



MOBILITY & WHEELCHAIR HOUSING
Supplementary Planning Document

SUSTAINABILITY
APPRAISAL REPORT

November 2005

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APPENDIX

APPENDIX 1: Environmental Assessment

Table to tests the proposed actions of the Mobility & Wheelchair Housing SPD against the SEA criteria to assess the likely impact of these actions on the environment

How to Comment on the Report

Comments relating to this Sustainability Appraisal [SA] or the 'Mobility & Wheelchair Housing', Supplementary Planning Document [SPD] should be sent to:

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Alternatively, comments can be sent by fax on 020 8424 1551.

The Council can accept comments by e-mail relating to this consultation. Please contact Ali Kashmiri on 020 8426 0811 or ali.kashmiri@harrow.gov.uk

Copies of both reports are also available via the planning pages on the Council's website at www.harrow.gov.uk

Comments from this informal consultation must be received by 4.30 pm on Friday 30th December 2005.

Sustainability Appraisal Background and Purpose

1. Introduction

1.1 The Main Principles of the Local Development Framework and Legislative Background

The Local Development Scheme (LDS), brought into effect in June 2005, outlines the programme for preparing and reviewing Local Development Documents. The LDS includes the timetable for the production of this Mobility & Wheelchair Housing Supplementary Planning Document (SPD). SPDs provide additional guidance expanding upon policies in the Harrow Unitary Development Plan (HUDP).

2. Policy Context

2.1 The Mobility & Wheelchair Housing SPD is supplementary to the Harrow Unitary Development Plan [HUDP] and will form part of the Local Development Framework [LDF]. The SPD amplifies policy H18 which reads as follows:

Accessible Homes

H18 THE COUNCIL WILL ENCOURAGE NEW HOUSING DEVELOPMENT, INCLUDING CHANGES OF USE AND CONVERSIONS OF BUILDINGS INTO FLATS, TO BE ACCESSIBLE TO ALL. IN LARGER RESIDENTIAL SCHEMES, THE COUNCIL WILL SEEK TO ENSURE THAT A PROPORTION OF THESE ARE BUILT AS LIFETIME HOMES OR CAPABLE OF ADAPTATION TO WHEELCHAIR HOUSING. ALL WHEELCHAIR HOUSING, PROVIDED AS PART OF A NEW RESIDENTIAL DEVELOPMENT, SHOULD BE IN A SUITABLE LOCATION IN ORDER TO MEET THE NEEDS OF THE OCCUPANTS.

2.2 In line with London plan policies and HUDP Policy H18, the Mobility & Wheelchair Housing SPD will provide developers with guidance in relation to the design of Wheelchair Standard Housing, and clear guidance of where it will be sought.

2.3 The London Plan targets of 100% Lifetime Homes, 10% wheelchair-accessible homes, and its general requirements for access for all, are fundamental to providing the right homes in the right place. The London Plan also acknowledges that successful high density housing will not be possible without the highest standards of urban design. For the purpose of this SA, the term 'Lifetime' will be used instead of the word 'mobility'. It is the Council's intention to change the title of this SPD to 'Accessible Homes SPD' in the Annual Monitoring Report (AMR) to be produced at the end of the year. This will more clearly link to the title of the policy and reflect its main intentions. The SPD addresses both the delivery of Lifetime and Wheelchair Standard housing, and ensuring good design in the delivery of such housing, and housing in general.

2.4 The SPD comprises of two types of housing unit - Lifetime homes and Wheelchair standard homes. A Lifetime home is a home for life and is designed with 16 specified criteria in mind (see below), for example, features such as level access, wider doors and sufficient internal turning space.

Criteria: Lifetime Homes Standard Housing

- 1) Car Parking - adjacent, capable width > 3.3m
- 2) Car parking - space between car park and home level
- 3) Entrance - approaches level or gently sloping
- 4) Entrance - illuminated, level & covered

- 5) Lifts - wheelchair accessible
- 6) Width - position of doors and halls
- 7) Internal turning space - 1500mm diameter
- 8) Sitting room - at entrance level
- 9) Bedroom - ground floor
- 10) Downstairs W.C - wheelchair accessible & shower
- 11) W.C. Walls - adaptable i.e. handrails
- 12) Future Stair lift Provision
- 13) Provision for ceiling tract hoist
- 14) W.C & Bathroom - side approach
- 15) Windows - 800mm or lower
- 16) Switches - 450mm to 1200mm

