



## **Babergh District Council**

**Final Sustainability Appraisal**  
(Incorporating Strategic Environmental Assessment)

Of the

**Affordable Housing SPD**

**Local Development Framework**

March 09

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# **General Methodology and Appraisal**

## Introduction

### **1.1 Context**

1.1.1 The Planning and Compulsory Purchase Act (2004) requires Local Authorities to replace Local Plans with the Local Development Framework (LDF). This is a collection or portfolio of documents called Local Development Documents containing policies and proposals to guide future development in the district.

1.1.2 This report records the findings of a Sustainability Appraisal (SA), incorporating the requirements for a Strategic Environmental Assessment (SEA), of Babergh District Council Affordable Housing, Supplementary Planning Document (SPD). The process of undertaking the SA and SEA has helped develop the initial versions of the document to ensure it achieves sustainable development objectives. The document has been used internally to help with the development of the document and the second version will be subject to public consultation at the same time as the Draft Supplementary Planning Document.

1.1.3 The scoping of documents and the methodology to be used in sustainability appraisal is set out in a separate document; the Scoping Report. The SA/SEA has been carried out in accordance with government guidance: 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' November 2005.

### **1.2 Local Development Framework**

1.2.1 The Babergh Local Plan Alteration No 2 (2006) will be replaced by the Local Development Framework and this will contain Development Plan Documents and Supplementary Planning Documents. The Local Plan has been saved for an initial period of 3 years from the date of adoption and continues to be used. The Supplementary Planning Document the subject of this appraisal is part of the transition process where it will be subordinate to a policy in the saved Local Plan.

1.2.2 The Affordable Housing SPD has been produced under the new planning system as part of the Local Development Framework but will clarify the operation of two affordable housing policies in the recently adopted Local Plan, which have been saved.

### **1.3 Affordable Housing SPD - Background**

1.3.1 The provision of affordable housing is considered one of the Council's highest priorities given the high level of need identified in Housing Needs Surveys undertaken by the Council in 2000, 2004 and 2008 as well as the 2008 Strategic Housing Market Assessment.

1.3.2 This problem has been long standing in the district and the adopted policies HS08 and HS09 of the Babergh Local Plan Alteration No 2, 2006 seek to ensure that greater numbers of affordable dwellings are delivered.

## **1.4 Sustainability Appraisal and Strategic Environmental Assessment**

1.4.1 Sustainability Appraisals are a requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments are required by European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (July 2004). Guidance from the ODPM, 2005 has merged this process to allow for a single joint appraisal to be carried out.

1.4.2 The formal preparation of this Supplementary Planning Document began after 20<sup>th</sup> July 2004, so according to the requirements of the EU Directive this plan falls within the timescale of those requiring a Strategic Environmental Assessment.

1.4.3 The output for an SEA is an Environmental Report which will include baseline information and a prediction of the environmental impacts of the plan. The Environmental Report should also identify options and alternatives and a great emphasis is placed upon consultation and monitoring. The Environmental Report will deal with the likely environmental effects, consider alternatives and reasonable current data on matters relating to the plan.

1.4.4 The output of an SA will be a Final Sustainability Report which encompasses the above information and broadens this to include social and economic considerations.

1.4.5 The work on this appraisal has run simultaneously to the development of the SPD so it becomes ingrained into the plan-making process as a way of improving the document as it develops and producing sustainable policies on the ground. By involving stakeholders and experts along the way, a fully integrated appraisal should develop.

1.4.6 Development of the full methodology for Sustainability Appraisals and SEA has been carried out by the SSAG group of officers which is the Suffolk Sustainability Appraisal Group and the methodology is set out in the separate Scoping Report for this SPD, which was consulted on in June and July 2007.

1.4.7 Baseline data has also been produced for the district; this required the collection of relevant social, environmental and economic baseline information and the characterisation of the district. The sustainability baseline provides the basis for prediction and monitoring of environmental and sustainability effects and helps identify problems and alternative ways of dealing with them. This information is contained in a separate document produced in 2006.

## **1.5 Limitations of the Methodology and Assumptions**

1.5.1 Appraisal of policies and Supplementary Planning Documents is rarely straightforward and the outcome may include levels of uncertainty. The following levels of uncertainty must be taken into account when looking at the results.

- Scientific uncertainties – variability in data and collection measures will always exist to a greater or lesser degree.
- Natural variability – there is often considerable natural variability in sustainability issues, for example the weather and people's actions.
- Lack of precision – environmental, social and economic issues can be difficult to quantify or measure with a high degree of accuracy.

- Uncertainty about exact implementation – with a ‘broad-brush’ strategy it is difficult to assess to a high degree of detail.

1.5.2 Research and professional judgement will help to reduce uncertainty but cannot completely eliminate it. Where there is no prospect of resolving such uncertainty in the immediate future, and if there are significant chances of damage to the environment, a precautionary approach has been taken in this appraisal. This is a standpoint which maintains there should be no delay in taking action to correct a threat of serious or irreversible damage to the environment merely because there is a lack of scientific certainty.

There are also limitations to data which are set out below:-

1.5.3 Indicators are quantified information which help explain how things are changing over time. However, they do not explain why particular trends are occurring and the secondary effects of any changes.

- The indicators have been chosen to monitor particular objectives and refine the broader issues into a measurable figure. Therefore this measurement is often only a small component of meeting the objective so may simplify the issues and interactions.
- It is the aim of the consultation process to gain consensus on which of the chosen indicators are most representative of, and relevant to, monitoring progress towards meeting the objective. However, the final monitoring set must be of a ‘reasonable’ level.
- There are many gaps in the data collected as not all information is available at a local level for recent time periods.
- Much of the data is collected or collated by external bodies, therefore Babergh District Council has little control over the temporal and spatial scope of the data and whether collection methods may change in the future which would restrict reliable comparisons.

1.5.4 It is important to recognise these limitations. Focusing solely on quantified indicators as a measure of progress could lead to misrepresentation and the distortion of trends. Therefore, qualitative information will also be needed, and expert judgements may still need to be made in some circumstances.

1.5.5 The Affordable Housing SPD has been produced by the planning policy group at Babergh DC and the SA and SEA has been carried out by a separate officer within that group to try and maintain some independence. When the first draft of the document was complete other officers and people with different expertise have been consulted within the Council and outside.

1.5.6 There are assumptions underlying the data and information in the SA and SEA and these are:-

- It is assumed that data and information from other reliable sources and external agencies is correct.

