



Appendix 2:

AFFORDABLE HOUSING Supplementary Planning Document

SUSTAINABILITY APPRAISAL

(WORKING DRAFT)

January 2006

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1. Introduction

The Main Principles of the Local Development Framework and Legislative Background

1.1 A new system of Local Development Frameworks (LDFs) is replacing Local Plans under the new Planning and Compulsory Purchase Act 2004. The new LDF will consist of Local Development Documents (LDDs) of which there are two types- Development Plan Documents (DPDs), that are part of the statutory development plan, and Supplementary Planning Documents (SPDs), which will expand upon policies set out in a DPD or provide additional detail expanding upon existing policies in the Harrow Unitary Development Plan (HUDP).

1.2 The Local Development Scheme (LDS)¹, brought into effect in June 2005, outlines the programme for preparing and reviewing Local Development Documents (LDDs). The LDS includes the timetable for the production of an Affordable Housing Supplementary Planning Document (SPD).

2. Policy Context

Reason for the Production of the Affordable Housing SPD

2.1 The Harrow Unitary Development Plan (HUDP) was adopted on 30th July 2004. The HUDP was automatically 'saved' under the provisions of the Planning and Compulsory Purchase Act 2004 for three years, meaning that the HUDP's policies remain in force under the new system until the LDF replaces it. Reflecting the importance of the delivery of affordable housing as a policy issue in Harrow and London, the Council is intending to release an Affordable Housing SPD to supplement policies H5 and H6 of the HUDP, to ensure the optimal application of these policies. An Affordable Housing SPD was identified as a 'high priority' in the Local Development Scheme (LDS).

2.2 The Affordable Housing SPD will amplify HUDP Policies H5 and H6. Policy H5 reads as follows:

H5 THE COUNCIL WILL SEEK THE MAXIMUM REASONABLE PROPORTION OF AFFORDABLE HOUSING ON SUITABLE SITES OF 0.5 HECTARES OR MORE, OR ON DEVELOPMENTS OF 15 OR MORE DWELLINGS. PROVISION SHOULD NORMALLY BE ON-SITE. IN AGREEING THE LEVEL AND FORM OF AFFORDABLE HOUSING PROVISION ON ANY INDIVIDUAL SITE, THE COUNCIL WILL HAVE REGARD TO:-

A) BOROUGH-LEVEL, SUB-REGIONAL AND REGIONAL TARGETS (SEE POLICIES [SH1](#) AND [H6](#)); AND

B) INDIVIDUAL SITE COSTS AND ECONOMIC VIABILITY, INCLUDING THE AVAILABILITY OF PUBLIC SUBSIDY AND OTHER PLANNING OBJECTIVES.

THE COUNCIL CONSIDERS THAT THE LIKELY MINIMUM PERCENTAGE OF AFFORDABLE HOUSING TO BE NEGOTIATED ON SUITABLE SITES SHOULD BE 30%.

THE COUNCIL WILL ENSURE, THROUGH THE USE OF PLANNING OBLIGATIONS, THAT THE OCCUPATION OF AFFORDABLE HOUSING IS RESTRICTED TO PEOPLE WHO ARE REGARDED BY THE COUNCIL AS IN NEED OF AFFORDABLE HOUSING.

¹ Local Development Scheme (LDS) -A project plan which outlines every Local Development Document that the Council intends to produce over the next three years along with timetables for their preparation. The Local Development Scheme will be reviewed annually

THE AFFORDABLE HOUSING PROVIDED SHOULD BE AVAILABLE TO PROSPECTIVE OCCUPANTS (TO BOTH INITIAL AND SUBSEQUENT OCCUPIERS).

THE REQUIREMENT SET OUT IN THE LAST TWO PARAGRAPHS ABOVE WILL BE DEEMED TO HAVE BEEN MET IF THE AFFORDABLE HOUSING IS TRANSFERRED TO A REGISTERED SOCIAL LANDLORD APPROVED BY THE COUNCIL.

HUDP policy H6 which reads as follows:

H6 THE COUNCIL WILL AIM TO SECURE AN AVERAGE ANNUAL AFFORDABLE HOUSING PROVISION OF AT LEAST 165 NET ADDITIONAL UNITS IN THE 10-YEAR PERIOD FROM THE ADOPTION OF THE PLAN.

2.3 It is intended that the Affordable Housing SPD will describe the Council's approach towards the application of policies H5 and H6 of the HUDP, so that the process of delivering affordable housing can operate efficiently and transparently.

2.4 The Affordable Housing SPD is supplementary to the HUDP and will form part of the Local Development Framework (LDF). It is being produced in line with Harrow's vision as contained in the HUDP under Section 2.17, for a Borough that 'provides a better choice of good quality housing that promotes developments with an appropriate mix of housing to cater for local needs thereby contributing to London's overall housing provision.'

2.5 The following documents have provided the basis for developing the sustainability appraisal process adopted by the Council:

1. The Strategic Environmental Assessment Directive: Guidance for Planning Authorities. ODPM, London, October 2003
2. Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

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

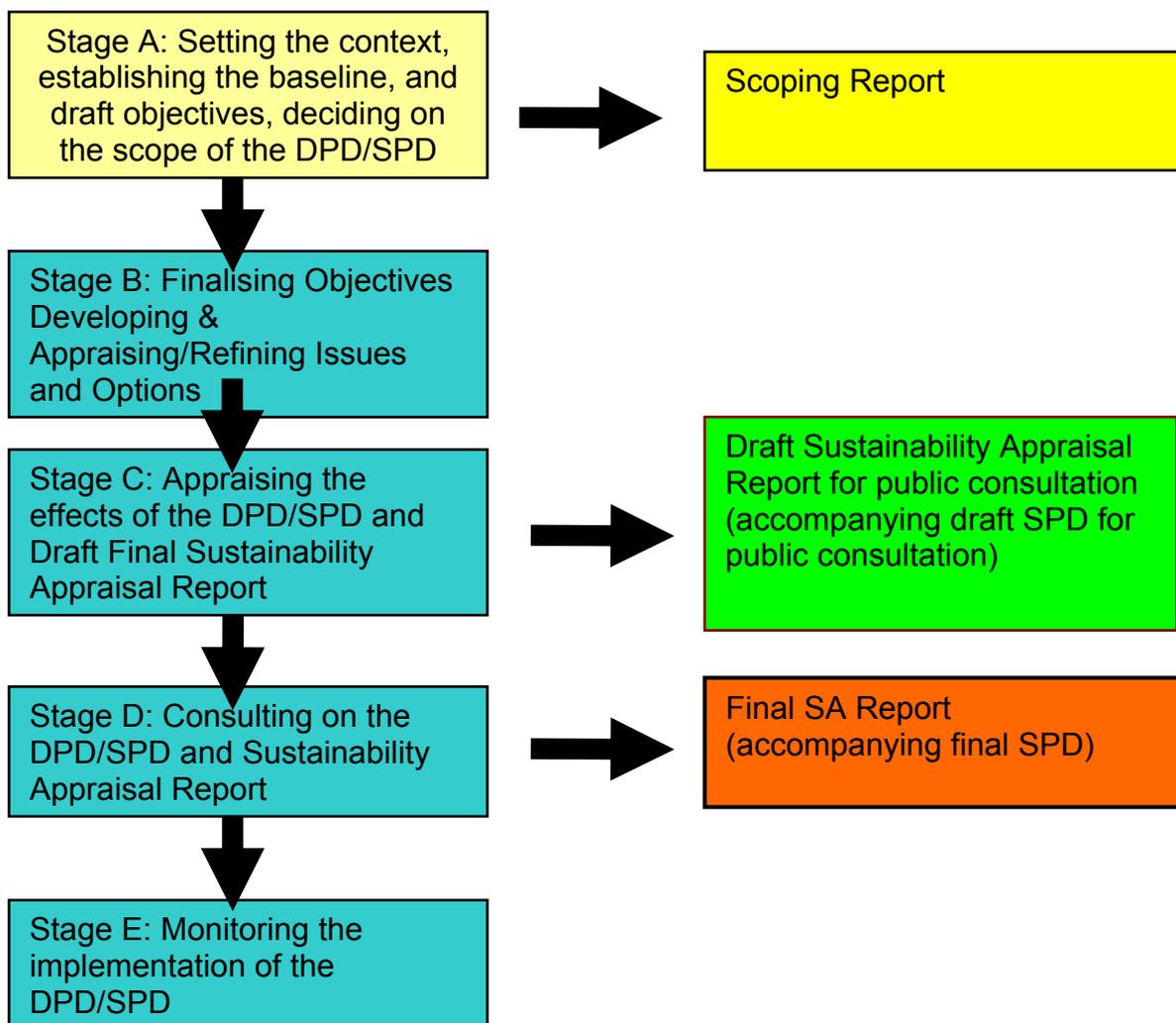
3.1 All LDDs will need to undergo Sustainability Appraisal (SA) as required under section 5 of the Planning and Compulsory Purchase Act 2004. SA is a systematic process carried out during plan production; its purpose is to assess the extent to which emerging policies, proposals and supplementary information will affect the achievement of relevant environmental, social and economic objectives i.e. sustainable development. The Government's SA process has incorporated the 'Strategic Environmental Assessment Directive' (SEA) requirements for plans and programmes that are likely to have a significant effect upon the environment under the European Directive 2001/42/EC within the SA guidance.

