

HOUSING

SPD

The Provision of Affordable Housing in New Housing Developments

Supplementary Planning Document

FINAL SUSTAINABILITY APPRAISAL REPORT

FEBRUARY 2008



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1.1 The Affordable Housing Supplementary Planning Document (SPD) provides advice on how Policy H13 (Affordable Housing) in the Replacement Calderdale Unitary Development Plan, adopted in August 2006, will be implemented. In preparing this document the 2004 Planning and Compulsory Purchase Act requires the Council to undertake sustainability appraisal in order to assess whether or not it will assist in meeting the Council's sustainability objectives which demonstrate what is meant by the term sustainability. These are concerned with the social, economic and environmental effects of the SPD and are set out in the generic Scoping Report undertaken before this appraisal. The scoping report can be viewed on the Council's website at: www.calderdale.gov.uk. European Directive 2001/42/EC, known as the 'Strategic Environmental Assessment' Directive specifically requires the Council to examine any effects the SPD may have on the environment. This appraisal meets both of these requirements.

1.2 As the SPD is very narrowly focused on the affordability of housing many of the sustainability objectives were found not to be relevant to this particular appraisal. Clearly they would be much more relevant in the case of a document considering the allocation of new housing sites. The appraisal found that the SPD would contribute towards the achievement of several of the sustainability objectives whilst not having any adverse effects. In particular, the SPD will assist in moving towards the social objectives such as ensuring quality housing is available to everyone.

1.3 The draft SPD and its sustainability appraisal were published for public consultation between 22nd June and 3rd August 2007.

2. Introduction

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2.1 The Council has adopted a Supplementary Planning Document (SPD) on the provision of affordable housing in new housing developments. This Affordable Housing SPD is linked to Policy H13 (Affordable Housing) in the 'saved' Replacement Calderdale Unitary Development Plan (RCUDP) and its purpose is to explain how Policy H13 will be implemented. A sustainability appraisal of the SPD has been undertaken in order to comply with the Environmental Assessment Regulations 2004 which incorporate the requirements of European Directive 2001/42/EC. This Directive requires organisations preparing plans to undertake Strategic Environmental Assessment (SEA) of those plans in order to assess any environmental effects they may have. This report explains how this appraisal was undertaken and describes its findings in relation to the social, economic and environmental effects of the SPD.

Sustainable Development

3.1 Sustainable Development was a concept that emerged from the Brundtland Report in 1987⁽¹⁾, describing it as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. It is about ensuring a better quality of life for everyone and for future generations. The UK government recently updated its own guidance on sustainable development⁽²⁾, which contains five principles, these being:

- Living within environmental limits;
- Ensuring a strong healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

Sustainability Appraisal and Strategic Environmental Assessment

3.2 The requirement for sustainability appraisals to be carried out during the preparation of Supplementary Planning Documents (SPDs) is set down in Section 39 of the Planning and Compulsory Purchase Act (2004). By informing the plan making process Sustainability Appraisal (SA) will help to ensure that the most sustainable options for development are selected. Additionally EU Directive 2001/42/EC⁽³⁾ requires any plan that may have

significant effects on the environment to be assessed by a Strategic Environmental Assessment (SEA). Table 3.1 'Compliance with the Strategic Environmental Assessment Directive'.

3.3 However, rather than carry out two separate appraisals, the Government has decided that in the UK the two processes are to be combined through one single appraisal process. The EU directive was incorporated into UK law by virtue of the Environmental Assessment Regulations 2004⁽⁴⁾ and determined that sustainability appraisal and SEA are to be combined through one single appraisal process. In order to ensure that the requirements of the EU Directive have been met the SA report must clearly demonstrate how the requirements of SEA have been met. For the purposes of this report the term Sustainability Appraisal also includes the environmental requirements of the SEA. Table 3.1 'Compliance with the Strategic Environmental Assessment Directive' signposts the components of this SA Report which make up the Environmental Report for the purposes of complying with the European Directive.

3.4 This combined SA/SEA has been undertaken in accordance with the Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents guidance published by the former Office of the Deputy Prime Minister (ODPM) in November 2005⁽⁵⁾.

Table 3.1 Compliance with the Strategic Environmental Assessment Directive

SEA Directive's Requirements	Where addressed in SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Task A1 of Scoping Report and Section 'Replacement Calderdale UDP and Affordable Housing SPD' of this appraisal
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report Task A2 and Section 4 'Sustainability Objectives, Baseline and Context' of this appraisal

1 Our Common Future - The World Commission on Environment and Development, WCED, 1987
 2 Securing the Future: UK Government Sustainable Development Strategy, 2005
 3 European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment
 4 The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I.2004 No. 1633)
 5 Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, 2005

3. Background

SEA Directive's Requirements	Where addressed in SA Report
c) The environmental characteristics of areas likely to be significantly affected;	Scoping Report Task A2
d) 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;	Scoping Report Task A2
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental consideration have been taken into account during its preparation;	Scoping Report Tasks A2 and A4
f) 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, heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Section 9 'Predicting and Evaluating the Effects of the Draft SPD'
g) 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;	Sections 6 'Assessing the Effects of the 'Saved' Replacement Calderdale UDP Policy H13' and 11 'Monitoring the Significant Effects of Implementing the SPD'
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or a lack of know-how) encountered in compiling the required information	Sections 9 'Predicting and Evaluating the Effects of the Draft SPD' including Table 9.1 'SA of the of the Affordable Housing SPD Detailed Options'
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Section 11 'Monitoring the Significant Effects of Implementing the SPD'
j) a non-technical summary of the information provided under the above headings;	Section 1 'Non-Technical Summary'
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	Sustainability Report
Consultation: <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4) • authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or 	Consultation on Scoping Report Task A5 Early community engagement on SPD in December 2005/January 2006 & consultation on the draft SPD

SEA Directive's Requirements	Where addressed in SA Report
<p>programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1,6.2).</p> <ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	<p>& SA Report between 22nd June & 3rd August 2007</p> <p>Not Applicable</p>
<p>Taking the environmental report and the results of the consultation into account in decision-making (Art. 8)</p>	<p>Publication of the adopted SPD & SA together with a consultation report</p>
<p>Provision of information on the decision: When the plan or programme is adopted, the public may and any countries consulted under Art. 7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> the plan or programme is adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reason for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Art. 9 and 10) 	<p>Adoption Statement</p> <p>Publication of final SA Report and Consultation Statement</p> <p>Section 11 'Monitoring the Significant Effects of Implementing the SPD'</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>Section 11 'Monitoring the Significant Effects of Implementing the SPD'</p>

Replacement Calderdale UDP and Affordable Housing SPD

3.5 The higher level policy to which the SPD is linked is Policy H13: Affordable Housing in the 'saved' RCUDP. It includes advice on how to ensure that appropriate provision for affordable housing is incorporated into development schemes (both in terms of the number, type and tenure of dwellings) and also explains the various mechanisms for securing affordable housing that the Council will adopt.