A wheelchair standard home is a home that is specifically designed with wheelchair users in mind. The criteria for Wheelchair standard homes are additional to the above listed Lifetime homes standards and promote subtle but highly effective differences that cater for a wheelchair user - for example, features such as covered car parking areas, low-level kitchen units and storage space. The Wheelchair standard homes criteria are as follows:

Criteria: Wheelchair Standard Homes

- 1) Car parking - covered
- 2) Storage space - outdoor mobility vehicles
- 3) Letter Box - type and height suitability
- 4) Circulation areas - 1200mm minimum
- 5) Internal doors - to open > 90 degrees
- 6) Leading Edge - 550mm from adjacent wall
- 7) Bathroom - 2400mm x 2400mm
- 8) Kitchen - 1400mm x 1400mm
- 9) Storage cupboard - disabled equipment

2.5 Lifetime Homes and Wheelchair housing are two different types of housing which should generally form part of the fabric of mainstream housing. Currently such housing is normally secured through negotiations with developers in Harrow. Older people and people with physical disabilities require housing which is designed to help them retain maximum independence. There is a need for housing which is not specifically designed for disabled people but adaptable and designed to be adjustable in accordance to the changing physical and medical circumstances. This places people who become disabled in a favourable position in as much as they do not have to move house. Consequently, the Council wishes to amplify on the implementation of policy H18 and further emphasise the support for Lifetime housing because

Lifetime homes substantially reduce the cost of later adaptation, and reduce the costs of personal care.

2.6 Baseline data relating to local social, economic and environmental issues was collected as a way of devising a structure for the Mobility & Wheelchair Housing SPD and to determine its content or scope in line with relevant government guidance, plans and programmes that were reviewed. The most important task in carrying out a SA of the Mobility & Wheelchair Housing SPD was to establish the likely significant effect of the content of the Mobility & Wheelchair Housing SPD against social, economic and environmental factors, in accordance with the requirements of the SEA Directive and the Planning and Compulsory Purchase Act 2004.

2.7 A review of European, national, regional and local policy and strategy plans was undertaken to identify appropriate social, environmental and economic objectives for the Mobility & Wheelchair Housing SPD.

Some of the most relevant documents reviewed for the production of the Mobility & Wheelchair Housing SPD and this SA Report are listed below:

1. The Strategic Environmental Assessment Directive: Guidance for Planning Authorities. ODPM, London, October 2003
2. Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Consultation Paper, ODPM, September 2004
3. Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim Advise Note on Frequently Asked Questions, ODPM, London, April 2005
4. Planning Policy Statement 1: Delivering Sustainable Development
5. Planning Policy Guidance 3: Housing
6. Planning Policy Guidance 15: Planning and the Historic Environment
7. The Disability Discrimination Act 1995 (DDA)
8. Planning and Access for Disabled People: A Good Practice Guide from the Office of the Deputy Prime Minister
9. Part M to the Building Regulations: May 2004
10. British Standard 8300; 2001- Code of Practice
11. Lifetime Home Standards, Joseph Rowntree Foundation
12. Wheelchair Housing Design Guide, 1997, BRE Publications
13. Scheme Development Standards, 2003, Fifth Edition
14. The London Plan (Spatial Development Strategy for Greater London), Mayor of London, February 2004.

3. Strategic Environmental Assessment (SEA) & Sustainability Appraisal (SA)

3.1 All DPDs and SPDs will need to undergo Sustainability Appraisal (SA) as required under section 5 of the Planning and Compulsory Purchase Act 2004. SA is a systematic process carried out during plan production; its purpose is to assess the extent to which emerging policies, proposals and supplementary information will help to achieve relevant environmental, social and economic objectives, i.e. sustainable development.

3.2 The European Directive 2001/42/EC requires an 'environmental assessment report' of plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment. This process is referred to commonly as 'strategic environmental assessment' (SEA).

3.3 An Environmental assessment report has to be included as part of this SA report (Appendix 1), under the Strategic Environmental Directive (2001/42 EC), and this has been achieved by combining the two document requirements, in accordance with Annexe 7 of the ODPM guidance as the SEA guidance requirements have been incorporated into the Draft SA guidance¹. This SA Report therefore uses an approach that addresses the requirements of SEA and SA simultaneously, by giving full consideration to environmental issues in compliance with SEA, whilst also addressing the spectrum of socio-economic concerns as required by SA.

