

Braintree District Council
Local Development Framework

Supplementary Planning Document
Affordable Housing
Sustainability Appraisal



Published May 2006

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1 Introduction

- 1.1 The Affordable Housing Supplementary Planning Document (SPD) expands upon the policies relating to affordable housing in the Braintree District Local Plan Review (LPR), adopted in July 2005. This Sustainability Appraisal (SA) accompanies the SPD and both documents are published for consultation in tandem.
- 1.2 The approach to the sustainability appraisal in this report reflects the Government's sustainability agenda and guidelines for undertaking sustainability appraisals. In *A Better Quality of Life – A Strategy for Sustainable Development in the UK – CM 4345 (May 1999)* the Government sets out four aims for sustainable development:
- Social progress which recognises the needs of everyone;
 - Effective protection of the environment;
 - The prudent use of natural resources; and
 - The maintenance of high and stable levels of economic growth and employment.

These were set out on PPS1: Delivering Sustainable Development.

- 1.3 The Council has prepared a screening document which demonstrates that a Strategic Environmental Assessment (SEA) is not required for this SPD (see paragraph 5.3).

2 Appraisal Methodology

Approach Adopted for the Sustainability Appraisal

2.1 The approach taken in this Sustainability Appraisal for the Affordable Housing SPD recognises that sustainable development is not limited to environmental concerns but recognises that economic and social issues also need to be taken into account. The Sustainability Appraisal of the Braintree District Local Plan Review Adopted July 2005 was based on a list of 28 objectives used in the Braintree Quality of Life Plan. These objectives represented a range of sustainability criteria affecting people's everyday lives as well as longer-term social, economic and environmental questions and against which the implications for sustainability of the Plan could be assessed. These were grouped under the following 13 headings:

- Housing
- Jobs, skills and the local economy
- Transport
- Built environment and landscape
- Energy, water and pollution
- Waste
- Nature conservation
- Health
- Community Safety
- Leisure and recreation
- Arts and heritage
- Equalities and welfare
- Promoting democracy.

2.2 This sustainability appraisal uses the same set of criteria to enable a direct comparison to be made between two options:

Option 1 - Adopting an SPD to add value to the LPR Policies by enabling the Council to negotiate, with more consistency and effectiveness, a level of affordable housing which will help to address the local housing needs of Braintree District.

Option 2 - A 'do nothing' scenario in which the existing LPR Policies RLP 5 and RLP 6 on Affordable Housing provide the sole basis for securing affordable housing, in the District.

It has been prepared in tandem with the SPD and consultation on both documents is being undertaken simultaneously.

3 Background

Purpose of the Sustainability Appraisal

- 3.1 Under the Planning and Compulsory Purchase Act a sustainability appraisal must be undertaken for each SPD (PPS12 paragraphs 3.14-3.18). The purpose of the sustainability appraisal is to promote sustainable development through better integration of sustainability considerations into their preparation. The appraisal looks at the guidance contained in the SPD and examines how it contributed to the aim of sustainable development. Identifying issues at an early stage enables the guidance to be changed and amended to ensure that it is as sustainable as possible.
- 3.2 The approach to sustainable development addresses social, economic and environmental concerns and covers a wide range of issues from local to global effects of development. This appraisal assesses the effect of the Affordable Housing Supplementary Planning Document on sustainability.

Policy Context

- 3.3 The Braintree District Local Plan Review, adopted in July 2005, provides general guidance on affordable housing through Policies RLP 5: Affordable Housing and RLP 6: Affordable Housing in Rural Areas.
- 3.4 The Braintree Housing Needs Survey 2002 concluded that many households would be unable to purchase a home even at the lower end of the open market. The role of providers of social housing, mostly Registered Social Landlords (RSLs), will be crucial in meeting this need. With the proposed transfer of Council dwellings to a registered social landlord, RSLs will be the largest group of providers and managers of social housing in the District.
- 3.5 Future provision of social housing will be dependent on social housing providers, traditionally non-profit organisations, but can now include profit-making organisations such as house builders. The Government is expecting that this provision will be brought about through the planning system by way of planning gain, with a reducing role for other funding bodies such as the Housing Corporation. It is therefore imperative that local authorities implement robust planning policies to ensure that the level of provision achieved through the planning process will help meet the needs identified in local housing studies.
- 3.6 The Affordable Housing SPD will supplement the existing Local Plan Review by providing guidance and advice to developers on how the policy should be interpreted and implemented, and to enable them to take the need for affordable housing into consideration, at an early stage in the development process.

