Sustainability Appraisal (SA) and Statement on Strategic Environmental Assessment (SEA) for Affordable Housing (SPD)
Introduction

1. The Broadland District Local Plan Replacement (BDLPR) was formally adopted on 22 May 2006 and became the saved plan. This plan was finally adopted following the Local Public Inquiry into objections at the first deposit and revised deposit stages and proposed modifications. However, the former Local Plan system will be replaced by the Local Development Framework (LDF) with a series of Local Development Documents (LDD) under the Planning and Compulsory Purchase Act 2004. Therefore, the Local Plan Replacement will be in effect for 3 years, or until the documents of Local Development Framework are in place for adoption.

2. The proposed Supplementary Planning Document (SPD) on Affordable Housing, that this Sustainability Appraisal (SA) report evaluates, is intended to supplement Policy HOU4, HOU10 and HOU18 in the Population and Housing chapter of the Local Plan Replacement. The Planning Inspector recommended no changes to these policies as a result of the objections heard at the Inquiry and made in writing; he was in support the approach of the local plan, which proposed to produce supplementary guidance on Affordable Housing. Indeed the Inspector in his report considered the merits of an SPD against a more detailed policy and concluded that provided there was a transparent policy nexus between local plan policy and the SPD then the concerns of the objectors would be met.

3. The Broadland District Local Plan Replacement was subject to a sustainability appraisal at the first deposit stage, which was later revisited at the revised deposit stage. While the SA of the Plan was not written under the new regulations it did nevertheless consider the plan and the policies against sustainability criteria and objectives. In addition the SA at the first, revised deposit stages received no representations against them; we can infer the SA therefore met with approval.

Formal Determination and statement of reasons for determination on Strategic Environmental Assessment (SEA)

4. The Council determined that the Supplementary Planning Document (SPD) on Affordable Housing does not require a formal Strategic Environmental Assessment (SEA).

5. The Environmental Assessment of Plans and Programmes Regulations 2004 require all plans commenced on or after 21/07/04 to undergo SEA, though it is normally incorporated in Sustainability Appraisal. However, the Local Plan commenced before 21/07/04 and was adopted before 22/07/06, and so is not subject to SEA Regulations. This SPD was commenced after 21/07/2004 and intended to amplify the parent policies in the Local Plan Replacement without raising new environmental issues beyond parent policies.
6. The Council made this decision following the consultation with the statutory environment bodies (English Nature, English Heritage, Environment Agency and the Countryside Agency) between November and December 2005, who all agreed that the production of this SPD would not raise any new significant environmental issues that would warrant a full Strategic Environmental Assessment.

7. Although any development has an impact on the environment it is unlikely that the development of affordable housing will have any more or less impact than other tenures. Where affordable housing is developed as an exception to other policies in the plan (Policy HOU18) this often may be on greenfield land outside, but adjoining a settlement limit.

8. The proposed SPD, as well as supplementing policy HOU4 – affordable housing provision sought as a consequence of development and policy HOU18 on rural exception sites for 100% affordable housing, also supplements policy HOU10 which seeks a range of house types. Ensuring a range of types are provided in Broadland, follows current national guidance and will also have an impact on meeting housing needs for a range of tenures.

9. In summary, the provision of affordable housing, whether as a consequence of development or as an exception site contributes to the Government's overarching aim for Sustainable Communities.

The saved policy framework and Sustainability Appraisal of the Broadland District Local Plan (Replacement)

10. The Broadland District Local Plan Replacement was progressed under the transitional regulations for development plans and is saved for 3 years from adoption, until May 2009 or until it is superseded by emerging LDF documents. The proposed SPD will supplement policies HOU4, HOU10 and HOU18 on housing as a consequence of new development, all of which were included in the Sustainability Appraisal.

11. The Local Plan Replacement was subject to a Sustainability Appraisal, although not under the recent regulations. As stated above this was deposited with the first and revised deposits, and was not subject to any objections.

12. The Appraisal of the plan considered the general policies proposed against five Sustainability Criteria, as follows,
   - Global sustainability
   - Natural resources
   - Local environment
   - Social equity
   - Economic wellbeing
13. The appraisal demonstrates the balance attributable to the criteria above and the allocations made in the plan. The residential allocations are expected to contribute 40% affordable housing on site, which is set out in individual Parish allocation policies, and so while the proposed SPD will be a consideration, it will be the Parish policy that is most significant in determining any future application. All the policies relevant to affordable housing were included under the section on Social Equity in terms of meeting housing needs. In the more detailed policy impact matrix, policies HOU4, HOU10 and HOU18 are considered against the 5 criteria set out above. All three policies positively contribute for social equity and policy HOU18 has both positive and adverse impact on Global sustainability and has adverse impact on Local environment.

**Impact of the proposed SPD on the environmental, economic and social objectives**

14. The SPD directly supplements the parent policies in the local plan replacement described above and adds detail to aid the determination of planning applications. The SPD adds detail on the percentage and tenure breakdown of affordable housing sought and guidance on procedure for applications giving rise to affordable housing. It is considered that the impact of the proposed SPD will not go any further than the policies set out in the replacement plan, already evaluated on sustainability grounds in the SA report.

15. The policies in the Local Plan Replacement have been subject to Sustainability Appraisal. The SPD sets out the mechanism for implementing the policies and is within the scope of the Sustainability Appraisal on the parent policies. More specifically, under the relevant criteria, its impacts on Global Sustainability and Local Environment will be no different from those of the plan; its effect on social equity however will be slightly positive as it sets out a clear mechanism for provision of affordable housing.

16. Therefore, it is concluded that the impact of the proposed SPD will not go any further than the policies set out in the replacement plan, already evaluated on sustainability grounds in the SA report.

**SPD or no SPD option**

17. The SPD on Affordable Housing is proposed to amplify policies in the saved plan, not to change the direction of them, therefore this report is unable to look at genuine alternatives apart from the SPD or no SPD options.

18. If there were to be no SPD, it is too late to make any alteration to the Local Plan Replacement so the Council would not be able to operate the policy as intended. The crucial issue that the SPD contains is the percentage sought in negotiation for affordable housing and the breakdown of tenures, and without an SPD the Council would be unable to negotiate any contributions from this starting point. The reason
for setting out the percentage target for affordable housing in a supplementary document is to allow a certain amount of flexibility, new housing needs surveys and research will most likely be commissioned and published during the lifetime of the plan and the logic being that SPD is relatively easier and quicker to update in comparison to a formal alteration to the local plan.

Conclusion

19. The Council decided not to conduct formal Strategic Environmental Assessment with the Supplementary Planning Document which this statement accompanies.

20. The reasons for the determination are that the SPD does not raise any additional social environmental or economic issues; its impacts on social issues are slightly more beneficial as it sets out a clear mechanism for provision of affordable housing. The determination was subject to consultation with four statutory environmental bodies, and is in accordance with the current relevant regulations.