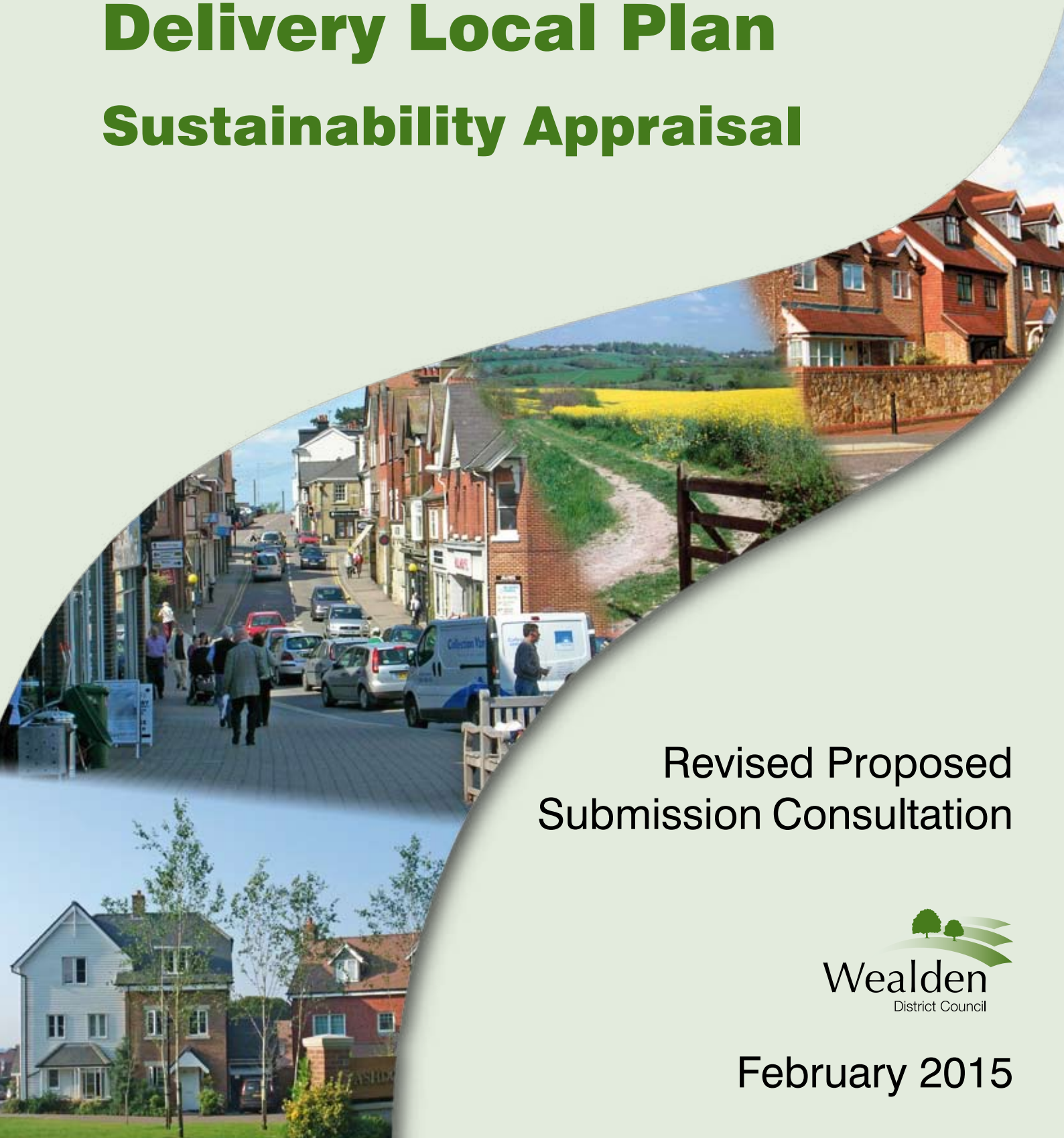
Wealden District Council Local Plan

Affordable Housing Delivery Local Plan

Sustainability Appraisal



Revised Proposed Submission Consultation

Wealden District Council

February 2015

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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

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Contents

1 Introduction 1
Purpose of the SA and the SA Report 1
Compliance with SEA Directive 2
Plan Objectives and Outline of Plan Contents 6

2 Sustainability Background 7
Introduction 7
Links to Other Policies, Plans and Programmes and Sustainability Objectives 9
Description of the Social, Environmental and Economic Baseline Characteristics and Predicted Future Baseline 10
Future trends without implementation of the Plan 11
Limitations of the Information and Assumptions Made 19
Main Social, Environmental and Economic Issues and Problems 19

3 Appraisal Methodology 21
Introduction 21
Approach Adopted to the SA 21
When the SA was Carried Out 25
Who Carried Out the SA 26
Who was Consulted, When and How 26

4 Plan Objectives 28
Introduction 28
The Local Plan Objective 28
SA of the Plan Objectives 28

5 The Plan Alternatives 30
Introduction 30
Main Options considered and how they were identified 31
The Social, Environmental and Economic Issues 35
How Social, Environmental and Economic Issues were Considered in progressing the Plan 35
Any Proposed Mitigation Measures 35
Sustainability Appraisal of the Plan Alternatives 36
Reasons for Selecting or Rejecting Alternatives 39
Habitats Regulations Assessment 42

Contents

6 The Plan Policy 43
Introduction 43
The Affordable Housing Local Plan Policy 43
Sustainability Appraisal of the Plan Policy 45
Significant Social, Environmental and Economic Effects of the Preferred Policies 47
Cumulative and Synergistic Effects 51
How Social, Environmental and Economic Problems were Considered in Developing the Policies and Proposals 52
Comparative analysis of draft policy against reasonable alternatives 52

7 Mitigation Measures 56
Introduction 56
Proposed Mitigation Measures 56
Uncertainties and Risks 57

8 Implementation 58
Introduction 58
Links to Other Tiers of Plans and Programmes and the Project Level 58
Monitoring 58

9 Appendices 61

Contents

Tables

Table 1 Compliance with the SEA Regulations 4
Table 2 The Sustainability Appraisal Framework 7
Table 3 Comparative analysis of Policy WCS8 and the Affordable Housing Delivery Local Plan 13
Table 4 Assessment criteria 25
Table 5 Assessment of Affordable Housing Delivery Local Plan Objective against SA Objectives 29
Table 7 Assessment of the Affordable Housing Delivery Local Plan Options against the SA Objectives 36
Table 8 Reasons for Selecting/Rejecting Options 39
Table 9 Summary of the SA of Policy AFH1 Affordable Housing 43
Table 10 Monitoring Framework 59
Table 11 Monitoring Actions 60
Table 12 Assessment of the Revised Proposed Submission Affordable Housing Delivery Local Plan Objective against SA Objectives 61
Table 13 Key of Criteria 66
Table 15 Assessment of Proposed Submission Affordable Housing Delivery Local Plan Policy AFH1 against SA Objectives (Option 21) 98
Table 16 Assessment of Local Plan Policy AFH1 (incorporating Government changes to affordable housing) against SA Objectives (Option 22) 103
Table 17 Assessment of Local Plan Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan against SA Objectives 108
Table 18 Advantages and disadvantages of Policy Options at Issues and Options 114

Contents

Section 1 Introduction

1.1 This document is the Sustainability Appraisal Report, incorporating the Environmental Report as required by the Strategic Environmental Assessment (SEA), for the Affordable Housing Delivery Local Plan. This document specifically meets the requirements of Sustainability Appraisal (SA) and the SEA Directive. The initial chapters identify the legislation governing SA and SEA and outlines the content of the Plan under assessment. This document is preceded by a non technical summary.

1.2 This Sustainability Appraisal also includes the Habitat Regulations Assessment of the Affordable Housing Delivery Local Plan. Representations may be made on the Sustainability Appraisal Report and Habitat Regulations Assessment of the Affordable Housing Delivery Local Plan, as well as the Plan itself. Representations are invited for a period of six weeks beginning on 2nd February 2015. Representations must be sent by e-mail to ldf@wealden.gov.uk or by post to **Planning Policy, Wealden District Council, Vicarage Lane, Hailsham, BN27 2AX** by 5pm on 16th March 2015. Please telephone 01892 602008 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, tape/CD or in another language please let us know.

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. The Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Affordable Housing Delivery Local Plan consultation paper, and associated documents, you confirm that you agree to this and accept responsibility for your comments.

Purpose of the SA and the SA Report

1.3 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for Local Plans. The purpose of SA is to set out how sustainable development will be achieved through the integration of economic, environmental and social considerations into the preparation and adoption of Local Plan documents. SA is an integral part of good plan making and should not be seen as a separate activity. It is an iterative process that identifies and reports on the likely significant effects of the Plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined.

1.4 In undertaking the full SA process in relation to a Local Plan, the following five stages should be followed[(1)]:

1 Planning Advisory Service Plan Making Manual and the National Planning Practice Guidance

1. Stage A - Setting the context and objectives; establishing the baseline and deciding on the scope

2. Stage B - Developing and refining alternatives and assessing effects

3. Stage C - Preparing the sustainability Appraisal Report

4. Stage D - Consult on the Sustainability Appraisal Report and the preferred options with consultation bodies and the public

5. Stage E - Post adoption statement and monitoring of significant effects of implementing the local plan, responding to any adverse effects

1.5 This document forms Stage C and D of the above process.

Compliance with SEA Directive

1.6 It is a requirement of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC for an Environmental Report to be produced for certain plans and programmes "identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". The objective of the SEA Directive is:

"To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans, with a view to promoting sustainable development"

1.7 SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, be they economic, social or environmental.

1.8 The SEA Directive states that an SEA/Environmental Report is mandatory for plans/programmes which:

- are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town & country planning or land use and which set the framework for future development consent of projects listed in the EIA Directive.

OR

- have been determined to require an assessment under the Habitats Directive

1.9 Government Guidance integrates the requirements of the SEA Directive into the SA process. To comply with the Directive, authorities are obliged to report on the environmental impacts of various alternatives considered before the plan is adopted, and the guidance calls for the SA Report to incorporate the elements of the Environmental Report required by the Directive.

Compliance with the SEA Regulations:

Where this report addresses the requirements of the SEA Regulations this will be explained in a box like this.

The SEA Regulations set out a legal assessment process that must be followed. In light of this, Table 1 sets out the relevant requirements of the SEA Regulations and explains how these have been satisfied. In particular, the SEA Regulations require the preparation of an 'Environmental Report' on the implications of the plan or programme in question. This report constitutes the Environmental Report under the SEA Regulations and Directive.

Table 1 Compliance with the SEA Regulations

Requirement	Where Met
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Section 3 and Appendix B of Scoping Report 2007 & 2009. Section 5 and Appendix A of Scoping Report 2012. Sections 2 and 4 of this SA Report.
Relevant aspects of the current state of the environment and its likely evolution without the implementation of the plan	Section 4 and Appendix C of Scoping Report 2009. Sections 5.2 and 5.3 of Scoping Report 2012. Section 2 paragraphs 2.6-2.18 and Table 3 of this SA Report
The environmental characteristics of the areas likely to be significantly affected	Section 4 of Scoping Report 2009. Section 5 of Scoping Report 2012
Any existing environmental problems (issues) in particular those relating to areas designated under the Habitats and Birds Directives	Section 5 and Table 6 of Scoping Report 2009. Section 5 and Tables 3 & 4 of Scoping Report 2012.

	Section 2 paragraphs 2.22-2.24 of this SA Report
The environmental protection objectives which are relevant to the plan or programme, and the way those objectives have been taken into account in its preparation	Section 3; Table 3; Appendix B and para 3.3 of Scoping Report 2009. Section 5 paragraphs 5.25-5.27 of this SA Report
The likely significant effects on the environment (and economic and social impacts)	Section 6 paragraphs 6.4-6.37 of this SA Report
The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment	Section 4.6-4.8 of Scoping Report 2009. Section 7 of this SA Report.
An outline of the reasons for selecting the alternatives dealt with …	Section 5 & Table 8 of this SA Report
… and a description of how the assessment was undertaken, any problems, etc.	Section 3 of this SA Report
A description of the measures envisaged concerning monitoring	Section 8 (para 8.4-8.10) of this SA Report and Tables 10 and 11
A non-technical summary of the information provided under the above headings	Separate non-technical summary

	published alongside the SA

Plan Objectives and Outline of Plan Contents

Compliance with the SEA Regulations:

The Environmental Report should provide information on:

"an outline of the contents, main objectives of the plan or programme" (Annex I (a))

1.10 The Affordable Housing Delivery Local Plan provides the policy framework which guides the provision and delivery of affordable dwellings within Wealden District, excluding the area of the District within the South Downs National Park Authority. The Affordable Housing Delivery Local Plan reviews the adopted Core Strategy Policy WCS8.

1.11 The Affordable Housing Delivery Local Plan is made up of four Chapters including an introduction, which outlines the scope of the Plan and the evidence base of the Plan and identifies how to comment on the Sustainability Appraisal. The next chapter outlines the objective of the Plan and the Plan Policy with some explanatory text. The third chapter identifies which Polices are superseded by the Plan and the final chapter contains the glossary.

1.12 The Affordable Housing Delivery Local Plan objective is:

Local Plan Objective

To help meet affordable housing needs of the District by securing and delivering the maximum amount of affordable housing on developments with market housing, whilst ensuring the overall viability of the development is not prejudiced and that a mix of tenure is provided to allow to meets the needs of the local area and that mixed and balanced communities are created and sustained.

Section 2 Sustainability Background

Introduction

Compliance with the SEA Regulations:

"The relationship [of the plan or programme] with other relevant plans and programmes" (Annex I (a))

"The environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan or programme … and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I (a), (e)

2.1 The first formal task when undertaking a Sustainability Appraisal (SA) is to consult on and publish a Scoping Report, which provides the framework for the sustainability appraisal of relevant Local Development Documents. In February 2007 Wealden District Council produced an SA Scoping Report, after consultation with relevant stakeholders, covering the Core Strategy, the Site Allocations Development Plan Document and the Design Guide Supplementary Planning Document. This SA Scoping Report was updated in 2009, through the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (December 2009), prior to the submission of the Core Strategy.

2.2 The Sustainability Appraisal of the Strategic Sites DPD Scoping Report (January 2012) updated the context and objectives for the Sustainability Appraisal, highlighted progress towards achieving the framework of sustainability objectives on a Wealden wide basis, and also highlighted the broad range of sustainability issues related to each of the areas considered within the Strategic Sites Local Plan. The Sustainability Appraisal Report (March 2014) submitted with the Strategic Sites Local Plan further updated the base line information. This scoping work is relevant to the Affordable Housing Delivery Local Plan, due to the links with both the Core Strategy Local Plan and the Strategic Sites Local Plan.

2.3 Scoping the SA is process orientated and involves establishing the baseline of current social, economic and environmental conditions; the identification and review of other plans that influence and govern development in Wealden District and, on the basis of a consideration of these two elements, the establishment of a set of Sustainability Appraisal (SA) Objectives. There are 22 agreed SA Objectives in total for Wealden, known collectively as the SA Framework. The SA Framework is set out in Table 2.

Table 2 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

Links to Other Policies, Plans and Programmes and Sustainability Objectives

2.4 Links with other plans and programmes are detailed within Section 3 and Appendix B of both the Sustainability Appraisal/Strategic Environmental Assessment Scoping Report (2007) and the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (December 2009)[2] The 2009 update included additional plans and programmes which had been published since the original 2007 SA Scoping Report. The Sustainability Appraisal of the Strategic Sites DPD Scoping Report (January 2012)[3]provides further updated information on plans and programmes that have been produced, amended or abolished, since the 2009 update, such as the South East Plan. This information is contained within Section 5 and Appendix A of the Sustainability Appraisal of the Strategic Sites DPD Scoping Report (January 2012).

2.5 No additional plans or programmes have been reviewed as part of the SA process for the Affordable Housing Delivery Local Plan as those detailed within the above mentioned Scoping Reports are the most up to date and have been taken into account in the formulation of the Plan. Whilst the 2007; 2009 and 2012 Scoping Reports highlight the key sustainability issues within the District, as a result of the review of relative plans and programmes, the most relevant themes emerging in relation to the Affordable Housing Delivery Local Plan are:

- To incorporate the principles of sustainable development
- To identify land to meet local housing requirements
- To increase the supply of affordable housing and promote social inclusion and cohesion

2 SA Reports 2007 and 2009
3 SA of the Strategic Sites DPD Scoping Report (January 2012)

Description of the Social, Environmental and Economic Baseline Characteristics and Predicted Future Baseline

Compliance with the SEA Regulations:

The Environmental Report should provide information on:

"Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" and "the environmental characteristics of the areas likely to be significantly affected" (Annex I (b), (c))

"Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC" (Annex I (c))

2.6 The description of the social, environmental and economic baseline characteristics, and the predicted future baseline without implementation of the Local Plan as a whole, can be found in Sections 4.2-4.5 and Appendix C of the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (December 2009). Therefore, rather than repeat that information, it should be referred to at this point.