3.6 One of the principles underlying the new planning system introduced by the 2004 Planning Act is that once sustainability appraisal has been carried out on the higher level documents such as the Core Strategy and other DPDs there will be either no need or only a limited need to carry it out on the lower level documents such as SPDs as the bulk of the necessary sustainability appraisal will already have

been undertaken. This approach is re-iterated in the ODPM guidance on SA/SEA which states that in most cases the SA of SPDs will draw extensively on appraisal undertaken at the higher level for policies within the DPD and the need for new work may be limited.

3.7 The Council adopted the RCUDP in August 2006. Whilst this plan was subject to the appropriate degree of sustainability appraisal during its preparation, the process of sustainability appraisal has subsequently become much more clearly specified by the Government. The SA of the RCUDP does not therefore meet the requirements of the current regulations which did not exist when the RCUDP was being prepared. There is therefore no relevant sustainability appraisal at the level of the RCUDP 'saved' policies.

3. Background

3.8 The ODPM guidance states that where policies have not been subject to SA the authority will need to carry out a SA of that policy and report on this appraisal. This is the case with Policy H13.

4. Sustainability Objectives, Baseline and Context

Relevant Plans, Programmes and Strategies

4.1 There are a number of other plans, programmes and strategies containing social, economic and environmental objectives which will influence the Affordable Housing SPD. These contain sustainability objectives which need to be taken account of in the sustainability report. The generic Scoping Report identified many documents of relevance to the documents to be produced for the LDF and these are listed in Appendix 1 to that report. These documents ranged from the international level down to the local level. Those most relevant to the affordable housing SPD are listed below:

National Planning Policy

- PPS1 Delivering Sustainable Development (2005)
- PPS1 draft supplement - Planning and Climate Change (2006)
- Consultation paper - Building a Greener Future, Towards Zero Carbon Development (December 2006)
- PPS3 Housing and accompanying guide on Affordable Housing (2006)
- PPS6 Planning for Town Centres (2005)
- PPS7 Sustainable Development in Rural Areas (2004)
- PPG13 Transport (2001)
- PPS22 Renewable Energy (2004)
- Securing the future - UK Government Sustainable Development Strategy (2005)
- Delivering sustainable communities (2005)

Regional Planning Policy

- Regional Spatial Strategy for Yorkshire and the Humber to 2016 (December 2004)
- Yorkshire and Humber Regional Housing Strategy 2005 - 2021 (2003)
- The Yorkshire and Humber Plan (December 2005) - Draft RSS

Local Planning Policy

- Calderdale Futures Plan 2006 - 2016 (Community Strategy)
- Local Area Agreement (2006)

- Replacement Calderdale Unitary Development Plan (2006)
- Calderdale Housing Strategy 2005 - 2010 (2005)
- Draft Calderdale Housing Strategy for an ageing population 2007 - 2011(2007)

The main points arising from those documents relevant to affordable housing provision are:

- Plan to provide quality housing to meet the requirements of the whole community including the ageing population, providing a mix of housing including size, type and tenure and ensure there is a good supply of affordable housing
- Avoid dispersal from where people live, work and access services
- Respond to the need to increase the proportion of energy derived from renewable sources and from decentralised sources
- Growing disparities across the District in relation to health, income levels and social inclusion
- Ensure issues on climate change influence policies in all plans

Calderdale Baseline Profile for Affordable Housing

4.2 Appendix 2 to the generic Scoping Report⁽⁶⁾ details baseline data that will be of assistance in monitoring the documents produced for the LDF in terms of whether the district is becoming more or less sustainable. The baseline data includes indicators which can be monitored to determine whether conditions are improving or deteriorating.

4.3 Affordability is a major problem in the District as evidenced by the Housing Requirements Study (HRS) 2005⁽⁷⁾. House prices have risen significantly in recent years and made it very difficult for first time buyers to enter the housing market. Brighouse ward experienced the largest house price increase in the UK in 2003 with house prices increasing by 69% at that time.

4.4 Affordable housing as a percentage of all completions has a rate of 13.9% compared with a national average of 24%. There is a clear need to increase the provision of affordable housing in the District, particularly in the high demand areas and in the rural areas. The Housing Requirements Study

6 Generic Sustainability Appraisal Scoping Report, Calderdale MBC, February 2007

7 Calderdale Council Housing requirements Study 2005, Outside Research and Development, 2005

4. Sustainability Objectives, Baseline and Context

determined that there is a need for an additional 720 units of affordable housing per annum across the district.

Key Sustainable Issues

4.5 The key sustainability issues arising from the search of other plans and programmes and the baseline data are listed in the generic Scoping Report. Those relevant to the SPD on affordable housing are:

- There is a lack of affordable housing across the District.
- Levels of accessibility to local services and facilities vary across the District.

- There is a need to increase the level of energy efficiency in dwellings and the proportion of energy generated from renewable and decentralised sources.
- A large proportion of the working population commutes out of the District to work

The Sustainability Appraisal Framework

4.6 The generic Scoping Report developed a number of sustainability objectives against which to test the documents prepared for the LDF. Further information relating to the sustainability objectives is provided in Appendix 3 of the generic Scoping Report. The Sustainability Objectives (SOs) included in the SA Framework are:

Table 4.1 List of Sustainability Objectives

Objective Number	Sustainability Objective
Objective 1	To ensure quality housing is available to everyone
Objective 2	To improve safety and security for people and property
Objective 3	To create and retain vibrant communities that promote good health and social inclusion
Objective 4	To ensure that culture, leisure and recreation activities are available to all
Objective 5	To improve accessibility to essential services, facilities and employment
Objective 6	To provide the education and training opportunities to build skills and capacities
Objective 7	To retain, protect and create a quality built environment
Objective 8	To reduce the effect of traffic on the environment
Objective 9	To protect and or enhance biodiversity
Objective 10	To reduce pollution levels including the carbon footprint of the district
Objective 11	To protect and enhance the natural, semi-natural and manmade landscape
Objective 12	To ensure prudent and efficient use of natural resources and energy
Objective 13	To ensure efficient use of land
Objective 14	To reduce the amount of waste produced
Objective 15	To protect and enhance the historic environment
Objective 16	To develop a managed response to the effects of climate change
Objective 17	To provide good employment opportunities for all
Objective 18	To achieve business success, economic growth and continued investment

5. Sustainability Appraisal Methodology

5.1 Sustainability appraisal includes several stages and these are summarised in Table 5.1 'Incorporating The SA process within the SPD Process' below. Stage A relates to the preparation of the Scoping Report, already completed and available on the Council's website at www.calderdale.gov.uk. This determined the SA Framework against which the objectives of the SPD could be tested. Following consultation on the generic Scoping Report in February/March 2007, changes were made to this

document including to the sustainability objectives in the SA Framework.