SPD Objective

- 3.7 The Affordable Housing SPD has one principle objective - to deliver affordable housing which meets the need of the community whilst providing balanced mixed communities. It will produce certainty and ensure a consistent approach to the provision of affordable housing throughout Braintree District.
- 3.8 The SPD gives further definition to affordable housing, reviews the current situation of housing need in the District, and the main issues in the local housing market. It gives guidance on how Policy RLP 5 should be interpreted to help meet the affordable housing target. It covers detailed issues such as subdivision of sites, housing in mixed use developments, the different forms of tenure, how the affordable housing will be provided, commuted payments, subsidy, viability, design and layout. It provides clarity, consistency and a more structured approach to the provision of affordable housing in the District and will assist the Council to negotiate an appropriate and more consistent level of affordable housing. The SPD also states how monitoring of the policy and the SPD will be undertaken to ensure successful implementation of the Policy RLP 5.

4 Objectives, Baseline and Context

Links to Other Strategies, Plans and Programmes

- 4.1 This SPD is part of a hierarchy of planning policy. It must conform to the Braintree District Local Plan Review, which itself is in accordance with the Essex and Southend on Sea Replacement Structure Plan. It is consistent with both the emerging Regional Spatial Strategy and national planning policy, both of which support the Government's sustainability agenda.
- 4.2 Other policies in the LPR also have a bearing on the location, accessibility and security of new residential development, including affordable housing. These will affect all housing equally, and will not have any particular effect on affordable housing. This sustainability appraisal will not consider those other policies because its purpose is to consider the likely effects of the SPD on implementing the affordable housing policies.

Baseline Characteristics

- 4.3 The Council has been operating a policy on affordable housing since 1987, although the current policy dates from the First Draft Local Plan Review. The adopted LPR covers the period 1996-2011, but has a baseline of 31 March 2002 and will be in force notionally for 9 years. Using the Housing Needs Survey 2002 as its baseline, the LPR recognises a housing need for an additional 547 affordable housing units annually or 4,923 over the 9 years. The Survey recognised that meeting the identified need is not economically deliverable or sustainable, especially if the desirability of achieving balanced communities is to be achieved. It therefore recommended that 30% of new housing should be negotiated to provide affordable housing. However, even if the 30% 'target' was achieved on all major sites, this would only provide 1,363 affordable homes by 2011, or 151 annually. Even this target is proving difficult to achieve, with only 80 affordable housing units being completed annually between 1999 and 2005, with no improvement in the completion rate since 2002.
- 4.4 It is assumed, in this sustainability appraisal, that new affordable housing will represent an improvement on much of the existing low cost or social rented housing. This is because it will meet current modern standards of efficiency, safety and access, both during construction and occupation, and its tenure will be controlled so that it remains affordable in the future.
- 4.5 This SPD on Affordable Housing is supplementary to the recently adopted Local Plan Review. Information on the environmental, social and economic baseline provides the basis for predicting and monitoring effects and helps to identify problems and alternative ways of dealing with them.

The Sustainability Appraisal Framework

- 4.6 To enable a direct comparison to be made between the Local Plan Review Policy and the Affordable Housing SPD the same 28 sustainability objectives were used, grouped under the following headings:

Social

Housing

- Access to housing
- Quality, Quantity and Affordability

Built environment and landscape

- Local distinctiveness
- Design - utility, aesthetics and sense of community

Health

- Health - lifespan and quality
- Access to health services

Community Safety

- Crime and disorder reduction
- Reduce perceptions of insecurity
- Reduce accidents

Leisure and recreation

- Encourage leisure activities
- Maximise leisure and sports opportunities

Arts and heritage

- Access to the Arts
- Preservation of local cultural heritage

Equalities and welfare

- Access to affordable housing, food, water and fuel
- Access to community services and facilities
- Opportunities for disadvantaged citizens and groups

Promoting democracy

- Opportunities to participate in decision-making

Environmental

Energy, water and pollution

- Energy, water and natural resources
- Pollution - air, water, land and noise

Waste

- Reduction in refuse and solid waste
- Sustainable waste management

Nature conservation

- Protection of biodiversity
- Opportunities for nature conservation

Economic

Jobs, skills and the local economy

- Stable and sustainable local economy
- Physical access to employment
- Training and skills

Transport

- Access - modal shift
- Impact of transport

- 4.7 They not only encompassed, but also went beyond the issues published by the Government in Sustainable Communities for the 21st Century. Each policy in the Local Plan Review was appraised through the use of a sustainability matrix and the impact of the policies measured in terms of having clear adverse effects or having unclear objectives. This process focused on policies where change was considered essential or desirable. In total 5 strategy elements and 39 policies, nearly a quarter of the policies contained in the Plan, were changed.