- Only two separate policies are being implemented, but in reality these policies will operate as part of a package of measures and other policies with interactions between them.
- Where relevant the appraisal will consider legislation and government policy as priority.
- At this stage the appraisal is not intended to be a detailed project-level assessment of each affordable housing site or allocation, such as that provided by an Environmental Impact Assessment, but it is a strategic level assessment providing a broad comparison of the operation of the SPD and affordable housing policies HS08 and HS09 combined.

## **Sustainability Appraisal**

### **2.1 Options**

2.1.1 It would be expected at this stage to consider different options for the implementation of the SPD. This SPD is subordinate to policies HS08 and HS09 of the Babergh Local Plan Alteration No 2 2006, which has been subject to a sustainability appraisal under the old UK system and adopted before the new regulations applied. The policies clearly identify how and when affordable housing should be provided and the purpose of the SPD is to provide guidance in terms of the implementation of the affordable housing policies for applicants and planning officers. It is important to note that the Affordable Housing SPD supports existing policies and cannot set policy in its own right. The alternative options considered and evaluated in this SA/SEA are (1) to have an adopted SPD in place with existing policies and (2) to rely on existing policies.

2.1.2 Given the clear guidance and limited options set out in the policies it is considered that there are no other realistic alternatives. Alternatives have to be realistic and feasible and there are several variables which might be relevant to affordable housing, such as density of development, landscaping, sustainability issues, materials used, and quality of design, but these are dealt with in national guidance, regional policies and Local Plan Policies. The type of affordable housing and its distribution is covered by the Housing Needs Surveys. The design of the housing and its integration with other housing is covered by PPS3 and other policies in the Local Plan, thresholds are also set out in the Local Plan Policies, which have been subject to consultation and public inquiry. To consider the alternative of no action or no policies at this stage would not be reasonable as this would be contrary to government guidance and contrary to the practice of the Council over several years.

### **2.2 Sustainability Impacts of the Affordable Housing SPD**

2.2.1 From the evolution of the Sustainability Appraisal and SEA process established by the Suffolk Sustainability Appraisal Group (SSAG) a set of 23 Sustainability Objectives have been agreed. These are the basis for assessing the sustainability impacts of the Affordable Housing SPD, there are also sub-objectives, and the 23 objectives are listed below:-

2.2.2 Key Sustainability Objectives for Babergh District Council LDF documents agreed as a result of the SSAG review exercise

## Social Objectives

1. To improve the health of the population overall
2. To maintain and improve levels of education and skills in the population overall
3. To reduce crime and anti-social activity
4. To reduce poverty and social exclusion
5. To improve access to key services for all sectors of the population
6. To offer everybody the opportunity for rewarding and satisfying employment
7. To meet the housing requirements of the whole community
8. To improve the quality of where people live and to encourage community participation

## Environmental Objectives

9. To maintain and where possible improve water quality
10. To maintain and where possible improve air quality
11. To conserve soil resources and quality
12. To use water and mineral resources efficiently, and re-use and recycle where possible
13. To reduce waste
14. To reduce the effects of traffic on the environment
15. To reduce contributions to climate change
16. To reduce vulnerability to climatic events
17. To conserve and enhance biodiversity and geodiversity
18. To conserve and where appropriate enhance areas of historical and archaeological importance
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

## Economic Objectives

20. To achieve sustainable levels of prosperity and economic growth throughout the plan area
21. To revitalise town centres
22. To encourage efficient patterns of movement in support of economic growth
23. To encourage and accommodate both indigenous and inward investment

2.2.3 The SPD has been scored according to its impact on the sustainability of the district, as in the table below.

The SPD will have a very positive impact on the sustainability objective	<b>++</b>
The SPD will have a slightly positive impact on the sustainability objective	<b>+</b>
The SPD will have a negligible or neutral impact on the sustainability objective. A recorded neutral effect does not necessarily mean there will be no effect at the project level, but shows that at this strategic level there are no identifiable effects.	<b>0</b>
The SPD will have a slightly negative impact on the sustainability objective	<b>-</b>
The SPD will have a very negative impact on the sustainability objective	<b>--</b>
The SPD impact on an issue is uncertain/cannot be predicted at this stage	<b>?</b>



## Sustainability Appraisal of the Affordable Housing SPD

This Supplementary Planning Document seeks to ensure the delivery of affordable housing to meet identified local needs and provides detailed guidance on the use of policies HS08 and HS09 of the Babergh Local Plan Alteration No 2, 2006

### Option 1

### Using policies HS08 and HS09 with the new SPD on Affordable Housing

#### *Documentation of Effects.*

*For a description of the Sustainability objectives and sub objectives refer to Table 4 on page 21 of the Scoping Report*

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
<b>Social Indicators</b>											
Health	Health facilities	86.9% of households within 30 minutes of G.P. by public transport.	It may increase the use of local facilities	O	+	+	+	+	?	+	Highly likely to happen
	Death rates		Providing appropriate housing should improve life expectancy	+	+	+	+	+	+	+	This is likely to happen and it should be permanent if affordable housing is available in perpetuity.
	Healthy lifestyles	Year on year increase in percentage of travel by sustainable modes.	By allowing more people to live and work in the district, this should help the process and give people the chance to use sustainable modes.	+	+	+	+	+	+	+	This is highly likely to happen.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
Education	Improve Qualifications		No direct link but children in appropriate housing are likely to be able to study more easily.	+	+	+	+	+	+	+	This is likely to happen and would benefit children wherever there is affordable housing.
Crime and anti-social activities	Will reduce crime	Crime rate of 55.4 per 1000 population in 2005 was below average for Suffolk but is rising	This will depend on good design	0	+	+	?	+	?	+	This will happen with good design and natural surveillance will increase.
	Reduce fear of crime	94% of residents feel safe in the area where they live.	There will be a variety of housing and more mixed communities which should increase the sense of well being and reduce the fear of crime as well as increased natural surveillance.	+	+	+	+	+	+	+	This is likely to happen and apply wherever there is affordable housing.
	Reduce noise and odours	Noise complaints in 2005: 308 and odour complaints 31 these figures are low but increasing	It is difficult to see a direct link	?	?	?	?	?	?	?	
Poverty and social exclusion	Reduce poverty	None of the districts population lives in the most deprived 10% of wards or most deprived 25% of wards in the country	By making housing affordable and available then it will reduce the cost of housing for more people	+	+	+	+	+	?	+	This is highly likely to happen if affordable housing is available.
Access key services	Access key local services		With people able to live in the district then they will have access to key services.	+	+	+	+	+	+	+	This is highly likely to happen across the whole district.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Accessibility of shopping facilities		This will vary according to location but it is expected that a majority of affordable housing will be in locations where shops are available.	+	+	+	?	+	+	+	This is likely across the whole district.
	Access child care		This will depend on childcare being available.	?	?	?	?	?	?	?	
Employment	Unemployment	Unemployment was 1.4% in 2006, the target is to ensure that the unemployment in Suffolk does not exceed the East of England figure.	By ensuring a variety of housing is available it should ensure that companies and other organisations can recruit and retain a variety of staff needed for business.	+	+	+	+	+	+	+	This is highly likely to happen and will apply across the whole district. It will also reduce the need for people to commute from outside the district.
	Job opportunities		No direct link but it will help create conditions where businesses can succeed increasing the number of jobs available.	+	+	+	+	+	+	+	Should apply across the whole district and make the district attractive to new companies.
	Improve earnings	April 2004 average earnings : £ 24,554 but these did decline from 2002 figure.	No direct link but it will contribute to the districts prosperity, see the above points	?	?	?	?	?	?	?	
Housing	Reduce homelessness		More affordable housing will be available, very positive effect.	++	++	++	++	++	++	++	This will apply across the whole district.
	Provide enough housing		This will make a significant contribution to the provision of a variety of housing types	++	++	++	++	++	++	++	This will apply across the whole district