2.7 The Council updated this information in 2010 for publication (please see Sustainability Appraisal of the Core Strategy (August 2011))[4].The baseline information will be periodically updated in the future so as to ensure the most up to date characteristics of the District are taken into account within Sustainability Appraisal. In addition, the Strategic Sites Local Plan Sustainability Appraisal Report (March 2014) and Sections 5.2 and 5.3 of the Sustainability Appraisal of the Strategic Sites DPD Scoping Report (January 2012) provide updated baseline information in regards to each of the Strategic Development Areas (SDA's) and should also be referred to at this point[5].

2.8 A brief summary of the main social, economic and environmental characteristics of Wealden District:

Social

- The District has a very low population density.
- The 40-59 age group is the largest in the District but the over 65's are estimated to see the most significant increase in population by 2026.
- Life expectancy is high within the District; 80.5 years for males and 83.5 years for females.

4 Core Strategy SA Report 2011
5 SA of the Strategic Sites DPD Scoping Report (January 2012)

- The District has an ageing population, a trend seen at the national scale.
- Housing is in good condition however it is expensive and is increasingly becoming out of reach for local people.
- There is a shortage of affordable housing within the District and house building density is lower than in the rest of East Sussex.
- The number of homeless people accepted as in priority need has reduced in Wealden from 251 in 2004/05 to 121 in 2007/08, but this figure is high compared to other local authorities in the County.

Economic

- The majority of businesses are in the service sector with few people employed in agriculture despite the rural nature of the District
- A significant proportion of people in Wealden travel to work using a car or van, with a smaller proportion choosing to use public transport, or walking or cycling
- Many of residents commute out of the District, towards Tunbridge Wells, East Grinstead, Brighton, Crawley, Gatwick and London

Environmental

- Two thirds of the District is designated as Areas of Outstanding Natural Beauty (AONB), a national recognition of landscape quality.
- The Pevensey Levels are designated as a Site of Special Scientific Interest (SSSI), a Ramsar site and a Site of Community Importance (SCI).
- The Ashdown Forest SSSI is designated as a Special Protection Area (SPA) under the EC Birds Directive 1979, and a Special Area of Conservation (SAC) under the Habitat Regulations.

2.9 The policy within the Affordable Housing Delivery Local Plan is not geographically specific and therefore the potential area likely to be significantly affected should be taken to be the District as a whole, excluding the part of the District within the South Downs National Park.

Future trends without implementation of the Plan

2.10 Section 4.4 of the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (2009) outlines the factors that will affect the District without the implementation of the Local Plan (formerly the Local Development Framework). Using East Sussex County Council projections data the Scoping Report concluded that regardless of the Wealden Local Plan, it will be necessary to provide for an increasing number of

households forming, as well as providing employment opportunities and floorspace for an anticipated increase in workforce. Section 4.5 of the Scoping Report (2009) summarises the areas of Wealden likely to be significantly affected in the future[6]

2.11 Section 5.3 of the Sustainability Appraisal of the Strategic Sites DPD Scoping Report 2012 identifies the key sustainability issues for Wealden, both in general and town specific terms. It also details the likely situation without implementation of the Local Plan, again both in general and then in specific reference to the strategic sites contained within the DPD[7] This updates the 2009 Scoping Report.

2.12 The Affordable Housing Delivery Local Plan focuses on one specific policy area; affordable housing.

2.13 Without the implementation of the Affordable Housing Delivery Local Plan, any decisions would be taken in accordance with Policy WCS8 of the adopted Core Strategy alone. Tables within Appendix B, C and D show the appraisal of all the options/alternatives considered for the Affordable Housing Delivery Local Plan policy against the 22 SA Objectives. Appendix E provides the full appraisal of Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan (February 2015) against the 22 SA Objectives.

2.14 In November 2014, the Government announced a change in policy and guidance in relation to affordable housing contributions. The policy states that affordable housing contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floorspace of no more than 1000sqm. However, for designated rural areas authorities may choose to implement a lower threshold of 5 units or less where affordable housing contributions should not be sought. Evidence shows that within Wealden District designated rural areas can sustain a lower threshold for the provision of affordable housing. For a list of the designated rural areas within Wealden please refer to paragraph 2.4 of the Revised Proposed Submission Affordable Housing Delivery Local Plan (Feb 2015).

2.15 Table 3 below provides a summary of the provision of affordable housing if Core Strategy Policy WCS8 or the Affordable Housing Delivery Local Plan were to be implemented. The Table includes Policy AFH1 of the Proposed Submission Affordable Housing Local Plan; Policy AFH1 incorporating the Government changes of November 2014 and Policy AFH1 of the Revised Proposed Submission Affordable Housing Local Plan (February 2015). This shows that the delivery of affordable housing would be more likely with the implementation of Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan, particularly on larger sites due to the introduction of affordable rent tenure. In addition to this the lowering of the site area threshold also provides the opportunity to capture affordable housing contributions from smaller scale development.

6 Background Paper E2: SA Updated Scoping Report 2009
7 Background Paper D16: SA of the Strategic Sites DPD Scoping Report (January 2012)

2.16 Policy AFH1 incorporating the Government changes of November 2014, would be unlikely to be as effective at delivering the affordable housing that is needed, particularly as it does not capture smaller sites.

2.17 Before the Governments announcement in November 2014 the likely evolution without implementing the Affordable Housing Delivery Local Plan would have been a lower provision of affordable housing which would move away from meeting SA Objectives 1-3. However, with the changes to the threshold for affordable housing provision and the subsequent change to Policy AFH1, it is now considered to be the case that the likely evolution without implementing the Affordable Housing Delivery Local Plan would be a higher provision of affordable housing. That is to say that Core Strategy Policy WCS8 would have been more effective. However, the Affordable Housing Delivery Local Plan and Policy AFH1 has to be in conformity with Government policy and guidance on thresholds for affordable housing provision/contributions, which it now is.

2.18 Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan, whilst maintaining the changes made by Government and hence the issues stated in paragraph 2.16, offers a more robust policy framework in terms of the tenure mix and in terms of the tenure split for affordable housing provision. The Policy states that where it can be demonstrated that it is not economically viable to achieve the required proportion or tenure mix of affordable housing on site, the Policy gives priority to ensuring the optimal tenure mix is achieved on site prior to the consideration of proportion. In the previous iterations of Policy AFH1 the situation was more ambiguous. This change therefore provides greater clarity.

Table 3 Comparative analysis of Policy WCS8 and the Affordable Housing Delivery Local Plan

Site Size Threshold			
Core Strategy Policy WCS8	**Proposed Submission Affordable Housing Local Plan (Policy AFH1)**	**Affordable Housing Delivery Local Plan Policy AFH1 (incorporating Government changes of November 2014)**	**Revised Proposed Submission Affordable Housing Delivery Local Plan Policy AFH1**
Affordable housing required on sites of 5 or more net dwellings or 0.2ha • The 0.2ha size provides a the	Affordable housing required on sites of 5 or more net dwellings or 0.16ha • Having a threshold of 0.16ha seeks to capture smaller sites and also	No site size threshold in regards to land area (ha). Affordable housing required on sites of 11 dwellings (net) or more, and with a combined gross floorspace of more than 1,000 sqm	No site size threshold in regards to land area (ha). Affordable housing required on sites of 11 dwellings (net) or more, and with a combined gross floorspace of more than 1,000 sqm

equivalent of 5 dwellings at 25 dwellings per ha (dph) density. So this accords with the threshold. However, the requirement for affordable housing could be avoided by reducing the site size at th application stage to provide a higher density.	attempts to address the matter of avoidance through reducing site size. This also allows low density sites to provide affordable housing as 0.16ha is equivalent to 5 dwellings at 30dph	within the Affordable Housing Policy Area and on development sites of 6 dwellings (net) or more in the rest of the District. • This policy is not as effective as that of the Proposed Submission Affordable Housing Delivery Local Plan in delivering the levels of affordable housing that is needed, however it is in line with national guidance and policy which our Local Plans must be in conformity with. This policy will not capture those sites of less than 11 dwellings within the Affordable Housing Policy Area	within the Affordable Housing Policy Area and on development sites of 6 dwellings (net) or more in the rest of the District. • This policy is not as effective as that of the Proposed Submission Affordable Housing Delivery Local Plan in delivering the levels of affordable housing that is needed, however it is in line with national guidance and policy which our Local Plans must be in conformity with. This policy will not capture those sites of less than 11 dwellings within the Affordable Housing Policy Area
Proportion of Affordable Housing			
Core Strategy Policy WCS8	**Affordable Housing Local Plan**	**Affordable Housing Delivery Local Plan Policy AFH1 (incorporating Government changes of November 2014)**	**Revised Proposed Submission Affordable Housing Delivery Local Plan Policy AFH1**

Affordable housing is required at 35% of the total dwellings on a site. Where a site is allocated in a Local Plan the Plan may specify a different, potentially higher, target dependant on viability and site specific considerations • The evidence base for the Core Strategy shows 35% to be achievable across the District but that in some circumstances sites could potentially provide a higher target. • The Policy retains the flexibility to set different targets for allocated sites • Ensures a high proportion of affordable housing is provided to help meet	Affordable housing is required at 35% of the total dwellings on a site. Where a site is allocated in a Local Plan the Plan may specify a different, potentially higher, target dependant on viability and site specific considerations • The evidence base for the Local Plan as a whole shows 35% to be achievable across the District but that in some circumstances sites could potentially provide a higher target. • The Policy retains the flexibility to set different targets for allocated sites • Ensures a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District.	Affordable housing is required at 35% of the total dwellings on a site. Where a site is allocated in a Local Plan, above nationally determined thresholds, the Plan may specify a different, potentially higher housing, target dependant on viability and site specific considerations • The evidence base for the Local Plan as a whole shows 35% to be achievable across the District but that in some circumstances sites could potentially provide a higher target. • The Policy retains the flexibility to set different targets for allocated sites • Ensures a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District.	Affordable housing is required at 35% of the total dwellings on a site. Where a site is allocated in a Local Plan, above nationally determined thresholds, the Plan may specify a different, potentially higher housing, target dependant on viability and site specific considerations • The evidence base for the Local Plan as a whole shows 35% to be achievable across the District but that in some circumstances sites could potentially provide a higher target. • The Policy retains the flexibility to set different targets for allocated sites • Ensures a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District.

the demand for affordable homes across the District.			
Tenure Mix			
Core Strategy Policy WCS8	**Affordable Housing Local Plan**	**Affordable Housing Delivery Local Plan Policy AFH1 (incorporating Government changes of November 2014)**	**Revised Proposed Submission Affordable Housing Delivery Local Plan Policy AFH1**
The Council will negotiate the exact tenure split on each site. Presumption is that around 80% of the total number of affordable homes provided will be for social rented accommodation with the remainder being for intermediate accommodation. • Allows for flexibility in tenure split • May cause issues with viability on larger sites due to these sites having greater financing costs than smaller sites.	The Council will negotiate the exact tenure split on each site. Presumption is for development sites of 49 dwellings (net) or less that around 80% of the total number of affordable homes provided will be for social rented accommodation with the remainder being for intermediate accommodation. For development sites of 50 dwellings (net) or more around 40% of the total number of affordable homes provided will be for social rented accommodation; 40% will be for affordable rent and 20% for intermediate accommodation. • Allows for the creation of a	The Council will negotiate the exact tenure split on each site. Presumption is for development sites of 49 dwellings (net) or less that around 80% of the total number of affordable homes provided will be for social rented accommodation with the remainder being for intermediate accommodation. For development sites of 50 dwellings (net) or more around 40% of the total number of affordable homes provided will be for social rented accommodation; 40% will be for affordable rent and 20% for intermediate accommodation. • Allows for the creation of a	Affordable housing provision should incorporate a mix of tenures. The presumption is for development sites of 49 dwellings (net) or less that around 80% of the total number of affordable homes provided will be for social rented accommodation with the remainder being for intermediate accommodation. For development sites of 50 dwellings (net) or more around 40% of the total number of affordable homes provided will be for social rented accommodation, 40% will be affordable rent and 20% intermediate accommodation.

	wider variety of affordable homes on sites which may help in creating mixed and balanced communities • Including affordable rent on larger sites takes account of viability issues and balances these with the overall provision of affordable homes • Tenure split seeks to ensure the housing is more affordable for those in greatest need • Allows for flexibility in tenure split • Viability evidence supports inclusion of affordable rent on larger sites	wider variety of affordable homes on sites which may help in creating mixed and balanced communities • Including affordable rent on larger sites takes account of viability issues and balances these with the overall provision of affordable homes • Tenure split seeks to ensure the housing is more affordable for those in greatest need • Allows for flexibility in tenure split • Viability evidence supports inclusion of affordable rent on larger sites	Where it can be proven that affordable housing requirement cannot be achieved, due to economic viability, there will be flexibility in meeting stated targets. In such exceptional circumstances, the tenure of affordable housing should be examined prior to the proportion of affordable housing. • Places a greater degree of control over tenure split in exceptional circumstances with the Council. Allows the Council to ensure the optimal tenure split is achieved before agreeing the proportion of affordable housing on such sites • allows for the creation of a wider variety of affordable homes on sites which may help in creating mixed and balanced communities • Including affordable rent on larger sites

			takes account of viability issues and balances these with the overall provision of affordable homes • Tenure split seeks to ensure the housing is more affordable for those in greatest need • Allows for flexibility in tenure split • Viability evidence supports inclusion of affordable rent on larger sites

Limitations of the Information and Assumptions Made

2.19 Section 4.8 of the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (2009) identifies the data gaps and limitations of the information. Appendix C of the Updated Scoping Report (2009) identifies each of the specific data gaps. Other concerns detailed in Section 4.8 are:

- Indicators tend to be quantified and help explain how things are changing over time. However, it is not always possible to explain the reasons why certain trends are occurring, or the secondary effects of any changes.

- External bodies collect a significant amount of the data. Therefore, Wealden District Council has little jurisdiction over the scope, frequency and availability of such information, and whether collection methods could change in the future, which would also restrict reliable comparisons. Examples of such include satisfaction surveys and accessibility studies.

2.20 However, the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (2009) has been able to reduce the number of data gaps by rationalising the baseline and choosing indicators that are regularly monitored. These indicators are predominantly those that are published on the East Sussex in Figures website. This resource is extremely useful as it presents up to date information for all the districts and boroughs in East Sussex as well as for East Sussex as a whole, the South East region and nationally.

2.21 Whilst East Sussex in Figures provides a concise database of information for a wide variety of indicators, not all of the data is released or updated at the same time or with the same frequency. Therefore, caution needs to be employed when interpreting, or making comparisons between, data from different years.

Main Social, Environmental and Economic Issues and Problems

2.22 Section 5.2 and Table 6 of the Sustainability Appraisal/Strategic Environmental Assessment Updated Scoping Report (2009) identify the sustainability issues and problems that resulted from the initial analysis of baseline information and other relevant strategies and plans.[8] The issues and problems were further updated in Section 5.3 and Tables 3 and 4 of the Sustainability Appraisal of the Strategic Sites DPD Scoping Report (January 2012)[9]

2.23 The sustainability issues identified in the 2009 and 2012 Scoping Reports by no means provide a definitive list of those problems affecting the District. However, the Council has identified the need to provide affordable housing as one of the most significant sustainability problems for the District[10]. The general sustainability issues for Wealden are:

8 Background Paper E2 SA Updated Scoping Report 2009
9 Background D16 SA of the Strategic Sites DPD Scoping Report (January 2012)
10 Core Strategy Background Paper 2: Managing the Delivery of Housing, August 2011 and Strategic Sites Local Plan Housing Background Paper, March 2014

1. Improving health;
2. Allocating sufficient land for affordable housing;
3. Improving education provision;
4. Ensuring open spaces and recreational facilities are easily accessible;
5. Improving design quality;
6. Ensuring vibrant communities;
7. Promoting social inclusion;
8. Preventing loss of biodiversity;
9. Promoting conservation of water quality & resources;
10. Protecting landscape & built heritage;
11. Maintain air quality;
12. Reflect sustainable land use;
13. Reduce flood risk;
14. Promote renewable energy;
15. Encouraging sustainable waste management;
16. Supporting small firms & local business;
17. Promote sustainable tourism;
18. Developing a skilled workforce;
19. Improving sustainable transport choice; and

2.24 Of the above issues the most relevant to the Affordable Housing Delivery Local Plan are 1; 2; 6 and 7.

Section 3 Appraisal Methodology

Introduction

Compliance with the SEA Directive:

The Environmental Report should provide information on: "

..a description of how the assessment was undertaken" (Annex 1 (h))

"Authorities which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes …shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report" (Article 5.4).

3.1 This chapter discusses the approach adopted to carry out the assessment stages of the SA, detailing the methods used in assessing the plan options at their various stages of development.