5 The Sustainability Appraisal

- 5.1 This appraisable adopts the most commonly employed method of using a sustainability matrix to cross-reference policies to specific sustainability objectives. The matrix, appended to this SPD, was developed by a small working group of officers representing housing, environmental and planning services. The matrix is used to compare the impacts of the principal LPR policy (RLP 5) with the impacts of the additional guidance given in SPD. As both were appraised on a similar basis, the SPD should achieve at least the same level of sustainability as the LPR and, ideally, some improvement. The matrix compares the relative effects of the SPD in comparison to the baseline data and assesses them as positive, neutral or negative.
- 5.2 The following elements of the SPD were tested against the selected sustainability indicators:
- **Proportion** - The percentage of new homes required to be affordable and currently the basis for securing affordable housing in the District.
 - **Thresholds** - The size of development on which affordable housing will be sought, and definition of what constitutes the site for the purposes of Policy RLP5. This may affect the economics of the development.
 - **Tenure and size** - One of the key objectives of the Draft SPD is to seek to influence the tenure and size of affordable homes, so as to meet the need prevailing at the time.
 - **On-site provision** - The preferred approach to securing the provision of affordable housing, either through dwellings made available to a RSL at build cost, or through transfer of land at nil cost.
 - **Off-site provision** - May be accepted where there are sound planning reasons for not providing affordable housing on site. This may have sustainability implications.
 - **Commuted payments** - Exceptionally, where provision on site is inappropriate and no alternative sites are available, a commuted payment will be sought from the developer to enable the Council to secure the provision of affordable housing. This may have sustainability implications.
 - **Affordable housing in mixed developments** - Guidance on the basis for securing affordable housing on mixed-use developments.
 - **Design standards** - Requiring all affordable homes to be designed to lifetime homes, Housing Corporation eco homes and Secured by Design standards will have an effect on the sustainability of a development.

Strategic Environmental Assessment

- 5.3 The Council undertook a screening exercise to determine whether a Strategic Environmental Assessment (SEA) should be carried out in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. Before making its determination, the Council carried out consultation with the four statutory bodies comprising the Countryside Agency, English Heritage, English Nature and the Environment Agency. No objections were raised to the Council's determination that a SEA was not required, because the Affordable Housing SPD was a thematic document that supplements existing saved policies in a Local Plan and is unlikely to have any significant environmental effects. See Appendix 2 for the Screening Statement.

6 Sustainability Effects of the SPD

6.1 The positive effects of the SPD are mostly social. The SPD will ensure an adequate supply of good quality housing appropriate to people's needs, improving the quality of life of people in need of affordable housing and reducing factors which may contribute to ill health. There were some negative sustainability effects of having off-site provision and commuted sums, but on balance the SPD is more beneficial than just relying on Policy RLP5.

6.2 The results of the assessment of the sustainability implications of having an affordable housing SPD rather than relying on Policy RLP5 alone are:

- **Proportion** - No change
- **Thresholds** - Having a threshold as a mechanism for ensuring the provision of affordable housing has a positive sustainability effect. The SPD increases this positive effect by interpreting the policy to reduce loopholes through which developers can avoid having to provide affordable housing under the policy. These loopholes include the prior subdivision of a site to bring it below the threshold for affordable housing, the subsequent increase in the number of residential units on a site at a later date which takes the total number above the threshold and the limiting of residential units in mixed developments to a figure just below the threshold. The effect will be to increase the number of people who will have access to good quality housing, with the potential for improved lifestyles with access to improved facilities and improvement in health.
- **Tenure and size** - The SPD has a significant positive sustainability effect through ensuring that the tenure and size of affordable housing to be provided will match people's needs.
- **On-site provision** - The provision of affordable housing on-site aids sustainability by encouraging social inclusion, which itself is likely to reduce crime and fear of crime. It will avoid isolated areas of social housing that may create social divide, through which criminal activity may be encouraged.
- **Off-site provision** - Has the opposite effect of on-site provision, in that it will produce isolated enclaves of social housing, thereby maintaining social exclusion, leading to increased crime and fear of crime and discouraging the adoption of sustainable lifestyles. Despite the potential for negative effects on sustainability, there will be circumstances in which off-site provision is the only option, and the positive effect of increasing access to affordable housing remains.
- **Commuted payments** - As with off-site provision there is a negative impact because it is less likely to provide social inclusion through the 'seamless' affordable housing provision that can be achieved in larger housing

developments. Further, it produces delays in the provision of affordable housing. Commuted payments are a fall back position to be used in exceptional circumstances, and will ensure that at the least there is some social benefit from a market housing development, which would not otherwise occur.