3.2 The Scoping stage is the first task in this SA process. It is described in Figure 1 and Appendix 1 stage A. It consists of deciding the scope and level of detail to be included in the SA, including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the SA Report. The Council produced an Affordable Housing SPD Sustainability Scoping Report for a six-week consultation period in November 2005. The document was sent to the four statutory consultees, English Heritage, English Nature, the Countryside Agency and the Environment Agency. The responses that were received have been considered in the production of this Sustainability Appraisal and the SPD.

4.Sustainability Appraisal Methodology

4.1 The approach adopted to undertake this SA Scoping Report is based on the process set out in the Government Guidance on SA of Regional Spatial Strategies and Local Development Documents (November 2005). Figure 1 below demonstrates the stage-by-stage flow of the SA process and Appendix 1 outlines the requirements and tasks to be undertaken within each stage of the SA process.

Figure 1: Flow Chart to Describe the SA Process Stage by Stage:



4.2 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 has entered Stage D (Refer to figure 1 above) in being available for public consultation.

4.3 The Council is producing an Overarching SA Report of the LDF, which is nearing completion. It identifies appropriate overarching high-level SEA/SA objectives for appraising policies against, and examines 'baseline' conditions in the Borough as required by stage A of the SA process. These overarching SEA/SA objectives (see page 14) have been used in this SA assessment. This ensures that the draft Affordable Housing SPD objectives have been assessed against these overarching SEA/SA sustainability objectives that address a range of sustainability issues across the social, economic and environmental spectrums. It is also considered they cover the environmental factors of the Strategic Environmental Assessment

Directive (2001/42/EC) through addressing the Annex 1 Article 5(1) requirements.² The compatibility of the Sustainability Objectives against each other has also been considered. This will be available for viewing in the Draft Overarching Sustainability Appraisal Scoping Report, which is expected to be available for public consultation shortly.

4.4 In this instance, as stated previously in paragraph 2.1, the proposed Affordable Housing SPD does not relate to policies in a DPD but to 'saved' policies in the Harrow Unitary Development Plan (HUDP), July 2004. The policies to which the SPD will expand upon are not themselves currently up for consideration, but are assessed in this Sustainability Appraisal as 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.³

5. Plans, Policies, Programmes, Strategies and Initiatives (PPPSIs) that Influence the Affordable Housing SPD Topic Area

5.1 The process of SA requires the identification and review of Plans, Policies, Programmes, Strategies and Initiatives (PPPSIs) that are relevant to the development of the DPDs and SPDs of the LDF.

5.2 Documents that have a potential influence on the SPD were appraised as part of this scoping report of the Sustainability Appraisal. This has helped to identify:

- any external social, environmental or economic objectives that should be reflected in the SA process;
- external factors, such as sustainability issues, that might influence the preparation of the SPD; and
- whether the policies in other plans and programmes might lead to cumulative effects when combined with proposals in the SPD

5.3 With respect to the first two bullet points these have been considered in the development of the subsequent stages of the SA. It is not considered that the SPD is likely to lead to cumulative effects when combined with policies in other plans and programmes. The SPD is intended to improve the application of affordable housing policies in the Harrow UDP. It is not intended that the SPD will significantly alter existing policy direction (for example the size of developments above which affordable housing will be required will not be altered). Consequently, significant cumulative effects are considered unlikely to occur. The table in Appendix 2 summarises the Plans, Policies, Programmes, Strategies and Initiatives (PPPSIs) that are considered to influence the SPD topic area.

6. Baseline Information and Trends

(1) 6.1 The process of SA requires an examination of the Borough in its current situation which is referred to as baseline data.

It is possible to identify sustainability issues that are affecting Harrow with respect to affordable housing from this information and to develop SPD objectives which will be tested against the sustainability objectives. This process will inform decisions as to whether to include certain

² 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.

³ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

policies or not, or allow for the identification of appropriate change to be made to policies. The following baseline information gives a contextual background to the Affordable Housing SPD.

Recent Delivery of Affordable Housing

6.2 The discussion and figures below describe the current delivery of affordable housing in relation to the existing HUDP policies. It should be remembered that the policies in the HUDP on affordable housing have only been implemented for a short time (since 31 July 2004). Varying policy positions have applied over the data period so the amount of affordable housing delivered should not be seen as reflective of the current policy situation or indicative of future trends.

6.3 Policy H6 of the Harrow UDP sets a target of ‘an average annual affordable housing provision of 165 net additional units in the 10-year period from the adoption of the plan.’ Additionally it aims, in line with the London Plan, to secure 50% of total housing provision as affordable housing. The targets are measured in terms of units completed (i.e. built).

6.4 The following table shows the number of completed developments over the last five financial years and the numbers and proportion that were affordable:

Figure 2: Affordable Housing Completions

Period	Net Number of units completed	Net number of affordable units built	Percentage Affordable	% Of HUDP target H6 (165 units per year)
April 2000 - March 2001	155	-3	-1.9	-1.8
April 2001 - March 2002	375	57	15.2	35
April 2002 - March 2003	373	96	25.7	58.1
April 2003 - March 2004	553	110	19.9	66.6
April 2004 - March 2005	497	89	17.9	54

6.5 As stated above the policies of the HUDP will have had little or no bearing on these figures. This table shows that in completion terms the targets of HUDP Policy H6 are someway from being met.

6.6 Whilst HUDP policy H5 affects all residential developments, Housing Association developments are usually (but not always) 100% affordable units and built for the sole purpose of providing affordable accommodation. It is therefore useful to see how much of the target is being met through private development, where the policy is usually applied to ensure the negotiation of an affordable element, as opposed to how much is being met through Housing Association development.

Figure 3: Net Affordable Completions by Developer Type

	2000/2001	2001/2002	2002/2003	2003/2004	2004/2005
Housing Association	-2	8	4	6	84
Private	0	49	92	104	5
Local Authority	-1	0	0	0	0

6.7 In order to provide an indication of what future rates of affordable housing development are likely to be, it is useful to consider the amount of permissions for affordable housing. In the last

financial year (2004/05), permissions for 292 affordable housing units were granted, which is the highest annual number of affordable housing permissions granted for the last five years. This suggests an upward trend reflecting the new affordable housing policies in the 2004 HUDP. Over the last five years, just one permission with an affordable element expired before the units were built, therefore it is reasonable to conclude that the permissions granted over the last five years can give a general indication of the likely future rates of housing completions. As can be seen from the table below, rates of permissions granted for all housing (comprising market and affordable housing) have been substantially higher than the London Plan target of 330 units per year, especially in the last year of 2004-2005.

