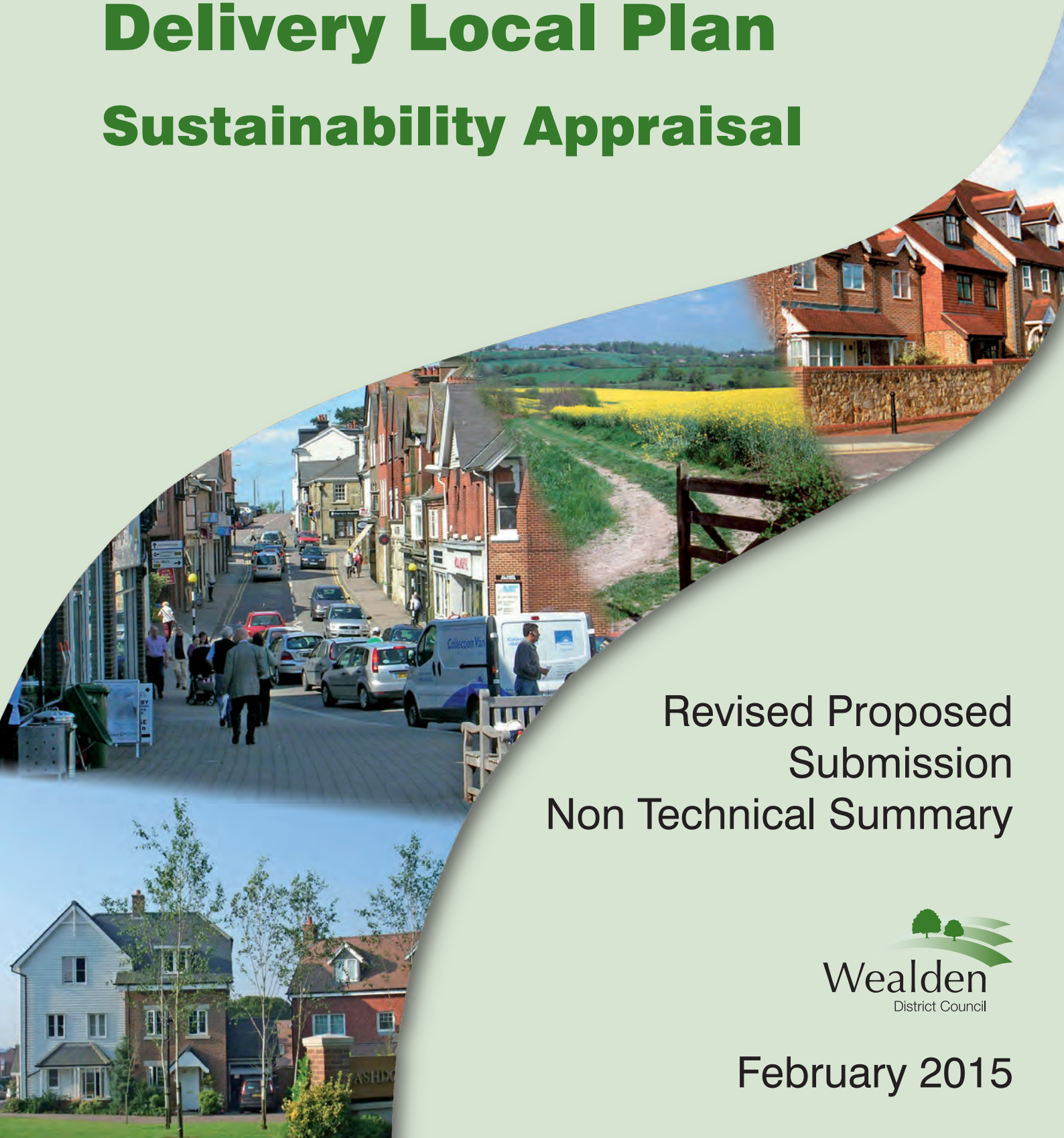
Wealden District Council Local Plan

Affordable Housing Delivery Local Plan

Sustainability Appraisal



Revised Proposed Submission
Non Technical Summary

Wealden
District Council

February 2015

How to Contact Us

Planning Policy
Wealden District Council
Council Offices, Vicarage Lane, Hailsham, East Sussex BN27 2AX

Telephone 01892 602007
E-mail: ldf@wealden.gov.uk
Website: www.wealden.gov.uk

Office hours Monday, Tuesday, Thursday, Friday 8.30am to 5.00pm and Wednesday 9.00am to 5.00pm

You may also visit the offices Monday to Friday, to view other Local Plan documents.