5.2 The sustainability appraisal essentially comprises the 'B' stages (developing and refining options and assessing effects) as set out in Table 5.1 'Incorporating The SA process within the SPD Process' below and extracted from the ODPM guidance. This work was undertaken by the Planning Policy Team within Planning Services.

Table 5.1 Incorporating The SA process within the SPD Process

	SPD Process		SA Process
PRE PRODUCTION	Evidence gathering	←	<p>Stage A: Setting the context, establishing the baseline and deciding on scope</p> <p>Tasks A1 to A5 - see Generic Scoping Report</p>
PRODUCTION	Preparation of draft SPD Public participation on draft SPD Representations and finalise SPD	←	<p>Stage B: Developing and refining options and assessing effects</p> <p>B1: Testing the SPD objectives against the SA framework</p> <p>B2: Developing the SPD Options</p> <p>B3: Predicting the effects of the draft SPD</p> <p>B4: Evaluating the effects of the draft SPD</p> <p>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: Proposing measures to monitor the significant effects of implementing the SPD</p>

5. Sustainability Appraisal Methodology

	SPD Process		SA Process
			<p>Stage C: Preparing the SA Report</p> <p>Stage D: Consulting on the draft SPD and SA</p> <p>D1: Public participation on the SA Report and the draft SPD</p> <p>D2: Assessing significant changes</p>
ADOPTION	Adoption and monitoring		<p>D3: Making decisions and providing information</p> <p>Stage E: Monitoring the significant effects of implementing the SPD</p>

6. Assessing the Effects of the 'Saved' Replacement Calderdale UDP Policy H13

6.1 The ODPM Guidance states that where the SPD has been prepared on the basis of a 'saved' plan policy or policies which have not been subject to SA, then the authority will need to carry out a SA of that policy or policies and report on those. This is the situation with the saved RCUDP which was adopted in August 2006. SA of the 'saved' RCUDP was undertaken by AERC Research under the earlier government guidance on Environmental Appraisal of Development Plans (DOE 1993). Whilst this Plan was therefore subject to the appropriate degree of sustainability appraisal during its preparation, the process of sustainability appraisal has subsequently become much more clearly specified by the Government. The SA of the RCUDP does not therefore meet the requirements of the current regulations which did not exist when the RCUDP was being prepared.

6.2 Policy H13: Affordable Housing of the RCUDP has therefore been appraised against the 18 Sustainability Objectives (SOs) in the Sustainability Appraisal framework as shown in Table 6.1 'Sustainability Appraisal of saved RCUDP Policy H13'. Since this is a retrospective exercise and relates to an adopted policy it cannot lead to amendment of that policy.

6.3 Policy H13 Affordable Housing was shown to have substantial benefits in terms of its social effects. Its environmental effects are less clear due to the focus on affordable housing but it is unlikely to have adverse environmental effects due to its requirements for no unacceptable environmental problems to be created by the provision of the affordable housing and its requirement to be consistent with other RCUDP Policies (of which there are a number directly relating to the environment). The appraisal of this policy is primarily concerned with its emphasis on affordable housing. The actual location of sites and related matters such as flooding, previously developed land and general location are covered in other policies. Generally no direct environmental impacts were identified and certainly no adverse impacts. Economic effects were not recorded other than that the affordable housing may enable people to have the opportunity to live in the district and near employment centres providing that employment opportunities exist. Overall the conclusion is that the policy has substantial sustainability benefits as regards the social effects without being detrimental in respect of economic and environmental effects. This broadly corresponds to the findings of the earlier SA undertaken by AERC.

Table 6.1 Sustainability Appraisal of saved RCUDP Policy H13

Sustainability Appraisal Objective		Assessment of effects			Justification and Comments
		ST	MT	LT	
1	To ensure quality housing is available to everyone	+	++	++	Over time the policy will increase the range and affordability of housing for all social groups across the District.
2	To improve safety and security for people and property	?	?	?	Effect uncertain but by helping everyone to access housing it will reduce homelessness.
3	To create and retain vibrant communities that promote good health and social inclusion	+	++	++	Providing affordable housing will lead to more diverse communities and this effect should increase over time as more affordable housing is provided across the District in private residential developments.
4	To ensure that culture, leisure and recreation activities are available to all	+	+	+	Development is required to be in accessible locations under other policies but this policy will have a positive effect since it states that sites have to be close to local facilities and services.

6. Assessing the Effects of the 'Saved' Replacement Calderdale UDP Policy H13

Sustainability Appraisal Objective		Assessment of effects			Justification and Comments
		ST	MT	LT	
5	To improve accessibility to essential services, facilities and employment	+	+	+	Effect positive and will assist in improving accessibility over time as policy requires there to be good access to public transport.
6	To provide the education and training opportunities to build skills and capacities	0	0	0	No significant effects
7	To retain, protect and create a quality built environment	?	?	?	Effect uncertain but policy requires there to be no adverse environmental effects and to comply with other RCUDP policies of which there are ones on design and materials
8	To reduce the effect of traffic on the environment	?	?	?	Effect uncertain but locational and accessibility requirements of policy may assist in moving towards SO8.
9	To protect and or enhance biodiversity	?	?	?	Effect uncertain but policy includes requirement to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO9.
10	To reduce pollution levels including the carbon footprint of the district	?	?	?	Effect uncertain but policy includes accessibility requirements and need to not create any unacceptable environmental problems and to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO10.
11	To protect and enhance the natural, semi-natural and manmade landscape	?	?	?	Effect uncertain but policy includes requirement not to create any unacceptable environmental problems and to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO11.
12	To ensure prudent and efficient use of natural resources and energy	?	?	?	Effect uncertain and indirect but policy includes requirement to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO12.
13	To ensure efficient use of land	?	?	?	Effect uncertain and indirect but policy includes requirement to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO13.
14	To reduce the amount of waste produced	0	0	0	No significant effects
15	To protect and enhance the historic environment	?	?	?	No direct effects but policy includes requirement to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO15.

6. Assessing the Effects of the 'Saved' Replacement Calderdale UDP Policy H13

Sustainability Appraisal Objective		Assessment of effects			Justification and Comments
		ST	MT	LT	
16	To develop a managed response to the effects of climate change	?	?	?	No direct effects but policy includes requirement to be consistent with other RCUDP policies of which there are ones leading towards achievement of SO18 and for development not to create any unacceptable environmental, or other problems.
17	To provide good employment opportunities for all	?	?	?	No direct effect but by providing affordable housing within the district occupiers may be able to live close to employment opportunities (as opposed to commuting) providing such employment exists or is provided in the future.
18	To achieve business success, economic growth and continued investment	0	0	0	No significant effects

KEY

Magnitude of effect

- ++ very positive effect on SA Objective
- + positive effect on SA Objective
- 0 neutral
- negative effect on SA Objective
- very negative effect on SA Objective
- ? impact uncertain

Timescale

- ST Short Term
- MT Medium Term
- LT Long Term

7. Testing the SPD Objectives

7.1 The objectives of the Affordable Housing SPD set out what it is aiming to achieve in spatial planning terms and set the context for the development of options of the SPD. These objectives need to follow sustainability principles. The overall aim of the SPD is to provide guidance on the implementation of Policy H13 of the RCUDP and thereby increase the provision of affordable housing in the District and to ensure that provision meets the needs of those in housing need as demonstrated by the Housing Requirements Study. At the same time this approach will assist in creating and maintaining mixed and balanced communities across the District. It is important that the objectives of the SPD are in accordance with sustainability principles. In order to determine whether this is the case these objectives must be tested for compatibility with the SA objectives.