Figure 4: Permissions by Financial Year

Period	Net gain	Affordable on-site	Off-site purchase	% Affordable	Payment made	% Of HUDP Policy H6 target (165 units per year)
2002/2001	402	54	10	15.9		38.8
2001/2002	806	184	0	22.8		111.5
2002/2003	524	70	0	13.4	£710,161	42.4
2003/2004	545	55	0	10.1		33.3
2004/2005	1171	292	0	24.9		176.9
Total	3448	655	10	19.29	£710,161	79.4

6.8 However, it should also be noted that the proportion of affordable housing granted is well short of the aim of 50% provision being affordable. It is thought that this trend should improve as the policy is longer established and all applications are subject to consideration via the HUDP. Nevertheless, with less than 25% of housing secured for affordable housing in the last financial years, it would appear that supplementing policy in the SPD would be useful given that it is intended that it would provide the Council with assistance in negotiating higher levels of affordable housing.

6.9 Below the figures have been split between developer types. Again it shows a considerable variance between years.

Figure 5: Affordable Housing Permissions Granted by Developer Type

	2000/2001	2001/2002	2002/2003	2003/2004	2004/2005
Housing Association	3	184	177	44	45
Private	61	0	115	26	10

Housing Need in Harrow

6.10 A Housing Needs survey was last carried out in 2000, and updated in 2003 to take account of the latest government guidance⁴. The information from the Housing Needs Survey forms the basis of the justification for the affordable housing policies in the HUDP. The Survey confirmed the high levels of housing need in Harrow. It was estimated that:

- 1,904 existing households in the Borough could not afford market housing.
- 10,339 households (12.6% of all households) are living in unsuitable housing.
- An estimated newly arising housing need came of 1,923 households per annum.
- Existing need was established as 281 units per annum.
- When this was added to the newly arising need and the existing need were combined, Harrow's total annual housing need was established at 2,204 units per annum.

Housing Need in the Intermediate Market

6.11 Research continues to indicate the high degree of housing need in Harrow. A recent study by the Joseph Rowntree Foundation⁵ identified Harrow as being among the six authorities with the most households who fall into the narrow intermediate housing market in England and Wales. The study indicated that 48.8% of households in Harrow can afford to pay a social rent without recourse to housing benefit but cannot purchase at the lowest 10% of house prices for two- and three-bedroom dwellings.

Stock of Social Rented Housing in Harrow

6.12 Harrow does not have a high existing stock of affordable housing. In July 2003 there were approximately 8200 social rented housing properties in Harrow. 11% of Harrow's total number of household's live in social rented accommodation. This is well below the percentage in London (approximately 26%) and England and Wales (19%) according to the 2001 national census.

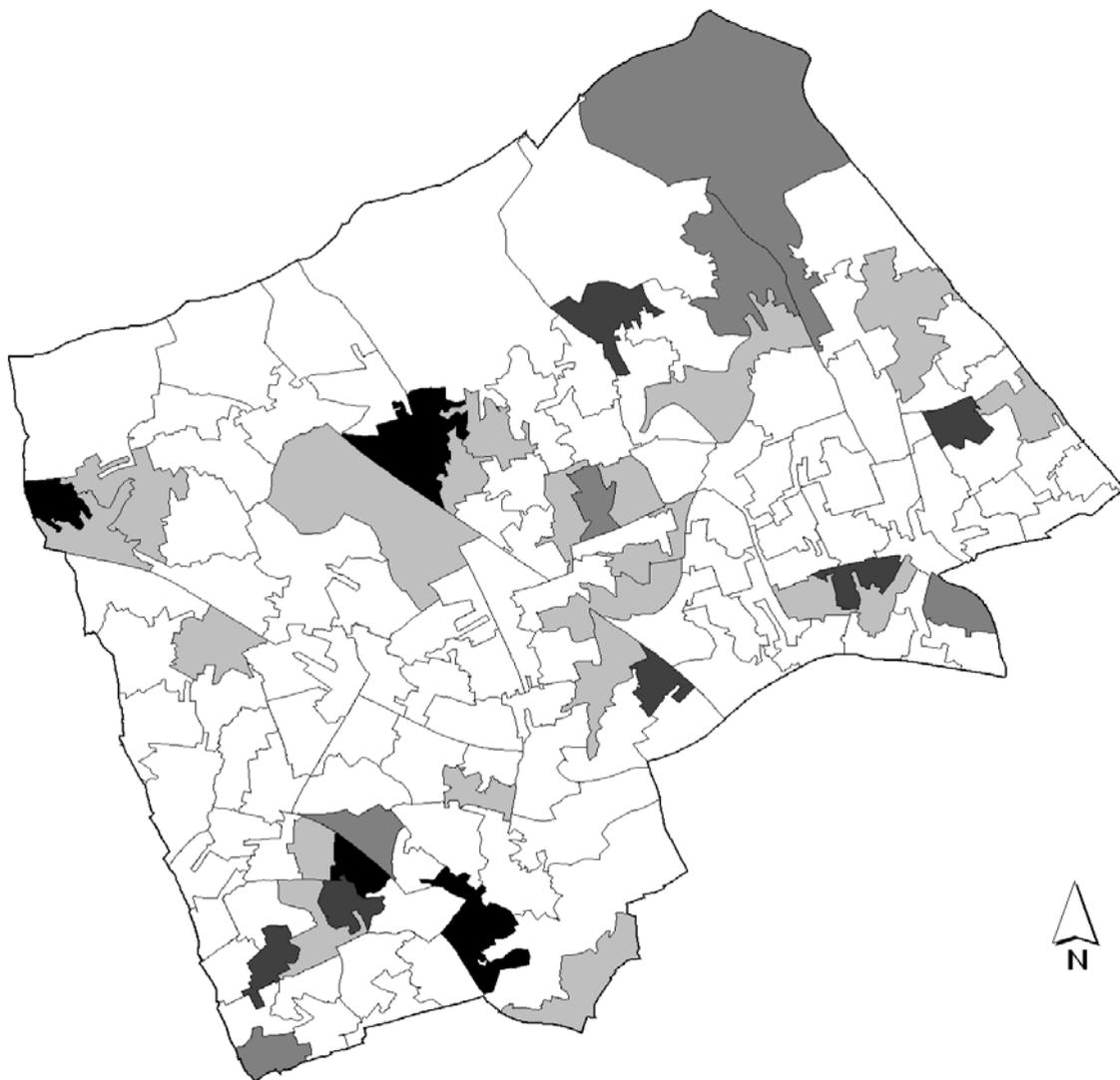
6.13 The spatial distribution of affordable housing, in terms of the need to encourage mixed and balanced communities with a range of housing types and tenures, has, in line with national policy, become an increasingly important policy issue for consideration. The map on the following page provides an indication of where the current stock of affordable housing is concentrated.

⁴ Housing Needs Survey Update 2003

⁵ Affordability and the Intermediate Housing Market, *Joseph Rowntree Foundation*, Steve Wilcox, 2005

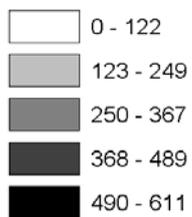
FIGURE 6:

SOCIAL HOUSING PROVISION, July 2003



Source: Harrow Council

Rate per 1000 households



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6.14 This map (figure 8) indicates that there are some Super Output Areas (SOAs) where there is a high level of social rented tenure, although it is considered that these are not particularly clustered in any one area. If the percentages of Social housing were assessed at a wider geographical area, it seems that there are currently few areas with high levels of Social housing. However, it is notable that large areas of the Borough are dominated by market housing.