A copy of the Affordable Housing Delivery Local Plan Sustainability Appraisal and associated documents can be downloaded from the Planning Policy pages of the Wealden website, www.wealden.gov.uk/planningpolicy or scan the QR code below with your smart phone.

If you, or somebody you know, would like the information contained in this document in large print, Braille, audio tape/CD or in another language please contact Wealden District Council on 01323 443322 or info@wealden.gov.uk

NAPM RECYCLED 75% APPROVED

Contents

1	Public consultation	2
2	Introduction	3
3	Legislative framework	4
4	Plan background	5
5	Inital stage: scoping (stage A)	7
6	Developing and refining alternatives and assessing effects (Stage B)	10
7	Sustainability Appraisal Report (Stage C)	11
8	Statement on the difference the process has made to date	15

1 Public consultation

1.1 The Sustainability Appraisal Report (SAR) supports the final stage of consultation which invites representations to be made on the Council's Affordable Housing Delivery Local Plan (AHDLP).

1.2 The Affordable Housing Delivery Local Plan sets out the preferred approach to affordable housing policy within Wealden District, excluding the part of the District within the South Downs National Park. This approach is in line with national policy and guidance as announced by the Government in November 2014.

1.3 Representations are invited on the Sustainability Appraisal Report of the Affordable Housing Delivery Local Plan. If you have any comments to make with direct reference to this document, which cannot be covered by responding to the AHDLP then please write to:

Planning Policy, Wealden District Council, Council Offices, Vicarage Lane, Hailsham, BN27 2AX.

Or email: ldf@wealden.gov.uk

1.4 If you have any questions relating to this document, please contact the Planning Policy Team at: ldf@wealden.gov.uk.

Data Protection Act 1998 and Freedom of Information Act 2000.

1.5 Representation cannot be treated in confidence. The Council will provide names and associated representations on its website, but will not publish personal information such as telephone numbers, email addresses or private addresses. By submitting representation on the Sustainability Appraisal Report, you confirm that you agree to this and accept responsibility for your comments.

2 Introduction

2.1 This Non Technical Summary presents the process and key findings of the Sustainability Appraisal Report (SAR) that has been prepared by the Council and which accompanies the Affordable Housing Delivery Local Plan (AHDLP).

2.2 The AHDLP reviews the adopted Wealden District (incorporating part of the South Downs National Park) Core Strategy Local Plan Policy WCS8 which relates to affordable housing.

2.3 The Sustainability Appraisal Report (SAR) demonstrates how the AHDLP has been developed, refined and considered against other reasonable alternatives and how sustainability objectives (social, economic and environmental) have formed an integral part of the plan making process.

2.4 The Sustainability Appraisal Process is formed of five stages (A-E):

- **Stage A**- Setting the context and objectives, establishing the baseline and deciding the scope;
- **Stage B**- Developing and refining plan options;
- **Stage C**- Appraising the effects of the plan;
- **Stage D**- Consulting on the preferred options and the SA report; and
- **Stage E**- Monitoring implementation of the plan.

2.5 This sits alongside the preparation of Local Plans. The preparation of the SAR relates to ‘Stages C and D' which is consistent with the preparation of the publication version of the Local Plan. Stages A and B are equally important to Sustainability Appraisal. Stage A involves setting the context and objectives, establishing the baseline and deciding on the scope of the Local Plan. Stage B involves developing and refining Options and assessing them against Sustainability Objectives.

2.6 This Non Technical Summary of the SAR provides a summary of the Sustainability Appraisal process that has been followed in the development of the AHDLP.

3 Legislative framework

3.1 Sustainability Appraisal (SA) is a legal requirement of plan-making which is set out in Section 19 of the Planning and Compulsory Purchase Act (2004). More generally, Section 39 of the Act requires that authorities preparing a Local Plan must do so *'with the objective of contributing to the achievement of sustainable development.'*

3.2 Sustainability Appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (known as the 'Strategic Environmental Assessment Regulations' or the SEA Regulations) which implement the requirements of the European Directive 2001/42/EC (the Strategic Environmental Assessment Directive).