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Increase range and affordability		The policies and SPD are designed to do this.	++	++	++	++	++	++	++	Widespread benefits are expected
	Reduce no of unfit homes		No direct effect.	0	0	0	0	0	0	0	
Community participation	Satisfaction of neighbourhood	89% of residents were satisfied with their neighbourhood in 2005	By creating mixed and balanced communities and by allowing people who have been born and brought up in the district to stay will increase satisfaction with the area.	++	++	++	++	++	++	++	This will apply across the whole district if the policies and SPD are fully implemented.
	Increase green space	Area 904.47 Ha on 156 sites in 2006 but this is the first year this has been calculated.	No direct link but when housing is properly designed then this will be part of the scheme.	?	?	?	?	?	?	?	
	Engagement in decision making		By allowing people to stay in the district they can be involved in the decision making processes	+	+	+	+	+	+	+	This will apply across the whole district.
	Involvement in volunteer activities		By allowing people to stay in the district they can be involved in voluntary activities.	+	+	+	+	+	+	+	This will apply across the whole district.
	Improve ethnic relations		By ensuring there is appropriate housing available for all groups this should help improve relations generally	+	+	+	+	+	?	+	This will apply across the whole district.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Improve access to cultural facilities		Difficult to see a direct link but a wider range of people will be able to live in the district and have access to local facilities	?	?	?	?	?	?	?	
Summary of appraisal against social objectives There are 18 positive assessments for this option against the social indicators above (4 significant positive) and no negative scores. It is considered that the policy and SPD would make significant improvements for several housing indicators, by helping to reduce homelessness, helping to ensure that there is enough housing and not surprisingly increase the affordability of housing, this is also considered to have a very positive impact on peoples satisfaction with their neighbourhood. Other benefits of this option are it will enable more people to get involved in local decision making and voluntary activities as well as supporting local services and facilities.				+	+	+	+	+	+	+	
Environmental Indicators											
Water and air quality	Quality of water		Difficult to see a direct link, but more housing could increase the demand for water.	?	?	?	?	?	?	?	
	Quality of air	No serious issues identified	Difficult again to see a direct link.	?	?	?	?	?	?	?	
To conserve soil resources and quality	Minimise loss of Greenfield land	2005/06 32% And in 2006/07 34% of dwellings were completed on Greenfield sites	This is difficult to assess because many of the new allocations are on Greenfield sites, but it would be expected that the sites under policy HS09 would be Brownfield and recently nearly 70% of completions have been on Brownfield land.	+	?	?	?	?	?	?	This is looking at likely future out comes, but it is expected that completions will largely be Brownfield over the next few years. These policies do not allocate land but seek a proportion of land for affordable housing. Policy HS09 should only cover brownfield sites.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Loss of agricultural land		This relates to the above indicator and in the future with new Greenfield completions it would be expected that more agricultural land would be lost.	+	?	?	?	?	?	?	The allocations in the Local Plan will result in the loss of agricultural land. These policies do not allocate land but seek a proportion of land for affordable housing. Policy HS09 should only cover brownfield sites.
	Soil quality		No direct link	0	0	0	0	0	0	0	
Use of water and mineral resources	Sustainable use of minerals		No direct link although construction of new dwellings will require the use of minerals, which should be more sustainably sourced.	?	?	?	?	?	?	?	
	Sustainable use of water		The affordable housing will be catering for local need, for people who live in the area so they should not increase demand and new properties should be more efficient.	+	+	+	?	?	?	+	This is likely across the whole district.
Reduce waste	Reduce household waste		Difficult to see a direct link, but it is hoped that new housing will result in more recycling, but the overall population may increase.	?	?	?	?	?	?	?	
	Increase recycling		It is hoped that new housing will be better designed to encourage recycling.	?	?	?	?	?	?	?	

Affordable Housing SPD											
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			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
Reduce effects of traffic	Effect on traffic volumes	Traffic volumes at 46 key sites have increased in the district.	By allowing people to live and work in the district this should mean that they can use more sustainable modes of transport and reduce traffic volumes at these key points.	+	+	+	+	+	?	+	This should apply across the whole district
	Reduce need for local travel		By allowing new housing to be near where people can work and find local services they will be able to use more sustainable modes of transport.	+	+	+	+	+	+	+	This should apply across the whole district.
	Increase car journeys	A year on year increase in the % of travel by sustainable modes.	As stated above there should be the chance to use more sustainable modes of transport with the appropriate location of new affordable housing.	+	+	+	+	+	+	+	This should apply across the whole district.
Reduce contributions to climate change	Reducing energy consumption?	There are now national targets.	Better new housing and the use of more sustainable transport should assist with this process.	+	+	+	+	+	+	+	All new housing should assist with this.
	Increase proportion of energy needs met by renewable sources?		No direct link	?	?	?	?	?	?	?	
Vulnerability to climatic events	Minimise risk of flooding		No direct link but any new drainage systems should be sustainable and help in the process.	+	+	+	?	?	?	+	This should apply to all housing developments.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Risk damage from storms		No direct link	?	?	?	?	?	?	?	
Conserve and enhance biodiversity	Maintain designated sites Does the policy or proposal have a significant impact on European designated sites, when considered on its own or with other plans or proposals?		No direct effect	0	0	0	0	0	0	0	
	Deliver targets of Suffolk Biodiversity Action Plan		No direct effect	0	0	0	0	0	0	0	
	Reverse decline in farmland birds		It is not known exactly what has caused this, but farmland will be lost to some housing development.	-	-	-	-	?	?	-	This will happen wherever there is a Greenfield site.
Historical and archaeological importance	Protect designated historical sites		No direct link	0	0	0	0	0	0	0	
	Protect designated archaeological sites		No direct link	0	0	0	0	0	0	0	
	Protect designated geological sites		No direct link	0	0	0	0	0	0	0	