Number of Bedrooms in Social Housing Units

6.15 In order to meet the affordable housing needs of the Borough it is important that a range of housing types are provided, reflecting, as much as possible, the profile of those households in the Borough in need of affordable housing. The 2003 Housing Need Study Update identified the following need for affordable units by bedroom number:

Figure 7: Housing Needs Survey 2003 Information on Bedroom Number Requirements

Number of bedrooms	1	2	3	4+	Total
Number of units	60	420	146	239	865
Percentage	6.9	48.6	16.9	27.6	100

6.16 The Housing Need Survey Update information has been used to establish a target mix of:

Figure 8: SPD Target mix for Bedroom Numbers per Unit in Social Housing

Number of bedrooms/ People accommodating	Percentage sought
1 bed/ 2 persons	7%
2 beds/ 4 persons	48%
3 beds/ 5-6 persons	23%
4 beds/ 6-8 persons	17%
5 beds +/- 9-10 persons	5%

6.17 The number of bedrooms in affordable housing units has been monitored. The following is a summary of this information in Harrow for developments of affordable housing for the period between April 2001 and the end of March 2005.

Figure 9: Number of Bedrooms in Social Housing Units between 2001/2002 and 2004/2005

Number of Bedrooms	%
1 Bedroom	14.0
2 Bedroom	28.3
3 Bedroom	49.4
4 Bedroom	5.4
5 Bedroom +	2.9

6.18 This information indicates that a large proportion of the housing has been built in the 1-3 bedroom range. Properties of 4 bedrooms or over are proving more difficult to deliver.

Number of Bedrooms in Intermediate Housing

6.19 The Low Cost Home Ownership Register (LCHO) is the Council's register for shared ownership opportunities (shared ownership is the dominant form of intermediate housing). The percentage breakdown of household size on the LCHO register as at January 2006 was as follows:

Figure 10: Registered Demand by Household Size for Intermediate Housing

Number of People in Household	Percentage of the household type	Average income for the household type
1 person	52%	£20,800
2 persons	22%	£28,900
3 persons	15%	£24,100
4 persons	15%	£26,600
5 persons	7%	£28,100
6 persons +	1%	£25,200

6.20 If it were assumed that all two-person households were seeking a one-bedroom property this would mean a 74% of households registered are seeking a one-bedroom property. However this estimate needs to be adjusted to reflect the fact that some two-person households purchase two-bed properties.

6.21 A target mix for Intermediate Housing in the SPD was thus established:

Figure 11: Target Bedroom Numbers Per Unit for Intermediate Housing

Number of bedrooms/ people accommodated for	Percentage sought
1 bed/ 2 people	60%
2 bed/ 4 people	40%

6.22 Average income levels for those on the LCHO register suggest that applicants for larger properties (3 bed +) can usually not afford to buy. In reflecting this, the Council has not included more than 2 bedrooms in the target, and the figures have been adjusted accordingly. A statement is included in the SPD saying that the delivery of larger Intermediate units will be encouraged.

The Affordability of Intermediate Housing

6.23 Joseph Rowntree research⁶ shows that the annual income for a multiple earner household to purchase at the lowest decile prices in Harrow is £47,812. Joseph Rowntree research is based on the Borough average house prices for 2 and 3 bed dwellings in the age range of 29 – 39 (a target range for shared ownership purchasers).

6.24 It was therefore concluded that Intermediate housing should be affordable to household incomes of £17,000 to £48,000. This is very similar to the 'Housing - The London Plan Supplementary Planning Guidance' definition, which establishes an income range of £17,000 to £49,000.

6.25 Within the range of £17,000 to £48,000, the Council wished to ensure that Intermediate Housing is being delivered to the housing needs of the Borough.

6.26 The Current percentage breakdown of income on the Council's Low Cost Home Ownership (LHCO) register is as follows:

Figure 12: Percentage Breakdown of the Low Cost Home Ownership Register by Income

Household Income	Proportion
Less than £17,000	19%
£17,000 – £24,999	46%
£25,000 – £29,999	15%
£30,000 – £34,999	7%
£35,000 – £39,999	6%
£40,000 or more	7%

6.27 If those applicants earning less than £17,000 are removed (as these fall below the Intermediate affordability range) the breakdown is as follows:

Figure 13: Percentage Breakdown of the Low Cost Home Ownership Register by Income (Adjusted)

Household Income	Proportion
£17,000 – £24,999	57%
£25,000 – £29,999	18%
£30,000 – £34,999	8%
£35,000 – £39,999	7%
£40,000 or more	10%

⁶ ibid

6.28 This information has been used to establish sub-categories of affordability in the Intermediate range in the SPD. Requiring the majority of affordable housing to be delivered to the lower end of the income range may have implications for the amount of affordable housing to be delivered in the Borough. Therefore the Council has adjusted the figures to place more emphasis on delivery in the middle range of affordability in the Intermediate market.

6.29 It is concluded that the target affordability range for intermediate housing shall therefore be:

Figure 14: Target SPD Affordability Requirements in the Intermediate Market

Household Income	Proportion
£17,000 – £24,999	50%
£25,000 – £34,999	35%
£35,000 – £48,000	15%

7. Sustainability Issues to Address

7.1 The following issues have been identified as part of the scoping exercise for further consideration throughout the SA process. It is possible that more may be identified as the SPD and SA processes progress.

Figure 15: Sustainability Issues Identified

Issue	Source
The negotiation of appropriate levels of affordable housing – Finding a maximum level of affordable housing contributions for private developments is important providing it does not discourage development, which could affect the economy and raise house prices and reduce affordability through reducing housing supply.	
Ensuring that negotiation secures levels and types of affordable housing that meets identified needs in terms of: <ul style="list-style-type: none"> • mix in dwelling types according to the number of habitable rooms • mix between intermediate and social rented housing • key worker requirements • black and minority ethnic group requirements 	Baseline Information/ discussions with Harrow Council staff /Housing Needs Survey Update 2003
Whether or not low cost market housing can be expected to meet any affordable housing needs in the Borough.	Harrow Unitary Development Plan/Affordability Information from a range of sources including the Housing Needs Survey Update 2003
Indications are that affordable housing is not being delivered to many of the targets	Baseline Information

of the HUDP, London Plan and West London Housing Strategy	
Securing appropriate living conditions for affordable housing, particularly for families and in higher density areas	Discussions with Harrow Council Staff
Housing need – there is a high level of existing housing need in the Borough, arising in part by an insufficient affordable housing stock and newly arising supply. Projections are for this problem to continue	Baseline information/ Housing Needs Survey Update 2003
Due to the costs of larger houses and the nature of many developments, larger affordable housing suitable for family occupation is not being delivered in sufficient quantities	Baseline information
Social exclusion – There are concerns that by allowing high levels of social housing to be built in areas where there are already higher levels of social housing and, that this could have implications in the facilitation of mixed and balanced communities.	Baseline information / PPS3

8. The Sustainability Appraisal Objectives

Figure 16: The Overarching SEA/SA Objectives contained in the Overarching SA Scoping Report of the LDF:

SEA/SA Objective No.	Overarching SEA/SA Objective
1	To make the most efficient use of land by developing on redundant and vacant brown field 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

9. Consideration of Options

9.1 The major option considered in the SA process was whether the production of an SPD was necessary and appropriate. Smaller scale options such as whether to address certain issues were also considered as part of the appraisal of the SPD objectives.