3.3 When plan-making, it is also necessary to take in to account the requirements of the Habitats Regulations (The Conservation of Habitats and Species Regulations 2010). In Wealden District there are two sites of international importance where it is important to have regard to the Habitats Regulations. These two sites are the Ashdown Forest which is a designated Special Protection Area (SPA) and Special Area of Conservation (SAC) and the Pevensey Levels which is designated as a Ramsar Site, Site of Community Importance (SCI), a Site of Special Scientific Interest (SSSI) and a National Nature Reserve (NNR).

3.4 This SAR incorporates the requirements of the Habitats Regulations, however as the AHDLP will not have an impact on the spatial distribution of growth within the District it has been concluded that the AHDLP will not have a significant effect on the Ashdown Forest or the Pevensey Levels. As such, no further independent assessment on this matter is required for the purposes of this Plan.

3.5 These legislative requirements have been fully taken into account throughout the SA process and in the preparation of the SAR.

3.6 The following section of this Non-Technical Summary outlines the background to the AHDLP and the review of CSLP Policy WCS8.

4 Plan background

4.1 Core Strategy Local Plan Policy WCS8 'Affordable Housing' was adopted by Wealden District Council and the South Downs National Park Authority as part of the joint Core Strategy Local Plan (CSLP) in February 2013.

4.2 The purpose of the AHDLP, which reviews the Wealden District (Incorporating the South Downs National Park) Core Strategy Local Plan Policy WCS8 concerning affordable housing, is to provide the policy certainty required for the Community Infrastructure Levy.

4.3 Policy WCS8 comprises three main components:

- proportions;
- thresholds; and
- tenure.

4.4 These components together comprise the adopted policy approach to achieving affordable housing within development in Wealden.

4.5 On 28th November 2014, through a Ministerial Statement, the Government announced changes to policy and guidance regarding the use of planning obligations for the provision of affordable housing. National policy now states that affordable housing contributions should not be sought on sites of 10 dwellings or less and which have a maximum combined gross floorspace of 1,000 square meters. However for designated rural areas authorities may choose to implement a lower threshold of 5 dwellings or less where affordable housing contributions should not be sought. In addition, on sites of 6-10 dwellings planning obligations should only be sought in the form of cash payments which are commuted until after completion of units. As a result, Policy AFH1 was amended to reflect the new national policy position with regards to affordable housing provision.

4.6 On 15th January 2015, the new draft Policy AFH1 (incorporating the changes in national policy and guidance) was considered by the Local Development Framework (LDF) Sub Committee and Joint Planning Committee North and South (PCN/PCS). The main issues raised related to the wording of how the affordable housing would be accommodated within an development site. The suggested wording was:

"The affordable housing will be suitably dispersed, wherever practicable, throughout the site and be indistinguishable in design terms from the market housing on the site so that the affordable housing is fully integrated into the development"

4.7 This was considered further. Taking into account the need to produce a deliverable policy, further wording was provided in the report to full Council. It was considered that if the distribution was 'dispersed' it would not be practical for either the developer or Registered Social Landlord and therefore the affordable housing could be said to be not deliverable. An alternative form of wording was suggested:

"The affordable housing will be distributed within the site to ensure it is integrated and indistinguishable within the new development and surrounds. It will also be comparable in design terms with the market housing on the site".

4.8 Draft Policy AFH1 was further amended in order to provide flexibility for the tenure of affordable housing on sites where there are viability issues, prior to considering the proportion of affordable housing.

4.9 Prior to the Governments announcement in November 2014, Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan proposed a number of small variations to CSLP Policy WCS8. These variations sought to maximise the delivery of affordable housing provided in the District whilst maintaining development viability and ensuring that communities are mixed, balanced and sustainable.

4.10 The final Policy AFH1 within the Revised Proposed Submission Affordable Housing Delivery Local Plan proposes a significant change in policy direction for the Council in regards to affordable housing delivery, however it is in conformity with national policy and guidance on affordable housing contributions.

4.11 Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan will not affect the areas of Wealden District which fall within the South Downs National Park Authority (SDNPA). For these areas Policy WCS8 will remain relevant until such time as the SDNPA has an adopted affordable housing policy in place. In all other cases it is proposed that the AHDLP will supersede Core Strategy Local Plan Policy WCS8.

4.12 The following sections of this Non Technical Summary provide a summary of the SAR including how the Sustainability Appraisal process has been followed in relation to the development of the AHDLP.