- **Affordable housing in mixed developments** - There is a positive sustainability effect in having mixed use developments. It increases the potential for affordable housing provision and has potential economic benefits, by maintaining a sustainable local economy and giving access to employment.
- **Design standards** - Because of the emphasis on affordable housing meeting specified design standards, which are not referred to within the LPR policy, the SPD is significantly more sustainable in terms of design than would be the policy alone.

7 Monitoring

7.1 The implementation of the SPD and its sustainability effects will be assessed by monitoring:

- The quantity of affordable housing completed annually by tenure, type of dwelling and size in terms of number of bedrooms.
- The type of provision in terms of on-site, off-site and that provided through commuted sums.

The level of development will then be assessed against the projected affordable housing shortfall to determine the effectiveness of the policy in meeting the needs of the District. The overall sustainability effect of the SPD will be assessed by having regard to the type of provision being secured, and in the medium to long term to secure a reduction in adverse impacts, if necessary through future modification to the guidance. The results of this assessment will be published in the Annual Monitoring Report.

Appendix 1

Sustainability Matrix

Showing Net Gain in Positive Sustainability Effects Over BDLPR Policy RLP5

| Sustainability Indicators | Proportion | Thresholds | Tenure/Size | On-Site Provisions | Off-Site Provisions | Commuted Sums | Design Standards | Affordable Housing in Mixed Use Schemes |
|---|------------|------------|-------------|--------------------|---------------------|---------------|------------------|---|
| SOCIAL INDICATORS: | | | | | | | | |
| Housing | | | | | | | | |
| Access to housing | 0 | 0 | + | 0 | 0 | - | + | + |
| Quality, quantity and affordability of housing | 0 | 0 | + | 0 | 0 | - | + | + |
| Built Environment and Landscape | | | | | | | | |
| Local distinctiveness | 0 | 0 | 0 | 0 | 0 | 0 | + | + |
| Design - utility, aesthetics and sense of community | 0 | 0 | + | + | 0 | - | + | + |
| Health | | | | | | | | |
| Lifespan and quality of life | 0 | 0 | + | + | 0 | - | + | + |
| Access to health services | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Community Safety | | | | | | | | |
| Reduction in crime and disorder | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 |
| Reduce perceptions of insecurity | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 |
| Reduce accidents | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 |
| Leisure and Recreation | | | | | | | | |
| Encourage leisure activities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Maximise leisure and sports opportunities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arts and Heritage | | | | | | | | |
| Access to the arts | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Preservation of the local cultural heritage | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Equalities and Welfare | | | | | | | | |
| Access to affordable housing, food, water and fuel | 0 | 0 | + | 0 | 0 | - | + | + |
| Access to community facilities and services | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Opportunities for disadvantaged citizens and groups | 0 | 0 | + | + | + | 0 | + | + |

| Sustainability Indicators | Proportion | Thresholds | Tenure/Size | On-Site Provisions | Off-Site Provisions | Commuted Sums | Design Standards | Affordable Housing in Mixed Use Schemes |
|---|-------------|-------------|-------------|--------------------|---------------------|---------------|------------------|---|
| Promoting Democracy Opportunities to participate in decision making | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ENVIRONMENTAL INDICATORS: | | | | | | | | |
| Energy, Water and Pollution Energy, water and natural resources Pollution of air, water, land and noise | 0 0 | 0 0 | 0 0 | + 0 | 0 0 | 0 0 | + + | 0 0 |
| Waste Reduction in refuse and solid waste Sustainable waste management | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | + 0 | 0 0 |
| Nature Conservation Protection of biodiversity Opportunities for nature conservation | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 |
| ECONOMIC INDICATORS: | | | | | | | | |
| Jobs, Skills and the Local Economy Stable and sustainable local economy Physical access to employment Training and skills | 0 0 0 | 0 0 0 | + 0 0 | + 0 0 | 0 0 0 | 0 0 0 | 0 0 0 | + + 0 |
| Transport Access to transport - securing a modal shift Impact of transport | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 | 0 0 |