<b>Affordable Housing SPD</b>											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
Landscapes and townscapes	Reduce underused land		New housing sites will come forward on underused land with an element of affordable provision	+	+	+	+	+	?	+	This will apply wherever there is appropriate underused land.
	Improve landscape/townscape		Good quality design and landscaping can improve both	+	+	+	+	+	?	+	This should apply to all new housing.
<p>Summary of appraisal against environmental objectives</p> <p>For environmental indicators there are 8 positive scores and 1 negative score. There will be opportunities to use underutilised land and by allowing people to remain in the district as well as work locally car journeys are expected to reduce as well as reducing the energy consumed and pollution. The expected negative effects are on the loss of agricultural land because new housing has to be built on Greenfield sites which will also have an adverse effect on farmland birds. These negative effects have to set against the positive benefits and new housing schemes should be well landscaped so as to minimise the adverse effects. These policies do not allocate land or evaluate acceptability of applications but is aimed at seeking a proportion of affordable housing. National guidance, regional guidance and all other policies in the adopted plan will address these impacts.</p>				+	+	+	+	+	+	+	
<b>Economic Indicators</b>											
Economic growth	Improve business development		There will be a variety of housing available for staff on different salary levels and so key workers will be able to stay in the district which will help business development.	+	+	+	+	+	?	+	This should benefit the whole district
	Promote growth in key sectors		By being able to keep key staff in the area it should help growth for key sectors.	+	+	+	+	+	?	+	Possibly district wide
	Economic performance		By being able to keep key staff in the area it should help economic performance	+	+	+	+	+	?	+	This would be across all sectors and parts of the district.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Rural diversification		As stated above by retaining people in rural areas, staff are available for local firms to employ and help with diversification.	+	+	+	+	+	?	+	This will apply for rural housing.
To revitalise town centres	Increase range of employment opportunities		Difficult to see a direct link.	?	?	?	?	?	?	?	
	Decrease vacant units in town centres?		If more people are retained in the area then they are more likely to spend money in the town centres and reduce vacant units	+	+	+	+	+	?	+	This is more of a secondary effect and would have a medium likelihood of occurring.
To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting	Average distance travelled to work was 17.45 km in the 2001 census	By allowing people to live and work in closer proximity it will reduce the need to commute long distances.	+	+	+	+	+	?	+	This is highly likely to happen and would benefit the whole district.
To encourage efficient patterns of movement in support of economic growth	Improve accessibility to work	No target	If jobs can be retained locally with the other policies in the plan and SPD then accessibility to work should be improved as well	+	+	+	+	+	?	+	This will apply across the whole district.
	Reduce journey times between employment areas		No direct link	0	0	0	0	0	0	0	

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Increase freight transported		No direct link	0	0	0	0	0	0	0	
	Increase consumption of local goods		If the right goods are available locally then they are more likely to be consumed locally.	?	?	?	?	?	?	?	
Increase investment	Encourage indigenous business		By having a variety of staff available locally it will encourage local business.	+	+	+	+	+	?	+	This should apply across the whole district.
	Encourage inward investment		Having the right staff and a variety of staff available is important for inward investment	+	+	+	+	+	?	+	This will apply to the whole district
	Make land available for business development		No direct link	0	0	0	0	0	0	0	
<b>Summary appraisal against economic objectives</b> For economic indicators there are 9 positive results and no negative scores. These positive results relate to helping to create the right conditions for businesses to thrive and for a variety of employees to be available for a number of organisations. It is also considered that trade for local town centres will increase and that new housing will contribute to a reduction in the number of vacant units. Journeys to work are expected to be shorter overall as people are able to live and work in closer proximity within the district. These advantages are expected to encourage indigenous business as well as inward investment.				+	+	+	+	+	+	+	

Affordable Housing SPD								
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects					Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	
<p><b>Recommendations:</b>            Overall the combination of the policies and SPD are expected to have a positive outcome and have resulted in a strong majority of positive assessments within the appraisal, but there is one area where there are potential negative effects and these relate to the use of agricultural land. Some of the new housing sites are to be developed on agricultural land which means the loss of Greenfield land and the consequent negative effect on farmland birds, it is important in these cases to ensure that the landscaping policies in the Local Plan are fully and appropriately used to mitigate these effects. In particular policies CR07 and CN01 should be used where appropriate. Policies HS08 and HS09 do not allocate land but seek a proportion of land for affordable housing. Policy HS09 should only cover brownfield sites</p>								
<p>Key to Appraisal of Effects</p> <p>Will the policy make a positive or negative contribution to the appraisal objective?            ++ Major positive      + Minor positive      - Minor negative      -- Major negative      0 Neutral effect      ? Uncertain effect</p>								

### Cumulative, Secondary and Synergistic effects:

#### Cumulative effects:

Arise, for instance where several developments each have insignificant effects but together have a significant effect.

#### Secondary effects:

Are effects that are not a direct result of the SPD, but occur away from the original effect or as a result of a complex pathway.

#### Synergistic effects:

Where effects interact to produce a total effect greater than the sum of the individual effects.

### **Cumulative effects:**

There are cumulative benefits throughout the assessments but each individual new affordable dwelling is important to the person or people who live in it, there are also benefits which increase where more are provided and only a few dwellings will not meet the identified need. Some of the cumulative benefits also come from these policies and SPD operating in conjunction with other policies and SPD's. As perhaps would be expected the greatest number of cumulative benefits would occur under the social indicator category. It would be expected that health levels would improve with an improved housing stock which meets more effectively the needs of the local population. By making housing more affordable it should help reduce poverty and improve along with other effects the satisfaction with a neighbourhood and general safety from crime. New housing should also contribute to the retention of local facilities and assist with providing job opportunities in the district. People will also be able to be involved in their local community more easily.