Approach Adopted to the SA

3.2 The SA for the Affordable Housing Delivery Local Plan was carried out in the following stages:

- The internal compatibility of the Sustainability Appraisal Framework and SA Objectives was examined and acknowledged through the Core Strategy Sustainability Appraisal Report August 2011 (see Text Box on page 31 of Background Paper 10: Sustainability Appraisal of the Core Strategy, August 2011[(11)].
- The SA Scoping Reports 2007; 2009 and 2012 were acknowledged. In particular the baseline information relating to affordable housing and the relevant indicators.
- A number of issues relating to affordable housing and Policy WCS8 were identified and published in the Affordable Housing Delivery Local Plan Issues and Options Consultation Paper (published in September 2014). These were:
    - That there is significant need for affordable housing in the District;
    - That there needs to be a balance between 'need' and delivery of affordable housing; and
    - Sites need to remain viable.

11 Core Strategy SA Report 2011

- As a result of those issues a number of reasonable alternatives, including a 'no plan' approach[12] were identified and subjected to consideration against the 22 SA Objectives (the SA Framework). These were published in the Affordable Housing Delivery Local Plan Sustainability Appraisal Issues and Options Consultation document[13]. This was also published in September 2014 for consultation.

- The Affordable Housing Delivery Local Plan Issues and Options were consulted on between 22nd September 2014 and 3rd November 2014, together with the Affordable Housing Delivery Local Plan Sustainability Appraisal, Issues and Options Document (September 2014)[14]

- The responses from the Issues and Options consultation, together with the responses from the consultation on the Affordable Housing Delivery Local Plan Sustainability Appraisal Issues and Options document, were reported to the Local Development Framework Sub Committee and the Joint Planning Committee North and South on 13th November 2014. These responses together with the evidence base resulted in a draft Local Plan document and Affordable Housing Policy. The consultation responses, Committee Report and Proposed Submission Affordable Housing Delivery Local Plan are available on the Councils website[15].

- The draft policy of the Proposed Submission Affordable Housing Delivery Local Plan was subject to a comparative analysis of the 22 SA Objectives and the Options considered at Issues and Options Consultation together with a no plan option. These options are included in the Sustainability Appraisal Report of the Proposed Submission Affordable Housing Delivery Local Plan. Appendix B of this SA Report contains the assessment of the original 20 Options considered as part of the Affordable Housing Delivery Local Plan against the 22 SA Objectives. This is the same as included within the Sustainability Appraisal Report of the Proposed Submission Affordable Housing Delivery Local Plan.

- As a result of the Government's announcement in November 2014 regarding the change in policy and guidance on affordable housing contributions , draft Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan (December 2014) was amended to take account of the changes and became Option 21 in regards to the development of the Affordable Housing Delivery Local Plan. The amendments took place during the consultation period and were subjected to assessment against the 22 SA Objectives. Appendix C of this SA Report contains the assessment of Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan (Option 21) against the 22 SA Objectives.

12 see paragraph 3.5 of the Affordable Housing Delivery Local Plan Sustainability Appraisal Issues and Options Consultation document

13 SA Issues and Options Consultation

14 Issues and Options Consultation documents

15 LDF Sub Committee Report

- Policy AFH1, incorporating the Governments changes, was assessed against the 22 SA Objectives and is included in Appendix D of this SA Report (now Option 22).

- Policy AFH1, incorporating the Governments changes, was presented to the Local Development Framework (LDF) Sub Committee and joint Planning Committee North and Planning Committee South (PCN and PCS) on Thursday 15th January 2014 for discussion and comment.

- During discussions at the LDF Sub Committee and joint PCN/PCS, the main point raised related to the wording of how the affordable housing would be accommodated within a development site. The wording suggested at the LDF Sub Committee and joint PCN/PCS 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".

- 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 a Registered Social Landlord and therefore the affordable housing could be said not to be deliverable.

- An alternative form of wording, which would help meet the objectives stated and reduce the risk of modification was:

  " 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".

- A further amendment was also made, in order to provide flexibility for the tenure of affordable housing, where there are viability issues, prior to considering the proportion of affordable housing.

- The new Policy AFH1 within the Revised Proposed Submission Affordable Housing Delivery Local Plan (February 2015) was subject to a comparative analysis of the 22 SA Objectives and this analysis is included in this Sustainability Appraisal Report at Appendix E.

Predicting the Effects

3.3 The purpose of this task is to predict the social, environmental and economic effects of the options/policy being considered in the Local Plan process. The potential effects need to be quantified where appropriate, or a judgement made where this is not possible, with reference to the baseline situation.

3.4 Predictions do not have to be expressed in quantitative terms. Quantification is not always practicable, and qualitative predictions can be equally valid and appropriate. These are often expressed in easily understood terms such as 'getting better or worse' or a scale from very positive to very negative. Predictions need to be supported by evidence, such as references to any research, discussions or consultation.

3.5 Any difficulties such as uncertainties or limitations in the information underlying both qualitative and quantitative predictions are documented. Assumptions, for instance about underlying trends or details of projects to be developed under the plan or programme, need to be clearly stated.

3.6 Each option is assessed against each SA Objective in order to identify:

- Whether the principal impacts are positive or negative (clearly some may support one objective whilst conflicting with another, although this does not mean the impacts cancel one another out);
- How these impacts may change over time (this cannot always be determined); and
- The relative magnitude of the impacts.

3.7 The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts. This activity also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures (see sections below).

3.8 A summary of how each option compares against the 22 SA Objectives and against each other in relation to the 22 SA Objectives is then undertaken.

Evaluating the Effects

3.9 Having identified and described the likely effects of the proposed Local Plan, an evaluation of their significance is then made.

3.10 Whether an effect is considered likely to be significant will depend on whether it has a material impact on an SA Objective. The effects may be judged according to:

- Probability, duration, frequency and reversibility of the effects
- Cumulative nature of the effects
- Trans-boundary nature of the effects
- Risks to human health or the environment

- Magnitude and spatial extent of the effects (geographical area and size of the 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 standards or limit values; intensive land-use; or effects on areas having a recognised national, Community or international protection status
- How they contribute to achieving, or restrict the achievement of, the various elements of the SA Objectives

3.11 Assumptions used in making judgements on the significance of effects are documented. Any inconsistencies between the objectives of the Local and its policies are highlighted, and amendments made where possible to reduce conflicts.

3.12 The assessment criteria are shown in Table 4 below

Table 4 Assessment criteria

Symbol	Likely effect against the SA Objective
+	Option moving towards the achievement of SA objective. Potentially beneficial effect.
?	Unknown depends on how option is implemented.
-	Option moving away from achievement of SA objective. Potentially adverse effect
o	Neutral: No relationship with SA objective

When the SA was Carried Out

3.13 In February 2007 Wealden District Council produced a Scoping Report, after consultation with relevant stakeholders, which concerned the formulation of the Core Strategy, the Site Allocations Development Plan Document and the Design Guide Supplementary Planning Document. This was further updated in 2009, prior to the submission of the Core Strategy. The Strategic Sites Local Plan Scoping Report 2012 updated the context and objectives for the Sustainability Appraisal , highlighted progress towards achieving the framework of sustainability objectives on a Wealden wide basis, and also highlighted the broad range of sustainability issues related to each of the areas considered within the Plan, as well as to the District generally. The Sustainability Appraisal Report submitted with the Strategic Sites Local Plan further updated the baseline information.

3.14 This scoping work is relevant to the development of the Affordable Housing Delivery Local Plan, due to the links of the Plan with both the Core Strategy Local Plan and the Strategic Sites Local Plan. A new Scoping Report for the Affordable Housing

Delivery Local Plan was not considered necessary as the previous Scoping Reports provided the most up to date baseline information and the issue of affordable housing policy was incorporated within these Scoping Reports.

3.15 The Sustainability Appraisal of the Affordable Housing Delivery Local Plan Issues and Options was undertaken prior to the publication and consultation on 22nd September 2014. The Sustainability Appraisal of the Proposed Submission Affordable Housing Delivery Local Plan was undertaken prior to the publication for representations on 1st December 2014.

3.16 Following the announcement by Government regarding changes in policy and legislation for affordable housing contributions, and the amendments made to draft Policy AFH1 as a result of the LDF Sub Committee and joint PCN/PCS, a Sustainability Appraisal of the Revised Proposed Submission Affordable Housing Delivery Local Plan (February 2015) and new draft Policy AFH1 was undertaken prior to the publication of the Plan for representations on 2nd February 2015.

Who Carried Out the SA

3.17 The SA Scoping Report for the Core Strategy 2007 was produced by officers of Wealden District Council and the SA Objectives were independently reviewed by Scott Wilson Consultants. The SA Scoping Report Update 2009 and the Strategic Sites SA Scoping Report 2012 were also prepared by officers of Wealden District Council and the SA Objectives reviewed internally. The SA Report of the Proposed Submission Affordable Housing Delivery Local Plan (2014), the alternatives considered and the Revised Proposed Submission Affordable Housing Delivery Local Plan (2015) has been produced by officers of Wealden District Council.

Who was Consulted, When and How

3.18 In respect of the scoping work carried out for the whole of the Local Plan and the documents to be produced for it, the SA Scoping Report 2007 was consulted on with the following bodies in September 2006:

- The Countryside Agency
- English Heritage
- English Nature (now Natural England)
- The Environment Agency
- The Government Office for the South East
- Wealden Local Strategic Partnership
- Parish and Town Councils
- East Sussex county Council
- The Highways Agency
- The High Weald AONB Unit
- South Downs Joint Committee

3.19 The 2009 Updated SA Scoping Report was also consulted on with the above bodies.

3.20 In respect of the SA Scoping Report for the Strategic Sites Local Plan, the following bodies were consulted with in 2011/2012:

- English Heritage
- The Countryside Agency
- English Nature (now Natural England)
- The Environment Agency
- Government Office for the South East
- Highways Agency
- East Sussex County Council
- High Weald and South Downs AONB Bodies
- Wealden Local Strategic Partnership
- Wealden Parish and Town Councils
- District Councillors

3.21 In addition to the above, the SA Scoping Reports were also put out for consultation with the wider public in the respective years, alongside the relevant Local Plan documents.

3.22 The Affordable Housing Delivery Local Plan Sustainability Appraisal Issues and Options Consultation was undertaken between 22nd September 2014 and 3rd November 2014, together with the Affordable Housing Delivery Local Plan Issues and Options Consultation Paper. The above bodies were also consulted with on these documents as were the wider public. The Sustainability Appraisal Report of the Proposed Submission Affordable Housing Delivery Local Plan consultation took place between 1st December 2014 and 12th January 2015. The bodies, identified above, were consulted.

3.23 Consultation on the SA Report of the Revised Proposed Submission Affordable Housing Delivery Local Plan will take place between 2nd February 2015 and 16th March 2015.

Section 4 Plan Objectives

Introduction

Compliance with the SEA Regulations:

The Environmental Report should provide information on: "an outline of the contents, main objectives of the plan or programme" (Annex I (a))

4.1 The objectives of the plan (in this case the Affordable Housing Delivery Local Plan), which underpin what the plan and the policies it contains intend to achieve, should be tested for compatibility with the sustainability objectives. This task helps to test whether there is compatibility between the plan objectives and the local sustainability objectives.

4.2 Where there are potential conflicts this can inform further work in the preparation of the Plan. It does not necessarily mean that objectives need to be amended. In some cases, adverse effects may be mitigated, and tensions between the objectives resolved. If development takes place in accordance with all of the strategic objectives of the Local Plan, any potential incompatibility may not necessarily be an insurmountable issue. However, this matter may need to be considered in the development of policies that comprise the Local Plan.

The Local Plan Objective

4.3 The objective of the Affordable Housing Delivery Local Plan is:

Local Plan Objective

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

SA of the Plan Objectives

4.4 The full SA appraisal of the plan objective is provided in Appendix A of this SA Report and this has not changed as a result of the Governments announcement in November 2014 nor the discussions at LDF Sub Committee and joint PCN/PCS. Table 5 below provides a summary of the appraisal. The appraisal consists of a matrix testing the compatibility of the plan objective with each SA Objective. The key for this Table is contained in Table 4 in Section 3 of this report.

Table 5 Assessment of Affordable Housing Delivery Local Plan Objective against SA Objectives

SA Objectives																				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	**+**	**+**	**o**	**o**	**o**	**o**	**o**	**o**	**?**	**?**	**o**	**o**	**o**	**o**	**o**	**?**	**o**	**o**	**o**	**o**	**o**

4.5 The appraisal of the plan objective has identified that whilst it is compatible with the SA Objectives, providing an overall positive effect and is likely to contribute to achieving the delivery of affordable housing within the District, there are some areas where there is the potential for conflict, principally with the environmental SA Objectives:

- SA Objective 10 - Conserve and enhance the biodiversity of the District
- SA Objective 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

4.6 This is, to a degree, inevitable considering the need to balance social, economic and environmental objectives and to accommodate growth whilst protecting the high quality of the District's environment. However, the potential conflict between objectives is not necessarily an insurmountable issue, particularly when they are considered together. For example, development of any kind within the District has the potential to adversely affect the landscape if delivered in an inappropriate way, however, other policies in other Local Plan documents (e.g. The Core Strategy) seek to conserve and enhance the landscape of the District. Considered together mitigation measures can be identified.

4.7 The process of assessment of the Affordable Housing Delivery Local Plan Objective against the SA Objectives has highlighted where the Local Plan needs to have clear regard to the sustainability objectives and inform decisions around potential mitigation measures.

Section 5 The Plan Alternatives

Compliance with the SEA Directive:

The Environmental Report should provide information on:

"Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" and give "an outline of the reasons for selecting the alternatives dealt with" (Article 5.1 and Annex I (h))

Introduction

5.1 The purpose of the Sustainability Appraisal is to consider reasonable alternatives in order to achieve the Plan's objectives. The Affordable Housing Delivery Local Plan Issues and Options Consultation document identified the scope of the plan, to review Policy WCS8 of the Wealden District (Incorporating Part of the South Downs National Park) Core Strategy Local Plan which was adopted in February 2013. The policy deals with the provision of affordable housing within the District, although this review relates to the District not within the South Downs National Park.

5.2 Affordable housing is defined in the National Planning Policy Framework as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

5.3 Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

5.4 Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes.

5.5 This section documents the options identified by the Council in the Affordable Housing Delivery Local Plan Issues and Options Consultation and summarises the Sustainability Appraisal and how social, economic and environmental effects have been considered in choosing the options to progress.

5.6 As a result of the Governments announcement in November 2014, draft Policy AFH1 of Proposed Submission Affordable Housing Delivery Local Plan has now been considered a reasonable alternative and is documented in this section (Option 21).

5.7 Policy AFH1, incorporating the changes to national policy, was considered by LDF Sub Committee and joint PCN/PCS in January 2015 and as a result of discussions the draft policy was amended further. Hence the policy put before these Committees has also now been considered a reasonable alternative and is documented in this section (Option 22).

Main Options considered and how they were identified

5.8 The alternatives to be considered must be reasonable. This means that alternatives that cannot be achieved or are not realistic are not considered to be reasonable. For the purposes of this appraisal the options have been grouped in relation to discrete components of the affordable housing policy contained within Core Strategy Policy WCS8, namely proportion of affordable housing, thresholds for implementing the policy and tenure. Whilst these components relate to Core Strategy Policy WCS8, they are recognised as the main areas within affordable housing policies as identified in the National Planning Policy Framework.

5.9 The reasonable alternatives also consider alternatives for affordable housing policies concerning Strategic Sites. For the purposes of this Sustainability Appraisal a Strategic Site is defined as any site that contributes to the provision of development, as specified in WCS4 of the Core Strategy Local Plan.