- + Beneficial effect
- Detrimental effect
- 0 Neutral effect

Appendix 2

SEA Screening Statement

1 Introduction

- 1.1 The Council is preparing an Affordable Housing Supplementary Planning Document (SPD) which expands upon the saved policies for affordable housing in the Braintree District Local Plan Review, adopted in July 2005. A Sustainability Appraisal is also being prepared to accompany the SPD and both documents will be subject to public consultation early next year.
- 1.2 Sustainability Appraisals are required to incorporate the requirements for Strategic Environmental Assessments (SEAs) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 which implements the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The Regulations place an obligation on local authorities to undertake an SEA on any land use plan which sets the framework for future development.
- 1.3 Where plans determine the use of only small areas at a local level, and for minor modifications, an exception may be made to this requirement if the local authority determines that the plan is unlikely to have significant environmental effects. To assist in this determination, local authorities are required to undertake a screening process, based on a set of criteria specified in the Regulations, to assess whether the plan is likely to have significant environmental effects. Before making its determination, a local authority is required to consult on the screening process with four statutory bodies comprising the Countryside Agency, English Heritage, English Nature and the Environment Agency.
- 1.4 The Council considers that the Affordable Housing SPD will not have any significant environmental effects since it is simply a thematic document that supplements existing local plan policies, and therefore a SEA under Directive 2001/42/EC is not required. Therefore this SEA Screening Document is being sent to the four bodies as part of the consultation process for their opinion on whether or not a SEA is required.

2 Affordable Housing Draft Supplementary Planning Document

- 2.1 In common with most areas in the England, there are a growing number of people for whom access to the housing market is denied by the widening gap between house prices and incomes. The District Council commissioned a Housing Needs Survey in 2002 which examined the problem of affordability in the District. By looking at housing provision, incomes and households, the Study concluded that there would be a projected annual shortfall of affordable housing stock in the District of 547 during the period of the Local Plan Review to 2011. It recommended that to achieve this level of unmet need, 30% of all new units on suitable sites should be subsidised affordable housing.

- 2.2 This figure was written into Adopted Braintree District Local Plan Review Policy RLP5 (Affordable Housing in New Developments):

In new developments of 15 dwellings or more, or residential sites of 0.5 hectare or more, provision should be made for up to 30% of the total number of dwellings to be in the form of affordable housing.

- 2.3 The provision of affordable housing could, and did, happen without the SPD, but the SPD provides additional guidance on how the Local Plan Review policy will be used to secure the affordable housing target. It covers detailed issues such as subdivision of sites, housing in mixed use developments, the different forms of tenure, how affordable housing will be provided, commuted payments, subsidy, viability, design and layout. It provides clarity, consistency and a more structured approach to the provision of affordable housing in the District and will assist the Council to negotiate an appropriate and more consistent level of affordable housing provision to ensure that the identified housing need will be met.

3 The Sustainability Appraisal

- 3.1 A sustainability appraisal is required for all DPDs and SPDs under the Planning and Compensation Act 1990, and must incorporate the requirements of the SEA Directive. However, the Directive is not applied to plans and programmes which “determine the use of small areas at a local level” or which are “Minor modifications” unless they are determined to be likely to have significant environmental effects.
- 3.2 The ODPM guidance on Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents states in Appendix 1 that the criteria in Article 3.3 may on occasion apply to SPDs in the form of design guides or issues based documents that supplement policies in the DPD. It is for the local authority to determine whether there are significant environmental effects, and where they consider that a plan is exempt the Directive requires the local authority to follow a screening procedure by consulting the four specified environmental bodies on whether or not there are likely to be significant environmental effects. The determination and a statement of reasons for reaching it must be made available to the public and local authorities are advised to include it in the SA Report during the consultation process.
- 3.3 Even where there are no significant environmental effects, the SA will be used to assess whether there are any economic or social effects. Since the Adopted Braintree Local Plan Review was subject to a sustainability appraisal, the SPD SA will compare the effects of the Affordable Housing SPD, with the effects of operating the affordable housing policy without any additional guidance.