9.2 The option of a DPD was not systematically appraised in the SA. There are considered to be a number of reasons for not undertaking the development of a DPD at this stage:

- it is considered that the current policy is relatively up-to-date (the HUDP was adopted in July 2004) and does not differ significantly from the Mayor's policy (the HUDP affordable housing policies were developed in the context of the emerging London Plan)
- the Council wishes to prioritise time and financial resources towards developing the new core strategy and generic development control policies. It was decided that an SPD would be a task more appropriate in scale at this time
- there are considered to be advantages in carrying out the review of affordable housing policy following the development of the core strategy, in parallel with the development of generic development control policies. The process should provide a robust evidence base that can justify any changes from current affordable housing policy direction

9.3 The Council stated this intention in the LDS and this was accepted by the Government Office of London, and has subsequently been approved by the Council.

10. SPD Objectives

10.1 The SPD Objectives are designed to reflect the matters which are supplementary to the current HUDP policies. An important part of the SA process is to consider the potential compatibility between the various (overarching) sustainability objectives against the SPD objectives, to identify where potential incompatibility and conflicts between objectives may arise. The SPD objectives have therefore been tested against the Overarching SEA/SA objectives of the LDF to identify these potential effects. Within this assessment, consideration has also been given to the options element of the SA Process. Therefore assessments for 'having an SPD' (Option A) and 'having no SPD' i.e. taking no action (option B) have been considered (refer to appendix ?) Option B assessed the effects of the 'saved' HUDP policies H5 and H6, thus providing a baseline for which to compare the effects of the objectives of the SPD.

10.2 If a large number of the SPD objectives proved incompatible with the Overarching SEA/SA Objectives in the assessment, particularly in comparison to the 'no SPD' option B, the option of 'no SPD' would likely be shown to be preferable to the 'SPD' option.

10.3 The SPD objectives that were tested are listed as follows:

1: To provide clear guidelines and information so that a fair and efficient process of negotiation between developers and the Council regarding the levels and nature of affordable housing provision can be carried out, and to describe the nature of provision that will be sought.

2: To indicate the procedures that will be undertaken to secure affordable housing contributions off-site and via cash-in-lieu contributions in instances where this is agreed as appropriate.

3: To state that the proportion of affordable housing proposed can be measured in either units, habitable rooms or floorspace.

4: To state that low cost market housing will not be regarded as affordable housing.

5: To specify sub-categories of intermediate income and target percentages for the delivery of intermediate housing to each sub-category.

6: To specify target mixes for social and intermediate housing.

7: To specify minimum space standards for social housing delivered in the Borough.

8: To ensure that affordable housing provision contributes positively to the creation of mixed and balanced communities in Harrow by specifying alternative mixes between intermediate and social housing in areas with a higher existing social housing stock.

11. Testing the SA Objectives Against the SPD Objectives

11.1 The following is a summary of the appraisal of the SPD Objectives against the Overarching SEA/SA Objectives (which can be seen in full in Appendix 3).

Summary of Assessment

11.2 Objective 1 was designed to cover the role of the SPD in explaining the Council's approach to the delivery and management of affordable housing. It was assessed to be a positive contribution to the policy framework.

11.3 Objectives 2 to 7 addressed more specific measures in the SPD. The effects of these objectives were considered to be relevant to a narrower range of SA objectives. All of these objectives were deemed to have a positive effect over the 'no SPD' option.

11.4 The last objective, SPD Objective 8 proved more problematic. It is concluded that the level of uncertainty about the outcome of including an objective of this nature in the SPD, as well as whether there is a genuine need to address the issue in Harrow, renders this policy unsuitable at this stage. Moreover it is considered that there is a more pressing need to increase the stock of social housing in the Borough and any policy which could affect this would need to be well justified through identified problems or negative trends.

11.5 Objective 8 was therefore deleted. Accordingly guidance and/or policies addressing this issue were not included in the SPD. However, the delivery of affordable housing and patterns of affordable housing distribution in the Borough will continue to be monitored and, should trends indicate potential problems, future policy documents may address the issue.

11.6 Overall it is considered the SA demonstrated that the benefits of the 'SPD' option outweigh the 'no SPD' option.

11.7 Tables showing the systematic appraisal of the SPD objectives can be seen in Appendix 3.

12. Monitoring

12.1 The Council will monitor the delivery of affordable housing through the following indicators:

1. The amount of housing completed in the borough and the amount of affordable housing completed
2. The number of housing units granted permission in the Borough and the amount of these that are for affordable housing
3. How many units of any development that are of :

- a) **Market housing,**
- b) **Intermediate housing or**
- c) **Social housing**

4. Who is providing the housing development:

- a) Private developer,
- b) Housing Association,
- c) Local Authority or
- d) Any other public authority

5. How many bedrooms and habitable rooms each unit has

6. If there is a financial contribution instead of housing provided and how much.

7. The loss of affordable housing.

8. The affordability of affordable housing and how this relates to targets.

9. The location of affordable housing, in mind of the need to consider the need for mixed and balanced communities.

In terms of reassessing housing need, a Housing Needs Study is scheduled to be completed by the end of 2006.

Appendices

Appendix 1: Sustainability Appraisal Process

Generic SA Stages for Plan making	SA process linkages to the preparation of DPDs and SPDs	Stages and Tasks
Stage A: Gathering information to produce an SA Scoping Report-	Prepared alongside the preparation of the evidence base for the relevant DPDs and SPDs.	<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.
Stage B: Identify issues and options and prepare for consultation	Prepared outside the preparation of issues and options.	<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 options and key sustainability issues</p>
<p>Stage C-Appraising the effects of the draft DPD/SPD and SA report</p>	<p>Prepared alongside the preparation of the preferred options. Consultation on both DPD/SPD and SA report will take place at the same time.</p>	<p>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 maximize 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.</p>
<p>Stage D- Consultation on the DPD/SPD and Sustainability Appraisal Report</p>	<p>Prepared alongside the preparation of the submission of DPD/SPD. Consultation on both will take place at the same time.</p>	<p>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.</p>
<p>Stage E Monitoring the Implementation of the DPD/SPD</p>	<p>The sustainability of the Core Strategy DPD / SPD Policies will be assessed as part of the Annual Monitoring Report.</p>	<p>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.</p>

Appendix 2: Policies Plans and Programmes that Influence the Affordable Housing Delivery Topic Area

Document and Policy	Source	Role of Document	Objectives/Requirements of note
National Level			
PPS1 Key Principles: Social Cohesion and Inclusion	Officer of the Deputy Prime Minister (ODPM)	Planning Policy Statement 1 sets out the Government's general vision for sustainable development and the planning system. Provides contextual information on Government Policy in the subject area.	Paragraph 16 states: 'Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing.' It also says that plan policies should seek to reduce social inequalities. Policies seeking the allocation of affordable housing seek to address this issue.
PPS1 Key Principles: Sustainable Economic Development	ODPM	Planning Policy Statement 1 sets out the Government's general vision for sustainable development and the planning system. Provides contextual information on Government Policy in the subject area.	Paragraph 23 states: 'Planning Authorities should: (vii) Ensure the provision of sufficient, good quality, new homes (including an appropriate mix of housing and adequate levels of affordable housing) in suitable locations, whether through new development or the conversion of existing buildings. The aim should be to ensure that everyone has the opportunity of a decent home, in locations that reduce the need to travel...'
Planning Policy Guidance 3	ODPM	Planning Policy Guidance 3 provides guidance on a range of issues relating to the provision of housing and provides contextual information on Government Policy in the subject area. The Government is undertaking the process of replacing PPG3 with PPS3 (see consultation papers below).	<p>PPG3 sets out the government's policy on housing and places a strong emphasis on the provision of affordable housing. Paragraph 2 states:</p> <p>'Local planning authorities should:</p> <ul style="list-style-type: none"> plan to meet the housing requirements of the whole community, including those in need of affordable and special needs housing;' <p>Paragraph 10 indicates the government's preference for on-site provision of affordable housing in new developments:</p> <p>'The Government believes that it is important to help create mixed and inclusive communities, which offer a choice of housing and lifestyle. It does not accept that different types of housing and tenures make bad neighbours. Local planning authorities should encourage the development of mixed and balanced communities: they should ensure that new housing developments help to secure a better social mix by avoiding the</p>