5.10 There is no standard methodology for devising reasonable alternatives, however it is considered appropriate in this case to consider the policy already in place and the alternatives to this policy. In some circumstances it may also be reasonable to have an alternative of no policy, however given that Policy WCS8 is already in place the alternative of a 'no policy' approach is not being pursued as it is not considered reasonable in this case. On this basis the reasonable alternatives identified include:

<u>Proportion of affordable housing (general)</u>

- **Option 1: To retain the overall proportion of affordable housing for non allocated sites to 35%** - This is in line with the adopted Core Strategy Policy WCS8
- **Option 2: To generally increase the overall proportion of affordable housing for non allocated sites to above 35%** - This proportion is above that stated within the adopted Core Strategy Policy WCS8
- **Option 3: To generally decrease the overall proportion of affordable housing for non allocated sites to below 35%** - This proportion is below that stated within the adopted Core Strategy Policy WCS8

Proportion of affordable housing (Strategic Sites)

- **Option 4: To retain the overall proportions of affordable housing for strategic sites, which is generally 35% with the exception of Strategic Sites in Stone Cross and Pine Grove which are 40%** - This threshold is in line with the submitted Strategic Sites Local Plan Policies (March 2014)
- **Option 5: To generally decrease the overall proportion of affordable housing for strategic sites to below 35%** - This proportion is below that stated within the submitted Strategic Sites Local Plan Policies (March 2014)
- **Option 6: To generally increase the overall proportion of affordable housing for strategic sites to above 35%** - This proportion is above that stated within the submitted Strategic Sites Local Plan Policies (March 2014)

Threshold

- **Option 7: To retain the threshold of 5 houses, when affordable housing is required** - This threshold is in line with the adopted Core Strategy Policy WCS8
- **Option 8: To increase the threshold of 5 houses, when affordable housing is required** - This threshold is above that contained with the adopted Core Strategy Policy WCS8
- **Option 9: To reduce the threshold of 5 houses, when affordable housing is required** - This threshold is below that contained with the adopted Core Strategy Policy WCS8
- **Option 10: To remove the threshold of 5 dwellings, and rely upon the size of site as a threshold** - To provide an alternative to that contained within Core Strategy Policy WCS8
- **Option 11: To retain the threshold of 0.2 hectares, when affordable housing is required** - This threshold is in line with the adopted Core Strategy Policy WCS8
- **Option 12: To increase the threshold of 0.2 hectares, when affordable housing is required -** This threshold is above that contained within the adopted Core Strategy Policy WCS8
- **Option 13: To reduce the threshold of 0.2 hectares, when affordable housing is required** - This threshold is below that contained with the adopted Core Strategy Policy WCS8
- **Option 14: To remove the threshold of 0.2 hectares, when affordable housing is required** - To provide an alternative to that contained within Core Strategy Policy WCS8

Tenure of Affordable Housing Options (Tenure)

- **Option 15: To retain the tenure requirement of 80% Social Rent and 20% Intermediate accommodation** - This tenure split is in line with the adopted Core Strategy Policy WCS8

- **Option 16: To generally change the tenure requirement of 80% Social Rent and 20% Intermediate accommodation to include a proportion of affordable rent** - This tenure split introduces a new affordable accommodation product

- **Option 17: To create a threshold in dwelling numbers to change the tenure requirement of 80% Social Rent and 20% Intermediate product to include a proportion of affordable rent** - This tenure split introduces a new affordable accommodation product and a threshold by which it is implemented, whilst retaining the Core Strategy Local Plan Policy of 80% social rent and 20% Intermediate accommodation

Tenure of Affordable Housing Options (Strategic Sites)

- **Option 18: To accommodate the tenure requirement of 40% Social Rent, 40% Affordable Rent and 20% Intermediate product for strategic sites** - This tenure split is in line with the submitted Strategic Sites Local Plan Policies (March 2014)

- **Option 19: To accommodate a change in tenure requirement for strategic sites to increase viability than the 40% Social Rent, 40% Affordable Rent and 20% Intermediate would achieve** - To explore alternative tenure split arrangements

- **Option 20: To accommodate a change in tenure requirement for strategic sites to decrease viability than the 40% Social Rent, 40% Affordable Rent and 20% Intermediate would achieve** - To explore alternative tenure split arrangements

Option 21: Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan (December 2014)

5.11 This Policy was the preferred approach to affordable housing provision within the District; however it now has to be considered as a reasonable alternative, in light of the Governments announcement in November 2014 regarding affordable housing contributions.

5.12 The Policy sought affordable housing provision on sites of 5 or more net dwellings or sites of 0.16ha in size and was supported by a robust evidence base including viability work. The Policy would have maximised the amount of affordable housing provision in Wealden as it applied to the District as a whole and sought to capture smaller sites and also attempted to address the matter of avoidance through reducing site size. The Policy would also have allowed for low density sites to provide affordable housing as 0.16ha is the equivalent to 5 dwellings at 30 dwellings per ha (dph).

5.13 However this Policy, whilst considered a reasonable alternative by the Council, would not be in line with the Government's changes in policy and guidance on affordable housing contributions announced in November 2014. As such Policy AFH1, as it stood in the above mentioned document, would not now be considered to be in conformity with the national approach to affordable housing provision, despite the fact that it would have provided more affordable housing in the District. Therefore, although it is a reasonable alternative it cannot be taken forward.

Option 22: Policy AFH1 incorporating Government changes to affordable housing thresholds (January 2015)

5.14 This Policy was the approach the Council intended to take in regards to affordable housing and was in conformity with the national approach to affordable housing policy and guidance following the changes announced by Government in November 2014.

5.15 This Policy is now considered as a reasonable alternative following the discussions and subsequent amendment to Policy AFH1 arising from the Committee meetings on 15th January 2015.

The Social, Environmental and Economic Issues

5.16 The social, environmental and economic issues identified as part of the Local Plan as a whole are presented in Sections 4.5 and 4.7 of the Sustainability Appraisal/Strategic Environmental Assessment Updates Scoping Report (2009) and Section 5.3 of the Sustainability Appraisal of the Strategic Sites DPD Scoping Report (2012), which can be found on the Wealden website.

How Social, Environmental and Economic Issues were Considered in progressing the Plan

5.17 The overarching issues in relation to affordable housing, identified through the SA Scoping Reports, the SA of the Affordable Housing Delivery Local Plan Issues and Options and associated evidence base have been important in progressing the Plan. These issues are given below.

Housing

5.18 The Housing Needs Assessment (January 2010) identifies a shortage of affordable housing within the District. The Assessment highlights an annual affordable housing need of 812 in Wealden, although this does not translate into 812 new build affordable units. Work on the new Wealden Strategic Housing Market Assessment (SHMA) is underway and this will further clarify the situation within the District in regards to affordable housing need, although it is unlikely that the need has fallen significantly.

5.19 Affordability of housing within the District is increasingly out of reach of many with the house price to earnings ratio continuing to increase. In 2010 the ratio was 8.56, meaning the average house cost 8.56 times the average income. The ratio continues to be far higher than the county and national averages (see Appendix B of the SA Scoping Report for the Strategic Sites Local Plan 2012). Again the SHMA will provide clarity on this matter.

Any Proposed Mitigation Measures

Compliance with the SEA Directive:

The Environmental Report should provide information on: "The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme…" (Annex I (g))

5.20 The purpose of the Affordable Housing Delivery Local Plan is to deliver the proportion and tenure of affordable housing that is required, as part of an overall development scheme. Whilst the development schemes in themselves may have an effect on the environment of Wealden, the proportion and tenure of affordable housing will not

have an impact upon any spatial distribution of growth. On this basis it is concluded that the Affordable Housing Delivery Local Plan will not have a significant effect on the environment.

5.21 Mitigation measures and/or requirements were identified within Section 6 of the Sustainability Appraisal of the Core Strategy Submission Document (August 2011) for the whole of the Local Plan and its policies and this should be read at this point[(16)].

Sustainability Appraisal of the Plan Alternatives

5.22 The full appraisal of the options is provided at Appendix B and is also contained within the Affordable Housing Delivery Local Plan Sustainability Appraisal Issues and Options Consultation document. The full appraisal of Option 21 and Option 22 can be found in Appendix C and D of this SA Report . Table 7 summarises the SA of the options against the 22 SA Objectives.

Key of Criteria

Table 6

+	**Option moving towards the achievement of SA objective**	**-**	**Option moving away from achievement of SA objective**
?	**Unknown depends on how option is implemented**	**o**	**Neutral: No relationship with SA objective**

Table 7 Assessment of the Affordable Housing Delivery Local Plan Options against the SA Objectives

	Options																					
SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	+	+	-	+	-	?	+	?	-	?	?	-	?	+	?	?	+	?	-	-	+	+
Improve the health and well being of the population	+	+	-	+	-	?	+	?	-	?	?	-	?	+	?	?	+	?	?	-	+	+
Promote social inclusion and create/ sustain vibrant communities	+	?	-	+	-	?	+	?	-	?	?	-	?	?	?	?	+	?	?	-	+	+
To ensure a safe environment including reducing	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o

16 Background Paper 10: SA of Core Strategy

	Options																					
crime and the fear of crime																						
To provide accessible and high quality public services and facilities	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
To reduce the risk of flooding and the consequential damage to property and public well being	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Reduce air pollution and ensure local air quality continues to improve	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Reduce emissions of greenhouse gases	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Conserve and enhance the biodiversity of the District	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
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	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Reduce the need to travel by car and promote alternative methods of transport	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Minimise waste, maximise the re-use	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o

	Options																					
of materials, recycling and composting																						
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Promote energy efficiency measures and encourage the use of renewable energy	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Promote sustainable tourism	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Ensure high and stable levels of employment and provide support for small firms and local businesses	?	?	-	?	-	?	?	?	-	?	?	-	?	?	?	?	+	?	?	-	?	?
Develop and maintain a skilled workforce to support long term competitiveness	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Stimulate regeneration of town centres	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
Develop a dynamic, diverse, and knowledge based economy	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o

5.23 The responses to the Issues and Options consultation; the Proposed Submission consultation; the Government changes to national policy/guidance and the comments arising from the LDF Sub Committee and Joint PCN/PCS were all analysed to explore ways forward in developing the Affordable Housing Delivery Local Plan. This analysis, at each stage of the Plan process, helped feed into each subsequent stage of the Plans production and resulted in draft Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan (February 2015).

Reasons for Selecting or Rejecting Alternatives

5.24 The table below indicates which Options the Council rejected and which it accepted and outlines the reasons for the decisions.

Table 8 Reasons for Selecting/Rejecting Options

Option	
Option 1	**Selected (taken forward for Proposed and Revised Proposed Submission Affordable Housing Delivery Local Plan)** - option ensures that viability of development sites is maintained across the District but still provides flexibility for varying proportions of affordable housing to be accommodated on specific sites. A high proportion of affordable housing will help meet the demand across the District and assist in achieving the corresponding social benefits.
Option 2	**Not Taken Forward -** option would help meet the demand across the District and assist in achieving the corresponding social benefits. However, it does not give due consideration to the issues of viability.
Option 3	**Not Taken Forward** - option will not help meet the need for affordable housing across the District nor assist in achieving the corresponding social benefits.
Option 4	**Selected (taken forward for Proposed and Revised Proposed Submission Affordable Housing Delivery Local Plan) -** option ensures that viability for development of strategic sites is maintained whilst providing flexibility
Option 5	**Not Taken Forward** - option will not help meet the need for affordable housing across the District in relation to the strategic sites nor assist in achieving the corresponding social benefits
Option 6	**Not Taken Forward** - option will not help meet the need for affordable housing across the District in relation to the strategic sites nor assist in achieving the corresponding social benefits
Option 7	**Selected (taken forward for Proposed Submission Affordable Housing Delivery Local Plan but not Revised Proposed Submission Affordable Housing Delivery Local Plan)** - Within Policy AFH1 of the

Option	
	Proposed Submission Affordable Housing Delivery Local Plan this option struck a balance between maximising the provision of affordable housing on site whilst minimising delay of delivery of housing through the need for legal agreements on smaller sites. However, new government policy and guidance removes this threshold and so option is not included in Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan.
Option 8	**Not Taken Forward (for Proposed Submission Affordable Housing Delivery Local Plan) -** a higher proportion of affordable housing would help meet demand across the District however commuted sums required for below 5 threshold will require finding appropriate sites which may impact on delivery **Partially Selected (for Revised Proposed Submission Affordable Housing Delivery Local Plan)** – In line with the Governments changes to the thresholds for affordable housing provision, this option is partially taken forward as the site threshold within the Policy has been increased to 11 or more net dwellings within the defined Affordable Housing Policy Area and 6 or more net dwellings in all other parts of the District
Option 9	**Not Taken Forward -** a lower proportion of affordable housing would not help meet demand across the District
Option 10	**Not taken forward (for Proposed Submission Affordable Housing Delivery Local Plan)** - a higher proportion of affordable housing would help meet demand across the District however site size can be changed to reduce affordable housing provision **Selected (for Revised Proposed Submission Affordable Housing Delivery Local Plan)** – In line with the Governments changes to the thresholds for affordable housing provision, the 5 dwelling threshold has been removed from Policy AFH1 and the Policy is now in line with Government policy and guidance.
Option 11	**Not Taken Forward -** a higher proportion of affordable housing would help meet demand across the District however site size can be changed to reduce affordable housing provision. In line with the changes to national policy and guidance on the thresholds for affordable housing, all reference to site size in terms of hectares has been removed from Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan.

Option	
Option 12	**Not Taken Forward** - a lower proportion of affordable housing would not help meet demand across the District. In line with the changes to national policy and guidance on the thresholds for affordable housing, all reference to site size in terms of hectares has been removed from Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan.
Option 13	**Selected** - option allows for an appropriate amount of affordable housing to be delivered at a reasonable density. Option will help address issues of circumventing affordable housing requirement through alteration of site area. In line with the changes to national policy and guidance on the thresholds for affordable housing, all reference to site size in terms of hectares has been removed from Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan.
Option 14	**Not Taken Forward** **Selected (for Revised Proposed Submission Affordable Housing Delivery Local Plan)** – option is in line with Government policy and guidance on thresholds for affordable housing, as announced in November 2014.
Option 15	**Not Taken Forward -** option may be more affordable for those in greatest need but could cause issues of viability on larger sites
Option 16	**Not Taken Forward** - option would be less affordable for those in greatest need, However the inclusion of affordable rented accommodation may improve viability and the ability of affordable housing to be provided.
Option 17	**Selected (for Proposed and Revised Proposed Submission Affordable Housing Delivery Local Plan)** - option provides consideration of both viability and maximising the type of affordable housing for those in greatest need.
Option 18	**Selected (for Proposed and Revised Proposed Submission Affordable Housing Delivery Local Plan) -** taken forward as threshold for 50 dwellings for large sites is in principle commensurate with a strategic site in terms of size and viability as opposed to a reference to a site identified in Core Strategy Policy WCS4

Option	
Option 19	**Selected (for Proposed and Revised Proposed Submission Affordable Housing Delivery Local Plan) -** taken forward as threshold for 50 dwellings for large sites is in principle commensurate with a strategic site in terms of size and viability as opposed to a reference to a site identified in Core Strategy Policy WCS4
Option 20	**Not Taken Forward -** the lower proportion of affordable housing due to lack of viability would not help meet demand across the District
Option 21	**Partially Selected** - some elements are not in conformity with the Governments changes to the policy and guidance on affordable housing thresholds. The Option would have maximised the provision of affordable housing across the District and was supported by a robust evidence base including viability studies.
Option 22	**Partially Selected** - The Option maintains the approach towards affordable housing that is in line with national policy and guidance however the element of tenure split and how affordable housing is accommodated on development sites has been revised and taken forward draft Policy AFH1.

Habitats Regulations Assessment

5.25 Under the provisions of the The Conservation of Habitats and Species Regulations 2010, known as the Habitat Regulations, a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for a plan or project which is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

5.26 There are two sites of international importance within Wealden District namely the Ashdown Forest which is designated a Special Protection Area and Special Area of Conservation and the Pevensey Levels which is a designated Ramsar site and Site of Community Importance (SCI)

5.27 The Policy being reviewed (Core Strategy Policy WCS8), and the potential new policy, relate to the proportion and tenure of affordable housing to be provided as part of an overall development scheme. Whilst the development schemes in themselves may have the potential to create a likely significant effect, the proportion and tenure of affordable housing will not have an impact upon any spatial distribution of growth. On this basis it is concluded that the Affordable Housing Delivery Local Plan will not have a likely significant effect on any SPA, SAC, SCI or Ramsar site. Therefore, no further assessment on this matter is required for this Plan.

Section 6 The Plan Policy

Introduction

6.1 This next chapter presents the summary findings of the SA of the Revised Proposed Submission Affordable Housing Delivery Local Plan . The Plan is a single policy document and this has been informed by all the preceding work including the review of affordable housing policies within the Core Strategy and Strategic Sites Local Plans; the objectives; the options/alternatives (including both former draft Policies AFH1) and testing of these through the SA process ; the findings of the SA Issues and Options consultation and consultation responses. The proposed affordable housing policy and supporting text is set out within the Revised Proposed Submission Affordable Housing Delivery Local Plan.

6.2 Table 9 below summarises the effects of Policy AFH1 on the SA Objectives. Green denotes potentially beneficial effects, yellow indicates a neutral effect, orange indicates uncertainty which may depend upon implementation detail and red indicates potentially adverse effects. The full SA of Policy AFH1 is included at Appendix E.

Table 9 Summary of the SA of Policy AFH1 Affordable Housing

	SA Objectives																				
Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20	SA21	SA22
AFH1																						

The Affordable Housing Local Plan Policy

6.3 The affordable housing policy within the Revised Proposed Submission Affordable Housing Delivery Local Plan is:

Policy AFH1 Affordable Housing

New housing developments, including affordable housing, will be expected to provide for a mix of dwelling size, type and tenure that meet the identified housing needs of the local area. New housing developments must make the most effective use of the land, taking into account the character of the local area.

Affordable housing is required at a level of 35% of the number of dwellings on development sites in areas defined on the Proposals Map as Affordable Housing Policy Area [(17)] of 11 dwellings (net) or more, and with a combined gross floorspace of more than 1,000 sqm. Affordable housing is required in all other areas of the District at a level of 35% of the number of dwellings on development sites of 6 dwellings (net) or more.

Where sites are allocated in a Local Plan, above nationally determined thresholds, that document may specify a different, and potentially higher, housing target having regard to the findings of the associated viability assessment and any site specific considerations.