5 Inital stage: scoping (stage A)

5.1 Scoping is the first stage in the SA process; it establishes the appropriate framework for undertaking the SA. It also ensures that the SA Framework is relevant and appropriate as a basis for assessing the sustainability of the Local Plan under preparation; in this case the AHDLP.

5.2 Scoping involves reviewing the context of the AHDLP and identifying the baseline social, economic and environmental conditions so that a series of SA Objectives can be reviewed. It is these SA Objectives which are then used to develop, refine and assess the 'reasonable alternatives' at the next stage in the SA process.

5.3 In this instance, the AHDLP seeks to review adopted Core Strategy Local Plan (CSLP) Policy WCS8 to provide an updated policy background for CIL. The development of 'reasonable alternatives' therefore relates to CSLP Policy WCS8, which is already in place as well as the change in the national approach to affordable housing provision.

5.4 Given the nature of the AHDLP and its relationship with the adopted CSLP, the Scoping for the CSLP and that of the Strategic Sites Local Plan (SSLP) is relevant.

5.5 The Scoping Reports which accompanied the CSLP were subject to extensive consultation with the relevant consultation bodies and provide information on the baseline social, economic and environmental characteristics of the District. The Scoping Report for the SSLP further updated the baseline information. The key baseline characteristics are set out in the SAR of the AHDLP.

5.6 As the AHDLP follows on from the CSLP and the SSLP, the plans and policies detailed in the Scoping Reports (also subject to SA) are considered to represent the relevant context for the AHDLP. Other relevant documents which set the context for the AHDLP are listed in the introduction section of the AHDLP. In addition to this, the new national policy approach to the provision of affordable housing also provides relevant context for the AHDLP.

5.7 Given the nature of the AHDLP and its relationship with the adopted CSLP, the SA Objectives that were developed for the CSLP and the SSLP remain appropriate. They are considered to represent the most appropriate framework for assessing the sustainability of options and alternatives for the AHDLP. This forms part of the Sustainability Appraisal (SA – Stage B).

5.8 The 22 SA Objectives for Wealden are outlined in Table 1 below:

Table 1 The Sustainability Appraisal Framework

SOCIAL OBJECTIVES	
1	Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

2	Improve the health and well being of the population
3	Promote social inclusion and create/ sustain vibrant communities
4	To ensure a safe environment including reducing crime and the fear of crime
5	To provide accessible and high quality public services and facilities
ENVIRONMENTAL OBJECTIVES	
6	To reduce the risk of flooding and the consequential damage to property and public well being
7	Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities
8	Reduce air pollution and ensure local air quality continues to improve
9	Reduce emissions of greenhouse gases
10	Conserve and enhance the biodiversity of the District
11	Conserve, enhance and make accessible for enjoyment, the District's countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment
12	Reduce the need to travel by car and promote alternative methods of transport
13	Minimise waste, maximise the re-use of materials, recycling and composting
14	Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency
15	Promote energy efficiency measures and encourage the use of renewable energy
16	Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products
ECONOMIC OBJECTIVES	
17	Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy
18	Promote sustainable tourism

19	Ensure high and stable levels of employment and provide support for small firms and local businesses
20	Develop and maintain a skilled workforce to support long term competitiveness
21	Stimulate regeneration of town centres
22	Develop a dynamic, diverse, and knowledge based economy

6 Developing and refining alternatives and assessing effects (Stage B)

6.1 The next stage involves identifying reasonable alternatives, taking into account the objectives and geographical scope of the Plan under preparation (the AHDLP).

6.2 The objective of the AHDLP is to review CSLP Policy WCS8, therefore the reasonable alternatives are considered to be intrinsically linked to this Policy and cover three key themes: **proportion, thresholds and tenure** – these are considered to be the main policy areas which make up Policy WCS8.

6.3 The geographical scope of Policy WCS8 is District-Wide, excluding the South Downs National Park, and within this scope there are large strategic allocations within the CSLP (Strategic Development Areas) where affordable housing will also be provided.

6.4 In order to be considered a 'reasonable alternative', the alternative must be both achievable and realistic. In developing reasonable alternatives, as there is already an adopted affordable housing policy in place (WCS8) it is not considered appropriate to adopt a 'no policy' baseline.

6.5 The initial identification of reasonable alternatives and the assessment against the 22 SA Objectives is contained within the Affordable Housing Delivery Local Plan Sustainability Appraisal Issues and Options Consultation document. 20 reasonable alternatives were identified for the affordable housing policy relating to **Generic** and **Strategic Sites** (as defined in WCS4 of the CSLP) as well as the three key themes.