7.2 Whilst house building per se raises significant sustainability issues, such as loss of greenfield land, transport issues and flooding, these are unlikely to be significantly affected by the SPD on affordable housing. The focus of the Affordable Housing SPD is very narrow and does not affect the allocation of land or the number of dwellings that will be built. The appropriate time to assess the sustainability implications of such policies will be during the preparation of future Development Plan Documents (DPDs) relating to new housing provision.

7.3 The Affordable Housing SPD spatial objectives have therefore been tested against the 18 SOs by means of a compatibility matrix, the approach recommended in the ODPM Guidance (see Table 7.1 'Affordable Housing SPD and SA Interaction Matrix'). This indicates that there is unlikely to be a significant interaction, either positive or negative, between the SPD objectives and the majority of the SOs. Potential compatible interactions identified numbered 13 and mainly involve the social objectives of the SA Framework. Prominent amongst these were those objectives relating to the provision of quality housing for everyone, social inclusion and utilising natural resources and energy. No potentially conflicting interactions were identified.

7.4 The spatial planning objectives of the SPD can be summarised as:

Objective 1: To deliver affordable housing that meets the needs of Calderdale

Objective 2: To create mixed communities both in new residential developments and in existing residential areas

Objective 3: To ensure affordable housing provision assists in creating a quality built environment including energy efficiency and use of renewable energy

Table 7.1 Affordable Housing SPD and SA Interaction Matrix

Sustainability Appraisal Objectives		Affordable Housing SPD Spatial Objectives		
		Objective 1	Objective 2	Objective 3
1	To ensure quality housing is available to everyone	Positive Compatible	Positive Compatible	Positive Compatible
2	To improve safety and security for people and property	Neutral	Neutral	Neutral
3	To create and retain vibrant communities that promote good health and social inclusion	Positive Compatible	Positive Compatible	Neutral
4	To ensure that culture, leisure and recreation activities are available to all	Neutral	Neutral	Neutral
5	To improve accessibility to essential services, facilities and employment	Neutral	Neutral	Neutral
6	To provide the education and training opportunities to build skills and capacities	Neutral	Neutral	Neutral
7	To retain, protect and create a quality built environment	Neutral	Neutral	Positive Compatible

7. Testing the SPD Objectives

Sustainability Appraisal Objectives		Affordable Housing SPD Spatial Objectives		
8	To reduce the effect of traffic on the environment	Neutral	Neutral	Neutral
9	To protect and/or enhance biodiversity	Neutral	Neutral	Neutral
10	To reduce pollution levels including the carbon footprint of the district	Neutral	Neutral	Positive Compatible
11	To protect and enhance the natural, semi-natural and manmade landscape	Neutral	Neutral	Positive Compatible
12	To ensure prudent and efficient use of natural resources and energy	Neutral	Neutral	Positive Compatible
13	To ensure efficient use of land	Positive Compatible	Positive Compatible	Positive Compatible
14	To reduce the amount of waste produced	Neutral	Neutral	Neutral
15	To protect and enhance the historic environment	Neutral	Neutral	Neutral
16	To develop a managed response to the effects of climate change	Neutral	Neutral	Positive Compatible
17	To provide good employment opportunities for all	Neutral	Neutral	Neutral
18	To achieve business success, economic growth and continued investment	Neutral	Neutral	Neutral

8. Appraisal of Alternatives and Developing Options for the SPD

Appraisal of Alternatives for the SPD

8.1 The ODPM Guide states that given the duty under the Planning and Compulsory Purchase Act 2004, on those preparing a SPD to contribute to sustainable development it is essential for it to set out to improve on the situation which would exist if there were no SPD. It should also aim to improve on the effects of implementing the existing saved RCUDP Policy. In order to test whether the production of the Affordable Housing SPD would improve on the existing situation two strategic options have been selected as follows:

- Publishing the SPD on Affordable Housing
- Retaining the status quo - relying on the SPG published in 1998, the RCUDP and Government Guidance (PPS3)

8.2 Determining the most sustainable course of action is achieved by testing the alternative approaches against the SA Framework objectives.

8.3 As Table 8.1 'Comparison of Major Alternative Approaches' shows there is very little to choose between the two approaches in terms of achieving the sustainability objectives as they both give similar results. The SPD is likely to assist in implementing Policy H13 and lead to higher levels of affordable housing thereby meeting SO1, in particular. The requirements in the SPD for meeting the Housing Corporation's Design and Quality Standards⁽⁸⁾ (which incorporate the DCLG's Code for Sustainable Homes⁽⁹⁾) will have a positive effect on meeting SOs 10, 11 and 12. Whilst the RCUDP/PPS3 will also have a positive effect on these objectives this is less certain, particularly in the short term. No adverse sustainability effects were identified as a result of producing the SPD. Overall the SPD will be beneficial in sustainability terms.

Table 8.1 Comparison of Major Alternative Approaches

Sustainability Objective (SO)		Option A Produce SPD				Option B RCUDP/ PPS3			
		Assessment of effects				Assessment of effects			
		ST	MT	LT	Comments	ST	MT	LT	Comments
1	To ensure quality housing is available to everyone	+	++	++	Level of detail in SPD will provide clearer advice to developers and assist in negotiations thereby delivering higher proportions of affordable housing which will increase the amount of housing available to all. Over time more progress will be made towards achieving this objective	+	+	+	Likely to be positive in short term and increase amount of affordable housing in longer term given direction of travel in national guidance but will be difficult to negotiate higher proportions of affordable housing based on policy alone
2	To improve safety and security for people and property	0	0	0	No significant effects	0	0	0	No significant effects