Affordable housing provision should incorporate a mix of tenures. The presumption is for development sites of 49 dwellings (net) or less that around 80% of the total number of affordable homes provided will be for social rented accommodation with the remainder being for intermediate accommodation. For development sites of 50 dwellings (net) or more around 40% of the total number of affordable homes provided will be for social rented accommodation, 40% will be affordable rent and 20% intermediate accommodation.

Where it can be proven that affordable housing requirement cannot be achieved, due to economic viability, there will be flexibility in meeting stated targets. In such exceptional circumstances, the tenure of affordable housing should be examined prior to the proportion of affordable housing. It will be the responsibility of the applicant to demonstrate that the requirements of the policy cannot be met. The closest alternative target that can be achieved will be sought taking into account viability and need.

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 site.

Affordable housing should be delivered on site. However, for developments between 6 and 10-units in designated rural areas (all areas within the District excluding the areas defined on the Proposals Map as Affordable Housing Policy Area) planning obligations will be sought in the form of cash payments which are commuted until after completion of units.

Sustainability Appraisal of the Plan Policy

6.4 The full appraisal of the Plan Policy against the 22 SA Objectives can be found in Appendix E. The appraisal consists of a matrix testing the compatibility of the Plan Policy with each SA Objective. The key for this Table is contained in Table 4 in Section 3 of this report. Below is a summary of the SA Objectives likely to be impacted upon by the Affordable Housing Delivery Local Plan Policy AFH1. In compliance with the Directive and SA Guidance the SA presents the effects of the Plan as a whole on each of the SA Objectives, thereby enabling an understanding of the predicted environmental, social and economic impacts of the Plan.

- **SA Objective 1 - Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home**

6.5 Policy AFH1 is likely to have a beneficial effect on this SA Objective. The housing evidence base for the Local Plan as a whole concludes that there are over-riding affordability issues within the District, with high house prices and rental levels relative to income needing addressing through the provision of affordable housing. The current mix of housing within the District is biased towards detached homes which further exacerbates the affordability problem. Policy AFH1 will enable these issues to be addressed, striking a balance between affordable housing delivery, viability of sites and consideration of the wider social, economic and environmental issues.

6.6 Setting the threshold at 35%, with the ability to set different targets for allocated sites, will ensure a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District and provides flexibility for negotiation of higher or lower thresholds on certain sites.

6.7 The tenure split provided within Policy AFH1 ensures that the proportions of affordable housing are viable and therefore deliverable on strategic sites as well as non-strategic sites. The split provides flexibility. The tenure split as set out in Policy AFH1 also seeks to ensure the housing is more affordable for those in greatest need and provides an appropriate mix and range of affordable housing.

6.8 The Policy has a further beneficial impact on this SA Objective in that on sites where it can be proven that affordable housing cannot be achieved due to economic viability issues, the emphasis is placed strongly in favour of ensuring the tenure mix is given priority over the proportion of affordable housing provided. This will ensure that the affordable housing which can be delivered is the most appropriate for the need within the District.

6.9 The previous draft Policy AFH1 (Option 21 in this SA Report) would have delivered more affordable housing within the District due to its capturing small as well as larger sites; it applying to the whole of the District and being a uniform policy approach and the potential it possessed to remove cases of reducing site size (in hectares) to avoid having to provide affordable dwellings. However, national policy and guidance on affordable

17 The Affordable Housing Policy Area is derived from Section 157(1) of the Housing Act 1985 and The Housing (Right to Acquire or Enfranchise) (Designated Areas in the South East) Order 1997 and The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 in accordance with Planning Policy Guidance Paragraph 012

housing has been changed through the Government's announcement in November 2014 and site size thresholds such as those proposed in Option 21 are no longer able to be accommodated in Local Plan Policy.

- **SA Objective 2 - Improve the health and well being of the population**

6.10 Policy AFH1 will help ensure a high proportion of affordable housing is provided across the District which will help meet the need of overcrowded households and households in unsuitable accommodation. However, commuted sums for development of 6-10 dwellings in designated rural areas will require finding appropriate sites which may impact on delivery. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need. The split also provides flexibility within the Policy.

- **SA Objective 3 - Promote social inclusion and create/sustain vibrant communities.**

6.11 Policy AFH1 will promote social inclusion through the provision of a high proportion of affordable homes, however this needs to be balanced with market housing to ensure there is a mix of housing which will create and sustain vibrant communities. The policy approach to tenure mix within Policy AFH1 will also promote social inclusion and community cohesion by providing a choice of affordable homes that will help achieve mixed and balanced communities. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need. The split also provides flexibility within the Policy. The priority given to ensuring the appropriate tenure mix is provided on sites where it is not economically viable to deliver affordable housing at the proportion required by policy, will also help to promote social inclusion and create sustainable communities. Furthermore, the policy ensures that the affordable housing is distributed within the site to ensure it is integrated and indistinguishable within the new development and surrounds and this will help promote social inclusion also.

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

6.12 The effect of Policy AFH1 may depend on its implementation in regards to this SA Objective. The provision of affordable housing through Policy AFH1 may help households who require accommodation close to small firms and local businesses but who cannot access market housing.

6.13 A consideration to bear in mind when understanding the significant social, economic and environmental effects of the Affordable Housing Delivery Local Plan is that the Plan is focused on one specific policy area, the delivery of affordable housing. Other policies will follow in the Wealden Local Plan next year. For the SA this means that there is some uncertainty around the effects of Policy AFH1, particularly in regards to some of the environmental SA Objectives.

Significant Social, Environmental and Economic Effects of the Preferred Policies

Compliance with the SEA Directive:

Information to be provided in the Environmental Report include:

"The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects" (Annex I (f) and footnote)

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

6.14 The SA Scoping Reports 2007; 2009 and 2012 highlighted the fact that there is a significant need for affordable housing within the District and that the house price to income ratio is significantly greater in Wealden than regional and national averages. The recommendation for the Local Plan as a result of this issue at the Scoping stage is to ensure housing is accessible to all through an increase in the supply of market and affordable housing, in sites for Gypsies and Travellers and in housing suitable for the elderly. The focus of Policy AFH1 is to provide a framework to ensure an adequate supply of affordable homes with an appropriate tenure mix to meet the needs of all sectors of the society and communities of Wealden. This will therefore provide beneficial effects for this SA Objective.

2. Improve the health and well being of the population

6.15 Overall the Affordable Housing Delivery Local Plan Policy is judged to have a significant beneficial effect for improving the health and well being of the population. In particular Policy AFH1 is judged to have significant beneficial effects for the health and well being of the population as it deals with the provision of affordable housing to meet local need.

3. Promote social inclusion and create/ sustain vibrant communities

6.16 There are pockets of deprivation within Wealden and whilst the Local Plan as a whole can address the issues of social exclusion and accessibility for disadvantaged groups through the ability to direct regeneration incentives, employment and housing growth to areas where it can best serve communities in need, the Affordable Housing Delivery Local Plan and Policy AFH1 is particularly aimed at reducing inequalities in the provision of housing through enabling the delivery of affordable housing. In so doing this will ensure that new housing does not socially exclude due to its location and connectivity.

Ensuring that the tenure mix is given priority over the proportion of affordable housing on sites in exceptional circumstances goes even further to address this SA Objective and will have a beneficial impact.

4. To ensure a safe environment including reducing crime and the fear of crime

6.17 The Affordable Housing Delivery Local Plan does not directly deal with proposals to address this SA Objective, however the provision of adequate housing, including affordable housing, can help to underpin safe communities. Therefore the effects on this SA Objective are not as significant as they may be on policies contained in later Local Plans, such as the Wealden Local Plan.

5. To provide accessible and high quality public services and facilities

6.18 The Scoping Stage of the SA process highlighted a need for improving access to sports facilities and schools and for improvements to public transport systems, however it is not the purpose of Policy AFH1, or the Affordable Housing Delivery Local Plan, to detail the provision of new services or facilities. This will be addressed through policies in subsequent Local Plans.

6. To reduce the risk of flooding and the consequential damage to property and public well being

6.19 The Core Strategy is committed to ensuring the safety of residents and reducing the economic impact of flooding by avoiding the allocation of land for employment or housing in areas subject to medium or high flood risk, taking into account the predicted impact of climate change. Therefore it is considered that there will be no detrimental affect on this SA Objective from the Affordable Housing Delivery Local Plan, as the Plan flows from the Core Strategy Policy WCS8 and will supersede it.

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

6.20 Wealden has a limited supply of Brownfield land, which is not unusual for a rural district, the majority of which falls within protected landscapes. Therefore, there is some uncertainty with regards to the effect of the Affordable Housing Delivery Local Plan on this SA Objective as the Plan does not allocate sites for development or indicate how they will be delivered. Policy AFH1 does however specify thresholds for the provision of affordable housing which will ensure the most efficient use of land, although subsequent Local Plans will address specific site boundaries.

8. Reduce air pollution and ensure local air quality continues to improve

6.21 Air quality in Wealden is generally considered to be good, but there is a high reliance on the private car and congestion occurs in the main towns due to road capacity issues exacerbated by limited bus and rail services. The Affordable Housing Delivery Local Plan focuses on the delivery of affordable housing and the issues associated with this SA Objective are addressed through the Core Strategy and its associated SA, from

which the Affordable Housing Delivery Local Plan and Policy AFH1 flows. Considered in combination with the relevant policies from the Core Strategy, Policy AFH1 is likely to have a neutral effect on this SA Objective.

9. Reduce emissions of greenhouse gases

6.22 Wealden has higher carbon dioxide emissions per capita from domestic sources than county or national averages and, as expected for a rural community, higher emissions per capita from transport. The Affordable Housing Delivery Local Plan focuses on the delivery of affordable housing and the issues associated with this SA Objective are addressed through the Core Strategy and its associated SA, from which the Affordable Housing Delivery Local Plan and Policy AFH1 flows. Considered in combination with the relevant policies from the Core Strategy, Policy AFH1 is likely to have a neutral effect on this SA Objective.

10. Conserve and enhance the biodiversity of the District

6.23 There is a high proportion of designated land in the District and whilst there is a significant amount of legislation and policy in place to protect designated sites of International and National importance, there is still a requirement for local authorities to understand the full range of biodiversity within their areas and integrate into Local Plan documents considerations for conserving and enhancing this important resource. Again, the Affordable Housing Delivery Local Plan focuses on the delivery of affordable housing and the issues associated with this SA Objective are addressed through the Core Strategy and its associated SA, from which the Affordable Housing Delivery Local Plan and Policy AFH1 flows. Considered in combination with the relevant policies from the Core Strategy, Policy AFH1 is likely to have a neutral effect on this SA Objective.

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

6.24 The protection and enhancement of historic buildings, Conservation Areas, landscapes and archaeological sites was identified at the Scoping stage as a sustainability issue for Wealden. gain, the Affordable Housing Delivery Local Plan focuses on the delivery of affordable housing and the issues associated with this SA Objective are addressed through the Core Strategy and its associated SA, from which the Affordable Housing Delivery Local Plan and Policy AFH1 flows. Considered in combination with the relevant policies from the Core Strategy, Policy AFH1 is likely to have a neutral effect on this SA Objective.

12. Reduce the need to travel by car and promote alternative methods of transport

6.25 As the Affordable Housing Delivery Local Plan focuses solely on the issues of affordable housing provision it is unlikely to impact on this SA Objective. The Core Strategy and its associated SA deal with the impact of the overall growth strategy for the District

on this SA objective and subsequent Local Plan which seek to allocate land will also assess the impacts. Considered in combination with the relevant policies from the Core Strategy, Policy AFH1 is likely to have a neutral effect on this SA Objective.

13. Minimise waste, maximise the re-use of materials, recycling and composting

6.26 The need to encourage recycling and waste reduction has been highlighted as a sustainability issue for the Local Plan as a whole to address through the SA Scoping Reports. The Affordable Housing Delivery Local Plan does not specifically deal with this SA Objective. The County Council waste strategy and plans will set the overall framework for minimising waste and maximising the re-use of materials, recycling and composting in the district. Subsequent Local Plans dealing with site allocations will provide an opportunity to consider waste facilities within new development.

14. Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency

6.27 The SA Scoping Reports highlight the conservation of water quality as a sustainability issue and the Core Strategy contains policies to to address this SA Objective. The Affordable Housing Delivery Local Plan does not specifically deal with this SA Objective. Subsequent Local Plans will provide opportunities to address these issues further.

15. Promote energy efficiency measures and encourage the use of renewable energy

6.28 The Affordable Housing Delivery Local Plan does not address this SA Objective in any detail. Policy AFH1 is not considered to have a significant effect on promoting energy efficiency and encouraging the use of renewable energy. However, Policy AFH1 may have an indirect beneficial affect due to the requirements for new affordable homes receiving grant to build to Code for Sustainable Homes Level 3, which relates to a certain level of energy savings.

16. Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.

6.29 This SA Objective may be better addressed through subsequent Local Plans which seek to allocate sites for development, where the detail of specific proposals may be set out.

17. Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy

6.30 This SA Objective may be better addressed through subsequent Local Plans which seek to allocate sites for development, where the detail of specific proposals may be set out. However, the Affordable Housing Delivery Local Plan and Policy AFH1 may have an indirect beneficial impact on this SA Objective, when considered in combination with other

relevant policies within the Core Strategy, by ensuring affordable homes are delivered throughout the District, which may include villages which in turn may increase or enhance their vitality.

18. Promote sustainable tourism

6.31 The focus of the Affordable Housing Delivery local Plan and Policy AFH1 is such that it has no impact on this SA Objective.

19. Ensure high and stable levels of employment and provide support for small firms and local businesses

6.32 The focus of the Affordable Housing Delivery local Plan and Policy AFH1 is such that it has no direct impact on this SA Objective. However, the provision of affordable housing through Policy AFH1 may help households who require accommodation close to small firms and local businesses but who cannot access market housing and so provide an indirect benefit in regards to this SA Objective.

20. Develop and maintain a skilled workforce to support long term competitiveness

6.33 The focus of the Affordable Housing Delivery local Plan and Policy AFH1 is such that it has no impact on this SA Objective.

21. Stimulate regeneration of town centres

6.34 The focus of the Affordable Housing Delivery local Plan and Policy AFH1 is such that it has no impact on this SA Objective.

22. Develop a dynamic, diverse, and knowledge-based economy

6.35 The focus of the Affordable Housing Delivery local Plan and Policy AFH1 is such that it has no impact on this SA Objective.

Cumulative and Synergistic Effects

6.36 Overall, Policy AFH1 and the Affordable Housing Delivery Local Plan provides beneficial cumulative and synergistic effects for the social and economic SA Objectives and this is broadly in line with the Sustainable Community Strategy Priorities. 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. The SA has identified uncertainty around the cumulative impacts for biodiversity and landscape and more detail will be known in subsequent Local Plans and the Wealden Local Plan, which will undergo SA at the appropriate stages. As already noted in this SA Report, the Affordable Housing Delivery Local Plan is focused on one specific policy area and will supersede Core Strategy Policy WCS8 Affordable Housing, once adopted.

6.37 Therefore, taken in combination with the other Core Strategy policies, the Affordable Housing Delivery Local Plan will have an overall beneficial impact on the SA Objectives. The effectiveness of Policy AFH1, along with policies in other Local Plans will be monitored to ensure their effectiveness.

How Social, Environmental and Economic Problems were Considered in Developing the Policies and Proposals

6.38 The Affordable Housing Delivery Local Plan has fully integrated the Sustainability Appraisal Process and sustainability principles in its development. The SA has been carried out 'in-house'. This central consideration of SA has led to a policy which seeks to deliver affordable housing as part of development to meet the needs of the District and integrates affordable housing in a positive manner for connectivity and social cohesion. The District's problems of social inequality and deprivation have been considered in the policy approach.

6.39 As the Affordable Housing Delivery Local Plan reviews and replaces Policy WCS8 of the Core Strategy, the other considerations within this sub-section are taken as being inherently incorporated into Policy AFH1 as they have been addressed in the SA of the Core Strategy. This includes the consideration of the impact of development on the landscape, biodiversity and flood risk (see Section 9 of the Core Strategy SA Report 2011).

Comparative analysis of draft policy against reasonable alternatives

6.40 The advantages and disadvantages of the policy options/alternatives that were considered at the Issues and Options stage can be found in Section 4 of the Affordable Housing Delivery Issues and Options document. Summary tables can be found in Appendix F of this Report. In addition, Section 5 of this Sustainability Appraisal Report and Appendix B, C and D of this Report provide details of the Options put forward, including the former two iterations of Policy AFH1 (Options 21 and 22) and an assessment of these against the SA Objectives.

6.41 The following sections provide a comparative analysis of Policy AFH1 in the Revised Proposed Submission Affordable Housing Delivery Local Plan against the options/alternatives considered as part of the development of the Affordable Housing Delivery Local Plan. The analysis is set out under each key element of Policy AFH1. As Policy AFH1 is a review of Policy WCS8 analysis between these will be included where appropriate.

6.42 For a comparative analysis of Policy AFH1 in the Proposed Submission Affordable Housing Delivery Local Plan against the options/alternatives considered as part of the development of the Affordable Housing Delivery Local Plan, please refer to Section 6 paragraphs 6.36-6.49 of that document.