4. Reason for the Production of the Mobility & Wheelchair Housing SPD and Plan Options

4.1 There are many misconceptions that surround housing provided to meet the needs of people with disabilities. Developers typically perceive Lifetime homes and Wheelchair Standard housing as properties that will require extra space, reduce housing density, and as a specialism separate from the needs of mainstream society. With only 1% of the total new housing stock currently being accessible and approximately 18% of existing dwellings requiring adaptations over the next 30 years, the Council is keen to ensure that all new housing meets the minimum standard for Lifetime Homes.

4.2 A key objective of the Mobility & Wheelchair Housing SPD is to demonstrate the links between the Council's planning process, government planning policy and nationally recognised housing standards. The Mobility & Wheelchair Housing SPD supports the principles of sustainable design, by actively discouraging design that potentially involves future costly and disruptive adaptations. Furthermore, the SPD actively demonstrates that homes which are ostensibly mainstream in design, can also be accessible to wheelchair users. The SPD will introduce design trends which encourage improved social inclusion of disabled people through accessible housing that is integrated across the whole borough.

4.3 The Mobility & Wheelchair Housing SPD aims to ensure:

- that new residential developments, including conversions and extensions, are of good quality in order to maintain and enhance the residential component and character of the Borough. More importantly it aims to provide and retain a range of housing types and sizes, of a high standard and design, to meet the varied physical and economic needs of the Borough's residents.

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Consultation Paper, ODPM, September 2004

- that Wheelchair Housing units should generally be integrated with mainstream housing. This is to ensure that such housing types are integrated and inclusive, thereby also reducing the chances of break-ins to housing which is known to belong to disabled people. Hence the SPD will give extra guidance on how to avoid problems associated with isolation

4.4 Options:

Following the introduction of the Planning and Compulsory Purchase Act 2004 and the publication of a variety of detailed accessible housing documents, a new comprehensive SPD was required. This SPD will be produced under the provisions of the Planning and Compulsory Purchase Act 2004, and Lifetime Homes and Wheelchair Standard Housing regulations.

4.5 It was recommended by the HUDP Planning Inspector that references to any standards within policy H18 ought to be placed in the policy's reasoned justification. To enhance the existing policy it was thought that a SPD would be an ideal tool to implementing the existing Accessible Homes Policy H18. Developing the document as an SPD for the LDF gives it more weight and duration under the new planning system as opposed to developing an SPG to the HUDP. This will ensure that the Mobility & Wheelchair Housing SPD can be implemented beyond the three year period of the initial Local Development Scheme (LDS), in which any HUDP policies and SPGs can be saved.

4.6 Due to the fact that the Mobility & Wheelchair Housing SPD expands upon an existing saved policy in the HUDP and does not introduce new options or policies, the guidance has been brought out as a SPD as opposed to new policy which would have required the document to be produced as a Development Plan Document (DPD). It was considered a sensible option to progress the document as a SPD since part of its production had already commenced prior to the LDF system coming into force.