8 Design and Quality Standards, Housing Corporation, April 2007

9 Code for Sustainable Homes - A step-change in sustainable building practice, DCLG, December 2006

8. Appraisal of Alternatives and Developing Options for the SPD

Sustainability Objective (SO)		Option A Produce SPD				Option B RCUDP/ PPS3			
		Assessment of effects				Assessment of effects			
		ST	MT	LT	Comments	ST	MT	LT	Comments
3	To create and retain vibrant communities that promote good health and social inclusion	+	++	++	By delivering higher levels of affordable housing and using the SPD to ensure it is provided on-site will result in achieving more mixed communities and have a positive effect on this objective	+	+	+	Achieving affordable housing will assist in moving towards more mixed communities but being less likely to achieve a high proportion of affordable housing will have less of an effect in creating mixed communities and achieving this objective
4	To ensure that culture, leisure and recreation activities are available to all	0	0	0	No significant effects	0	0	0	No significant effects
5	To improve accessibility to essential services, facilities and employment	0	0	0	No significant effects	0	0	0	No significant effects
6	To provide the education and training opportunities to build skills and capacities	0	0	0	No significant effects	0	0	0	No significant effects
7	To retain, protect and create a quality built environment	+	+	+	Specific reference in the SPD to the Housing Corporation's Design and Quality Standards will ensure the affordable housing is built to at least equivalent standards to the market housing and therefore have a positive effect on this objective.	?	?	?	RCUDP Policies control design/materials but can only go so far and so it is uncertain to what extent relying on RCUDP policies will effect the quality of the built environment and assist in meeting this objective.
8	To reduce the effect of traffic on the environment	0	0	0	No significant effects	0	0	0	No significant effects

8. Appraisal of Alternatives and Developing Options for the SPD

Sustainability Objective (SO)		Option A Produce SPD				Option B RCUDP/ PPS3			
		Assessment of effects				Assessment of effects			
		ST	MT	LT	Comments	ST	MT	LT	Comments
9	To protect and or enhance biodiversity	0	0	0	No significant effects	0	0	0	No significant effects
10	To reduce pollution levels including the carbon footprint of the district	+	++	++	Specifying the requirement to meet the Code for Sustainable Homes will have a positive effect on this objective which should become more positive over time.	?	?+	?+	Over time as Building Regulations become more stringent all housing will move towards being zero carbon. National policy /regulations are likely to have a positive effect on this objective.
11	To protect and enhance the natural, semi-natural and manmade landscape	?	+	+	Effect uncertain in short term but requirement to meet the Housing Corporation's Design and Quality Standards will assist in enhancing the manmade landscape and have a positive effect on this objective.	?	?	?	Effect uncertain as RCUDP policies will influence design/materials but applicants can only be requested to achieve a certain standard of design.
12	To ensure prudent and efficient use of natural resources and energy	+	++	++	Requirement to meet the Code for Sustainable Homes will result in increased use of renewable energy sources, more efficient water consumption and higher standards regarding materials used. Effect will increase over time as number of affordable homes accumulates having an increasingly positive effect on this objective.	?	?+	?+	Opportunities to increase sustainability of dwellings will be missed in the short term but over time all dwellings will have to meet higher standards as Building Regulations become more stringent. Effect on this objective therefore positive in medium to longer term but less certain in short term.
13	To ensure efficient use of land	+	++	++	Effect will be to increase densities as many , although not all, affordable homes smaller. Mixing house types and tenures itself	+	++	++	RCUDP policies require certain densities to be achieved and the use of brownfield sites and therefore will have a positive effect on meeting this objective.

8. Appraisal of Alternatives and Developing Options for the SPD

Sustainability Objective (SO)		Option A Produce SPD				Option B RCUDP/ PPS3			
		Assessment of effects				Assessment of effects			
		ST	MT	LT	Comments	ST	MT	LT	Comments
					leads to efficient use of land.				
14	To reduce the amount of waste produced	0	0	0	No significant effects	0	0	0	No significant effects
15	To protect and enhance the historic environment	0	0	0	No significant effects	0	0	0	No significant effects
16	To develop a managed response to the effects of climate change	?	?	?	Specific nature of SPD means effects limited but requirement to meet Code for Sustainable Homes will have a positive effect on meeting this objective	?	?	?	RCUDP Policies will have a positive effect in moving towards this objective.
17	To provide good employment opportunities for all	?	?	?	By providing affordable homes in the district this will enable people to live near employment opportunities. Effect uncertain as dependent on those employment opportunities being present.	?	?	?	By providing affordable homes in the district this will enable people to live near employment opportunities. Effect uncertain as dependent on those employment opportunities being present.
18	To achieve business success, economic growth and continued investment	0	0	0	No significant effects	0	0	0	No significant effects

KEY:

Magnitude of effect

- ++ very positive effect on SA Objective
- + positive effect on SA Objective
- 0 neutral
- negative effect on SA Objective
- - very negative effect on SA Objective
- ? impact is uncertain

Timescale

- ST Short Term
- MT Medium Term
- LT Long Term

8.4 Having considered the different overall approaches, the detailed options for the Affordable Housing SPD are now considered.

8. Appraisal of Alternatives and Developing Options for the SPD

Developing Options for the SPD

8.5 The development of options for the SPD relates to the ways in which the the SPD can assist in the implementation of 'saved' Policy H13 in the RCUDP. Options regarding alternatives to the actual 'saved' policy in the RCUDP cannot be considered here as the overall policy is fixed in the RCUDP until this is reviewed through the appropriate Local Development

Document (LDD) (most likely a DPD on housing). The options considered for the implementation of the SPD are therefore by definition concerned with detailed matters of implementation. The relevant matters have been set out under the headings of 'Objectives' in the SPD and for the purpose of consistency are referred to in the same manner here. The options considered are listed in Table 8.2 'Affordable Housing SPD Summary of Options' below:

Table 8.2 Affordable Housing SPD Summary of Options

SPD Ref	Options
Objective 1	<p>Proportion of affordable housing required</p> <p>Option 1: Retain 20% target figure in SPD & saved RCUDP</p> <p>Option 2: Increase figure to 30% to better reflect findings of HRS</p>
Objective 2	<p>Location of the affordable housing</p> <p>Option 1: The affordable housing will be provided on-site</p> <p>Option 2: Adopt more flexible approach to allow the affordable housing to be provided off-site or in the form of a commuted sum</p>
Objective 3	<p>Size and Type of dwellings</p> <p>Option 1: Do not specify the mix</p> <p>Option 2: Specify the basis on which the range of house types and sizes will be based</p>
Objective 4	<p>Management of the affordable housing</p> <p>Option 1: All dwellings be transferred to a Registered Social Landlord</p> <p>Option 2: Be more flexible with management arrangements</p>
Objective 5	<p>Building/Design standard of the affordable housing</p> <p>Option 1: Insist on the Housing Corporation's Design and Quality Standards (include DCLG's Code for Sustainable Homes)</p> <p>Option 2: Do not insist on the Housing Corporation's Design and Quality Standards (include DCLG's Code for Sustainable Homes)</p>

8.6 Having identified the various options to be considered the effects of these options on the SA Framework objectives were predicted and evaluated. Earlier parts of this appraisal concerned with appraising Policy H13 of the 'saved' RCUDP, the spatial objectives of the SPD and the alternative

approaches regarding whether it would be beneficial to produce a SPD or not, all made it clear that only certain of the sustainability objectives are relevant to the consideration of a document as specific as an Affordable Housing SPD. Therefore only those sustainability objectives relevant to the matters where

8. Appraisal of Alternatives and Developing Options for the SPD

options were considered are included in this part of the appraisal. The results are recorded in Table 9.1 'SA of the of the Affordable Housing SPD Detailed Options'. In accordance with the advice in the ODPM Guidance and where relevant these effects are described in terms of their magnitude, geographical scale, the time period over which they will occur, whether they are permanent or temporary, positive or negative, probable or improbable, frequent or rare, and whether or not there are secondary, cumulative and/or synergistic effects. The significance of any effect is also evaluated.