4 The Screening Process

4.1 Annex II of the Directive sets out the relevant criteria to be used in the screening process to determine whether the Draft Affordable Housing SPD is exempt from the requirements of Directive 2001/42/EC:

1. The characteristics of plans and programmes having regard to
 - the degree to which it sets a framework for projects and other activities
 - the degree to which it influences other plans and programmes
 - the relevance for integration of environmental considerations in particular with a view to promoting sustainable development
 - environmental problems relevant to the plan or programme
 - relevance for the implementation of Community legislation on the environment
2. Characteristics and effects of the area likely to be affected having regard to
 - probability, duration, frequency and reversibility of the effects
 - cumulative nature of the effects
 - transboundary nature of the effects
 - risks to human health or the environment
 - magnitude and spatial extent of the effects (geographical area and size of population likely to be affected)
 - value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage
 - exceeded environmental quality or standards or limit values
 - intensive land use
 - effects on areas or landscapes which have a recognised national, Community or international protection status.

- 4.2 The screening process required the Draft Affordable Housing SPD to be assessed against the criteria listed above and the results are listed in Table 1. The table shows that the SPD is unlikely to have any significant environmental effects, because any effects were neutral or positive.

5 Conclusions

- 5.1 The screening process has demonstrated that the Affordable Housing SPD will not have any significant environmental effects and that a Strategic Environmental Assessment need not be incorporated into the Sustainability Appraisal.

Table 1

| SEA Directive Criteria | Response |
|--|--|
| <p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p> | <p>The SPD will not set a framework for any other projects or activities, rather it will supplement existing planning policies in the Braintree District Local Plan Review which set out the framework for affordable housing requirements in the District.</p> <p>The SPD will provide more detailed guidance on how affordable housing policies shall be interpreted and on the mechanisms through which it will be delivered. It will enable the Council to negotiate an appropriate level of affordable housing to ensure that the local housing needs of the District are met.</p> <p>The SPD elaborates and adds further detail to BDLPR Policy RLP 5.</p> |
| <p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p> | <p>The SPD is the lowest form of plan in the hierarchy and is subservient to the Local Plan Review and Regional Planning Guidance. It will not influence these or any other plans or programmes.</p> |

| SEA Directive Criteria | Response |
|--|---|
| <p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p> | <p>The SPD will promote sustainable development in accordance with the principles of PPS12. It will increase access to good quality housing at an affordable cost and encourage the provision of affordable housing in locations which are accessible to users of public or forms of transport other than the motor car. These are key sustainability indicators. Environmental considerations are integrated with social benefits through good design and quality and the inclusion of affordable housing in housing developments.</p> |
| <p>Environmental problems relevant to the plan or programme.</p> | <p>The SPD will not lead to environmental problems. A sustainability appraisal including social, economic and environmental effects has already been undertaken on the policies and proposals of the Local Plan Review.</p> |
| <p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p> | <p>The SPD has no relevance to the implementation of Community legislation on the environment.</p> |
| <p>The probability, duration, frequency and reversibility of the effects.</p> | <p>The SPD will have positive social effects through the delivery of good quality affordable housing integrated with market housing. There are no adverse environmental effects - indeed local environments may be improved.</p> <p>The effects will be long term because the policy requires the affordable housing to remain as such in perpetuity.</p> |

| SEA Directive Criteria | Response |
|--|--|
| The cumulative nature of the effects. | In the longer term there may be positive social and environmental effects through addressing the problem of access to affordable housing and the integration of social housing with open market housing. |
| The transboundary nature of the effects. | The SPD applies only to development within the administrative area of Braintree District Council and will not impact on the neighbouring local authorities which will have their own policies for addressing the issue of affordable housing. |
| The risks to human health or the environment (e.g. due to accidents). | The SPD will not pose risks to human health, rather it seeks to ensure that all persons will have access to good quality affordable housing. |
| The magnitude and spatial extent of the effects (geographical area and size of population likely to be affected). | The SPD provides guidance on the provision of affordable housing within Braintree District, although only localised geographical areas will be affected. |
| The value and vulnerability of the area likely to be affected due to special characteristics or cultural heritage, exceeded environmental quality standards or limit standards, or intensive land use. | The area to which the policy applies does not have any special characteristics which will be harmed by the guidance in the SPD. Whilst it may have some impact on intensity of land use, e.g. through meeting the current demand for smaller dwellings, affordable housing schemes will still need to meet planning requirements and accord with any special character of an area. |
| The effects on areas or landscapes which have a recognised national, Community or international protection status. | There are no areas or landscapes within Braintree District that have a recognised national, European Community or international status. |

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