-regional and local planning policies.

Option 2: Provide additional guidance on affordable housing to supplement adopted Exeter City Local Plan First Review policies

	SA / SEA TOPIC	SA / SEA OBJECTIVE	OPTION 1	OPTION 2	EXPLANATION / JUSTIFICATION
SOCIAL	HOUSING	1. To ensure everyone has the opportunity of a decent home.	+	++	The SPD attempts to provide affordable housing without affecting overall housing supply.
	SOCIAL INCLUSIVENESS	2. To ensure that all groups of the population have access to the services that are required, in terms of the number of facilities and being able to reach them.	-	-	A significant proportion of new affordable housing will most likely be on larger sites at the periphery of the City. The dispersal of people with special needs or disabilities within these developments will reduce their ability to access facilities including education opportunities.
		3. To provide for education, skills and lifelong learning to: a. meet the needs of the local population, and b. meet local employment needs.	+	+	
	POPULATION AND HEALTH	4. To improve the population's health.	+	++	Measures to encourage provision of affordable good quality housing for vulnerable people will be beneficial.

	SA / SEA TOPIC	SA / SEA OBJECTIVE	OPTION 1	OPTION 2	EXPLANATION / JUSTIFICATION
	URBAN LIVEABILITY	5. To reduce crime and fear of crime.	?	?	Outcomes are uncertain. The creation of mixed communities should be beneficial in the long term. The isolation of people with disabilities on large estates on the periphery of the City may raise their real or perceived vulnerability.
		6. To reduce noise levels.	+	++	This should result from the requirement that affordable housing should be of high quality.
ENVIRONMENT	BUILT HERITAGE AND LANDSCAPE	8. To maintain and enhance built and historic assets.	+	++	The requirement that affordable housing is of good design should be beneficial.
	TRANSPORT	12. To reduce the level in growth of car usage.	?	?	Increased effectiveness of policies providing for people on lower incomes to live on potentially remote estates may encourage increased car ownership and use.
	AIR AND WATER QUALITY	13. To maintain a high quality environment in terms of air, soil and water quality.	+	++	The SPD encourages enhanced energy efficiency measures such as solar power and the use of recycled water and sustainable materials in the design of affordable homes.
	CLIMATE CHANGE	14. To contribute towards a reduction in local emissions of greenhouse gases.	+	++	
NATURAL RESOURCES	ENERGY CONSUMPTION	16. To ensure energy consumption is as efficient as possible.	+	++	

	SA / SEA TOPIC	SA / SEA OBJECTIVE	OPTION 1	OPTION 2	EXPLANATION / JUSTIFICATION
ECONOMY	ECONOMIC GROWTH	20. To encourage and accommodate both indigenous and inward investment.	?	+	The SPD may discourage investment insofar as it imposes additional costs on development, but the SPD details how the council will take into account cases where affordable housing development is not viable. A positive is that improved provision of affordable housing may make recruitment and retention of staff easier.

- ++** Significant positive / beneficial impact compliant with the SA objective
- +** Positive / beneficial impact compliant with the SA objective
- Negative or adverse impact, conflicting with the SA objective
- Significant negative or adverse impact, conflicting with the SA objective
- 0** Neutral, no adverse impact or no direct relationship to the SA objective
- ?** Impact not known / relationship uncertain

Bibliography

Defra, 2005: Securing the future, delivering the UK sustainable development strategy, The UK Sustainable Development Strategy.

ODPM, 2004: Planning Policy Statement 12: Local Development Frameworks.

ODPM, 2005: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities. London: November 2005.