Proportion of Affordable Housing

6.43 Policy AFH1 proposes that affordable housing be delivered at 35% of the total number of dwellings on a development within the District. This applies to the whole of the District but only on sites of 11 or more net dwellings and with a combined gross floorspace of more than 1,000 sqm in areas defined on the Proposals Map as Affordable Housing Policy Area and on sites of 6 or more net dwellings in all other areas of the District. Policy AFH1 does include the flexibility to increase this on sites allocated through subsequent Local Plans , if viable and subject to site specific considerations.

6.44 The alternatives were to increase or decrease the proportion and this was the same for both the Proposed Submission Affordable Housing Delivery Local Plan and the Revised Proposed Submission Affordable Housing Delivery Local Plan. Decreasing the proportion would have resulted in less affordable housing being delivered within the District which would not meet SA Objective 1 and subsequently SA Objectives 2 and 3 and therefore not a reasonable approach to adopt in terms of delivering affordable housing to meet the needs of the District. Similarly, increasing the proportion, whilst likely to provide more affordable housing in theory, may have resulted in site viability issues and hence had the potential to stifle or delay development and result in less affordable housing being delivered as a consequence.

6.45 In addition to the above, the 35% proportion is in line with Policy WCS8 of the Core Strategy, which was found sound under examination and supported by a robust evidence base. The flexibility for the proportional provision on allocated sites has been shown through the Strategic Sites Local Plan and its evidence base to be be appropriate and achievable, as certain sites are capable of providing higher affordable housing whilst remaining viable.

6.46 Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan also places priority on ensuring that, on sites where it can be shown to be not economically viable to provide affordable housing at the required proportion, a suitable tenure mix is achieved prior to looking at issues of proportion. This goes further than the previous iterations of Policy AFH1 and places greater emphasis on ensuring the appropriate tenure mix is provided within the District to meet the need for affordable housing and gives more flexibility to the Council in terms of policy.

Site size thresholds

6.47 Policy WCS8 of the Core Strategy required affordable housing on sites of 5 or more (net) dwellings or 0.2ha. The alternatives put forward in terms of site size thresholds were to either increase, decrease or remove them altogether. These were the alternatives considered for Policy AFH1 in the Proposed Submission Affordable Housing Delivery Local Plan and to a degree remained the same for the Revised Proposed Submission Affordable Housing Delivery Local Plan.

6.48 In regards to the original alternatives considered in developing Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan, increasing the threshold could have potentially decreased the amount of affordable housing provided within the

District which would have moved away from meeting SA Objectives 1-3. This is due to the fact it would have provided the opportunity for developers to submit sites for development that were just under the threshold and hence avoided the need to provide affordable housing. Having the site size threshold set at the lowest level that is appropriate and viable reduced the opportunity for this kind of approach to development by developers.

6.49 On the other hand, decreasing the thresholds presented other issues, principally the need to increase the amount of legal agreements through S106, which could have caused delays to developments and increased costs to the Council. Furthermore, it could have led to the need to collect commuted sums requiring sites to be found and financed which carried risks in terms of loss of funds due to lack of use.

6.50 Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan would have maximised the provision of affordable housing as it sought to apply a uniform and fair policy approach in terms of requiring affordable housing as part of developments and covered large and small sites throughout the District. Furthermore it was supported by a robust evidence base including viability evidence which showed that the provision of affordable housing on sites of 5 dwellings or more or sites of 0.16ha was a justified threshold to apply to the whole of the District.

6.51 National policy in regards 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 of the Revised Proposed Submission Affordable Housing Delivery Local Plan now satisfies this requirement.

6.52 Policy AFH1 now proposes that affordable housing be provided on sites of 11 dwellings (net) or more, and with a combined gross floorspace of more than 1,000 sqm in areas defined on the Proposals Map as Affordable Housing Policy Areas. Affordable housing is required in all other areas of the District on development sites of 6 dwellings (net) or more. This policy whilst in conformity with the approach of national government and providing a level of affordable housing, will have a detrimental impact on the delivery of affordable housing within Wealden, compared to previous Policy AFH1 in the Proposed Submission Affordable Housing Delivery Local Plan. The Policy will deliver affordable housing however it does not capture sites of less than 11 net dwellings, except in designated rural areas, nor does it capture sites of less than 6 dwellings on a District wide basis. The Policy also does not refer to the size of the site. In this respect it is unlikely to deliver as much affordable housing as the previous Policy AFH1 would have.

Tenure mix

6.53 Policy AFH1 proposes the following tenure mix:

- 49 net dwellings or less - 80% Social Rent and 20% Intermediate accommodation
- 50 net dwellings or mire - 40% Social Rent; 40% Affordable Rent and 20% Intermediate Accommodation

6.54 In terms of comparison against the alternatives, Revised Policy AFH1 does contain some of the elements of the alternatives put forward, including Policy AFH1 of the Proposed Submission Affordable Housing Delivery Local Plan in that it has set a size threshold in relation to dwelling numbers; dwelling numbers for the tenure split and has included an element of Affordable Rent on larger sites. The inclusion of Affordable Rent on larger sites provides for choice and takes account of the need to balance viability with the overall provision of affordable homes. The tenure split proposed within Policy AFH1 retains the basic requirements of Policy WCS8 which was found sound at examination.

6.55 From the Issues and Options stage, through the Proposed Submission Stage and now through to the Revised Proposed Submission Stage, the threshold for the quantity of development in relation to tenure changed from Strategic Sites to 50 dwellings. The use of 50 dwellings is commensurate with the Community Infrastructure Levy Viability Studies regarding large sites and covers the majority of Strategic Sites as defined in the Strategic Sites Local Plan, although not geographically specific. Options 18 to 20 in the Issues and Options have not been re-appraised by substituting the term Strategic Sites for 50 dwellings as the outcome of the assessment will be the same. Therefore for the purposes of the SA the appraisal of options for the threshold of 50 dwellings for a different tenure of affordable housing is the same as Options 18-20 in the Issues and Options Sustainability Appraisal.

6.56 Furthermore, by not increasing the proportion of intermediate accommodation, which was an alternative put forward for consideration, Policy AFH1 ensures the amount of social rent and affordable rent is appropriate and will meet the needs of those households most in need. Affordable rent does not meet the needs of very low income households however, by only requiring affordable rent on larger sites the needs of very low income households will be met whilst maintaining site viability. Prioritising tenure mix over proportion of affordable homes on certain sites will also help ensure the needs of the District in relation to affordable housing are met.

Section 7 Mitigation Measures

Introduction

7.1 This chapter, in accordance with the SEA Directive, SEA and SA guidance, looks at mitigation measures designed to prevent, reduce or offset any significant adverse environmental, social and economic effects of the Plan Policy. Mitigation measures can also include recommendations for enhancing the beneficial effects of options. Mitigation measures are wide-ranging and can include:

- Changes to the Local Plan as a whole by bringing forward new options or deleting options;
- Refining policy options by strengthening criteria contained within; and
- Technical measures.

Compliance with the SEA Directive:

The Environmental Report should provide information on:

"The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme…" (Annex I (g))

Proposed Mitigation Measures

7.2 Mitigation measures have been considered through the SA process, primarily within the SA Scoping Reports 2007, 2009 and 2012 together with the full SA Reports as well as within the Core Strategy and Strategic Sites Local Plan themselves. Therefore, mitigation measures in regards to housing delivery, both market and affordable, are addressed in these documents.

7.3 Avoidance of development in flood risk areas, in close proximity to the Ashdown Forest and a relative constraint on development affecting the Pevensey Levels are all mitigation measures contained within the Core Strategy and Strategic Sites Local Plan documents. In regards to the Strategic Sites Local Plan the requirement for mitigation measures of a more technical nature are identified in Chapters 5, 7 and 9 of the Strategic Sites Local Plan SA Report (March 2014) in relation to site specific mitigation requirements for the Habitat Regulations and for each SDA or strategic site.

7.4 Given that the Affordable Housing Delivery Local Plan focus on the single policy area of delivering affordable housing, and follows on from the Core Strategy and Strategic Sites Local Plan, it is considered that mitigation measures are not required in themselves and that the policy has been developed in order to help achieve sustainability objectives. However, mitigation measures proposed in the Core Strategy and Strategic Sites Local Plan are applicable and appropriate to the Affordable Housing Delivery Local Plan also.

The mitigation measures primarily relate to environmental aspects of the District, principally the Ashdown Forest and Pevensey Levels, but also to other local sites and the landscape and biodiversity of the District in general. Proposed mitigation measures include:

- The provision of Suitable Alternative Natural Green Spaces (SANGS) and the provision of a Strategic Access Management and Monitoring Strategy (SAMMS) for Ashdown Forest;
- The need to provide appropriate mitigation on sites within the catchment of the Pevensey Levels to ensure that the hydrology is not affected by development;
- Provision of mitigation areas designed to prevent encroachment onto the Pevensey Levels and protect the most environmentally sensitive areas; and
- Provision of sustainable drainage schemes (SuDS)

Uncertainties and Risks

7.5 Sustainability Appraisal is an inherently unscientific process that involves making predictions concerning environmental and sustainability conditions on the basis of often limited or inadequate data. Most of the impact predictions made in this report are, therefore, subject to some uncertainty and entail risks.

7.6 Such risks cannot be totally avoided or eliminated, but measures to reduce or contain them can be taken during the monitoring phase of the Sustainability Appraisal. Where impacts are uncertain and / or the risk of negative effects is significant, recommendations are made for monitoring the implementation of the DPD.

7.7 The key uncertainties identified are as follows:

- Incomplete / unavailable baseline data in SA Scoping;
- The true nature of cumulative and synergistic effects will only become apparent as the plan period progresses when the interaction of the policies is underway, and the construction of developments and infrastructure have taken place; and
- the detailed site-appraisal of successive plans is required to increase the information within the SA and produce more certainty with respect particularly to biodiversity, landscape and land efficiency.

Section 8 Implementation

8.1 This chapter examines the links with other plans and programmes and the monitoring proposal.

Compliance with the SEA Directive:

"Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action".

8.2 Monitoring allows the identification of the actual significant environmental effects of implementing the plan, which can be compared to those predicted. Unforeseen effects can be identified and future predictions made more accurately. Monitoring needs to consider both adverse and beneficial effects and must be clearly linked to the SA process.

Introduction

Links to Other Tiers of Plans and Programmes and the Project Level

8.3 This SA Report maintains that the mitigation measures put forward in the Core Strategy and Strategic Sites Local Plan are relevant and appropriate to the Affordable Housing Delivery Local Plan, as the SA Report on the Proposed Submission Affordable Housing Delivery Local Plan also concluded.

Monitoring

8.4 A key element of the Local Plan is the delivery of the Policy and Objective. Monitoring helps to verify whether policies are achieving their objectives, particularly concerning sustainable development, or whether they may have unintended consequences. Monitoring should assess whether:

- Predictions of sustainability effects are accurate;
- The plan is contributing to the achievement of the desired SA objectives and targets;
- If mitigation measures are performing as well as expected;
- If there are any adverse effects, including unforeseen adverse effects; and
- Whether any effects are within acceptable limits or remedial action is desirable.

8.5 Both the requirements for SEA and the guidance regarding SA place emphasis on closely monitoring those parts of the plan where the appraisal has found either or both significantly negative and positive effects, to assess both whether the plan is performing sustainably and that any agreed mitigation is functioning in a way it was expected to.

8.6 This SA has not identified any significant negative or adverse effects of Policy AFH1 or the Affordable Housing Delivery Local Plan. The significant positive effects include:

- Objective 1 - to ensure everyone has the opportunity to live in a good quality, affordable home;
- Objective 2 - to improve health and well being; and
- Objective 3 - to promote social inclusion.

8.7 Plan monitoring and monitoring of the Sustainability Appraisal should be closely linked due to the fact that the SA Objectives and the appraisal framework were used to help refine Policy AFH1 in the Affordable Housing Delivery Local Plan. Therefore, where possible the same indicators will be used in both documents. Also, by using the same indicators it will be possible to highlight where potential gaps exist within the monitoring frameworks for both documents.

8.8 A robust monitoring and implementation framework is required to ensure that envisaged outcomes are achieved. The Council has produced a Monitoring and Implementation Framework for the adopted Core Strategy. The review of the Core Strategy Policy WCS8 requires an update of the Monitoring and Implementation Framework with regards to affordable housing provision. This is also linked to the Sustainability Appraisal Objective 1, [18] which also requires a monitoring framework. The monitoring of the Affordable Housing Delivery Local Plan and Policy AFH1 will be incorporated into the Annual Monitoring Report, and will identify if the policy is working, and if not why not.

8.9 The Monitoring Framework for the Affordable Housing Delivery Local Plan is shown in Table 10.

Table 10 Monitoring Framework

Name	Description	Target
Strategic Affordable Housing target	Affordable housing completions as a percentage of all completions	35%
Affordable housing target	Number of developments in the rural designated area with a net gain of 6 or more dwellings, achieving 35% affordable housing; or Number of developments in the Affordable Housing Policy Area with a net gain of 11 dwellings or more, and a combined gross floorspace of more than 1000 sqm achieving 35% affordable housing.	75%
Tenure	Proportion of tenure as a percentage of all completions	No target

8.10 Action will be required if targets are not achieved. The action requirements for the affordable housing targets are identified in Table 11.

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

Table 11 Monitoring Actions

Issue	Action
Affordable housing completions as a percentage of all completions is less than 35%	Review data if target is consistently not met over two year consecutive period to find issues and seek to resolve. If not able to be resolved/ explained then review policy.
Number of developments in the rural designated area with a net gain of 6 or more dwellings, achieving 35% affordable housing	Review policy if target is not met consistently over two year consecutive period.
Number of developments in the Affordable Housing Policy Area with a net gain of 11 dwellings or more, and a combined gross floorspace of more than 1000 sqm achieving 35% affordable housing	Review policy if target is not met consistently over two year consecutive period.

Section 9 Appendices

Appendix A

Table 12 Assessment of the Revised Proposed Submission Affordable Housing Delivery Local Plan Objective against SA Objectives

SA No	SA Objective	Compatibility of Local Plan Objective	Commentary
1	Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	+	The objective of the Local Plan specifically seeks to deliver affordable housing, with a mix of tenure, to meet future need within the District.
2	Improve the health and well being of the population	+	The objective of the Local Plan is likely to have a positive impact of this SA Objective through providing decent affordable homes.
3	Promote social inclusion and create/sustain vibrant communities	+	The objective of the Local Plan is likely to have a positive impact on this SA Objective due to seeking to provide for affordable housing and creating sustainable communities with associated infrastructure.
4	To ensure a safe environment including reducing crime and the fear of crime	o	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
5	To provide accessible and high quality public services and facilities	o	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
6	To reduce the risk of flooding and the consequential damage to property and public well being	o	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
7	Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of	o	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.

SA No	SA Objective	Compatibility of Local Plan Objective	Commentary
	existing buildings and promoting higher development densities		
8	Reduce air pollution and ensure local air quality continues to improve	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
9	Reduce emissions of greenhouse gases and resulting detriment to the environment and public well being	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
10	Conserve and enhance the biodiversity of the District	**?**	There is the potential for the Affordable Housing Delivery Local Plan Objective to conflict with this SA Objective, due to its very nature - delivering housing development. However, within the Core Strategy Local Plan there are specific policies relating to the conservation and enhancement of the Districts biodiversity and environmental resources, which when read in conjunction with the Affordable Housing Delivery Local Plan will help meet this SA Objective. Therefore the impact is likely to depend on the implementation of policy and the relative weight given to different policies.
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	**?**	There is the potential for the Affordable Housing Delivery Local Plan Objective to conflict with this SA Objective, due to its very nature - delivering housing development. However, within the Core Strategy Local Plan there are specific policies relating to the conservation and enhancement of the Districts countryside, landscape, historic and

SA No	SA Objective	Compatibility of Local Plan Objective	Commentary
			built environment. Resources which when read in conjunction with the Affordable Housing Delivery Local Plan will help meet this SA Objective. Therefore the impact is likely to depend on the implementation of policy and the relative weight given to different policies.
12	Reduce the need to travel by car and promote alternative methods of transport	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.e.
13	Minimise waste, maximise the re-use of materials, recycling and composting	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
14	Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
15	Promote energy efficiency measures and encourage the use of renewable energy	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
16	Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
17	Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**?**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.

SA No	SA Objective	Compatibility of Local Plan Objective	Commentary
18	Promote sustainable tourism	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
19	Ensure high and stable levels of employment and provide support for small firms and local businesses	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
20	Develop and maintain a skilled workforce to support long term competitiveness	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
21	Stimulate regeneration of town centres	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.
22	Develop a dynamic, diverse, and knowledge based economy	**o**	The Affordable Housing Delivery Local Plan Objective is unlikely to have an impact on this SA Objective.