From the Environmental perspective it is expected that there would be a reduced need to travel by car with the consequent reduction in traffic volumes, pollution and energy consumption. Some affordable housing has already come forward on underused land and it is expected that more will be developed, and with good quality design and landscaping this can contribute to improvements.

There would also be economic benefits by helping to ensure that a pool of labour for different jobs can be satisfactorily accommodated in the district. This would help local firms and organisations develop as well as help make the district attractive for inward investment.

### **Secondary effects:**

There are many secondary effects identified in the table, several are listed above in the cumulative section. By ensuring that affordable housing is available a range of secondary benefits are highly likely to occur. These include possible improvements in health, safety and general satisfaction with the area. It should help create the conditions for economic success across the district and contribute to the viability and vitality of town centres, this should help keep employment low or reduce it as well as improving people's general satisfaction with the area.

It is possible by ensuring good design and landscaping for new schemes that a secondary effect would be to improve the townscape or landscape. A possible negative secondary effect could be to lose Greenfield land, reduce farmland and consequently habitats for farmland birds, this will not happen in all cases and policies HS08 and HS09 do not allocate sites. To mitigate this it is recommended that appropriate landscaping is used in all schemes.

## Synergistic effects:

It is considered that the benefits outlined above would in many instances combine with a potentially much higher overall benefit to the community. There is the strong likelihood that more balanced and sustainable communities can be created by ensuring that a full range of housing and particularly affordable housing is available locally which will result in a wide range of other benefits outlined above. These benefits are likely to be much greater than just ensuring that affordable housing is available locally.

## Option 2

### Using policies HS08 and HS09

#### *Documentation of Effects.*

*For a description of the Sustainability objectives and sub objectives refer to Table 4 on page 21 of the Scoping Report*

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>• Likelihood/certainty of effect occurring (high/med/low)</li> <li>• Geographical scale of effect</li> <li>• Whether temporary or permanent</li> <li>• Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
Social Indicators											
Health	Health facilities	86.9% of households within 30 minutes of G.P. by public transport.	It may increase the use of local facilities	O	+	+	+	+	?	+	Highly likely to happen

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Death rates		Providing appropriate housing should improve life expectancy	+	+	+	+	+	+	+	This is likely to happen and it should be permanent if affordable housing is available in perpetuity. It is possible this will happen less quickly without the SPD.
	Healthy lifestyles	Year on year increase in percentage of travel by sustainable modes.	By allowing more people to live and work in the district, this should help the process and give people the chance to use sustainable modes.	+	+	+	+	+	+	+	This is highly likely to happen.
Education	Improve Qualifications		No direct link but children in appropriate housing are likely to be able to study more easily.	+	+	+	+	+	+	+	This is likely to happen and would benefit children wherever there is affordable housing.
Crime and anti-social activities	Will reduce crime	Crime rate of 55.4 per 1000 population in 2005 was below average for Suffolk but is rising	This will depend on good design	0	+	+		+	?	+	This will happen with good design and natural surveillance will increase.
	Reduce fear of crime	94% of residents feel safe in the area where they live.	There will be a variety of housing and more mixed communities which should increase the sense of well being and reduce the fear of crime as well as increased natural surveillance.	+	+	+	+	+	+	+	This is likely to happen and apply wherever there is affordable housing.
	Reduce noise and odours	Noise complaints in 2005: 308 and odour complaints 31 these figures are low but increasing	It is difficult to see a direct link	?	?	?	?	?	?	?	

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
Poverty and social exclusion	Reduce poverty	None of the districts population lives in the most deprived 10% of wards or most deprived 25% of wards in the country	By making affordable housing available then it will reduce the cost of housing for more people	+	+	+	+	+	?	+	
Access key services	Access key local services		With people able to live in the district then they will have access to key services.	+	+	+	+	+	+	+	This is highly likely to happen across the whole district.
	Accessibility of shopping facilities		This will vary according to location but it is expected that a majority of affordable housing will be in locations where shops are available.	+	+	+	?	+	+	+	This is likely across the whole district.
	Access child care		This will depend on childcare being available.	?	?	?	?	?	?	?	
Employment	Unemployment	Unemployment was 1.4% in 2006; the target is to ensure that the unemployment in Suffolk does not exceed the East of England figure.	By ensuring a variety of housing is available it should ensure that companies and other organisations can recruit and retain a variety of staff needed for business.	+	+	+	+	+	+	+	This is highly likely to happen and will apply across the whole district. It will also reduce the need for people to commute from outside the district.
	Job opportunities		No direct link but it will help create conditions where businesses can succeed increasing the number of jobs available.	+	+	+	+	+	+	+	Should apply across the whole district and make the district attractive to new companies.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Improve earnings	April 2004 average earnings: £ 24,554 but these did decline from 2002 figure.	No direct link but it will contribute to the districts prosperity, see the above points	?	?	?	?	?	?	?	
Housing	Reduce homelessness		More affordable housing will be available, very positive effect.	++	++	++	++	++	++	++	This will apply across the whole district. Without the SPD it is possible that the housing will not be delivered as quickly.
	Provide enough housing		This will make a significant contribution to the provision of a variety of housing types	++	++	+	+	+	++	++	This will apply across the whole district. Without the SPD it is possible that the housing will not be delivered as quickly.
	Increase range and affordability		The policies are designed to do this.	++	++	+	+	+	+	+	Widespread benefits are expected, without the assistance of the SPD the process is likely to be slower.
	Reduce no of unfit homes		No direct effect.	○	○	○	○	○	○	○	New affordable housing will be good quality homes
Community participation	Satisfaction of neighbourhood	89% of residents were satisfied with there neighbourhood in 2005	By creating mixed and balanced communities and by allowing people who have been born and brought up in the district to stay will increase satisfaction with the area.	++	++	+	+	+	+	+	This will apply across the whole district if the policies are fully implemented. Without the assistance of the SPD the process is likely to be slower.
	Increase green space	Area 904.47 Ha on 156 sites in 2006 but this is the first year this has been calculated.	No direct link but when housing is properly designed then this will be part of the scheme.	?	?	?	?	?	?	?	

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Engagement in decision making		By allowing people to stay in the district they can be involved in the decision making processes	+	+	+	+	+	+	+	This will apply across the whole district.
	Involvement in volunteer activities		By allowing people to stay in the district they can be involved in voluntary activities.	+	+	+	+	+	+	+	This will apply across the whole district.
	Improve ethnic relations		By ensuring there is appropriate housing available for all groups this should help improve relations generally	+	+	+	+	+	?	+	This will apply across the whole district.
	Improve access to cultural facilities		Difficult to see a direct link but a wider range of people will be able to live in the district and have access to local facilities	?	?	?	?	?	?	?	