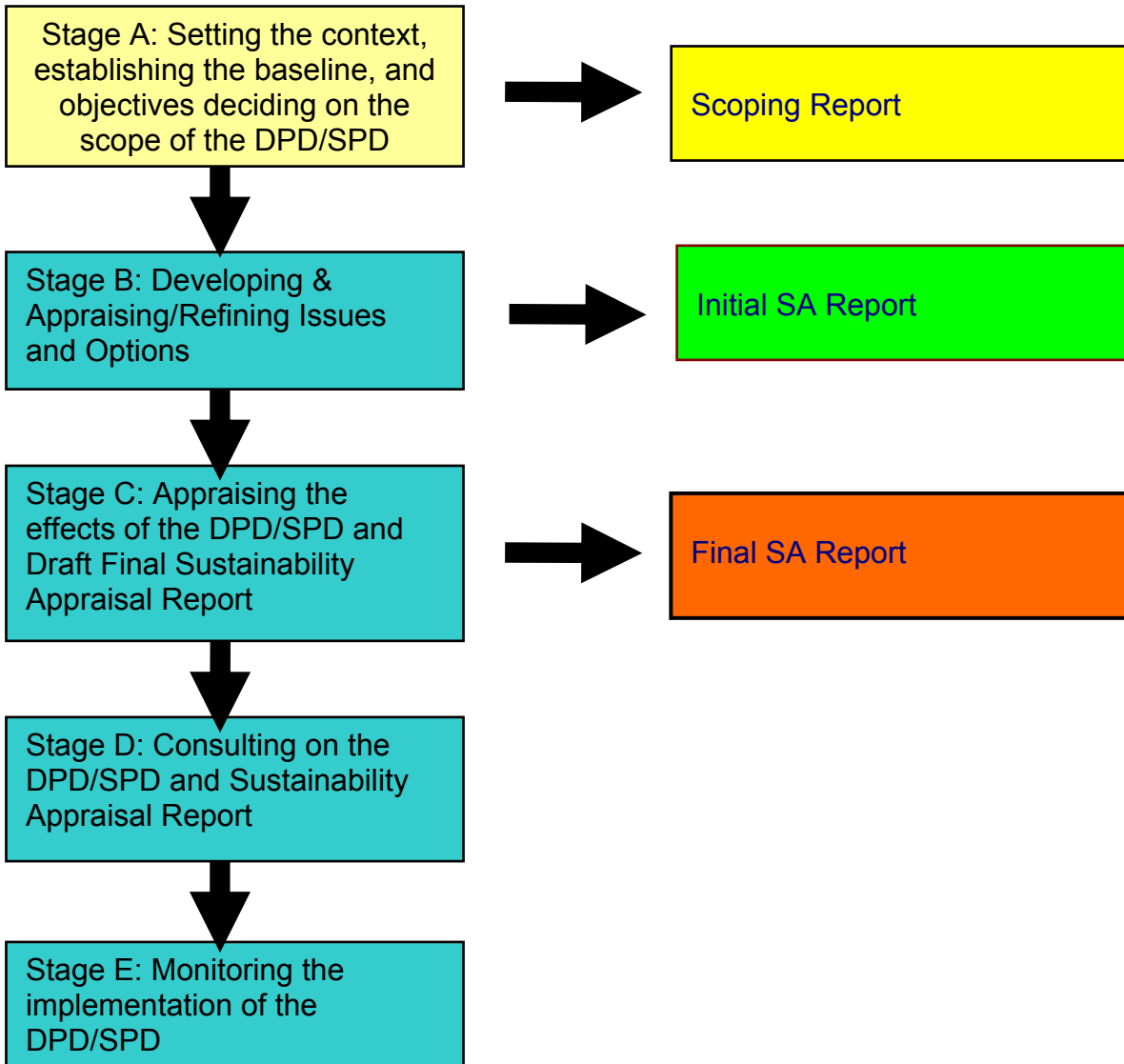
5. The Purposes the Mobility & Wheelchair Housing SPD will serve

5.1 The purpose of the SPD is to illustrate examples of well-designed accessible homes in the Borough and a range of good design solutions to these. The SPD will be designed to highlight the most important principles in designing accessible homes and is particularly aimed at developers and builders. The document seeks to illustrate the best ways to achieve well-designed accessible homes, that seamlessly integrate with the surrounding area, using a range of property types. The SPD will provide practical guidance to developers and will demonstrate that with careful planning, Lifetime Home Standards can be introduced without compromising the number of habitable rooms provided otherwise.

6. Sustainability Appraisal Methodology

6.1 The approach adopted to undertake the SA was based on the process set out in the Draft Government Guidance on SA of Regional Spatial Strategies and Local Development Frameworks (September 2004). Figure 1 below demonstrates the stage by stage flow of the SA process and Figure 2 outlines the requirements and tasks to be undertaken within each stage of the SA process.

FIGURE 1: Flow Diagram to Describe the SA Process Stage by Stage:



6.2 At each stage of DPD or SPD production, a sustainability appraisal will be carried out to inform the consultation process, assist in refining policies and proposals and support submitted DPDs during the examination stage. There are five stages within the SA process and currently this SA report has addressed the tasks of stage A to stage C. It also addresses the options appraisal requirements of stage B, which have been clarified in paragraph 4.3. The SA process will develop alongside the progression of the SPD. It should be recognised that informal consideration of sustainable development requirements has been given throughout the formulation of this SA, as have all aims included in the Mobility & Wheelchair Housing SPD. Figure 2 (pages 11-12) also demonstrates the tasks involved in the SA process and how these link with the production of DPDs and SPDs.

6.3 The Council is producing an Overarching SA Report of the LDF, which is nearing completion. It identifies appropriate overarching high-level objectives for appraising policies against, and examines ‘baseline’ conditions in the Borough as required by stage A of the SA process. These overarching objectives have been used in this SA report assessment of the Mobility & Wheelchair Housing SPD (refer to figure 4 and pages 15-19). This Overarching SA report is referred to as the SA Scoping Report in accordance with the ODPM draft SA guidance (September 2004) and has been designed to provide a foundation for the range of DPDs and SPDs that the Council intends to produce, but will if necessary be updated during the early stages of DPD or SPD production to ensure that the information and analysis it contains remain

relevant. It will also be updated should any significant changes occur to the final ODPM SA guidance was due to be published in October 2005.