9.1 Given the very specific nature of the Affordable Housing SPD, not all of the sustainability objectives were directly relevant to this sustainability appraisal. Those objectives relating to the selection of sites for development and associated impacts on the environment are more relevant for a site allocations DPD and would normally have been addressed at this level before any SPDs were prepared. It is only because of the fact that the Council is in transition from the former development plans system to that introduced by the 2004 Planning Act that this situation has arisen. However, it must be borne in mind that the SPD is specifically concerned with the provision of affordable housing and is not a site allocations DPD. For this reason a number of sustainability objectives were not considered particularly relevant to this appraisal at all and in the interest of making the report as relevant as possible have not been included. These are Sustainability Objectives (SOs):

- SO2 To improve safety and security for people and property
- SO4 To ensure that culture, leisure and recreation activities are available to all
- SO5 To improve accessibility to essential services, facilities and employment
- SO6 To provide the education and training opportunities to build skills and capacities
- SO8 To reduce the effect of traffic on the environment
- SO9 To protect and/or enhance biodiversity
- SO14 To reduce the amount of waste produced
- SO15 To protect and enhance the historic environment
- SO18 To achieve business success, economic growth and continued investment

9.2 In examining the various options in relation to specific objectives of the SPD, only certain SOs remain relevant in each case. At the end of each section within Table 9.1 'SA of the of the Affordable Housing SPD Detailed Options' below conclusions are drawn about the competing approaches and the preferred approach for inclusion in the SPD selected.

9. Predicting and Evaluating the Effects of the Draft SPD

Key:

Magnitude of effect:

- ++ very positive
- + positive effect on SA Objective
- 0 neutral
- negative effect on SA objective
- very negative effect on SA objective
- ? impact is uncertain

Table 9.1 SA of the Affordable Housing SPD Detailed Options

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment	
	Short Term	Medium Term	Long Term		
OBJECTIVE 1: PROPORTION OF AFFORDABLE HOUSING REQUIRED					
<i>Option 1: Retain 20% requirement in RCUDP and SPD</i>					
1	To ensure quality housing is available to everyone	+	+	++	Will help to increase affordable housing provision across district over time but not meet need identified in HRS. Effect may be permanent but dependent on right to buy/acquire legislation
3	To create and retain vibrant communities that promote good health and social inclusion	+	+	++	Provision of affordable housing will help meet this objective but at 20% level will take time to have a major influence on this objective.
7	To retain, protect and create a quality built environment	+	+	+	Requirement to meet the Housing Corporation's Design and Quality Standards will help create quality built environment but effect will be limited by number of affordable properties built.
12	To ensure prudent and efficient use of natural resources and energy	+	+	+	Requirement to meet Code for Sustainable Homes will help achieve this objective although at 20% number of properties affected limited.
<i>Option 2: Increase requirement to 30% to better reflect HRS</i>					
1	To ensure quality housing is available to everyone	+	++	++	Effect will be to increase amount of affordable housing more quickly and affordable dwellings will accumulate

9. Predicting and Evaluating the Effects of the Draft SPD

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment
	Short Term	Medium Term	Long Term	
				over time. Effect may be permanent but dependent on right to buy/acquire legislation
3	+	++	++	Provision of affordable housing will help meet this objective and at 30% level will more quickly have an influence on this objective.
7	+	+	+	Requirement to meet Housing Corporation's Design and Quality Standards will help create quality built environment but effect will be limited by number of affordable properties built. Effect on this objective will be greater the higher the proportion of affordable dwellings built.
12	+	+	+	Requirement to meet Code for Sustainable Homes will help achieve this objective and at 30% number of properties affected will increase.
Implications for SPD:				
Both options have a beneficial effect on the relevant sustainability objectives. Option 2 by providing a higher level of affordable housing will have a greater effect on the sustainability objectives and in particular SO1. However, as Option 1 is the level set in the RCUJP the requirement cannot be altered prior to the preparation of a DPD on housing. This appraisal does show that there are sustainability benefits to be achieved from raising the requirement and should inform a future DPD on housing. Should developers be willing to build residential developments with higher proportions of affordable housing this should be supported as it will help achieve sustainability objectives.				
OBJECTIVE 2: LOCATION OF THE AFFORDABLE HOUSING				
Option 1: Expectation is that the affordable housing will be provided on-site				
1	+	++	++	More likely to meet need and be provided earlier if built on-site. Permanent subject to right to buy legislation
3	+	+	+	Over time on-site provision will lead to a higher proportion of mixed communities across the district which should become a permanent feature.

9. Predicting and Evaluating the Effects of the Draft SPD

Sustainability Appraisal Objective		Predicted Effects on SA Objective			Justification and Comment
		Short Term	Medium Term	Long Term	
13	To ensure efficient use of land	+	+	++	Provision on-site will lead to mixed use developments in terms of tenure and since affordable housing units are often, but not always, smaller housing units their inclusion on-site will assist in achieving higher densities of development. Effect will increase over time as more sites are developed. It is permanent and district wide depending on where sites come forward that include affordable housing.
17	To provide good employment opportunities for all	?	?	?	Provision on-site will ensure that the affordable housing is on developments which by virtue of other RCUDP policies should be easily accessible by public transport to employment centres and therefore enable residents of the affordable housing to have easy access to employment centres. The uncertainty is associated with whether or not those employment opportunities exist in the district which is an issue beyond the scope of the SPD. Effects will be permanent and district wide in relation to sites where affordable housing is achieved.
Option 2: Adopt more flexible approach to allow the affordable housing to be provided off-site or in the form of a commuted sum					
1	To ensure quality housing is available to everyone	-	-	-	Off-site provision or a commuted sum may not meet housing needs as directly as on-site and likely to be delay in provision.
3	To create and retain vibrant communities that promote good health and social inclusion	-	-	-	Failure to achieve affordable housing on-site will lead to opportunities being missed to create a better mix of housing and communities and will not address the problems arising from areas of monotenure.
13	To ensure efficient use of land	?	?	?	Allowing off-site provision or commuted sums may result in less efficient use of land since it is not certain that mixed developments in terms of tenure will be built. It also depends how and where commuted sums are spent.