Document and Policy	Source	Role of Document	Objectives/Requirements of note
			<p>creation of large areas of housing of similar characteristics.'</p> <p>Sets a minimum density figure for residential development of 30 dwellings per hectare.</p> <p>Paragraph 11 states Local Authorities 'should formulate plans which:</p> <ul style="list-style-type: none"> • secure an appropriate mix of dwelling size, type and affordability in both new developments and conversions to meet the changing composition of households in their area in the light of the likely assessed need; • encourage the provision of housing to meet the needs of specific groups [includes Key Workers]; • avoid housing development which makes inefficient use of land and provide for more intensive housing development in and around existing centres and close to public transport nodes' <p>Provides for LPA's to create policies requiring affordable housing in new developments where there is a demonstrable need. Such policies should define affordable housing in terms of the area and set targets for amounts and types of affordable housing. Also states the need to monitor.</p>
<p>Consultation Statement on a New Planning Policy Statement 3 (PPS3) Housing</p>	<p>ODPM</p>	<p>The Draft PPS3 describes Government Policy towards planning policy for housing.</p>	<p>Draft changes to PPG3 provide increasing emphasis on local planning authorities seeking to achieve a mix of housing to create sustainable communities, through ensuring housing is built in within sustainable and mixed communities. Also encourages the delivery of a wide range of housing of different types to promote social inclusion and address the needs of households. Provides for lower affordable housing thresholds in new developments (at most 15 units and lower where this can be justified).</p> <p>Places increased emphasis on the need for planning to be responsive to the housing market.</p>

Document and Policy	Source	Role of Document	Objectives/Requirements of note
Sustainable Communities: Homes for All (2005)	ODPM	A five-year plan that outlines the government's policy towards the housing sector.	Discusses how the Government wishes to offer greater choice and opportunity in housing across the country. Planning is seen as an integral part of this approach. The governments wish for increased dialogue and consultation between LA's, RSL's and developers is discussed.
Sustainable Communities: Building for the Future (2003)	ODPM	A programme of action to tackle problems of low or high housing demand in England. Sets out ways in which the Government seeks to address these issues.	States that the government will update guidance on affordable housing. Government will work with LPA's to ensure the size and type of affordable housing better meets need. Government will seek to reduce the time taken for negotiations over planning obligations and to optimise outcomes for both local authorities and developers (It is intended that an SPD should assist in meeting this objective).
Sustainable Communities in London: Building for the Future	ODPM	A programme of action for housing, planning and neighbourhood renewal in London.	With respect to housing, sets actions to: <ul style="list-style-type: none"> - provide for more and better homes - have better coordination between strategy and funding, and; - make improvements in planning
Circular 05/2005 – Planning Obligations	ODPM	Sets out the government's policy for Planning Obligations in the development control process.	Sets out the policy tests the Secretary of State expects to be applied when considering the use of planning obligations.
Circular 06/98 – Planning and Affordable Housing	ODPM	Expands on PPG 3 by setting out the Government's policy towards affordable housing (will be withdrawn when PPS3 is adopted).	Includes presumption of on-site provision. Says that affordable housing policies should be based on a good understanding of the needs of the area (i.e. via a Housing Needs Survey).
Regional Level			

Document and Policy	Source	Role of Document	Objectives/Requirements of note
The London Plan (2004) Policy 3A.2 Borough Housing Targets	Mayor of London/ Greater Authority of London (GLA)	The London Plan is by definition a Regional Spatial Strategy, meaning Local Development Documents, such as those that will be developed by the London Borough of Harrow, must be in general conformity with it. This includes Development Plan Documents and Supplementary Planning Documents such as the Affordable Housing SPD.	This policy sets targets for the numbers of houses that should be built in each Borough as a minimum from 1997 to 2016. Harrow has a target of providing at least 6620 houses (or 330 annually). The target was established by the GLA's Housing Capacity Study 2000. The policy states that the UDP policies should seek to exceed the target and discusses the potential sources for development and the need to monitor housing applications and completions.
The London Plan Policy 3A.6 Definition of Affordable Housing	Mayor of London/ Greater Authority of London (GLA)	The London Plan is a Regional Spatial Strategy, meaning Local Development Documents, such as those that will be developed by the London Borough of Harrow, must be in general conformity with it. This includes Development Plan Documents and Supplementary Planning Documents such as the Affordable Housing SPD.	This policy requires London Boroughs to define affordable housing as 'housing designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in the borough'. It also states that affordable housing can be social housing, intermediate or in some cases low cost market housing. Definitions are given to these categories in the supporting text.
The London Plan Policy 3.A7 Affordable housing targets	Mayor of London/ Greater Authority of London (GLA)	The London Plan is a Regional Spatial Strategy, meaning Local Development Documents, such as those that will be developed by the London Borough of Harrow, must be in general conformity with it. This includes Development Plan Documents and Supplementary Planning Documents such as the Affordable Housing SPD.	This policy requires UDP policies to set an overall target for the amount of affordable housing over the plan period in their area. This should be based on a Housing Needs Assessment and a realistic assessment of supply. Establishes the Mayor's 50% target for affordable housing and, within this, the target of a 70:30 split between social rented and intermediate housing.
The London Plan Policy 3A.8 Negotiating affordable housing in individual private residential and mixed-use schemes	Mayor of London/ Greater Authority of London (GLA)	The London Plan is a Regional Spatial Strategy, meaning Local Development Documents, such as those that will be developed by the London Borough of Harrow, must be in general conformity with it. This includes Development Plan Documents and Supplementary Planning Documents such as the Affordable Housing SPD.	This policy asserts that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on schemes that qualify for affordable housing. The need to have regard of individual circumstances and the need to encourage rather than restrain residential development are also discussed. The supporting text also discusses the size of developments for which an element of affordable housing should be provided and states that such thresholds should be no higher than 15 units and lower if this can be justified. Establishes a presumption that affordable housing provision should be on-site unless exceptional circumstances exist.
Draft London Affordable Housing SPG	Mayor of London/ Greater Authority	The SPG (presently in draft form) will assist boroughs when reviewing their Unitary Development Plans and Local Development	Expands on the definitions of different types of affordable housing in London. Advises on Housing Needs Assessments. Calls for each borough to identify the mix of unit sizes (measured by number of

Document and Policy	Source	Role of Document	Objectives/Requirements of note
to the London Plan	London Authority (GLA)	Documents and when assessing planning applications. It will be a material planning consideration when determining planning applications so will have substantial weight as a formal supplement to the London Plan. Will be combined with the Housing Provision SPG when adopted.	bedrooms) for each category of affordable housing provision. Provides detailed further guidance on negotiating affordable housing allocations.
2005 London Housing Strategy	London Housing Board	A housing delivery mechanism which establishes the current situation and sets a vision for the future.	Sets out aims and targets for increasing housing supply and affordable housing supply (consistent with the London Plan). Addresses other issues in detail such as design and accessibility.
Sub-regional Level			
West London Housing Strategy	Mayor of London/G LA	A jointly agreed document of seven West London boroughs. Sets the strategic framework for the delivery of housing services across the West London sub-region	<p>Fills three key functions:</p> <ul style="list-style-type: none"> • To support the West London boroughs in bidding for and allocating resources at a sub-regional level and to provide a basis for lobbying on housing issues • To provide a sub-regional strategic context for existing and new housing strategies • To provide a framework to promote cross-borough working <p>Sets out a 10-year vision for affordable housing to 2012. Sets goals to:</p> <ul style="list-style-type: none"> - Increase the supply of housing - Increase the provision of affordable homes - Improve the quality of housing - Create sustainable communities
Draft Sub Regional Development Framework – West London	Greater London Authority/ Mayor of London	Provides guidance on the implementation of policies in the London Plan at a sub-regional level.	<p>Discusses ‘an urgent need for more affordable housing’ and the considerable gap between policy intention and outcomes in some boroughs. A shortage of family larger social rented dwellings is also highlighted.</p> <p>Invites Boroughs and the GLA to establish a coordinated system to monitor and manage such issues.</p>
Local Level			
Harrow Unitary	London Borough	Sets policies and land allocations for development and conservation under the 1990 Town and Country	Policy seeks ‘the provision of a mix of dwellings, types, sizes and tenures in large housing developments’.