FIGURE 2: Sustainability Appraisal Process

Generic SA Stages for Plan making	SA process linkages to the preparation of DPDs and SPDs	Stages and Tasks
<p>Stage A: Gathering information to produce an SA Scoping Report</p>	<p>Prepared alongside the preparation of the evidence base for the relevant DPDs and SPDs.</p>	<p>A1- Identifying other relevant plans, programmes & sustainability objectives relevant to the LDF objectives to document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed.</p> <p>A2- Collecting relevant economic, social and environmental baseline information to provide an evidence base for sustainability issues, effects prediction and monitoring.</p> <p>A3- Identifying sustainability Issues to help focus the SA and streamline the subsequent stages, including baseline information analysis, setting of the SA Framework, prediction of effects and monitoring.</p> <p>A4- Developing the SA Framework to provide a means by which the sustainability of the plan can be appraised.</p> <p>A5- Testing the DPD/SPD objectives against the SA Framework - to ensure that the overall objectives of the plan are in accordance with sustainability principles and provide a suitable framework for developing options.</p> <p>A6- Consulting on the scope of the SA- The 'authorities' identified by the UK Government in the SEA Directive as being likely to be concerned by the environmental effects of implementing DPDs/SPDs have to be consulted to ensure the SA covers the sustainability issues.</p> <p>The four consultation authorities with environmental responsibilities as set out in Regulation 9 as part of the SEA determination process are:</p> <ol style="list-style-type: none"> 1. The Environment Agency; 2. The Countryside Agency; 3. English Nature; and 4. English Heritage.
<p>Stage B: Identify issues and options and prepare for consultation</p>	<p>Prepared outside the preparation of issues and options.</p>	<p>B1- Appraising issues and Options- To assist in the development and refinement of the options, by identifying potential sustainability effects of options for achieving the DPD/SPD objectives.</p> <p>B2- Consulting on the SA of emerging options of the DPD/SPD- To consult with the public and statutory bodies on the SA of emerging options to ensure the SA covers all the reasonable</p>

		options and key sustainability issues.
Stage C-Appraising the effects of the draft DPD/SPD and SA report	Prepared alongside the preparation of the preferred options. Consultation on both DPD/SPD and SA report will take place at the same time.	C1- Predicting the effects of the plan, including plan options- to predict the significant effects of the DPD/SPD and the DPD/SPD options. C2- Assessing the effects of the DPD/SPD- to assess the significance of the predicted effects of the DPD/SPD and its options and assist in the refinement of the DPD/SPD. C3- Propose measures to maximise beneficial effects and mitigate adverse effects. C4- Developing proposals for monitoring- To detail the means by which the sustainability performance of the plan can be assessed. C5- Preparing the SA Report- to provide a detailed account of the SA process, including the findings of the appraisal and how it influenced the development of the DPD/SPD, in a format suitable for public consultation and decision-makers.
Stage D- Consultation on the DPD/SPD and Sustainability Appraisal Report	Prepared alongside the preparation of the submission of DPD/SPD. Consultation on both will take place at the same time.	D1- Consulting on the SA Report alongside the DPD/SPD- To provide the public and statutory bodies with an effective opportunity to express their opinions on the SA Report and to use it as a reference point in commenting on the plan. D2 - appraising significant changes- To ensure that any significant changes to the plan are assessed for their sustainability implications and influence the revision of the DPD/SPD. D3 - Decision making and providing information- to provide information on how the SA Report and consultees' opinions were taken into account in preparing the DPD/SPD. Submit DPD/SPD and SA Report to the Secretary of State.
Stage E- Monitoring the Implementation of the DPD/SPD	The sustainability of the Core Strategy DPD / SPD Policies will be assessed as part of the Annual Monitoring Report.	E1- Monitoring the significant effects of the plan- To measure the sustainability performance of the plan in order to determine whether its effects are as anticipated, and thereby inform future revisions. E2 - Responding to adverse effects- to ensure that the adverse effects can be identified and appropriate responses/actions developed.

6.4 Stages followed in assessing the Mobility & Wheelchair Housing SPD

This Mobility & Wheelchair Housing SA report has addressed stages A-C of the SA process as outlined in Figure 2 above. This SA report accompanying the Mobility & Wheelchair Housing SPD was referred to the four consultation authorities with environmental responsibilities as stated in stage A6 of the SA process. See Figure 2 above. The responses to the consultation were positive and have been summarised in the Mobility & Wheelchair Housing Consultation Statement. The current consultation (December 2005) addresses Stage D1 of the SA process.