<b>Affordable Housing SPD</b>												
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement	
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating		
<p>Summary of appraisal against social objectives</p> <p>The assessments or scores are in effect the same for this option without the SPD as for Option 1, but to achieve the same results will be more difficult both for planning officers and developers and will involve a more protracted process, which would be less satisfactory for both parties. The SPD will help speed up the process and will make very clear to developers what is required early on. Therefore it is considered that Option 1 would have greater positive impacts and Option 2.</p> <p>There are 18 positive assessments for this option against the social indicators above (4 significant) and no negative scores. It is considered that the policies will have particular improvements for several housing indicators, by helping to reduce homelessness, helping to ensure that there is more housing and not surprisingly increase the affordability of housing; this is also considered to have a very positive impact on peoples satisfaction with their neighbourhood. Other benefits of more affordable housing being available are that it will enable more people to get involved in local decision making and voluntary activities as well as supporting local services and facilities.</p>			+	+	+	+	+	+	+	+		
<b>Environmental Indicators</b>												
Water and air quality	Quality of water		Difficult to see a direct link, but more housing could increase the demand for water.	?	?	?	?	?	?	?	?	
	Quality of air	No serious issues identified	Difficult again to see a direct link but if people are able to use more sustainable modes of transport then air quality will improve.	?	?	?	?	?	?	?	?	

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> <b>Include recommendations for mitigation/improvement</b>
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
To conserve soil resources and quality	Minimise loss of Greenfield land	2005/06 32% And in 2006/07 34% of dwellings were completed on Greenfield sites	This is difficult to assess because many of the new allocations are on Greenfield sites, but it would be expected that the sites under policy HS09 would be Brownfield and recently nearly 70% of completions have been on Brownfield land.	+	?	?	?	?	?	?	This is looking at likely future outcomes, but it is expected that completions will largely be Brownfield over the next few years. The two policies do not allocate land just seek a proportion for affordable housing.
	Loss agricultural land		This relates to the above indicator and in the future with new Greenfield completions it would be expected that more agricultural land would be lost.	+	?	?	?	?	?	?	It is likely that the long term effect of the policies as well as the allocations in the Local Plan will result in the loss of agricultural land. The two policies do not allocate land just seek a proportion for affordable housing.
	Soil quality		No direct link	0	0	0	0	0	0	0	
Use of water and mineral resources	Sustainable use of minerals		No direct link although construction of new dwellings will require the use of minerals, which should be more sustainably sourced.	?	?	?	?	?	?	?	
	Sustainable use of water		The affordable housing will be catering for local need, for people who live in the area so they should not increase demand and new properties should be more efficient.	+	+	+	?	?	?	+	This is likely across the whole district.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
Reduce waste	Reduce household waste		Difficult to see a direct link, but it is hoped that new housing will result in more recycling, but the overall population may increase.	?	?	?	?	?	?	?	
	Increase recycling		It is expected that new housing will be better designed to encourage recycling.	?	?	?	?	?	?	?	
Reduce effects of traffic	Effect on traffic volumes	Traffic volumes at 46 key sites have increased in the district.	By allowing people to live and work in the district this should mean that they can use more sustainable modes of transport and reduce traffic volumes at these key points.	+	+	+	+	+	?	+	This should apply across the whole district
	Reduce need for local travel		By allowing new housing to be near where people can work and find local services they will be able to use more sustainable modes of transport.	+	+	+	+	+	+	+	This should apply across the whole district.
	Increase car journeys	A year on year increase in the % of travel by sustainable modes.	As stated above there should be the chance to use more sustainable modes of transport with the appropriate location of new affordable housing.	+	+	+	+	+	+	+	This should apply across the whole district.
Reduce contributions to climate change	Reducing energy consumption?	There are now national targets.	Better new housing and the use of more sustainable transport should assist with this process.	+	+	+	+	+	+	+	All new housing should assist with this.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Increase proportion of energy needs met by renewable sources?		No direct link	?	?	?	?	?	?	?	
Vulnerability to climatic events	Minimise risk of flooding		No direct link but any new drainage systems should be sustainable and help in the process.	+	+	+	?	?	?	+	This should apply to all housing developments.
	Risk damage from storms		No direct link	?	?	?	?	?	?	?	
Conserve and enhance biodiversity	Maintain designated sites Does the policy or proposal have a significant impact on European designated sites, when considered on its own or with other plans or proposals?		No direct effect	0	0	0	0	0	0	0	
	Deliver targets of Suffolk Biodiversity Action Plan		No direct effect	0	0	0	0	0	0	0	
	Reverse decline in farmland birds		It is not known exactly what has caused this, but farmland will be lost to some housing development.	-	-	-	-	?	?	-	This will happen wherever there is a Greenfield site.
Historical and archaeological importance	Protect designated historical sites		No direct link	0	0	0	0	0	0	0	

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Protect designated archaeological sites		No direct link	0	0	0	0	0	0	0	
	Protect designated geological sites		No direct link	0	0	0	0	0	0	0	
Landscapes and townscapes	Reduce underused land		New housing sites will come forward on underused land with an element of affordable provision	+	+	+	+	+	?	+	This will apply wherever there is appropriate underused land.
	Improve landscape/townscape		Good quality design and landscaping can improve both	+	+	+	+	+	?	+	This should apply to all new housing. Having an SPD will assist the process more.

<b>Affordable Housing SPD</b>											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
<p>Summary of appraisal against environmental objectives</p> <p>The assessments or scores are expected to be the same or similar for this option without the SPD as for Option 1, but to achieve the same results will be more difficult both for planning officers and developers and will involve a more protracted process, which would be less satisfactory for both parties.</p> <p>For environmental indicators there are 8 positive scores and 1 negative score. There will be opportunities to use underutilised land and by allowing people to remain in the district as well as work locally, car journeys are expected to reduce as well as reducing energy consumption and pollution. The expected negative effects are on the loss of agricultural land because new housing has to be built on Greenfield sites which will also have and adverse effect on farmland birds. These negative effects have to be set against the positive benefits and new housing schemes should be well landscaped so as to minimise the adverse effects. These policies do not allocate land or evaluate acceptability of applications but is aimed at seeking a proportion of affordable housing. National guidance, regional guidance and all other policies in the adopted plan will address these impacts.</p>			+	+	+	+	+	+	+	+	
<b>Economic Indicators</b>											
Economic growth	Improve business development		There will be a variety of housing available for staff on different salary levels and so key workers will be able to stay in the district which will help business development.	+	+	+	+	+	?	+	This should benefit the whole district
	Promote growth in key sectors		By being able to keep key staff in the area it should help growth for key sectors.	+	+	+	+	+	?	+	Possibly district wide
	Economic performance		By being able to keep key staff in the area it should help economic performance	+	+	+	+	+	?	+	This would be across all sectors and parts of the district.