Appendix B

Table 13 Key of Criteria

+	Option moving towards the achievement of SA objective	**–**	Option moving away from achievement of SA objective
?	Unknown depends on how option is implemented	**o**	Neutral: No relationship with SA objective

Table 14

		Option 1: **To retain the overall proportion of affordable housing for non allocated sites to 35%**		**Option 2:** **To generally increase the overall proportion of affordable housing for non allocated sites to above 35%**		**Option 3:** **To generally decrease the overall proportion of affordable housing for non allocated sites to below 35%**
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	**+**	A high proportion of affordable housing will help meet the demand for affordable homes across the District	**+**	A higher proportion of affordable housing will help meet the demand for affordable homes across the District	**–**	A lower proportion of affordable housing will move away from helping meet the demand for affordable homes across the District
Improve the health and well being of the population	**+**	A high proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.	**+**	A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.	**–**	A lower proportion of affordable housing will move away from helping to meet the need of overcrowded households and households in unsuitable accommodation.
Promote social inclusion and	**+**	A high proportion of affordable	**?**	A higher proportion of	**–**	A lower proportion of

create/ sustain vibrant communities		housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities		affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities		affordable housing will move away from promoting social inclusion, and creating a mix of housing to sustain vibrant communities
To ensure a safe environment including reducing crime and the fear of crime	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

promoting higher development densities						
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve and enhance the biodiversity of the District	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
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	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the need to travel by car and promote alternative methods of transport	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

Minimise waste, maximise the re-use of materials, recycling and composting	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and encourage the use of renewable energy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

Promote sustainable tourism	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	Providing affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**?**	Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**–**	Providing less affordable housing will move away from helping households accessing jobs within the District and therefore meeting the objective
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse, and knowledge based economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

		Option 4: **To retain the overall proportions of affordable housing for strategic sites, which is generally 35% with the exception of Strategic Sites**		**Option 5:** **To generally decrease the overall proportion of affordable housing for strategic sites to below 35%**		**Option 6:** **To generally increase the overall proportion of affordable housing for strategic sites to above 35%**

		in Stone Cross and Pine Grove which are 40%				
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	**+**	With the tenure spilt provided in the Policy the proportions of affordable housing is viable and therefore deliverable for strategic sites.	**–**	A lower proportion of affordable housing will move away from helping meet the demand for affordable homes across the District	**?**	With the tenure spilt provided in the Policy the proportions of affordable housing is viable for certain sites but not all.
Improve the health and well being of the population	**+**	A high proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities	**–**	A lower proportion of affordable housing will move away from helping to meet the need of overcrowded households and households in unsuitable accommodation.	**?**	A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation, however if not viable will be undeliverable.
Promote social inclusion and create/ sustain vibrant communities	**+**	A high proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities	**–**	A lower proportion of affordable housing will move away from promoting social inclusion, and creating a mix of housing to sustain vibrant communities	**?**	A higher proportion of affordable housing will promote social inclusion, however if not viable will be undeliverable.

To ensure a safe environment including reducing crime and the fear of crime	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve and enhance the biodiversity of the District	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve, enhance and make	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

accessible for enjoyment, the District's countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment						
Reduce the need to travel by car and promote alternative methods of transport	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Minimise waste, maximise the re-use of materials, recycling and composting	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and encourage the use of renewable energy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the global, social and environmental impact of consumption of	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

resources by using sustainably produced and local products						
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote sustainable tourism	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	Providing affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**–**	Providing less affordable housing will move away from helping households accessing jobs within the District and therefore meeting the objective	**?**	Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse, and knowledge based economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

		Option 7:		**Option 8:**		**Option 9:**

		To retain the threshold of 5 houses, when affordable housing is required		To reduce the threshold of 5 houses, when affordable housing is required		To increase the threshold of 5 houses, when affordable housing is required
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	+	A threshold of 5 dwellings maximises the provision of affordable housing on site, whilst minimising delay of delivery of housing through the need for legal agreements on smaller sites. Commuted sums below the five threshold will require finding appropriate sites which may have an impact on delivery.	?	A higher proportion of affordable housing will help meet the demand for affordable homes across the District, however commuted sums required for below five threshold will require finding appropriate sites which may have an impact on delivery.	–	A lower proportion of affordable housing will move away from helping meet the demand for affordable homes across the District
Improve the health and well being of the population	+	A high proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.	?	A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation. However commuted sums required for below five threshold will require finding	–	A lower proportion of affordable housing will move away from helping to meet the need of overcrowded households and households in unsuitable accommodation.

				appropriate sites which may have an impact on delivery.		
Promote social inclusion and create/ sustain vibrant communities	**+**	A high proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities.	**+**	A higher proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities.	**–**	A lower proportion of affordable housing will move away from promoting social inclusion, and creating a mix of housing to sustain vibrant communities
To ensure a safe environment including reducing crime and the fear of crime	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Make the most efficient use of land by prioritising Brownfield sites for development,	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

the re-use of existing buildings and promoting higher development densities						
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve and enhance the biodiversity of the District	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
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	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the need to travel by car and promote alternative methods of transport	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Minimise waste, maximise the re-use of materials,	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

recycling and composting						
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and encourage the use of renewable energy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote sustainable tourism	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Ensure high and stable levels of employment and provide support for small firms and local	**?**	Providing affordable housing within the District will help households requiring	**?**	Providing more affordable housing within the District will help households requiring	**–**	Providing less affordable housing will move away from helping households

businesses		accommodation close to small firms and local businesses		accommodation close to small firms and local businesses		accessing jobs within the District and therefore meeting the objective
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse, and knowledge based economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

		Option 10: **To remove the threshold of 5 dwellings, and rely upon the size of site as a threshold**		**Option 11:** **To retain the threshold of 0.2 hectares, when affordable housing is required**		**Option 12:** **To increase the threshold of 0.2 hectares, when affordable housing is required**
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	**?**	A high proportion of affordable housing will help meet the demand for affordable homes across the District. However, size of site can be changed to reduce affordable housing provision.	**?**	A higher proportion of affordable housing will help meet the demand for affordable homes across the District. However, size of site can be changed to reduce affordable housing provision.	**–**	A lower proportion of affordable housing will move away from helping meet the demand for affordable homes across the District

Improve the health and well being of the population	**?**	A high proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation. However, size of site can be changed to reduce affordable housing provision.	**?**	A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation. However, size of site can be changed to reduce affordable housing provision.	**–**	A lower proportion of affordable housing will move away from helping to meet the need of overcrowded households and households in unsuitable accommodation.
Promote social inclusion and create/ sustain vibrant communities	**?**	A high proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities. However, size of site can be changed to reduce affordable housing provision.	**?**	A higher proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities.	**–**	A lower proportion of affordable housing will move away from promoting social inclusion, and creating a mix of housing to sustain vibrant communities
To ensure a safe environment including reducing crime and the fear of crime	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve and enhance the biodiversity of the District	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve, enhance and make accessible for enjoyment, the District's countryside (in particular	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

protecting the best and most versatile agricultural land), landscape, historic and built environment						
Reduce the need to travel by car and promote alternative methods of transport	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Minimise waste, maximise the re-use of materials, recycling and composting	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and encourage the use of renewable energy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote sustainable tourism	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	Providing affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**?**	Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**–**	Providing less affordable housing will move away from helping households accessing jobs within the District and therefore meeting the objective
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse, and knowledge based economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

		Option 13: **To reduce the threshold of 0.2 hectares, when affordable housing is required**		**Option 14:** **To remove the threshold of 0.2 hectares, when affordable housing is required**

Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	**?**	A higher proportion of affordable housing will help meet the demand for affordable homes across the District, however commuted sums required for below five threshold will require finding appropriate sites which may have an impact on delivery.	**+**	Need to rely upon a dwelling number threshold that would be more reliable in terms of implementation.
Improve the health and well being of the population	**?**	A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation. However commuted sums required for below five threshold will require finding appropriate sites which may have an impact on delivery.	**+**	Need to rely upon a dwelling number threshold that would be more reliable in terms of implementation. A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.
Promote social inclusion and create/ sustain vibrant communities	**?**	A higher proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities.	**?**	Need to rely upon a dwelling number threshold that would be more reliable in terms of implementation. A higher proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities
To ensure a safe	**o**	Not Applicable	**o**	Not Applicable

environment including reducing crime and the fear of crime				
To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable
Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities	**o**	Not Applicable	**o**	Not Applicable
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable
Conserve and enhance the biodiversity of the District	**o**	Not Applicable	**o**	Not Applicable
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	**o**	Not Applicable	**o**	Not Applicable
Reduce the need to travel by car and promote alternative methods of transport	**o**	Not Applicable	**o**	Not Applicable
Minimise waste, maximise the re-use of materials,	**o**	Not Applicable	**o**	Not Applicable

recycling and composting				
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and encourage the use of renewable energy	**o**	Not Applicable	**o**	Not Applicable
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	Not Applicable	**o**	Not Applicable
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable
Promote sustainable tourism	**o**	Not Applicable	**o**	Not Applicable
Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**?**	Need to rely upon a dwelling number threshold that would be more reliable in terms of implementation. Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable

Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse, and knowledge based economy	**o**	Not Applicable	**o**	Not Applicable

		Option 15: **To retain the tenure requirement of 80% Social Rent and 20% Intermediate accommodation**		**Option 16:** **To generally change the tenure requirement of 80% Social Rent and 20% Intermediate accommodation to include a proportion of affordable rent**		**Option 17:** **To create a threshold in dwelling numbers to change the tenure requirement from 80% Social Rent and 20% Intermediate product to include a proportion of affordable rent**
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	**?**	This tenure split is more affordable for those in greatest need, however may cause issues of viability on larger sites.	**?**	This tenure split may be less affordable for those in greatest need. However the inclusion of affordable rented accommodation may improve viability and the ability of affordable housing to be provided. A higher proportion of affordable housing will help meet the demand for affordable homes across the	**+**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those in greatest need.

				District		
Improve the health and well being of the population	**?**	This tenure split is more affordable for those in greatest need, however may cause issues of viability on larger sites. If not viable this will have an impact overall on the amount of affordable housing accommodated on site which may have an impact upon meeting the need of overcrowded households and households in unsuitable accommodation.	**?**	This tenure split may be less affordable for those in greatest need. However the inclusion of affordable rented accommodation may improve viability and the ability of affordable housing to be provided. A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.	**+**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those in greatest need. A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.
Promote social inclusion and create/ sustain vibrant communities	**?**	This tenure split is more affordable for those in greatest need, however may cause issues of viability on larger sites. If not viable this will have an impact overall on the amount of affordable housing accommodated on site which may have an impact on the promotion of social inclusion.	**?**	This tenure split may be less affordable for those in greatest need. However the inclusion of affordable rented accommodation may improve viability and the ability of affordable housing to be provided. A higher proportion of affordable housing will promote social inclusion.	**+**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those in greatest need. A higher proportion of affordable housing will promote social inclusion.
To ensure a safe	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

environment including reducing crime and the fear of crime						
To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve and	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

enhance the biodiversity of the District						
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	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the need to travel by car and promote alternative methods of transport	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Minimise waste, maximise the re-use of materials, recycling and composting	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

encourage the use of renewable energy						
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote sustainable tourism	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	If not viable this will have an impact overall on the amount of affordable housing accommodated on site. Providing affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**?**	This tenure split may be less affordable for those in greatest need. However the inclusion of affordable rented accommodation may improve viability and the ability of affordable housing to be provided. Providing more affordable housing within the District will help households	**+**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those in greatest need.

				requiring accommodation close to small firms and local businesses		
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse, and knowledge based economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

		Option 18: **To accommodate the tenure requirement of 40% Social Rent, 40% Affordable Rent and 20% Intermediate product for strategic sites**		**Option 19:** **To accommodate a change in tenure requirement for strategic sites to increase viability than the 40% Social Rent, 40% Affordable Rent and 20% Intermediate would achieve**		**Option 20:** **To accommodate a change in tenure requirement for strategic sites to decrease viability than the 40% Social Rent, 40% Affordable Rent and 20% Intermediate would achieve**
Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and	**?**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those	**–**	A tenure split maximising viability for affordable housing would reduce or remove social rent, which	**–**	A tenure split which would decrease viability may have an impact on the amount of affordable

affordable home		in greatest need at 35% affordable housing. However there are opportunities to increase provision in Stone Cross and Pine Grove, Crowborough Strategic Sites		may impact upon the households in greatest need for affordable accommodation. However it may overall increase affordable housing provision.		housing. The lower proportion of affordable housing will move away from helping meet the demand for affordable homes across the District
Improve the health and well being of the population	**?**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those in greatest need at 35% affordable housing. However there are opportunities to increase provision in Stone Cross and Pine Grove, Crowborough Strategic Sites. A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.	**?**	A tenure split maximising viability for affordable housing would reduce or remove social rent, which may impact upon the households in greatest need for affordable accommodation. However it may overall increase affordable housing provision. A higher proportion of affordable housing may help meet the need of overcrowded households and households in unsuitable accommodation.	**–**	A tenure split which would decrease viability may have an impact on the amount of affordable housing. The lower proportion of affordable housing will move away from helping to meet the need of overcrowded households and households in unsuitable accommodation.
Promote social inclusion and create/ sustain vibrant communities	**?**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those	**?**	A tenure split maximising viability for affordable housing would reduce or remove social rent, which	**–**	A tenure split which would decrease viability may have an impact on the amount of affordable

		in greatest need at 35% affordable housing. However there are opportunities to increase provision in Stone Cross and Pine Grove, Crowborough Strategic Sites. A higher proportion of affordable housing will promote social inclusion.		may impact upon the households in greatest need for affordable accommodation. However it may overall increase affordable housing provision. A higher proportion of affordable housing will promote social inclusion, however this needs to be balanced with market accommodation to create a mix of housing to sustain vibrant communities		housing. The lower proportion of affordable housing will move away from promoting social inclusion, and creating a mix of housing to sustain vibrant communities
To ensure a safe environment including reducing crime and the fear of crime	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To provide accessible and high quality public services and facilities	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
To reduce the risk of flooding and the consequential damage to property and public well being	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Make the most	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities						
Reduce air pollution and ensure local air quality continues to improve	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce emissions of greenhouse gases	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Conserve and enhance the biodiversity of the District	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
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	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the need to travel by car and promote alternative	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

methods of transport						
Minimise waste, maximise the re-use of materials, recycling and composting	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote energy efficiency measures and encourage the use of renewable energy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Promote	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

sustainable tourism						
Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	This tenure split considers both viability and seeking to maximise the type of affordable housing for those in greatest need at 35% affordable housing. However there are opportunities to increase provision in Stone Cross and Pine Grove, Crowborough Strategic Sites. Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**?**	A tenure split maximising viability for affordable housing would reduce or remove social rent, which may impact upon the households in greatest need for affordable accommodation. However it may overall increase affordable housing provision. Providing more affordable housing within the District will help households requiring accommodation close to small firms and local businesses	**–**	A tenure split which would decrease viability may have an impact on the amount of affordable housing. Providing less affordable housing will move away from helping households accessing jobs within the District and therefore meeting the objective
Develop and maintain a skilled workforce to support long term competitiveness	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Stimulate regeneration of town centres	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable
Develop a dynamic, diverse,	**o**	Not Applicable	**o**	Not Applicable	**o**	Not Applicable

and knowledge based economy						

Appendix C

Table 15 Assessment of Proposed Submission Affordable Housing Delivery Local Plan Policy AFH1 against SA Objectives (Option 21)

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
1	Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	+	The housing evidence base for the Local Plan as a whole concludes that there are over-riding affordability issues within the District, with high house prices and rental levels making the District one of the least affordable areas in the country. There is also a very high housing need within the District which needs addressing through the provision of affordable housing. The current mix of housing within the District is biased towards detached homes which further exacerbates the affordability problem. Policy AFH1 will enable these issues to be fully addressed, striking a balance between affordable housing delivery, viability of sites and consideration of the wider social, economic and environmental issues. Setting the threshold at 35% will ensure a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District and provides flexibility for negotiation of higher or lower thresholds on certain sites.

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
			The tenure split provided within Policy AFH1 ensures that the proportions of affordable housing are viable and therefore deliverable on strategic sites as well as non-strategic sites. The split provides flexibility. The tenure split as set out in Policy AFH1 also seeks to ensure the housing is more affordable for those in greatest need and provides an appropriate mix and range of affordable housing. The threshold of 5 dwellings within Policy AFH1 maximises the provision of affordable housing on sites whilst minimising the delay of delivery through the need for legal agreements on smaller sites. However, commuted sums on sites of below the 5 dwelling threshold will require finding appropriate sites which may impact on delivery.
2	Improve the health and well being of the population	+	Policy AFH1 will help ensure a high proportion of affordable housing is provided across the District which will help meet the need of overcrowded households and households in unsuitable accommodation. However, commuted sums on sites of below the 5 dwelling threshold will require finding appropriate sites which may impact on delivery. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need.