7. Baseline Collection

7.1 The population of the UK is predicted to grow by 7% over the next 30 years, however, the number of disabled people in the UK is expected to rise by 40% according to the Office for National Statistics. 29, 524 people currently have a long-term illness or a disability.

7.2 The latest population projections produced by the Greater London Authority (GLA) (2005 Interim Projections Scenario 8.8) show that by year 2020 it is estimated that half of Harrow's adult population will be aged over 50, with people over 75 being the most rapidly growing sector. With an ever-increasing aging population and the associated likelihood of higher numbers of people with restricted mobility, there is urgent need for design methods based on better understanding of age and disability related factors. The Council must therefore adopt guidance that sets clear parameters for the design of housing developments to be of Lifetime and Wheelchair Standards, as decisions taken now will affect Harrow in the decades beyond 2020.

FIGURE 3: Population of Harrow with Limiting Long Term Illness (LLTI) or Disability (2001 Census)

Age Range	Population of Harrow	People with LLTI or Disability	People likely to benefit from Inclusive Design
0-15 years of age	41655	1518	3.64 %
Females 16-59 Males 16-64	129599	13119	10.12 %
Females 60+ Males 65+	33843	14887	43.99 %
*75+	*13750	*7832	*56.96 %
All people	205097	29524	14.40 %

(*figures in italics do not contribute to the total).

7.3 This data has informed the need for the Mobility & Wheelchair Housing SPD as the potential number of people who would benefit from the provision of lifetime and wheelchair housing is substantial. This observation results from both the number of older and disabled people living in Harrow and because Harrow has a growing aging population. The SPD will work to influence new housing developments to be designed in a way which will reduce the need for adaptations in the future since people mostly prefer to remain in their homes.

7.4 In analysing the implementation of Policy H18 a number of recent schemes were identified for possible examination. It was decided not to include any housing scheme involving Registered Social Landlords (RSLs) as these would have been required to be built to acceptable standards by the Housing Corporation. It was agreed also to analyse new schemes rather than adaptations. Baseline data has been collected from larger residential schemes to determine whether or not lifetime homes and wheelchair accessible homes have been secured

in Harrow. For the purposes of the data collection larger residential schemes are housing schemes of 15 units or above, granted planning permission in Harrow.

7.5 After searching the planning register for this type of planning application seven applications complied with the parameters outlined above. The details of the seven applications were examined against the 16 criteria for Lifetime homes and the 9 criteria for Wheelchair standard homes. Six out of the seven schemes short-listed did not propose any Lifetime home standard housing. Whilst all schemes attempted to provide some percentage of Wheelchair standard housing, none of the units complied with the majority of the stipulated criteria. Hence the need for clearer guidance on the implementation of the policy.

8. The objectives of the Mobility & Wheelchair Housing SPD are to:

1. To encourage improved social inclusion for disabled people through accessible housing that is integrated across the borough in its design, location and construction.
2. To promote housing that eliminates the need for potential costly future adaptations
3. To ensure that all new residential property in the borough is designed to be flexible, easy to use and therefore accessible to all occupiers

8.1 These Mobility & Wheelchair Housing SPD sustainability objectives have been assessed against environmental factors as required by Annex 1 Article 5(1) of the SEA Directive, to identify the likely significant effects of the Mobility & Wheelchair Housing SPD on these environmental factors. The environmental factors detailed in the SEA Directive Annex 1 Article 5(1) are as follows: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (See Appendix 1). This environmental assessment ensures compliance with the SEA Directive requirements as mentioned earlier in paragraph 3.3.

8.2 Appendix 1 details the three sustainability objectives which reflect the context of the Mobility & Wheelchair Housing SPD and the sustainability dimensions these objectives address i.e. social, economic and/or environmental. It also demonstrates the proposed actions of the Mobility & Wheelchair Housing SPD and the likely impact of these actions on the environmental factors listed above in implementing the Mobility & Wheelchair Housing SPD, and whether they are likely to be short, medium or long-term effects. A few indicators have also been devised to monitor the implementation of the Mobility & Wheelchair Housing SPD objectives, however further work is required to this working draft in formulating indicators for monitoring purposes.