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Rural diversification		As stated above by retaining people in rural areas staff are available for local firms to employ and help with diversification.	+	+	+	+	+	?	+	This will apply for rural housing.
To revitalise town centres	Increase range of employment opportunities		Difficult to see a direct link.	?	?	?	?	?	?	?	
	Decrease vacant units in town centres?		If more people are retained in the area then they are more likely to spend money in the town centres and reduce vacant units	+	+	+	+	+	?	+	This is more of a secondary effect and would have a medium likelihood of occurring.
To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting	Average distance travelled to work was 17.45 km in the 2001 census	By allowing people to live in closer proximity to their work it will reduce the need to commute long distances.	+	+	+	+	+	?	+	This is highly likely to happen and would benefit the whole district.
To encourage efficient patterns of movement in support of economic growth	Improve accessibility to work	No target	If jobs can be retained locally with the other policies in the Local Plan then accessibility to work should be improved as well	+	+	+	+	+	?	+	This will apply across the whole district.
	Reduce journey times between employment areas		No direct link	0	0	0	0	0	0	0	

Affordable Housing SPD											
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects								Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	Cumulative	Synergy	Rating	
	Increase freight transported		No direct link	0	0	0	0	0	0	0	
	Increase consumption of local goods		If the right goods are available locally then they are more likely to be consumed locally.	?	?	?	?	?	?	?	
Increase investment	Encourage indigenous business		By having a variety of staff available locally it will encourage local business.	+	+	+	+	+	?	+	This should apply across the whole district.
	Encourage inward investment		Having the right staff and a variety of staff available is important for inward investment	+	+	+	+	+	?	+	This will apply to the whole district
	Make land available for business development		No direct link	0	0	0	0	0	0	0	
<p>Summary appraisal against economic objectives</p> <p>The assessments or scores are similar for this option without the SPD as for Option 1. There are a limited range of scores that can be attached to each assessment and they will be similar, but to achieve the same results will be more difficult both for planning officers and developers and will involve a more protracted process, which would be less satisfactory for both parties. With the benefit of a statutory SPD it would be easier and take less time to achieve these results and they would be more likely to happen.</p> <p>For economic indicators there are 9 positive results and no negative scores. These positive results relate to helping to create the right conditions for businesses to thrive and for a variety of employees to be available for a number of organisations. Journeys to work are expected to be shorter overall as people are able to live and work in closer proximity within the district. These advantages are expected to encourage indigenous business as well as inward investment.</p>				+	+	+	+	+	+	+	

Affordable Housing SPD								
Sustainability Objective	Sub Objective	Summary baseline situation and/or targets	Predicted Effects					Justification for assessment noting: <ul style="list-style-type: none"> <li>Likelihood/certainty of effect occurring (high/med/low)</li> <li>Geographical scale of effect</li> <li>Whether temporary or permanent</li> <li>Assumptions made</li> </ul> Include recommendations for mitigation/improvement
			Nature of Effect (quantify where possible)	Short Term	Med term	Long term	Secondary	
<p><b>Recommendations:</b>            While it is possible to achieve the same level of positive outcome with the current situation it involves more work and a longer negotiation process for planning officers and developers; making a satisfactory outcome more difficult to achieve. The Supplementary Planning Document will speed up the process and make quite clear to developers what is required making it easier for both parties, it should also make it easier to achieve the expected positive outcomes listed above. By having a statutory backing the SPD is more likely to achieve the desired results.</p> <p>There are the same potential negative consequences of some Greenfield developments from this approach and it would require the use of the appropriate policies CR07 and CN01 to help mitigate them.</p>								
<p>Key to Appraisal of Effects</p> <p>Will the policy make a positive or negative contribution to the appraisal objective?            ++ Major positive      + Minor positive      - Minor negative      -- Major negative      0 Neutral effect      ? Uncertain effect</p>								

## Cumulative, Secondary and Synergistic effects:

### Cumulative effects:

There are cumulative benefits throughout the assessments but each individual new affordable dwelling is important to the person or people who live in it, there are also benefits which increase where more are provided and only a few dwellings will not meet the identified need. Some of the cumulative benefits also come from these policies operating in conjunction with other policies and SPD's. As perhaps would be expected the greatest number of cumulative benefits would occur under the social indicator category. It would be expected that health levels would improve with an improved housing stock which meets more effectively the needs of the local population. By making housing more affordable it should help reduce poverty and improve along with other effects the

satisfaction with a neighbourhood and general safety from crime. New housing should also contribute to the retention of local facilities and assist with providing job opportunities in the district. People will also be able to be involved in their local community more easily.

From the Environmental perspective it is expected that there would be a reduced need to travel by car with the consequent reduction in traffic volumes, pollution and energy consumption. Some affordable housing has already come forward on underused land and it is expected that more will be developed, and with good quality design and landscaping this can contribute to improvements.

There would also be economic benefits by helping to ensure that a pool of labour for different jobs can be satisfactorily accommodated in the district. This would help local firms and organisations develop as well as help make the district attractive for inward investment.

### **Secondary effects:**

There are many secondary effects identified in the table, several are listed above in the cumulative section. By ensuring that affordable housing is available a range of secondary benefits are highly likely to occur. These include possible improvements in health, safety and general satisfaction with the area. It should help create the conditions for economic success across the district and contribute to the viability and vitality of town centres, this should help keep employment low or reduce it as well as improving people's general satisfaction with the area.

It is possible by ensuring good design and landscaping for new schemes that a secondary effect would be to improve the townscape or landscape. A possible negative secondary effect could be to lose Greenfield land, reduce farmland and consequently habitats for farmland birds, this will not happen in all cases policy HS09 should only apply to brownfield land and both policies do not allocate sites. To mitigate this it is recommended that appropriate landscaping is used in all schemes.

### **Synergistic effects:**

It is considered that the benefits outlined above would in many instances combine with a potentially much higher overall benefit to the community. There is the strong likelihood that more balanced and sustainable communities can be created by ensuring that a full range of housing and particularly affordable housing is available locally which will result in a wide range of other benefits outlined above. These benefits are likely to be much greater than just ensuring that affordable housing is available locally.