6.6 The Consultation on the Affordable Housing Delivery Local Plan Issues and Options and the accompanying SA, took place between 22nd September and 3rd November 2014. The SAR of the AHDLP details how and why Options were selected and rejected (see Table 8 in Section 5 of the SAR) together with a link to the consultation responses to the Issues and Options documents on the Councils website (see Section 3 para 3.2 of the SAR).

6.7 As a result of the changes in national policy and guidance on affordable housing provision made by Government in 2014, draft Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan has subsequently been considered as a reasonable alternative in regards to the production of the AHDLP (please see Section 5 paragraphs 5.11-5.13 and Table 8 of the SAR).

6.8 Furthermore, amendments were made to the policy following the LDF Sub Committee and Joint PCN/PCS and so draft Policy AFH1 which was put before these meetings has also now been considered as a reasonable alternative (please see Section 5 paragraphs 5.14-5.15 and Table 8 of the SAR).

7 Sustainability Appraisal Report (Stage C)

7.1 The SAR accompanies the AHDLP and builds upon earlier sustainability work that has been undertaken in setting the SA Objectives and developing, refining and assessing 'Options' to take forward.

Developing the Local Plan Objective

7.2 The Issues and Options Consultation set out the scope and reasons for the review of CSLP Policy WCS8. This enabled the identification of a **Local Plan Objective** for the AHDLP, which is set out below:

'To help meet the affordable housing needs of the District by securing and delivering a significant proportion of affordable housing from developments with market housing, whilst ensuring the overall viability of the development is not prejudiced and that a mix of tenure is provided that meets the needs of the local area and create balanced communities.'

7.3 The SAR tests the Local Plan Objective against the 22 SA Objectives. This determines whether there is compatibility between the AHDLP Objective and the SA Objectives.

7.4 The appraisal of the AHDLP Objective shows that it is broadly compatible with the SA Objectives, with potential conflicts identified with two of the environmental SA Objectives (10 and 11). However, overall it is considered to have a positive effect that would be likely to contribute significantly to achieving the delivery of affordable housing within the District.

7.5 Some degree of conflict is considered to be inevitable when seeking to balance social, economic and environmental objectives; however mitigation is available to address this conflict. There are other policies in other Local Plan documents (i.e. the CSLP) which seek to conserve and enhance the landscape of the District. Considered together, mitigation measures can be identified.

Developing and Refining Policy AFH1

7.6 The earlier SA work and the responses to the Issues and Options Consultation allowed Policy AFH1 'Affordable Housing' to be developed and refined. Policy AFH1 was assessed against the 22 SA Objectives; and this is detailed in full within Appendix C of the Sustainability Appraisal Report.

7.7 Section 6 of the Sustainability Appraisal Report provides an assessment of Policy AFH1 against the SA Objectives upon which it is likely impact. These are:

- SA Objective 1 – Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home;
- SA Objective 2 – Improve the health and wellbeing of the population;
- SA Objective 3 – Promote social inclusion and create/sustain vibrant communities; and

- SA Objective 19 – Ensure high and stable levels of employment and provide support for small firms and local businesses

7.8 The Sustainability Appraisal Report also provides a detailed assessment of the significant social, environmental and economic effects of Policy AFH1 against each of the SA Objectives; the results of this are set out within Section 6 the SAR also (see para 6.14-6.35).

Cumulative/Synergistic Effects

7.9 The Sustainability Appraisal Report also considers how these effects could impact on the SA Objectives when looked at in combination and with existing Plan policies. This process is known as assessing **'cumulative'** or **'synergistic'** effects and is a requirement of the SEA Directive and SA guidance.

7.10 The Sustainability Appraisal Report concludes that Policy AFH1 provides beneficial cumulative and synergistic effects for the social and economic SA Objectives. Improving the housing offer by ensuring the delivery of affordable housing can produce synergistic effects of improving health, sense of community and quality of life.

7.11 The Sustainability Appraisal identified uncertainty around the cumulative impacts for biodiversity and landscape and more detail will be known in the next Wealden Local Plan (currently under preparation) which will undergo SA at the appropriate stage.

7.12 In combination with other Core Strategy Policies the AHDLP will have an overall beneficial impact on the SA Objectives. Monitoring will be undertaken to ensure the effectiveness of the Policy in achieving its Objective.