8.3 These Mobility & Wheelchair Housing SPD objectives have also been assessed against the overarching SA objectives contained in the Overarching SA Scoping Report of the LDF that the Council is nearing completion (as mentioned earlier in paragraph 6.3, also see below, figure 4). This is to ensure that the Mobility & Wheelchair Housing SPD objectives are consistent with the overall objectives of the Council's vision proposed for the LDF, and also to test that the SPD objectives meet economic, environmental and social factors

FIGURE 4: The overarching SEA/SA Objectives contained in the Overarching SA Scoping Report of the LDF

SEA/SA Objective No.	Overarching SEA/SA Objective	Econ	Soc	Env
1	To make the most efficient use of land by developing on redundant and vacant brownfield sites and buildings, and to ensure that land is remediated as appropriate			✓
2	To protect the quality, quantity and accessibility of open spaces in the Borough			✓
3	To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough			✓
4	To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features.	✓	✓	✓
5	Reduce road congestion and traffic pollution levels by improving travel choice, reducing the need for travel by car, and shortening the length and duration of journeys	✓	✓	✓
6	To reduce air pollution and ensure air quality continues to improve through addressing the cause of climate change through reducing emissions of greenhouse gases		✓	✓
7	To reduce pollution of land (soil) and water			✓
8	To promote development proposals and/ or policies which consider the implementation of renewable/sustainable energy technologies, which exploit the use of wind, solar and biomass energy	✓		✓
9	Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting			✓
10	To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	✓	✓	
11	To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents.	✓	✓	✓
12	To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	✓	✓	
13	To improve the health and wellbeing of Harrow residents and reduce inequalities in health	✓	✓	✓
14	To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	✓	✓	
15	To reduce crime and the fear of crime	✓	✓	✓

8.4 The SEA/SA overarching objectives are designed to provide a balance between the three sustainability dimensions of sustainable development, the environment, the economy and

society. The ticks (✓) demonstrate which dimensions of sustainability are addressed for each overarching objective.

9. Existing saved Policy Appraisal

It is a requirement that when appraising an SPD, the unitary development plan policies being supplemented should themselves be appraised if this has not previously taken place.² As mentioned in paragraph 2.1, Mobility & Wheelchair Housing SPD supplements policy H18 of the HUDP. The intention of the SPD is to expand on the saved Policy H18, improve its application and avoid any negative impacts. Figure 5 below, demonstrates the appraisal of policy H18 against the overarching SEA/SA objectives of the LDF.

² Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim Advice Note on Frequently Asked Questions, ODPM, London, April 2005

FIGURE 5: Policy H18 policy appraisal chart

		Overarching SEA/SA objectives by Number														
Policy H18 - HUDP saved policy	Short, medium and long term impacts	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Short											+	+	+		+
	Medium				-						+	++	++	++		+
	Long				-						+	++	++	++		+

Key:

++	Strong impact
+	Moderate impact
-	Negative impact
	No impact

Assessment of Policy H18:

H18 in relation to SEA/SA objective 4 has been shown in the table to be potentially negative in its implementation impact. There are some areas of potential conflict which will always remain, for example, certain listed buildings and housing which may require changes to be accessible to all and afford equal opportunities to all, may not be adaptable to accommodate appropriate access arrangements as this could compromise the architectural and historic value of the building. It should be noted, however that where adaptations are permissible, potential likely negative impacts can be avoided through the implementation of the Mobility & Wheelchair Housing SPD.

In relation to SEA/SA objective 15, Disabled people often feel vulnerable to crime, especially if their house conspicuously displays the fact that they are disabled or that disabled people live there. Good design through the application of the Mobility & Wheelchair Housing SPD should integrate disabled facilities into the overall design and thereby reduce the fear of crime.

The possible incompatibilities identified between the saved Policy H18 and the Overarching SEA/SA objectives should be mitigated through the application of the Mobility & Wheelchair Housing SPD. Hence there is a lack of incompatibilities between the SPD objectives and the Overarching SEA/SA objectives (see figure 6, page 18).

FIGURE 6: Compatibility Matrix comparing the Mobility & Wheelchair Housing SPD objectives against the Overarching SEA/SA Objectives of the LDF

		OVERARCHING SEA/SA OBJECTIVES OF THE LDF (by number)														
S P D O B J E C T I V E S		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	1	+	+		+	+/-						+	+			
	2	+			+				+	+		+				
	3				+	+/-						+				

+	Objectives are compatible
	Objectives have no link
?	Uncertain link
+/-	Potentially compatible and incompatible
-	Objectives are incompatible

Generally the Mobility & Wheelchair Housing SPD objectives performed very well against the sustainability objectives in terms of their compatibility, and the majority of effects identified were very positive. There are two instances where there are likely potential compatible and incompatible links between the overarching LDF objectives and the Mobility & Wheelchair Housing SPD objectives identified in the matrix above (figure 6). It is considered that these potential incompatibilities identified do not necessitate the Mobility & Wheelchair Housing SPD objectives to be re-written since the actual likely impact or effect of the objectives on one another is dependent on the way in which they are implemented.