Document and Policy	Source	Role of Document	Objectives/Requirements of note
Development Plan (UDP) Policy H7 Dwelling Mix	of Harrow	Planning Act, the Town and Country planning (Unitary Development Plan)(England) Regulations 1999 and the Local Government Act 1985. The UDP was automatically 'saved' for at least 3 years following the passing of the Planning and Compulsory Purchase Act in 2004 as the UDP will be replaced by the LDF.	Affordable housing provision will usually be required to reflect the Borough's needs, as directed by information sources such as the Council's Annual Housing Strategy. States that regular monitoring and appraisal of development activity will be carried out by the Council.
Harrow Housing Strategy 2002-2007	London Borough of Harrow	Describes the work, priorities and targets of Housing Services for the five-year period from 2002.	Describes Harrow's housing mission and strategic aims, which include: <ul style="list-style-type: none"> - To maximise the supply of affordable housing - To build quality and choice into housing options across all tenures - To combat poverty, social exclusion and increase community safety - To ensure housing meets the needs of all groups in the community - To contribute to more sustainable communities in social, economic and environmental terms <p>The use of the planning system is referred to with respect to the aim of promoting supply and delivery of affordable housing. 'To expand to increase the supply of affordable housing in Harrow, to meet general and specific needs' is also stated as a priority.</p>
Housing Needs Survey Update 2003	London Borough of Harrow	ODPM guidance <i>Local Housing Needs Assessment: A Guide to Good Practice (2000)</i> establishes the responsibility of every Local Authority 'to produce a housing strategy based on up-to-date assessments of aggregate housing needs in their area'. It also states 'Local Housing needs assessment also plays a crucial role in underpinning land-use policies relating to affordable housing'.	Establishes the amount and nature of housing need in Harrow. Concludes that affordability of housing is a serious problem in the Borough which provided a justification for addressing affordable housing through policies in the Harrow UDP.
Harrow Key Worker Strategy	London Borough of Harrow	A two-year plan to provide guidance towards securing key-worker housing development.	Aims to: <ul style="list-style-type: none"> - support the recruitment and retention of key workers by providing affordable housing for them in the borough - enter dialogue with stakeholders on the strategy and its review and carry out further research - coordinate local initiatives with those on the Government agenda

Document and Policy	Source	Role of Document	Objectives/Requirements of note
			<p>and within the sub-region, to promote a joined strategic approach to the provision of key worker housing</p> <p>Defines Key Workers. Sets a series of objectives and actions towards delivering Key Worker housing.</p>
Harrow Community Strategy	London Borough of Harrow	Sets an overarching vision for Harrow. Sets objectives for the functions of the Council. Lists current initiatives and future plans.	<p>Regenerating Harrow Mission: 'To create a more vibrant and sustainable community with a diversity of employment, thriving business, a broad range of good quality homes, and a dynamic town centre'</p> <p>Objective 9.3 'Increasing the supply and quality of housing to meet a range of needs'.</p> <p>Objective 9.4 'Working with partners to build housing that achieves sustainable communities'.</p> <p>Objective 9.5 'Tackling homelessness'</p>

Appendix 3: Appraisal of the SPD Objectives Against the Overarching SA/SEA Objectives

Key:

++	Strong positive effect
+	Weak positive effect
-	Weak Negative effect
x	No effect

SPD Objective 1: To provide clear guidelines and information so that a fair and efficient process of negotiation between developers and the Council regarding the levels and nature of affordable housing provision can be carried out, and to describe the nature of provision that will be sought.

SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	+	+	+	The SPD emphasises the Council's position ensuring the optimal use of land, especially where a developer may underdevelop a site in order to avoid the 15 unit or 0.5 ha threshold for which a proportion of affordable housing will be required	X	X	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	X	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	X	X	

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.	+	+	+	The SPD emphasises the Council's requirements for high quality design of affordable housing.	?	?	?	There is some concern that the streetscape can be adversely affected by developers choosing to use poorer quality building materials etc and cheaper designs in order to reduce the costs of providing affordable units
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	+	+	+	By encouraging the development of affordable housing in all areas workers should be able to choose to live closer to their work places and therefore reduce travel-to-work times and distances.	+	+	+	By encouraging the development of affordable housing in all areas workers should be able to choose to live closer to their work places and therefore reduce travel-to-work times and distances.
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	X	X	X		X	X	X	
7 To reduce pollution of land (soil) and water	X	X	X		X	X	X	

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	X	X	X		X	X	X	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	X	X		X	X	X	
10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	+/-	+/-	+/-	By increasing the supply of affordable housing more workers of various skills, professions and age groups (and thus income levels) will be able to live in the vicinity of their work places and contribute to the local economy. This will ensure Harrow has a skilled and varied workforce. However it is also recognised that by reducing profit levels for private investors, HUDP policy H5 may slow the building industry and have effects on the economy. For this reason the SPD places emphasis on the use of financial appraisals to determine what a reasonable amount of affordable housing contribution would be, while allowing for a reasonable profit for developers.	+/-	+/-	+/-	By increasing the supply of affordable housing more workers of various skills, professions and age groups (and thus income levels) will be able to live in the vicinity of their work places and contribute to the local economy. This will ensure Harrow has a skilled and varied workforce. However it is also recognised that by reducing profit levels for private investors this may slow the building industry and have effects on the economy. For this reason HUDP policy H5 seeks the 'maximum reasonable proportion' of affordable housing, implying that contributions should not render a development uneconomic.

11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	++	++	While the requirements of HUDP policy H5 should increase the supply of affordable housing the additional effects of the SPD are likely to be less significant in these terms (the targets for provision of affordable housing and the thresholds for which it will be required remain the same). However, it is considered that by clarifying the Council's position towards the negotiation of affordable housing through an SPD, this should strengthen the Council's ability to negotiate affordable housing to proportions above 30%.	+	++	++	HUDP policy H5 should increase the supply of affordable housing. The emphasis on securing the maximum reasonable proportion is designed to ensure that the proportion of affordable housing negotiated should be at a level that does not unduly discourage development and thus the delivery of housing, which could affect the affordability of housing in the Borough.
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	+/-	++/-	++/-	This objective is thought to have no significant effect beyond the existing policy status	+/-	++/-	++/-	The presumption of policy H5 is that social housing delivery should usually be on-site. It is considered that this should encourage the development of mixed and inclusive communities through a mix of housing tenures. It should also be noted however, that if large amounts of social housing were to be concentrated in developments in certain areas of the Borough where large amounts of social rented housing already exist, it could reinforce these patterns and contribute to imbalanced communities.
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	+	+	+	This objective is thought to have no significant effect beyond the existing policy status	+	+	+	By increasing the provision of affordable housing it is intended that there will be less residents in inappropriate conditions that lead to inequalities in health.
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	X	X	X		X	X	X	

15 To reduce crime and the fear of crime	X	X	+	This objective is thought to have no significant effect beyond the existing policy status	X	X	+	By favouring on-site provision of affordable housing it is intended that this should assist in avoiding the creation of areas of social exclusion. From this it is hoped that conditions that contribute to crime and antisocial behaviour will be reduced.
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Objective 2: To indicate the procedures that will be undertaken to secure affordable housing contributions off-site and via cash-in-lieu contributions in instances where this is agreed as appropriate.

SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	X	X	X		X	X	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	X	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	X	X	
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.	X	X	X		X	X	X	

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	X	X	X		X	X	X	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	x	
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	X	x	X		x	x	x	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	x	X		x	x	x	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	x	x	x		x	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	By ensuring that the Council states its procedures to deal with affordable housing where on-site provision proves inappropriate or impractical the Council should ensure that affordable housing is delivered through alternative forms of provision.	x	x	x	
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	+	+	+	In rare instances where there is concern that on-site provision could contribute to problems of imbalanced communities, procedures will be specified whereby alternative forms of provision will be sought.	x	x	X	
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	x	x	x		x	x	X	
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		x	x	X	
15 To reduce crime and the fear of crime	x	x	x		x	x	X	

Objective 3: To state that the proportion of affordable housing proposed can be measured in either units or habitable rooms.								
SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	X	X	X		X	x	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	x	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	x	x	
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.	X	X	X		X	X	X	

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	X	x	X		X	X	X	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	x	
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	X	x	X		x	x	x	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	x	X		x	x	x	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	x	x	x		x	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	It is anticipated that more affordable family housing will be delivered if there the potential disincentive of only measuring affordable housing only in units is removed.	-	-	-	There are concerns that by implying that the Council will measure the proportion of affordable housing only in units that this may discourage the delivery of more expensive, larger affordable units suitable for family accommodation
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	x	x	x		x	x	X	
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	x	x	x		x	x	X	
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		x	x	X	
15 To reduce crime and the fear of crime	x	x	x		x	x	X	

Objective 4: To state that low cost market housing will not be regarded as affordable housing.								
SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	X	X	X		X	x	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	x	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	x	x	
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.	X	X	X		X	X	X	

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	X	x	x		x	x	x	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	x	
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	X	x	X		x	x	x	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	X	X		x	x	x	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	+	+	+	Government guidance, officer experience and housing needs information have all indicated that low cost market housing cannot be used to contribute towards affordable housing. By clearly stating this it is considered that there should be less schemes that attempt to incorporate this which invariably are not accepted. This should reduce costs and time wasted for the applicant and the Council which could have (slight) economic benefits for those parties	x	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	X	x	X		x	x	x	
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	X	x	x		x	x	X	
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	x	x	x		x	x	X	
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		x	x	X	
15 To reduce crime and the fear of crime	x	x	x		x	x	X	

Objective 5: To specify sub-categories of intermediate income and target percentages for the delivery of intermediate housing to each subcategory.

	Option A (SPD)				Option B (No SPD)			
SA Objective	Effect			Comments	Effect			Comments
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	X	X	X		X	x	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	x	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	x	x	
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.	X	x	x		x	x	x	

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	X	x	x		x	x	x	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	x	
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	X	x	X		x	x	x	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	X	X		x	x	x	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	?	?	?	It is possible that requiring more properties to be delivered to the lower end of the intermediate market may increase costs to developers. However, this will often be dependent on the amount of subsidy that is secured.	X	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	In accordance with the Mayor's guidelines for the affordability of intermediate housing the SPD regards Intermediate housing to be affordable to households on incomes between £17,000 and £46,000. The Council wishes to ensure that housing is affordable to incomes across the spectrum of this range and directed towards the identified need of the Borough. It is considered that the implementation of these targets should assist in helping those who have registered with the Council's low cost home register find accommodation.	-	-	-	As the current situation exists there is considered to be a risk that a large number of intermediate properties will be delivered just to the upper end of affordability of the intermediate market which will not reflect the housing need of the Borough.
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	X	x	x		x	X	X	
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	X	x	x		x	x	X	

14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		x	x	X	
15 To reduce crime and the fear of crime	x	x	x		x	x	X	

Objective 6: To specify target mixes for social and intermediate housing.

SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	x	x	x		X	x	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	x	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	x	x	
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.	x	x	x		x	x	x	

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	x	x	x		x	x	x	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	x	
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	X	x	X		x	x	x	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	X	X		x	x	x	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	X	x	X		x	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	The inclusion of target mixes in the SPD should strengthen the Council's position in negotiating a mix of affordable housing that meets the needs of Borough's residents. There is potential that if monitoring information shows an under-provision of a certain type of affordable housing that the Council will seek to secure a higher proportion of that housing type in subsequent developments.	?	?	?	It is uncertain as to whether delivery would meet the housing need of the Borough without the stated mix in the SPD, although monitoring information to date has indicated that there is an under-provision of larger affordable units suitable for families bring delivered.
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	X	x	x		x	X	X	
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	x	x	x		x	x	X	
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		x	x	X	
15 To reduce crime and the fear of crime	x	x	x		x	x	X	

Objective 7: To specify minimum space standards for social housing delivered in the Borough.

SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	x	x	x		X	x	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	x	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	x	X	
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.	x	x	x		x	x	X	

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	x	x	x		x	x	X	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	X	
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	X	x	X		x	x	X	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	X	X		x	x	X	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	X	x	X		x	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	+	+	+	Minimum space standards are important in ensuring a reasonable standard of accommodation to ensure sustainable living environments.	x	x	x	
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	X	x	X		x	X	X	
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	+	+	+	Minimum space standards are important in ensuring a reasonable standard of accommodation to ensure good standards of health, particularly in houses with multiple occupants	x	x	X	
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		x	x	X	
15 To reduce crime and the fear of crime	x	x	x		x	x	X	

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SA Objective	Option A (SPD)			Comments	Option B (No SPD)			Comments
	Effect				Effect			
	Short term	Medium term	Long term		Short term	Medium term	Long term	
1 To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate	x	x	x		X	x	X	
2 To protect the quality, quantity and accessibility of open spaces in the Borough	X	X	X		X	x	X	
3 To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough	X	X	X		X	x	X	
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.	x	x	x		x	x	X	

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	x	x	x		x	x	X	
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	X	x	X		x	x	X	
7 To reduce pollution of land (soil) and water	X	x	X		x	x	X	
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	X	x	X		x	x	X	
9 Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting	X	X	X		x	x	X	

10 To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	X	x	X		x	x	X	
11 To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents	?	?	?	It is uncertain as to whether such a policy could lead to an over delivery on a Borough-wide basis of intermediate housing at the expense of social housing or <i>vice versa</i> .	x	x	X	
12 To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	+	+	+	The policy would assist in the development of mixed and balanced communities by ensuring social housing is not delivered to significant amounts where there is already a significant existing stock of that tenure.	?	?	?	It is uncertain whether the absence of such a policy would contribute to the creation of imbalanced communities. Although there are some smaller areas (at SOA level) in the Borough with higher proportions of social rented accommodation it is not considered that these are relatively significant when looked at a wider, for instance ward, level. Additionally it should be noted that Harrow's existing social housing stock is very low in comparison to other London Boroughs. It is also uncertain whether the absence of such a policy would make significant changes to the social make up of communities.
13 To improve the health and wellbeing of Harrow residents and reduce inequalities in health.	x	x	x		X	x	X	
14 To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	x	x	X		X	x	X	

15 To reduce crime and the fear of crime	x	x	x		X	x	X	
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Overall Comment Regarding Objective 8– It is considered that the level of uncertainty about the outcome of including an objective of this nature in the SPD, as well as whether there is a genuine need to address the issue in Harrow, renders this policy unsuitable at this stage. Moreover, it is considered that there is a more pressing need to increase the stock of social housing in the Borough and any policy which could affect this would need to be well justified in mind of identified problems or negative trends. This objective will not be included in the SPD, although the delivery of affordable housing and patterns of affordable housing distribution in the Borough will continue to be monitored and should trends indicate potential problems future policy documents may address the issue.