Comparative Analysis against Reasonable Alternatives

7.13 The comparative analysis of the draft policy against other reasonable alternatives was undertaken under the three main policy component headings (proportion, threshold and tenure). A summary of each element is set out below. Further detail can be found within Section 6 of the Sustainability Appraisal Report (see paras 6.40-6.56).

Proportion

7.14 Policy AFH1 proposes that affordable housing is delivered at 35% of the total number of dwellings within a development. The alternative Options looked at either increasing or decreasing this proportion. Decreasing the proportion would result in the provision of less affordable housing. Increasing the proportion would be likely to result in site viability and deliverability issues.

7.15 The 35% proportion was found sound at the examination of the CSLP and was based on a robust evidence base. The wording of Policy AFH1 allows flexibility for different proportions of affordable housing to be delivered on allocated sites and this has been shown through the Strategic Sites Local Plan (SSLP) and its evidence base to be appropriate and achievable.

7.16 Policy AFH1 also places priority on ensuring that on sites where it can be demonstrated that there are viability issues with providing affordable housing, a suitable tenure mix is achieved prior to the consideration of proportion, providing additional flexibility within the Policy.

Thresholds

7.17 Policy WCS8 of the Core Strategy required affordable housing on sites of 5 or more net dwellings or 0.2ha. Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan (December 2014) required affordable housing on sites of 5 or more (net) dwellings or 0.16ha. The original alternative Options put forward were to increase, decrease or remove the thresholds altogether. These were the alternatives considered for the Proposed Submission Affordable Housing Delivery Local Plan and to a degree remained the same for the draft policy incorporating the changes in national policy and guidance.

7.18 In regards to the original alternatives considered, increasing the threshold could have potentially decreased the amount of affordable housing provision, which would not meet Sustainability Objectives. Decreasing the thresholds could have resulted in a greater number of legal agreements being required, greater costs to the Council and potential for further delays which would impede delivery.

7.19 National policy in regard to the site size thresholds (both in terms of number of dwellings and site hectarage) for provision of affordable housing has now superseded the approach the Council was seeking to adopt through Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan. There are now more limited opportunities for Local Planning Authority specific site size thresholds. However, Local Plans must be in conformity with national policy and Policy AFH1 now satisfies this requirement.

Tenure Mix

7.20 Policy AFH1 proposes a site size threshold, in terms of number of net dwellings, in regards to tenure mix. For sites that will result in 49 (net) dwellings or less the tenure split is 80% Social Rent and 20% Intermediate Accommodation. For sites that will result in 50 (net) dwellings or more, the tenure split proposed is 40% Social Rent, 20% Affordable Rent and 20% Intermediate Accommodation.

7.21 Policy AFH1 has taken forward some of the alternative options suggested in that it includes this site size threshold, in terms of net dwelling numbers, for tenure split.

7.22 Affordable Rent has been included for larger sites as this provides greater choice as well as balancing viability with overall provision of affordable homes. The tenure split proposed retains the basic elements of WCS8 that were found sound at examination. By not increasing the amount of intermediate accommodation (which was an alternative put forward for consideration) Policy AFH1 ensures that the amount of Social Rent and Affordable Rent will meet the needs of those households most in need.

7.23 Furthermore, by prioritising tenure mix over proportion of affordable homes on certain sites will help ensure affordable housing needs within the District are met.

8 Statement on the difference the process has made to date

8.1 The SA process was largely carried out 'in house' by Policy Officers. The Scoping Report (2007) was produced by officers of Wealden District Council and the SA Objectives were independently reviewed by Scott Wilson Consultants. The SA Updated Scoping Report 2009 and the SSLP SA Scoping Report (2012) were also prepared by officers of Wealden District Council and the SA Objectives reviewed internally.

8.2 The Sustainability Appraisal Report of the AHDLP, and the alternatives, was produced by officers of Wealden District Council.