Measures and guidance has generally been identified in the Mobility & Wheelchair Housing SPD to mitigate potential negative effects or at least require more detailed consideration of the issue at the planning application stage. High visual amenity of new residential developments will be expected to be in-keeping with local heritage and landscape character and distinctiveness and housing layout will be required to contribute towards community safety.

FIGURE 7: Highlights the areas of uncertainty and incompatibility between the implementation of objectives as identified in the matrix above (Figure 6)

SPD objective	Compatibility uncertainty with overarching SA objective	Implementation considerations
<p>1) To encourage improved social inclusion for disabled people through accessible housing that is integrated across the borough in its design, location and construction.</p> <p style="text-align: center;">and</p> <p>3) To ensure that all new residential property in the borough is designed to be flexible, easy to use and therefore accessible to all occupiers</p>	<p>5) Reduce road congestion and traffic pollution levels by improving travel choice, reducing the need for travel by car, and shortening the length and duration of journeys</p>	<p>New developments have potential negative impacts via increasing the effects of traffic on the environment. Also design layouts encouraging use of alternatives to the car may have a potentially negative impact, reducing the suitability of developments for providing appropriate housing for disabled people.</p>

10.Next Steps

10.1 The next stages in the SA process will be completed alongside the development of the Mobility & Wheelchair Housing SPD and responses received to this SA Report will be taken into consideration. Indicators to monitor the SPD objectives have been devised to enable effective monitoring of the Mobility & Wheelchair Housing SPD in its implementation.

10.2 Access Statements illustrate a planning applicants commitment to good design principles, ensuring that access remains inclusive to a building throughout its lifetime, and not merely ancillary to its existence. Access Statements are encouraged by the ODPM as part of the development process in their guide Planning and Access for Disabled People: 'A Good Practice Guide' (published March 2003). A key component of the Access Statement submission, is a need to qualify the written statement by way of an accompanying a marked-up plan, clearly illustrating all access provisions and the standards to which they refer. This, in turn, will allow development applications to be dealt with swiftly and efficiently, and moreover, will ensure that appropriate access standards are applied consistently to all qualifying developments. It is therefore the council's intention to demonstrate the benefits of Access Statements within the SPD, which will include an example marked-up plan, specific to Lifetime Homes and Wheelchair Standard Housing. The use of Access Statements will allow for formalised monitoring of access provision within the development control process, and will allow for efficient future monitoring of the SPD.

APPENDIX 1: Environmental Assessment

Table to tests the proposed objectives of the Mobility & Wheelchair Housing SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors

Mobility & Wheelchair Housing SPD Sustainability Objectives			The likely significant effects of the Mobility & Wheelchair Housing SPD objectives on the SEA environmental factors in implementing the SPD. The table also shows the likely duration of these effects.											The following indicators will be used to monitor the implementation of the Mobility & Wheelchair Housing SPD Objectives
Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Cultural Heritage & Archaeology	Landscape & Townscape	Material Assets	
To encourage improved social inclusion for disabled people through accessible housing that is integrated across the borough in its design, location and construction.														Increased number of buildings and environments designed in accordance with Urban Design principles with accessible features not permitted as compromised afterthoughts.
+	+	+		✓	✓		+				+	+	+	

Mobility & Wheelchair Housing SPD Sustainability Objectives			The likely significant effects of the Mobility & Wheelchair Housing SPD objectives on the SEA environmental factors in implementing the SPD. The table also shows the likely duration of these effects.										The following indicators will be used to monitor the implementation of the Mobility & Wheelchair Housing SPD Objectives
Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Cultural Heritage & Archaeology	Landscape & Townscape	Material Assets
To promote housing that eliminates the need for potential costly future adaptations													A noticeable reduction in requests for Disabled Facilities grants or Social Services referrals requiring adaptation of rented accommodation. A significant change in the type of application from major to minor adaptation, ie: eliminating the need to move internal walls, widen doorways, construct ramps, etc.
+	+	+	✓	✓	✓		+				+	+	+
To ensure that all new residential property in the borough is designed to be flexible, easy to use and therefore accessible to all occupiers													Increased number of buildings and environments designed in accordance with Urban Design principles with accessible features not permitted as compromised afterthoughts.
+	+	+	✓	✓	✓		+					+	+