9. Predicting and Evaluating the Effects of the Draft SPD

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment
	Short Term	Medium Term	Long Term	
17 To provide good employment opportunities for all	?	?	?	The affordable housing may not be provided as quickly and may not be in as sustainable locations as on-site provision thereby reducing the opportunity for easy access to employment centres. Residents of the affordable housing may experience more difficulty/greater costs in travelling to work. The uncertainty arises from not knowing how the commuted sum will be spent and where. It may be difficult for RSLs or the Council to find suitable sites on which to utilise the commuted sum.
<p>Implications for SPD: Option 2 suggests that there would be minor negative effects together with uncertain effects if the affordable housing were provided off-site or a financial contribution accepted, largely because the way in which the commuted sum may be spent is less predictable than with on-site provision. Option 1 would help in meeting SO1, SO3 and SO13 by helping create mixed communities and providing the affordable housing earlier. Option 1 is therefore the preferred approach followed in the Draft SPD.</p>				
OBJECTIVE 3: SIZE AND TYPE OF DWELLINGS				
Option 1: Do not specify the mix				
1 To ensure quality housing is available to everyone	--	--	--	Not specifying the mix will not result in a range of housing to meet the needs of all social groups. Effect permanent as dwellings provided will remain in district's housing stock but will not necessarily be aligned with the District's housing needs.
Option 2: Specify the basis on which the range of house types and sizes will be based				
1 To ensure quality housing is available to everyone	+	+	++	By ensuring the affordable housing is built to meet the district's housing needs through providing specific numbers of types and sizes of dwellings the range and affordability of all social groups will be met. Over time the ability of the district's housing stock will increasingly become better aligned with its housing needs. Effect permanent and district wide in relation to location of sites where affordable housing is achieved.

9. Predicting and Evaluating the Effects of the Draft SPD

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment
	Short Term	Medium Term	Long Term	
<p>Implications for SPD: By specifying the types and sizes of dwellings (Option 2) the district's housing stock will become more precisely aligned over time with the needs of its residents. This is therefore the option followed in the Draft SPD.</p>				
OBJECTIVE 4: MANAGEMENT OF THE AFFORDABLE HOUSING				
<i>Option 1: All dwellings be transferred to a RSL</i>				
1	To ensure quality housing is available to everyone	+	++	Management by RSL assists in controlling retention of housing as affordable and in selecting those occupants remaining in need. Effect is permanent subject to Right to Buy Legislation and district wide according to where affordable housing is achieved. Over time an increase in the number of RSL properties will assist in providing housing for a greater proportion of the population.
7	To retain, protect and create a quality built environment	+	+	RSLs ensure quality of housing and gardens is maintained and are bound to the Housing Corporation's Design and Quality Standards.
<i>Option 2: Be more flexible with management arrangements</i>				
1	To ensure quality housing is available to everyone	?	?	Retaining housing as affordable and selecting appropriate occupants less certain when RSL not involved. Permanence of affordable housing less certain. Effect district wide depending on where affordable housing built.
7	To retain, protect and create a quality built environment	?	?	Some uncertainty over maintenance of dwellings and curtilage with private landlords
<p>Implications for SPD: Whilst the effects of who manages the affordable housing are somewhat uncertain, generally where a RSL is involved there is a greater likelihood that the affordable housing will meet SO1 and possibly SO7. Option 1 is therefore the preferred choice for the draft SPD.</p>				
OBJECTIVE 5: BUILDING/DESIGN STANDARD OF THE AFFORDABLE HOUSING				

9. Predicting and Evaluating the Effects of the Draft SPD

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment	
	Short Term	Medium Term	Long Term		
Option 1: Insist on the Housing Corporation's Design and Quality Standards (include DCLG's Code for Sustainable Homes)					
1	To ensure quality housing is available to everyone	++	++	++	<p>Building to the Housing Corporation's Design and Quality Standards will ensure housing built to standards that meet occupants' needs in terms of room size.</p> <p>Will ensure quality housing available to everyone since those in need of affordable housing will benefit from cheaper heating and power making the costs of housing more affordable.</p> <p>Permanent and spread across the district where affordable housing is achieved.</p>
7	To retain, protect and create a quality built environment	++	++	++	<p>The Housing Corporation's Design and Quality Standards will ensure a high specification benefiting the quality of the built environment. Effect permanent and spread across those parts of the district where affordable housing is built.</p>
10	To reduce pollution levels including the carbon footprint of the district	+	+	++	<p>Building to the DCLG's Code for Sustainable Homes will help reduce emissions as less energy consumed and less carbon produced. Effect permanent and district wide where affordable housing achieved.</p>
11	To protect and enhance the natural, semi-natural and manmade landscape	?	?	?	<p>Building to the Housing Corporation's Design and Quality Standards will ensure building to good design standard and same as general market housing but not clear if this will actually enhance the manmade landscape.</p>
12	To ensure prudent and efficient use of natural resources and energy	+	+	++	<p>Building to the Housing Corporation's Design and Quality Standards will result in increased use of renewable energy, reduced energy and water consumption and specific standards in relation to the</p>

9. Predicting and Evaluating the Effects of the Draft SPD

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment
	Short Term	Medium Term	Long Term	
				materials used both in design terms and environmental terms. Effect will be permanent and district wide where affordable housing is built. Benefit will increase over time.
16	To develop a managed response to the effects of climate change	?	?	The very specific nature of this SPD means that the opportunities to respond to climate change are limited. SO12 as documented above will assist in reducing the actual causes of climate change.
Option 2: Do not insist on the Housing Corporation's Design and Quality Standards (include DCLG's Code for Sustainable Homes)				
1	To ensure quality housing is available to everyone	?	?	Affordable housing may be built to lower specification than general market housing. Effect permanent and spread across those parts of the district where affordable housing built Requirements of Building Regulations and planning policies will ensure all dwellings built to an increasingly high standard over time. Effect uncertain in relation to requirements to meet DCLG's Code for Sustainable Homes but will catch up in time.
7	To retain, protect and create a quality built environment	?	?	Affordable housing may be built to lower specification than general market housing having a negative effect on the quality of the built environment. Really depends on decision of builder at time of development. Effect permanent and spread across the district where affordable housing built.
10	To reduce pollution levels including the carbon footprint of the district	- ?	- ?	Unlikely to help reduce pollution and carbon emission levels in short term but as Building Regulations ramp up over coming years this situation should improve.