## **2.3 Appraisal Summary and Recommendations**

2.3.1 The combined effect of the SPD and policies HS08 and HS09 will be to make a significant and vital positive contribution to creating sustainable communities. Without the provision of affordable housing there would be considerable social, environmental and economic costs.

2.3.2 There are expected to be wide ranging social benefits in addition to the provision of new housing for local people which they can afford. These include enabling people to get involved in local activities and supporting local facilities which will help their viability, this could be schools, doctors surgeries or shops. There should also be an improved satisfaction with the local area and a greater sense of security.

2.3.3 In addition to the above there will be environmental and economic benefits for the community of using the SPD and providing affordable housing. These include the reduction of pollution and the more efficient use of energy as well as reduced consumption of energy. More affordable housing will help create the conditions for the improvement of the local economy as well as attract inward investment.

2.3.4 It is recommended that the SPD is fully implemented and used wherever relevant. Other policies in the Local Plan can be used to reduce the possible adverse effects of developing on Greenfield land and policies CN01 and CR07 should be of particular help in ensuring that satisfactory landscaping schemes form a part of any development. Reference to the need for sufficient and appropriate landscaping is included in the SPD as a result of the recommendations of this Sustainability Appraisal/ SEA.

## **Consultation**

### **3.1 Consultation**

3.1.1 Initially the drafts of the Affordable Housing SPD and SA/SEA have been consulted on in accordance with the Council's adopted Statement of Community Involvement. The SA/SEA has been used in developing the SPD and this final version will be available on the Council's web site.

## **Monitoring**

### **4.1 Monitoring**

4.1.1 Part of the requirements for this report is that it must set out how the Council intends to monitor the implementation of the SPD. Each year an Annual Monitoring Report (AMR) is produced for the Local Development Framework and many relevant indicators are monitored on a regular basis for that document. Each month planning consents for housing are checked and monitored in

preparation for the AMR, at the end of the year housing completions are also monitored. The location of the developments is also monitored, whether the sites are allocations or elsewhere in the district, their size and whether they are on Greenfield or Brownfield land. The Housing team within the council also monitor very closely the development of affordable housing from all sources.

4.1.2 In addition the baseline information for the SA/SEA is updated from time to time and the indicators within it can be used to understand how the situation is changing for a wide variety of issues, although there may be no direct link with the effects of the SPD.

4.1.3 The AMR also requires that the effectiveness of any SPD is commented on in addition the AMR also contains commentary on appeal decisions. This commentary will be based on the quantitative information available as well as the qualitative assessment of planning and housing enabling officers. Following from the analysis of this information, recommendations for future action will be made in the AMR.

## **Non Technical Summary**

5.1.1 Sustainability Appraisal and Strategic Environmental Assessment are carried as a requirement of European and UK legislation and cover Social, Environmental and Economic topics. Babergh DC in conjunction with other Suffolk authorities has agreed a methodology for this process. The main effects of the Supplementary Planning Document (SPD) are summarised below.

5.1.2 The effect of the SPD when combined with relevant planning policies on Social, Environmental and Economic Objectives is considered generally very positive and it can help improve many aspects of the local community. There are thirty five indicators where a positive response is expected as opposed to three with a negative score.

5.1.3 Housing needs surveys have identified the requirement for more affordable housing and there are considered to be wide ranging benefits from providing more affordable housing. A greater choice of housing will be available in the district which will reduce the need to commute long distances and potentially make more disposable income available. There will be increased opportunity to participate in the local community. Local facilities should benefit from greater usage and therefore be less likely to close. The potential to increase walking and cycling to work offers health benefits and increases natural surveillance. These benefits are likely to increase when this SPD is operated in conjunction with other policies and SPD's.

5.1.4 The negative scores or comments relate to the use of Greenfield farmland for new housing which will also have an adverse effect on farmland birds. To reduce this impact there are policies relating to landscaping which can be used to ensure that the effect is minimised, when new housing is granted planning consent.

## The Quality Assurance Checklist

from 'Sustainability Appraisal of Regional SS and LDD'S'  
ODPM November 2005

### Appendix 4 – Quality Assurance checklist

Quality Assurance can be used to help ensure that the requirements of the SEA Directive are met, highlight any problems with the SA Report and show how effectively the appraisal has integrated sustainability considerations into the plan-making process.

The Quality Assurance checklist covers both the technical and procedural steps of the appraisal process and can be applied at any stage of the appraisal to check the quality of work carried out up to that point.

Quality Assurance checklist

#### Objectives and context

• The plan's purpose and objectives are made clear.	√
• Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	√
• SA objectives are clearly set out and linked to indicators and targets where appropriate.	√
• Links with other related plans, programmes and policies are identified and explained.	√
• Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described.	√

#### Scoping

• The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report.	√
• The appraisal focuses on significant issues.	√
• Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	√
• Reasons are given for eliminating issues from further consideration.	√

## Options/Alternatives

• Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	√
• Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant.	√
• The sustainability effects (both adverse and beneficial) of each alternative are identified and compared.	√
• Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	√
• Reasons are given for selection or elimination of alternatives.	√

## Baseline information

• Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	√
• Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.	√
• Difficulties such as deficiencies in information or methods are explained.	√

## Prediction and evaluation of likely significant effects

• Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.	√
• Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.	√
• Likely secondary, cumulative and synergistic effects are identified where practicable.	√
• Inter-relationships between effects are considered where practicable.	√
• Where relevant, the prediction and evaluation of effects makes use of accepted:	√
• standards, regulations, and thresholds.	
• Methods used to evaluate the effects are described.	√

## Mitigation measures

• Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.	√
• Issues to be taken into account in development consents are identified	√

## The Sustainability Appraisal Report

• Is clear and concise in its layout and presentation.	√
• Uses simple, clear language and avoids or explains technical terms.	√
• Uses maps and other illustrations where appropriate.	√
• Explains the methodology used.	√
• Explains who was consulted and what methods of consultation were used.	√
• Identifies sources of information, including expert judgement and matters of opinion.	√
• Contains a non-technical summary.	√

## Consultation

• The SA is consulted on as an integral part of the plan-making process.	√
• The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.	√

## Decision-making and information on the decision

• The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.	√
• An explanation is given of how they have been taken into account.	√
• Reasons are given for choices in the adopted plan, in the light of other reasonable options considered	√

## Monitoring measures

• Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA.	√
• Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA.	√
• Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	√
• Proposals are made for action in response to significant adverse effects.	√