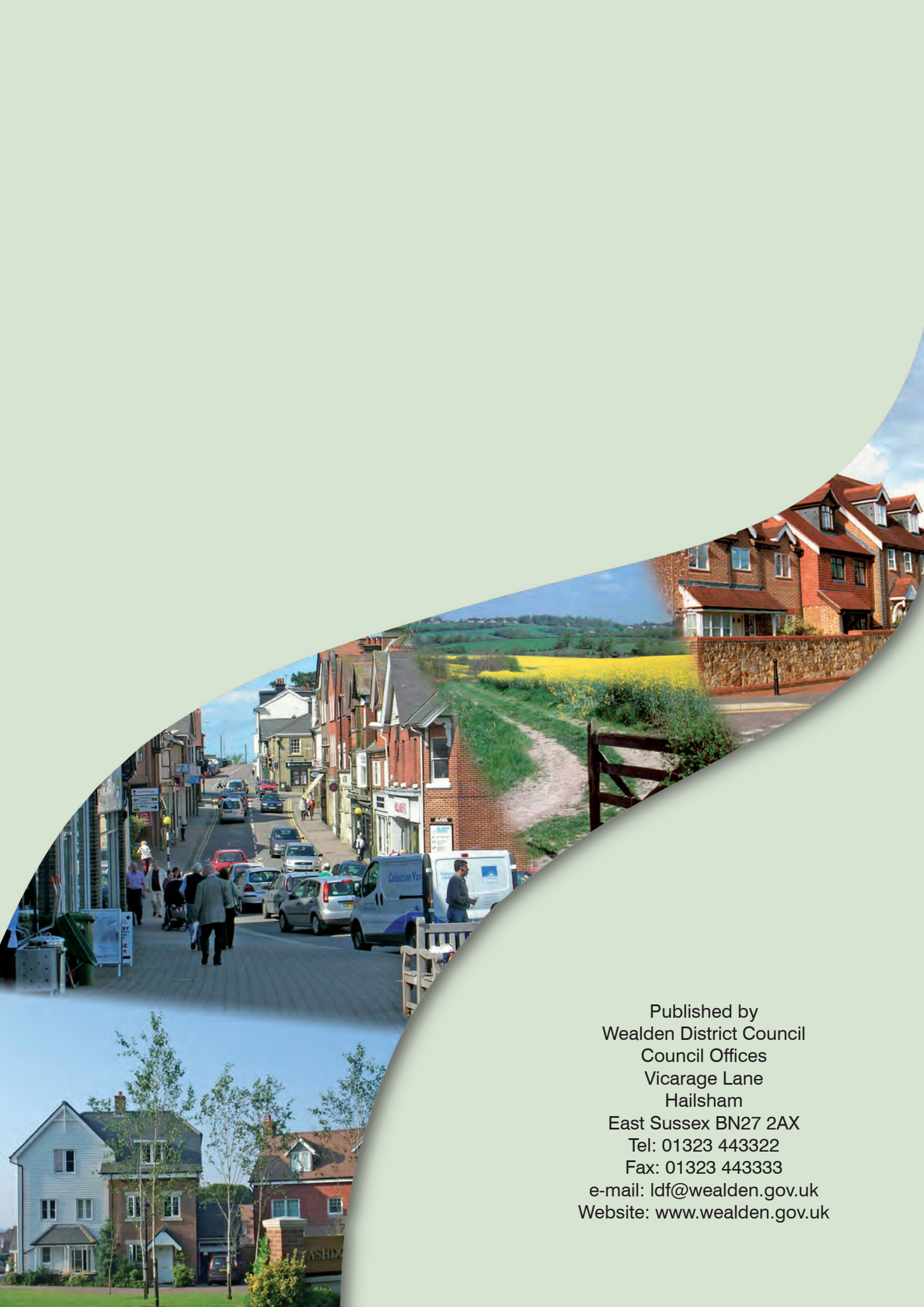
8.3 The SA Framework of 22 Objectives was used to identify the options published in the Affordable Housing Delivery Local Plan Issues and Options Paper and SA Report for the Issues and Options consultation. SA has had an impact on the choice of options taken forward in Policy AFH1.

8.4 This has made a positive difference as it has enabled social, economic and environmental impacts to be considered from the outset of the development of the AHDLP, together with a greater overall understanding of the sustainability issues concerned with developing and refining options for the affordable housing policy in comparison to other alternatives.

8.5 The SA process has closely followed Government guidance on SA and has ensured that sustainability has been a key component of the plan making process.

8.6 The ultimate effectiveness of the AHDLP from the perspective of delivering sustainable development will depend on an effective partnership between Wealden District Council, its partner agencies, prospective developers and the community.

Non Techincal Summary - February 2015



Published by
Wealden District Council
Council Offices
Vicarage Lane
Hailsham
East Sussex BN27 2AX
Tel: 01323 443322
Fax: 01323 443333
e-mail: ldf@wealden.gov.uk
Website: www.wealden.gov.uk