Sustainability Appraisal Objective	Predicted Effects on SA Objective			Justification and Comment
	Short Term	Medium Term	Long Term	
11 To protect and enhance the natural, semi-natural and manmade landscape	?	?	?	Not requiring building to the Housing Corporation's Design and Quality Standards will not necessarily result in poor building standards but dependent on quality of schemes coming forward. Poor schemes will not get planning permission but mediocre may not be refusable.
12 To ensure prudent and efficient use of natural resources and energy	- ?	? -	? -	<p>Opportunities to benefit from renewable energy, increased water and energy efficiency and environmentally beneficial materials will be missed. Effect uncertain as Building Regulations ramped up over coming years will result in more sustainable development.</p> <p>Effect likely to not assist SO12 in short to medium term but less certain in longer term.</p> <p>Any effect will be district wide where affordable housing is built.</p>
16 To develop a managed response to the effects of climate change	?	?	?	The very specific nature of this SPD means that the opportunities to respond to climate change are limited. SO12 as documented above will assist in reducing the actual causes of climate change.
<p>Implications for SPD: Option 1 will have beneficial effects for better quality accommodation, a better quality environment and ensure dwellings are built to high standards of energy and water efficiency and use of renewable energy. Option 2 is likely to result in inferior space standards, standards of design and energy efficiency although any such negative effects will be ameliorated to some extent by saved RCUDP Policies on design and amenity and by the relevant Building Regulations. However, pursuing Option 1 provides the opportunity to progress to higher levels of sustainable dwellings more quickly. Overall Option 1 is the most sustainable option and is the one preferred in the draft SPD.</p>				

9. Predicting and Evaluating the Effects of the Draft SPD

Overall Conclusions of the Appraisal

9.3 A number of the objectives in the sustainability appraisal framework will be furthered by the SPD, whilst the SPD will not have any effects at all on other objectives. No adverse effects were identified in the appraisal.

9.4 Following consultation, no significant changes were made to the SPD, rather several minor changes were made to improve its clarity and on occasion introduce a little more flexibility where appropriate. These improvements to the document will help ensure that the SPD furthers those sustainability objectives it had already been identified as supporting.

9.5 Those aspects of the SPD having the most positive effects on the Sustainability Objectives (SOs) are:

SO1 To ensure quality housing is available to everyone

- increasing the proportion of affordable housing required
- requiring the affordable housing to be provided on-site
- specifying the size and type of housing
- allowing RSLs to manage the dwellings
- building to the Code for Sustainable Homes

SO3 To create and retain vibrant communities that promote good health and social inclusion

- increasing the proportion of affordable housing required
- requiring the affordable housing to be provided on-site

SO7 To retain, protect and create a quality built environment

- increasing the proportion of affordable housing required
- allowing RSLs to manage the dwellings
- building to the Housing Corporation's Design and Quality Standards

SO10 To reduce pollution levels

- building to the Code for Sustainable Homes

SO11 To protect and enhance the natural and manmade landscape

- building to the Housing Corporation's Design and Quality Standards

SO12 To ensure prudent and efficient use of natural resources and energy

- increasing the proportion of affordable housing required
- building to the Housing Corporation's Design and Quality Standards
- building to the Code for Sustainable Homes

SO13 To ensure efficient use of land

- requiring the affordable housing to be provided on-site

SO17 To provide good employment opportunities for all

- requiring the affordable housing to be provided on-site

10. Mitigating Adverse Effects and Maximising Beneficial Effects

10.1 The sustainability appraisal has shown that there are no significant adverse effects of implementing the SPD. The majority of the interactions in the appraisal concerned the social objectives of sustainability. The actual provision of affordable housing will assist in furthering these objectives, particularly SO1 (providing quality housing for everyone). The benefits of providing affordable housing could be increased by seeking a higher proportion of affordable units on suitable sites but the level selected for the SPD reflects the position in the saved RCUDP and is an improvement on what has been achieved historically. A future DPD on housing may seek to raise the proportion of affordable housing required in private development schemes but will be dependent on the housing needs of the district at that time. The requirement for building to the Housing Corporation's Design and Quality Standards will reinforce the requirements of other planning policies in the RCUDP and the Building Control Regulations.

11.1 Monitoring allows the actual significant effects of the SPD to be tested against those predicted in the SA. The Planning and Compulsory Purchase Act 2004 already requires Local Planning Authorities (LPAs) to publish an Annual Monitoring Report which monitors the implementation of policies in the RCUDP. Further analysis and updating of the HRS will provide information about the level of need in the district in the next few years. Recording information on the number of affordable housing completions, permissions and in-lieu financial contributions provides useful indicators of how successfully the policy is being implemented. At the same time the baseline indicators in the SA will need monitoring to determine how successful the SPD is in furthering the sustainability objectives relevant to this SPD.

12. Sustainability Implications & Recommendations

12.1 Overall the draft SPD will have a beneficial effect on those sustainability objectives relevant to such a specific topic as affordable housing whilst not having any adverse effects. The beneficial effects could be maximised by increasing the proportion of affordable housing required on private development sites. However, as the requirement for 20% of homes to be affordable is set in the RCUDP this figure cannot be changed until a DPD on housing is prepared. Not only will this have a beneficial effect on SO1 (quality housing available to everyone) but it will increase the positive effects on those objectives where the draft SPD only has a marginal effect. The main uncertainty in relation to the effects of the SPD is that its implementation is dependent on suitable sites (above the threshold in PPS3) coming forward. The main recommendations arising from this appraisal are therefore:

- Increase the proportion of affordable housing required on private development sites in a future DPD on housing.
- Where opportunities arise to increase the level of affordable housing above the 20% level required in the RCUDP the Council must take full advantage of these opportunities.

Appendix 1. List of References

- Our Common Future: The World Commission on Environment and Development (WCED 1987)
- Securing the Future - delivering UK sustainable development strategy, HM Government (March 2005)
- European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
- The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004 No. 1633)
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)
- Generic Sustainability Appraisal Scoping Report, Calderdale MBC (February 2007)
- Calderdale Council Housing requirements Study 2005 (Outside Research and Development, 2005)
- Design and Quality Standards, Housing Corporation (April 2007)
- Code for Sustainable Homes - A step-change in sustainable home building practice (DCLG, December 2006)
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Appendix 2. Abbreviations & Glossary

Table 2.1 Abbreviations and Glossary

Abbreviation	Description
AMR	Annual Monitoring Report
The 'Act'	The Planning and Compulsory Purchase Act 2004
Core Strategy	A local development document which sets out the key strategies and policies for a planning authority
CLG	Communities and Local Government
DPD	Development Plan Document (part of the Local Development Framework
EU	European Union
LAA	Local Area Agreement
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LPA	Local Planning Authority
ODPM	Office of the Deputy Prime Minister (former)
PDL	Previously Developed Land
PPS	Planning Policy Statement
RCUDP	Replacement Calderdale Unitary Development Plan
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
Scoping	The process of deciding the scope and level of detail of a sustainability appraisal
SEA	Strategic Environmental Assessment
SEA Directive	European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment
SEA Regulations	The Environmental Assessment of Plans and Programmes Regulations 2004
SO	Sustainability Objective