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
			The split also provides flexibility within the Policy.
3	Promote social inclusion and create/ sustain vibrant communities	+	Policy AFH1 will promote social inclusion through the provision of a high proportion of affordable homes, however this needs to be balanced with market housing to ensure there is a mix of housing which will create and sustain vibrant communities. The tenure mix within Policy AFH1 will also promote social inclusion and community cohesion by providing a choice of affordable homes that will help achieve mixed and balanced communities. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need. The split also provides flexibility within the Policy.
4	To ensure a safe environment including reducing crime and the fear of crime	o	N/A
5	To provide accessible and high quality public services and facilities	o	N/A
6	To reduce the risk of flooding and the consequential damage to property and public well being	o	N/A

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
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	**o**	N/A
8	Reduce air pollution and ensure local air quality continues to improve	**o**	N/A
9	Reduce emissions of greenhouse gases and resulting detriment to the environment and public well being	**o**	N/A
10	Conserve and enhance the biodiversity of the District	**o**	N/A
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	**o**	N/A
12	Reduce the need to travel by car and promote alternative methods of transport	**o**	N/A
13	Minimise waste, maximise the re-use of materials, recycling and composting	**o**	N/A
14	Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	N/A

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
15	Promote energy efficiency measures and encourage the use of renewable energy	**o**	N/A
16	Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	N/A
17	Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	N/A
18	Promote sustainable tourism	**o**	N/A
19	Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	The provision of affordable housing through Policy AFH1 may help households who require accommodation close to small firms and local businesses but who cannot access market housing.
20	Develop and maintain a skilled workforce to support long term competitiveness	**o**	N/A
21	Stimulate regeneration of town centres	**o**	N/A
22	Develop a dynamic, diverse, and knowledge based economy	**o**	N/A

Appendix D

Table 16 Assessment of Local Plan Policy AFH1 (incorporating Government changes to affordable housing) against SA Objectives (Option 22)

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
1	Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	+	The housing evidence base for the Local Plan as a whole concludes that there are over-riding affordability issues within the District, with high house prices and rental levels making the District one of the least affordable areas in the country. There is also a very high housing need within the District which needs addressing through the provision of affordable housing. The current mix of housing within the District is biased towards detached homes which further exacerbates the affordability problem. Policy AFH1 will address these issues, albeit not to the same degree as Policy AFH1 of the Proposed Submission document. The Policy will strike a balance between affordable housing delivery, viability of sites and the consideration of the wider social, economic and environmental issues however it will not capture certain development sites within the District, namely those of less than 11 dwellings outside of designated rural areas Setting the threshold at 35% will ensure a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District and provides flexibility for negotiation of higher or lower thresholds on certain sites.

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
			The tenure split provided within Policy AFH1 ensures that the proportions of affordable housing are viable and therefore deliverable on strategic sites as well as non-strategic sites. The split provides flexibility. The tenure split as set out in Policy AFH1 also seeks to ensure the housing is more affordable for those in greatest need and provides an appropriate mix and range of affordable housing. Government changes in policy and guidance towards affordable housing, and the subsequent revised Policy AFH1, means that whilst affordable housing will be delivered it will not be maximised as it would have been in the previous Policy AFH1. This is primarily due to the fact Policy AFH1 will not capture smaller sites outside of the designated rural areas.
2	Improve the health and well being of the population	+	Policy AFH1 will help ensure a reasonable proportion of affordable housing is provided across the District, although it is unlikely that this will be as high as would have been provided with the Proposed Submission Policy AFH1 previously (Option 21). However, Policy AFH1 will still help meet the need of overcrowded households and households in unsuitable accommodation. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
			affordable for those in greatest need. The split also provides flexibility within the Policy.
3	Promote social inclusion and create/ sustain vibrant communities	+	Policy AFH1 will promote social inclusion through the provision of affordable homes but this will need to be balanced with market housing to ensure there is a mix of housing which will create and sustain vibrant communities. The tenure mix within Policy AFH1 will also promote social inclusion and community cohesion by providing a choice of affordable homes that will help achieve mixed and balanced communities. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need. The split also provides flexibility within the Policy.
4	To ensure a safe environment including reducing crime and the fear of crime	o	N/A
5	To provide accessible and high quality public services and facilities	o	N/A
6	To reduce the risk of flooding and the consequential damage to property and public well being	o	N/A

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
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	**o**	N/A
8	Reduce air pollution and ensure local air quality continues to improve	**o**	N/A
9	Reduce emissions of greenhouse gases and resulting detriment to the environment and public well being	**o**	N/A
10	Conserve and enhance the biodiversity of the District	**o**	N/A
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	**o**	N/A
12	Reduce the need to travel by car and promote alternative methods of transport	**o**	N/A
13	Minimise waste, maximise the re-use of materials, recycling and composting	**o**	N/A
14	Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	N/A

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
15	Promote energy efficiency measures and encourage the use of renewable energy	**o**	N/A
16	Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	N/A
17	Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	N/A
18	Promote sustainable tourism	**o**	N/A
19	Ensure high and stable levels of employment and provide support for small firms and local businesses	**?**	The provision of affordable housing through Policy AFH1 may help households who require accommodation close to small firms and local businesses but who cannot access market housing.
20	Develop and maintain a skilled workforce to support long term competitiveness	**o**	N/A
21	Stimulate regeneration of town centres	**o**	N/A
22	Develop a dynamic, diverse, and knowledge based economy	**o**	N/A

Appendix E

Table 17 Assessment of Local Plan Policy AFH1 of the Revised Proposed Submission Affordable Housing Delivery Local Plan against SA Objectives

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
1	Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home	+	The housing evidence base for the Local Plan as a whole concludes that there are over-riding affordability issues within the District, with high house prices and rental levels making the District one of the least affordable areas in the country. There is also a very high housing need which needs to be addressed within the District through the provision of affordable housing. The current mix of housing within the District is biased towards detached homes which further exacerbates the affordability problem. Policy AFH1 will address these issues, albeit not to the same degree as Policy AFH1 of the Proposed Submission document. The Policy will strike a balance between affordable housing delivery, viability of sites and the consideration of the wider social, economic and environmental issues however it will not capture certain development sites within the District, namely those of less than 11 dwellings outside of designated rural areas. Setting the threshold at 35% will ensure a high proportion of affordable housing is provided to help meet the demand for affordable homes across the District and provides flexibility for negotiation of higher or lower thresholds on certain sites.

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
			Policy AFH1 will also have a beneficial impact on this SA Objective due to the fact that on sites where it can be proven that there are economic viability issues in regards to providing affordable housing, the Policy gives priority to ensuring the tenure mix of any affordable housing is considered prior to the issue of proportion. This will ensure the most appropriate mix of affordable housing is provided to meet the need within the District.
2	Improve the health and well being of the population	+	Policy AFH1 will help ensure a reasonable proportion of affordable housing is provided across the District, although it is unlikely that this will be as high as would have been provided with the Proposed Submission Policy AFH1 previously (Option 21). However, Policy AFH1 will still help meet the need of overcrowded households and households in unsuitable accommodation. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need. The Policy also provides flexibility with regards to the tenure mix of affordable housing, particularly on sites where there are economic viability issues.

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
3	Promote social inclusion and create/ sustain vibrant communities	+	Policy AFH1 will promote social inclusion through the provision of affordable homes but this will need to be balanced with market housing to ensure there is a mix of housing which will create and sustain vibrant communities. The tenure mix within Policy AFH1 will also promote social inclusion and community cohesion by providing a choice of affordable homes that will help achieve mixed and balanced communities. The tenure split as set out in Policy AFH1 considers both viability and seeks to ensure the housing is more affordable for those in greatest need. The split also provides flexibility within the Policy. The Policy goes further in relation to this SA Objective and beneficial impacts in that it gives priority to ensuring the tenure mix of any affordable housing is considered prior to the issue of proportion, on sites where it can be shown there are economic viability issues with providing affordable housing. In addition, the Policy ensures that the affordable housing is distributed within the site to ensure it is integrated and indistinguishable within the new development and surrounds, which will further help achieve social inclusion and vibrant, sustainable communities within the District.

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
4	To ensure a safe environment including reducing crime and the fear of crime	**o**	N/A
5	To provide accessible and high quality public services and facilities	**o**	N/A
6	To reduce the risk of flooding and the consequential damage to property and public well being	**o**	N/A
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	**o**	N/A
8	Reduce air pollution and ensure local air quality continues to improve	**o**	N/A
9	Reduce emissions of greenhouse gases and resulting detriment to the environment and public well being	**o**	N/A
10	Conserve and enhance the biodiversity of the District	**o**	N/A
11	Conserve, enhance and make accessible for enjoyment, the District's countryside (in particular protecting the best and	**o**	N/A

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
	most versatile agricultural land), landscape, historic and built environment		
12	Reduce the need to travel by car and promote alternative methods of transport	**o**	N/A
13	Minimise waste, maximise the re-use of materials, recycling and composting	**o**	N/A
14	Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency	**o**	N/A
15	Promote energy efficiency measures and encourage the use of renewable energy	**o**	N/A
16	Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products	**o**	N/A
17	Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy	**o**	N/A
18	Promote sustainable tourism	**o**	N/A
19	Ensure high and stable levels of	**?**	The provision of affordable housing through Policy AFH1 may help

SA No	SA Objective	Compatibility of Policy AFH1	Commentary
	employment and provide support for small firms and local businesses		households who require accommodation close to small firms and local businesses but who cannot access market housing.
20	Develop and maintain a skilled workforce to support long term competitiveness	**o**	N/A
21	Stimulate regeneration of town centres	**o**	N/A
22	Develop a dynamic, diverse, and knowledge based economy	**o**	N/A

Appendix F

Threshold Options

Table 18 Advantages and disadvantages of Policy Options at Issues and Options

Option 1: **To review the threshold of 5 dwellings, for when affordable housing is required**	
Advantages	**Disadvantages**
• Provides an opportunity to reconsider the threshold, particularly as registered social landlords prefer affordable housing not to be isolated from each other	• Increasing the threshold of 5 units will potentially decrease the amount of affordable housing provided within the District, which moves away from the objective to increase affordable housing provision. • Decreasing the threshold of 5 units, increases the amount of legal requirements through the use of Section 106 planning obligations which could delay development and increases the costs to the Council • Decreasing the threshold of 5 units, results in the need to collect commuted sums requiring sites to be found and financed which has risk implications in terms of loss of funds due to lack of use • This policy has been examined and found sound, and therefore the principle is accepted in planning terms

Table 19

Option 2: **To review the threshold of 0.2 hectares, for when affordable housing is required**	
Advantages	**Disadvantages**
• Concerns have been raised that the use of site size can be overcome by changing slightly the size of the site, and thereby avoiding the need to provide affordable housing	• There will be situations where low density development may be acceptable, with large land values. The use of size thresholds ensure that much needed affordable housing is funded.

Proportion of Affordable Housing Options

Table 20

Option 3: **To generally review the requirement for 35% affordable housing for non allocated sites**	
Advantages	**Disadvantages**
• There are opportunities to review how well the policy is working in practice • Review provides opportunities to consider higher affordable housing provision, if evidence allows, to meet District wide need	• Lower affordable housing provision would not help meet the needs of the District • The Core Strategy policy has already been found sound under examination

Table 21

Option 4: **To review the proportional requirement for affordable housing for strategic sites**	
Advantages	**Disadvantages**
• Work already undertaken shows that there are opportunities for higher proportions of affordable housing in certain strategic development areas, of certain size, helping to meet District wide need	• Lower affordable housing provision has an adverse impact on the District wide affordable housing need

Table 22

Option 5: **To review the requirement of 80% social rent and 20% intermediate accommodation to include a proportion of affordable rent**	
Advantages	**Disadvantages**
• To reconsider the impact of tenure on viability of sites • To review the situation with regards to the introduction of affordable rent,	• Affordable rent does not meet the needs of very low income households and, taking into account the affordability gap between income and

Option 5: **To review the requirement of 80% social rent and 20% intermediate accommodation to include a proportion of affordable rent**	
and the affordability on Wealden residents • Potential to increase intermediate accommodation would assist those households looking for shared equity solutions and increase viability • May allow an overall increase in affordable housing provision	rent, then this could have an impact on a certain sector of society. • Potential to increase intermediate accommodation would reduce the amount of social rent/ affordable rent which would disproportionately affect the households in most need.

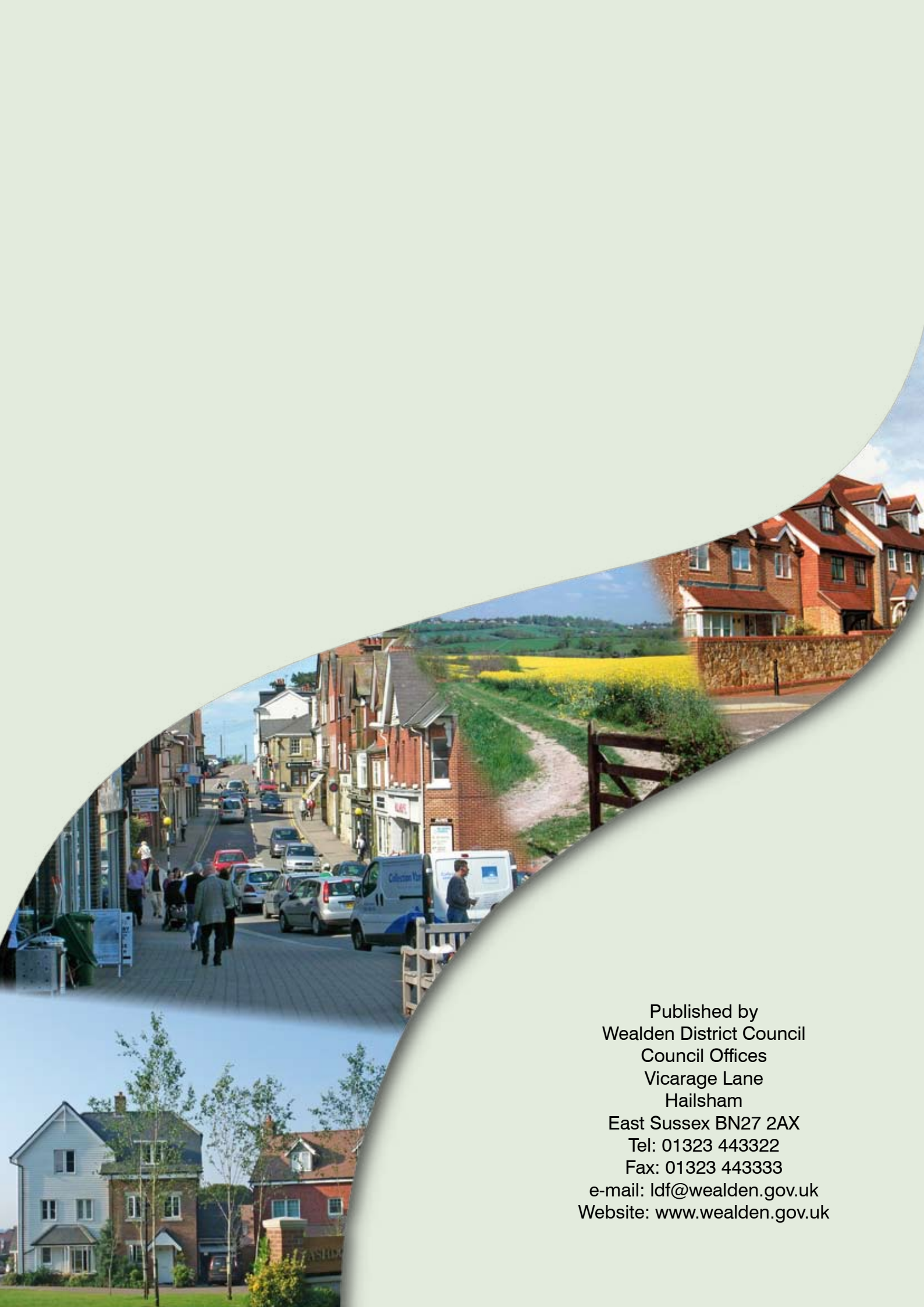
Table 23

Option 6: **To create a threshold in dwelling numbers above which the tenure requirement from 80% social rent and 20% intermediate accommodation would include a proportion of affordable rent**	
Advantages	**Disadvantages**
• Could take into account the viability of larger sites, but allow the provision of social rent in smaller schemes • Would allow the creation of a mix of variety in larger sites, which may assist in creating mixed and balanced communities • May allow an overall increase in affordable housing provision	• Would overall reduce the amount of social rented accommodation, not meeting the needs of certain households

Table 24

Option 7: **To accommodate the tenure requirement of 40% social rent, 40% affordable rent and 20% intermediate accommodation for strategic sites**	
Advantages	**Disadvantages**

Option 7: **To accommodate the tenure requirement of 40% social rent, 40% affordable rent and 20% intermediate accommodation for strategic sites**	
• Could take into account the viability of larger sites, but allow the provision of social rent in smaller schemes • Would enable enhanced tenure variety in larger sites, which may assist in creating mixed and balanced communities • May allow an overall increase in affordable housing provision	• Would overall reduce the amount of social rented accommodation, not meeting the needs of households



Published by
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